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

OCT 25 2018 PM04:14

# APPLICATION OF NGL WATER SOLUTIONS PERMIAN, LLC FOR APPROVAL OF SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

### CASE NO. 16443

### PRE-HEARING STATEMENT

This pre-hearing statement in submitted by Santo Petroleum Operating, LLC as required

by Oil Conservation Division Rule 19.15.4.13.B.

# **APPEARANCES**

## **APPLICANT**

NGL Water Solutions Permian, LLC

# **ATTORNEY**

Deana Bennett Jennifer Bradfute Modrall Sperling Law Firm PO Box 2168 Bank of America Centre Albuquerque, New Mexico 87103-2168 (505) 848-1800 Attorneys for NGL Water Solutions Permian, LLC

#### **OPPONENT**

Santo Petroleum Operating, LLC

# **ATTORNEY**

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# **APPLICANT'S STATEMENT OF CASE**

Applicant seeks an order approving disposal into the Devonian and Silurian formations through the Sidewinder SWD No. 1, located in Section 10, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico.

### **OPPONENT'S STATEMENT OF CASE**

Santo operates a horizontal well within the notice area for the proposed location of the Sidewinder SWD No. 1 and, contrary to 19.15.26.8(A) NMAC, has not received notice of the injection application or hearing. Santo objects to this application on the basis that the proposed injection well will interfere with its existing well and future development.

#### **APPLICANT'S PROPOSED EVIDENCE**

| WITNESS            | ESTIMATED TIME | EXHIBITS |
|--------------------|----------------|----------|
| Name and Expertise |                |          |

#### **OPPONENT'S PROPOSED EVIDENCE**

| WITNESS<br>Name and Expertise            | ESTIMATED TIME     | EXHIBITS  |
|--|--------------------|-----------|
| Nicole Singer,<br>Land and Legal Manager | Approx. 10 minutes | Approx. 2 |
| Mark Ashley,<br>Geologist                | Approx. 15 minutes | Approx. 5 |
| Jocelyn Compton<br>Engineer              | Approx. 15 minutes | Approx. 5 |

#### PROCEDURAL MATTERS

Santo has requested a continuance to the December 6, 2018 Examiner Hearing Docket.

Respectfully submitted,

HOLLAND & HART LLP

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# **ATTORNEYS FOR EOG RESOURCES, INC.**

#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2018, I served a copy of the foregoing document to

the following counsel of record via Electronic Mail to:

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