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

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

Case No. 16507

# NGL WATER SOLUTIONS PERMIAN, LLC'S PRE-HEARING STATEMENT

NGL Water Solutions Permian, LLC ("NGL") submits its Pre-Hearing Statement in this matter, pursuant to Oil Conservation Division Rule 19.15.4.13 NMAC.

### **APPEARANCES**

Applicant	Attorney
NGL Water Solutions Permian, LLC	Lara Katz Darin C. Savage Abadie & Schill, P.C. 214 McKenzie Street Santa Fe, New Mexico 87501 (970) 385-4401
Interested Parties	Attorney
Commissioner of Public Lands, New Mexico State Land Office	Andrea Antillon New Mexico State Land Office P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504 (505) 827-5752
EOG Resources, Inc.	Michael H. Feldewert Adam G. Rankin Juila Broggi Holland & Hart, LLP P.O. Box 2208 Santa Fe, NM 87504 (505) 988-4421

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#### APPLICANT'S STATEMENT OF THE CASE

In Case No. 16507, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Moab SWD #1 well. NGL proposes to drill this well at a surface location 255 feet from the South line and 1,538 feet from the West line of Section 24, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 16,400' - 18,004'. NGL further seeks approval of the use of 7 inch tubing inside the surface and immediate casings, and 5½ inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Neel Duncan - Operations	Approx. 15 mins.	Approx. 5
Kate Zeigler - Geologist	Approx. 15 mins.	Approx. 4
Scott Wilson - Engineer	Approx. 20 mins.	Approx. 11
Steve Taylor - Seismologist	Approx. 15 mins.	Approx. 5

## PROCEDURAL MATTERS

NGL intends to present evidence via affidavit in this matter and would like to consolidate this case at hearing with its pending applications, if possible.

Respectfully submitted,

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#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel via email on this 11<sup>th</sup> day of April, 2019:

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