

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

**APPLICATION OF NGL WATER  
SOLUTIONS PERMIAN, LLC  
TO APPROVE SALT WATER  
DISPOSAL WELL IN LEA  
COUNTY, NEW MEXICO**

**Case No. 16504**

**PRE-HEARING STATEMENT OF  
BC&D OPERATING, INC.**

BC&D Operating, Inc. ("BC&D Operating") submits this Pre-Hearing Statement as required by the Oil Conservation Division's ("Division's") rules.

**APPEARANCES**

**PARTIES**

**ATTORNEYS**

**APPLICANT**

NGL Water Solutions Permian, LLC

Jennifer Bradfute  
Deana Bennett  
Modrall, Sperling, Roehl, Harris &  
Sisk, P.A.  
Post Office Box 2168  
Albuquerque, NM 87103-2168  
(505) 848-1800  
jennifer.bradfute@modrall.com  
deana.bennett@modrall.com

**OPPONENT**

BC&D Operating, Inc.

Gary W. Larson  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504  
(505) 982-4554  
glarson@hinklelawfirm.com

### **STATEMENT OF THE CASE**

Applicant NGL Water Solutions Permian, LLC ("NGL") requests the Division to issue an order approving its proposed Cobra SWD #1 well. NGL proposes to drill the well at a surface location 326 feet FNL and 718 feet FEL of Section 19, Township 25 South, Range 36 East in Lea County. NGL's application seeks (i) authorization to inject salt water into the Silurian – Devonian formation at a depth of 15,600 feet to 17,261 feet, (ii) approval of the use of seven (7) inch tubing inside the surface and intermediate casings and five and a half (5 ½) inch tubing inside the liner, (iii) approval of a maximum daily injection rate of 50,000 bbl/day, and (iv) a maximum injection pressure of 3,120 psi.

BC&D opposes NGL's application because of the proximity of the location of NGL's proposed Cobra SWD #1 well to BC&D's West Jal B Deep Well No. 1 (API No. 30-025-25046), a commercial SWD well located in Unit H of Section 17, Township 25 South, Range 36 East in Lea County. BC&D operates the West Jal B Deep Well No. 1 pursuant to Administrative Order SWD-1482.

### **PROPOSED EVIDENCE**

#### **WITNESS**

#### **ESTIMATED TIME**

#### **EXHIBITS**

Donnie Hill  
(Engineer)

20 minutes

5

BC&D reserves the right to call a rebuttal witness(es) and introduce rebuttal exhibits if appropriate.

### **PROCEDURAL MATTERS**

Counsel for BC&D has solicited the concurrence of NGL's counsel in a request to continue this case to the December 6, 2018 docket.

Respectfully submitted,

HINKLE SHANOR LLP



Gary W. Larson

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

*Counsel for BC&D Operating, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of October, 2018, I served a true and correct copy of the foregoing ***Pre-Hearing Statement of BC&D Operating, Inc.*** via email to:

Jennifer Bradfute

Deana Bennett

Modrall, Sperling, Roehl, Harris & Sisk, P.A.

Post Office Box 2168

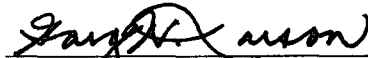
Albuquerque, New Mexico 87103-2168

(505) 848-1800

[jennifer.bradfute@modrall.com](mailto:jennifer.bradfute@modrall.com)

[deana.bennett@modrall.com](mailto:deana.bennett@modrall.com)

*Counsel for Applicant NGL Water Solutions Permian, LLC*



Gary W. Larson