

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

**APPLICATION OF GOODNIGHT MIDSTREAM  
PERMIAN, LLC FOR APPROVAL OF  
SALTWATER DISPOSAL WELLS  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 24123**

**APPLICATIONS OF GOODNIGHT MIDSTREAM  
PERMIAN, LLC FOR APPROVAL OF  
SALTWATER DISPOSAL WELLS  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 23614-23617**

**APPLICATION OF GOODNIGHT MIDSTREAM  
PERMIAN LLC TO AMEND ORDER NO. R-22026/SWD-2403  
TO INCREASE THE APPROVED INJECTION RATE  
IN ITS ANDRE DAWSON SWD #1,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 23775**

**APPLICATIONS OF EMPIRE NEW MEXICO LLC  
TO REVOKE INJECTION AUTHORITY,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 24018-24027**

**GOODNIGHT MIDSTREAM'S REBUTTAL WITNESS DISCLOSURE**

Goodnight Midstream Permian, LLC ("Goodnight Midstream"), through undersigned counsel, respectfully submits the following witness disclosures and anticipated rebuttal testimony as required under the December 4, 2024, amended scheduling order issued in these matters.

| <b><u>Witness</u></b>                                                                    | <b><u>Area of Expertise</u></b>                 | <b><u>Subject Matter of Testimony</u></b>                                                                                                           |
|------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Preston McGuire,<br>Geology and Reservoir<br>Engineering Manager,<br>Goodnight Midstream | Petroleum Geology and<br>Reservoir Engineering, | <ul style="list-style-type: none"><li>• Rebuttal of Empire's witness testimony that there is communication between Goodnight's San Andres</li></ul> |

|                                       |                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |                                                                                 | <p>disposal zone and the overlying Grayburg formation</p> <ul style="list-style-type: none"> <li>• Rebuttal of OCD's witness testimony that disposal of produced water in Goodnight's San Andres disposal zone will affect underground sources of drinking water or freshwater</li> <li>• Rebuttal of Empire's witness testimony that disposal into the San Andres impairs or will impair EMSU operations</li> <li>• Rebuttal of Empire's witness testimony that the San Andres is an economic residual oil zone in the EMSU</li> <li>• Rebuttal of OCD witness testimony that the San Andres disposal zone is geologically and hydraulically connected to the Capitan Reef and/or Goat Seep complex</li> </ul> |
| Thomas E. Tomastik,<br>ALL Consulting | Petroleum Geology,<br>Petroleum Engineering, UIC<br>Regulatory and Geochemistry | <ul style="list-style-type: none"> <li>• Rebuttal of Empire's witness testimony that injection of produced water in Goodnight's San Andres disposal zone causes corrosion or scale in Empire's wells and/or that any corrosion or scale is caused by Goodnight's injection</li> <li>• Rebuttal of Empire's witness testimony that there is a change in water chemistry in the Grayburg formation due to Goodnight's injection of produced water into Goodnight's San Andres disposal zone</li> <li>• Rebuttal of Empire's witness testimony that there is communication between the</li> </ul>                                                                                                                  |

|                                                              |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                              |                                  | <p>Grayburg and Goodnight's San Andres disposal zone</p> <ul style="list-style-type: none"> <li>• Rebuttal of Empire's witness testimony that the San Andres is an economic residual oil zone in the EMSU</li> <li>• Rebuttal of OCD witness testimony regarding UIC/USDW issues and disposal of produced water into the San Andres disposal zone</li> </ul>                                                                                                                                                                                                                                                                    |
| William J. Knights, Netherland, Sewell & Associates, Inc.    | Petroleum Geology and Geophysics | <ul style="list-style-type: none"> <li>• Rebuttal of Empire's witness testimony that there is evidence of communication between the Grayburg and Goodnight's San Andres disposal zone</li> <li>• Rebuttal of Empire witness testimony that there are economic concentrations of oil or potential for an ROZ in the San Andres disposal zone within the EMSU</li> <li>• Rebuttal of Empire witness testimony regarding calculated OIP in the EMSU</li> <li>• Rebuttal of Empire witness testimony regarding North Monument Unit, Hobbs Units, Vacuum Fields, and other allegedly analogous Grayburg/San Andres fields</li> </ul> |
| Dr. James A. Davidson, Netherland, Sewell & Associates, Inc. | Petrophysics                     | <ul style="list-style-type: none"> <li>• Rebuttal of Nutech and Galen Dillewyn's petrophysical interpretation of the EMSU</li> <li>• Rebuttal of Empire witness testimony that there is an ROZ in the San Andres disposal zone within the EMSU</li> <li>• Rebuttal of Empire witness testimony regarding calculated OIP in the EMSU</li> </ul>                                                                                                                                                                                                                                                                                  |

|                                                                 |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                 |                                                    | <ul style="list-style-type: none"> <li>• Evaluation of geologic barriers between the Grayburg and Goodnight's San Andres disposal zone</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| John McBeath, P.E.,<br>Austin Consulting<br>Petroleum Engineers | Reservoir Engineering                              | <ul style="list-style-type: none"> <li>• Rebuttal of William West testimony, including but not limited to:               <ul style="list-style-type: none"> <li>• injection influence</li> <li>• economic models</li> <li>• formation pressures and related calculations and assumptions</li> </ul> </li> <li>• Rebuttal of Dr. James Buchwalter testimony, including but not limited to:               <ul style="list-style-type: none"> <li>• reservoir simulation inputs, assumptions, and outputs</li> </ul> </li> <li>• Rebuttal of Empire witness testimony regarding purportedly analogous ROZ developments</li> <li>• Rebuttal of Empire witness testimony addressing EMSU ROZ evaluation and plans to conduct ROZ operations</li> <li>• Rebuttal of Empire witness testimony regarding economic feasibility of ROZ operation in Goodnight's San Andres disposal zone</li> <li>• Rebuttal of Empire witness testimony regarding impacts from injection to EMSU operations</li> </ul> |
| Dr. Larry Lake, Austin<br>Consulting Petroleum<br>Engineers     | Reservoir Engineering and<br>Enhanced Oil Recovery | <ul style="list-style-type: none"> <li>• Rebuttal of William West testimony</li> <li>• Rebuttal of Dr. James Buchwalter testimony</li> <li>• Rebuttal of Empire witness testimony regarding its plans to</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                              |                            |                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                            | <p>develop Goodnight's San Andres disposal zone as ROZ</p> <ul style="list-style-type: none"><li>• Rebuttal of Empire witness claims that Goodnight's San Andres disposal zone impairs EMSU operations</li><li>• Rebuttal of Empire witness claims that Goodnight's San Andres disposal zone is not suitable as a produced water disposal zone</li></ul> |
| David White, PG, Geolex Inc. | Petroleum Geology, Geology | <ul style="list-style-type: none"><li>• Rebuttal of OCD witness testimony that the San Andres disposal zone is geologically and hydraulically connected to the Capitan Reef and/or Goat Seep complex</li><li>• Rebuttal of OCD witness testimony regarding UIC/USDW issues and disposal of produced water into the San Andres disposal zone</li></ul>    |

Goodnight reserves the right to supplement or amend this rebuttal disclosure and the anticipated scope of opinions. Goodnight reserves the right to call and/or rely upon expert testimony by any expert identified by any other party.

DATED: January 6, 2025

Respectfully submitted,

**HOLLAND & HART LLP**

*/s/ Adam G. Rankin*

By: \_\_\_\_\_

Michael H. Feldewert  
Adam G. Rankin  
Nathan R. Jurgensen  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrankin@hollandhart.com  
nrjurgensen@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR GOODNIGHT MIDSTREAM  
PERMIAN, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Ernest L. Padilla  
Padilla Law Firm, P.A.  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577  
*padillalawnm@outlook.com*

Dana S. Hardy  
Jaclyn M. McLean  
HINKLE SHANOR LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
*dhardy@hinklelawfirm.com*  
*jmclean@hinklelawfirm.com*

Sharon T. Shaheen  
Daniel B. Goldberg  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, NM 87504-2307  
(505) 986-2678  
*sshhaheen@montand.com*  
*dgoldberg@montand.com*  
cc: *wmcginnis@montand.com*

***Attorneys for Empire New Mexico, LLC***

Miguel A. Suazo  
BEATTY & WOZNIAK, P.C.  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
Tel: (505) 946-2090  
*msuazo@bwenergylaw.com*  
*sgraham@bwenergylaw.com*  
*kluck@bwenergylaw.com*

***Attorneys for Pilot Water Solutions SWD, LLC***

Jesse Tremaine  
Chris Moander  
Assistant General Counsels  
New Mexico Energy, Minerals, and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 741-1231  
(505) 231-9312  
*jessek.tremaine@emnrd.nm.gov*  
*chris.moander@emnrd.nm.gov*

***Attorneys for New Mexico Oil Conservation Division***

Matthew M. Beck  
PEIFER, HANSON, MULLINS & BAKER,  
P.A.  
P.O. Box 25245  
Albuquerque, NM 87125-5245  
Tel: (505) 247-4800  
*mbeck@peiferlaw.com*

***Attorneys for Rice Operating Company and Permian Line Service, LLC***

/s/ Adam G. Rankin  
Adam G. Rankin