

**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. 22626**

**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**

Michael H. Feldewert, Esq.  
Adam G. Rankin, Esq.  
Julia Broggi, Esq.  
Paula M. Vance, Esq.  
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**OTHER PARTIES**

Empire New Mexico, LLC

Ernest L. Padilla  
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P.O. Box 2523  
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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 **Piazza SWD 1 Well** (API No. pending), which will be located 1,847 feet from the south line and 2,537 feet from the west line (Unit K), Section 9,

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 4,125 feet and 5,400 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 495 psi. The maximum surface injection pressure will be 825 psi.

The application was filed administratively but protested by the Empire New Mexico, LLC. Accordingly, Goodnight Midstream has requested that this application be set for hearing before a Division examiner.

Goodnight Midstream believes that the evidence and testimony filed concurrently herewith demonstrates that the San Andres injection interval is not prospective for hydrocarbons and has not produced hydrocarbons in the area of the proposed injection well; that the proposed injection will remain contained within the San Andres injection interval and will not migrate out of zone; that the injection will not cause waste or impair correlative rights; and that the injection will not interfere with Empire’s operations in the EMSU. The evidence and testimony presented also shows that the proposed injection otherwise complies with the New Mexico Oil and Gas Act.

Goodnight Midstream is not aware of any material facts not in dispute.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Nate Alleman, ALL Consulting	Affidavit	Exhibits A, B, B-1 through B-2
Steve Allen Drake, Petroleum Geologist and Reservoir Engineer	Affidavit	Exhibits C, C-1 through C-20

### PROCEDURAL MATTERS

Goodnight Midstream intends to file a motion in limine to exclude all testimony and evidence that relies on or includes information or data responsive to Goodnight Midstream's subpoena that was required to be produced under the Division's Order on Motion to Quash Subpoena dated July 26, 2022 (the "Order") but was not produced. Goodnight Midstream may raise objections on this basis to evidence and testimony offered by Empire.

Respectfully submitted,

HOLLAND & HART LLP

By:



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**ATTORNEYS FOR GOODNIGHT MIDSTREAM  
PERMIAN, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 8, I served a copy of the foregoing document, along with the above-referenced testimony and exhibits, via Electronic Mail to:

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QUESTIONS

Action 141864

**QUESTIONS**

Operator: GOODNIGHT MIDSTREAM PERMIAN, LLC 5910 North Central Expressway Dallas, TX 75206	OGRID: 372311
	Action Number: 141864
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	60