

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

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

**CASE NO. 21570**

**PRE-HEARING STATEMENT**

Goodnight Midstream Permian, LLC (“Goodnight Midstream”), the applicant in this case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division

**APPEARANCES**

**APPLICANT**

Goodnight Midstream Permian, LLC

**ATTORNEY**

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**OTHER PARTIES**

New Mexico State Land Office

Ari Biernoff, Esq.  
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310 Old Santa Fe Trail  
P.O. Box 1148  
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**APPLICANT’S STATEMENT OF CASE**

Goodnight Midstream Permian, LLC seeks authorization to inject produced salt water for purposes of disposal through its proposed **Ernie Banks SWD No. 1 Well** (API No. pending), which will be located 395 feet from the north line and 1,203 feet from the west line (Unit D),

Section 17, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the San Andres formation [SWD; San Andres (Pool Code 96121)] between approximately 4,312 feet and 5,615 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 431 psi. The maximum surface injection pressure will be 862 psi.

The application was filed administratively but protested by the State Land Office. Accordingly, Goodnight Midstream has requested that this application be set for hearing before a Division examiner.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Nate Alleman, ALL Consulting	Affidavit	Approx. 1
Steve Drake, Petroleum Geologist	Affidavit	Approx. 1
Tom Tomastik, ALL Consulting, Petroleum Engineer and Geologist	Affidavit	Approx. 1

#### **PROCEDURAL MATTERS**

Goodnight Midstream intends to present this case by affidavit. Counsel for Goodnight Midstream has conferred with counsel for the State Land Office and has confirmed that the State Land Office does not object to the presentation of this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



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

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**ATTORNEYS FOR GOODNIGHT MIDSTREAM  
PERMIAN, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Ari Biernoff, Esq.  
General Counsel  
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*Attorney for the Commissioner of Public  
Lands, New Mexico State Land Office*



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