

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**APPLICATION OF TROVE ENERGY AND WATER, LLC  
FOR APPROVAL OF A SALT WATER DISPOSAL WELL,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 21142**

**NGL WATER SOLUTIONS PERMIAN LLC'S PRE-HEARING STATEMENT**

NGL Water Solutions Permian LLC submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Trove Energy and Water, LLC

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
jamesbruc@aol.com

**OPPONENT**

NGL Water Solutions Permian, LLC

**OPPONENT'S ATTORNEY**

Deana M. Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103  
Telephone: 505.848.1800

New Mexico State Land Office

Andrea Antillon  
Office of the General Counsel  
310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148  
Phone 505.827.5752  
aantillon@slo.state.nm.us

## STATEMENT OF CASES

### APPLICANT:

In case number, 21142 Applicant seeks an order approving disposal of produced water at depths of approximately 17750 - 19015 feet subsurface into the proposed **WLC South Fed. SWD Well No. 3**, to be located 1768 feet from the south line and 240 feet from the east line of Section 26, Township 26 South, Range 33 East, NMPM. The well is located approximately 19.5 miles west-southwest of Bennett, New Mexico.

### OPPONENT:

NGL opposes this application and the earlier, related application Trove Energy and Water, LLC filed, case number 20756. NGL opposes these applications based on the proposed well's proximity to NGL assets.

## PROPOSED EVIDENCE

NGL does not intend to put on any witnesses and does not oppose Trove putting this case on by affidavit, but NGL does intend to state on the record at the hearing that NGL opposes the granting of this application and the related application in case number 20756.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.**

By: Deana M. Bennett

Deana M. Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on February 27, 2020.

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
jamesbruc@aol.com

Andrea Antillon  
New Mexico State Land Office  
Office of the General Counsel  
310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148  
Phone 505.827.5752  
aantillon@slo.state.nm.us

By: Deana M. Bennett  
Deana M. Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800