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 NOS. 20555-20558

CONSOLIDATED PRE-HEARING STATEMENT

Goodnight Midstream Permian, LLC ("Goodnight Midstream"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT	ATTORNEY
Goodnight Midstream Permian, LLC	Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Kaitlyn A. Luck, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile
OTHER PARTIES	
New Mexico State Land Office	Andrea Antillon, Esq. New Mexico State Land Office 310 Old Santa Fe Trail P.O. Box 1148 Santa Fe, NM 87504-1148

APPLICANT'S STATEMENT OF CASE

Goodnight Midstream Permian, LLC seeks authorization to inject produced salt water for purposes of disposal through four proposed injection wells in four different pending cases. The applications were originally filed administratively but each were protested. Accordingly,

Goodnight Midstream set each of the cases for hearing before a Division examiner. Goodnight Midstream seeks authority for the following:

- In **Case No. 20555**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Nolan Ryan SWD No. 1 Well** (API No. 30-025-45349), which will be located 779 feet from the south line and 1,995 feet from the east line (Unit O), Section 13, 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 4,100 feet and 4,700 feet below the ground through a perforated completion. The estimated average injection pressure is expected to be approximately 400 psi. The maximum injection pressure will be 820 psi.

- In **Case No. 20556**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Robinson SWD No. 1 Well** (API No. pending), which will be located 1,868 feet from the north line and 1,564 feet from the west line (Unit F), Section 4, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the Glorieta formation (SWD; Glorieta, Pool Code 91606) between 5,750 feet and 6,500 feet below the ground through an open-hole completion. The estimated average injection pressure is expected to be approximately 575 psi. The maximum injection pressure will be 1,150 psi.

- In **Case No. 20557**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Scully SWD No. 1 Well** (API No. pending), which will be located 1,724 feet from the north line and 1,607 feet from the west line (Unit F), Section 4, Township 22 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 4,450 feet and 5,750 feet below the ground through an open-hole completion. The estimated average injection pressure is expected to be approximately 445 psi. The maximum injection pressure will be 890 psi.

- In **Case No. 20558**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Yaz 28 SWD No. 1 Well** (API No. 30-025-pending), which will be located 230 feet from the north line and 236 feet from the east line (Unit A), Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the San Andres-Glorieta formation (SWD; San Andres-Glorieta, Pool Code 96127) between 4,630 feet and 6,100 feet below the ground through a perforated completion. The estimated average injection pressure is expected to be approximately 750 psi. The maximum injection pressure will be 926 psi.

APPLICANT'S PROPOSED EVIDENCE

WITNESS **Name and Expertise**	**ESTIMATED TIME**	**EXHIBITS**
Grant Adams, Goodnight Midstream Permian, LLC	Approx. 10 minutes	Approx. 2
Nate Alleman, ALL Consulting	Approx. 15 minutes	Approx. 5
Steve Drake, Geologist	Approx. 10 minutes	Approx. 3
Tom Tomastik, ALL Consulting, Geologist and Regulatory Specialist	Approx. 10 minutes	Approx. 3

PROCEDURAL MATTERS

For administrative efficiency, Goodnight Midstream requests that Case Nos. 20555 through 20558 be consolidated for purposes presenting the cases together at hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: _____

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ATTORNEYS FOR GOODNIGHT MIDSTREAM PERMIAN, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2019 I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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