

**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.

<u>Witness</u>	<u>Area of Expertise</u>	<u>Subject Matter of Testimony</u>
Preston McGuire, Geology and Reservoir Engineering Manager, Goodnight Midstream	Petroleum Geology and Reservoir Engineering,	• Rebuttal of Empire's witness testimony that there is communication between Goodnight's San Andres

		disposal zone and the overlying Grayburg formation • 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 • Rebuttal of Empire's witness testimony that disposal into the San Andres impairs or will impair EMSU operations • Rebuttal of Empire's witness testimony that the San Andres is an economic residual oil zone in the EMSU • 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
Thomas E. Tomastik, ALL Consulting	Petroleum Geology, Petroleum Engineering, UIC Regulatory and Geochemistry	• 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 • 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 • Rebuttal of Empire's witness testimony that there is communication between the

		Grayburg and Goodnight's San Andres disposal zone • Rebuttal of Empire's witness testimony that the San Andres is an economic residual oil zone in the EMSU • Rebuttal of OCD witness testimony regarding UIC/USDW issues and disposal of produced water into the San Andres disposal zone
William J. Knights, Netherland, Sewell & Associates, Inc.	Petroleum Geology and Geophysics	• Rebuttal of Empire's witness testimony that there is evidence of communication between the Grayburg and Goodnight's San Andres disposal zone • 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 • Rebuttal of Empire witness testimony regarding calculated OIP in the EMSU • Rebuttal of Empire witness testimony regarding North Monument Unit, Hobbs Units, Vacuum Fields, and other allegedly analogous Grayburg/San Andres fields
Dr. James A. Davidson, Netherland, Sewell & Associates, Inc.	Petrophysics	• Rebuttal of Nutech and Galen Dillewyn's petrophysical interpretation of the EMSU • Rebuttal of Empire witness testimony that there is an ROZ in the San Andres disposal zone within the EMSU • Rebuttal of Empire witness testimony regarding calculated OIP in the EMSU

		• Evaluation of geologic barriers between the Grayburg and Goodnight's San Andres disposal zone
John McBeath, P.E., Austin Consulting Petroleum Engineers	Reservoir Engineering	• Rebuttal of William West testimony, including but not limited to: • injection influence • economic models • formation pressures and related calculations and assumptions • Rebuttal of Dr. James Buchwalter testimony, including but not limited to: • reservoir simulation inputs, assumptions, and outputs • Rebuttal of Empire witness testimony regarding purportedly analogous ROZ developments • Rebuttal of Empire witness testimony addressing EMSU ROZ evaluation and plans to conduct ROZ operations • Rebuttal of Empire witness testimony regarding economic feasibility of ROZ operation in Goodnight's San Andres disposal zone • Rebuttal of Empire witness testimony regarding impacts from injection to EMSU operations
Dr. Larry Lake, Austin Consulting Petroleum Engineers	Reservoir Engineering and Enhanced Oil Recovery	• Rebuttal of William West testimony • Rebuttal of Dr. James Buchwalter testimony • Rebuttal of Empire witness testimony regarding its plans to

		develop Goodnight's San Andres disposal zone as ROZ • Rebuttal of Empire witness claims that Goodnight's San Andres disposal zone impairs EMSU operations • Rebuttal of Empire witness claims that Goodnight's San Andres disposal zone is not suitable as a produced water disposal zone
David White, PG, Geolex Inc.	Petroleum Geology, Geology	• 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 • Rebuttal of OCD witness testimony regarding UIC/USDW issues and disposal of produced water into the San Andres disposal zone

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