

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

**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN, LLC FOR APPROVAL OF A
SALT WATER DISPOSAL WELL IN
LEA COUNTY, NEW MEXICO**

CASE NO. 21527

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by the New Mexico State Land Office as required by the Oil Conservation Division under 19.15.4.13(A) NMAC.

APPEARANCES

APPLICANT

Goodnight Midstream Permian, LLC

APPLICANT'S ATTORNEY

Adam Rankin, Holland & Hart LLP

OPPONENTS

New Mexico State Land Office

OPPONENT'S ATTORNEY

Ari Biernoff

STATEMENT OF THE CASE

APPLICANT

CASE NO. 21527

Application of Goodnight Midstream Permian, LLC, for approval of a salt water disposal well in Lea County, New Mexico. The proposed well is located less than ¼ mile from New Mexico state trust lands and minerals.

BASIS FOR NEW MEXICO STATE LAND OFFICE'S OPPOSITION

The State Land Office is concerned with the proximity of the proposed well site to State Trust Lands and Minerals, and the potential negative impact on and waste of New Mexico State Trust Minerals.

PROPOSED EVIDENCE

The State Land Office has not received notice of witnesses or exhibits that will be presented by the Applicant.

The State Land Office does not intend to present evidence at the December 3, 2020 hearing.

PROCEDURAL MATTERS

No procedural matters have been identified that need to be resolved prior to the hearing.

Respectfully submitted,

/s/ Ari Biernoff

Ari Biernoff
General Counsel
New Mexico State Land Office
P.O. Box 1148
Santa Fe, NM 87504-1148
(505) 827-5756

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 2020, I served a copy of the foregoing Prehearing Statement via email upon counsel for the applicant as follows:

HOLLAND & HART LLP
Adam Rankin
arankin@hollandhart.com

/s/ Ari Biernoff