

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

APPLICATIONS OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC FOR  
APPROVAL OF A SALTWATER DISPOSAL  
WELLS, LEA COUNTY, NEW MEXICO

CASE NOS. 23614  
23615  
23616  
23617

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Subpoena was served this 19<sup>th</sup> day of September, 2023 on counsel for Goodnight Midstream Permian, LLC.

Michael H. Feldewert	<a href="mailto:mfeldewert@hollandhart.com">mfeldewert@hollandhart.com</a>
Adam G. Rankin	<a href="mailto:agrarkin@hollandhart.com">agrarkin@hollandhart.com</a>
Julia Broggi	<a href="mailto:jbroggi@hollandhart.com">jbroggi@hollandhart.com</a>
Paula M. Vance	<a href="mailto:pmvance@hollandhart.com">pmvance@hollandhart.com</a>
Dana S. Hardy	<a href="mailto:dhardy@hinklelawfirm.com">dhardy@hinklelawfirm.com</a>
Jaclyn M. McLean	<a href="mailto:jmclean@hinklelawfirm.com">jmclean@hinklelawfirm.com</a>
Sharon T. Shaheen	<a href="mailto:sshaheen@montand.com">sshaheen@montand.com</a>
Samantha H. Catalano	<a href="mailto:scatalano@montand.com">scatalano@montand.com</a>

/s/ Ernest L. Padilla  
Ernest L. Padilla

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

APPLICATIONS OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC FOR  
APPROVAL OF A SALTWATER DISPOSAL  
WELLS, LEA COUNTY, NEW MEXICO

CASE NOS. 23614  
23615  
23616  
23617

SUBPOENA

TO: Goodnight Midstream Permian, LLC  
c/o Adam Rankin  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, NM 87504-2208

**YOU ARE HEREBY COMMANDED** pursuant to NMSA 1978, §70-2-8 and Rule 19.15.4.16.A NMAC to produce the following documents at the offices of Padilla Law Firm, P.A., Ernest L. Padilla, PO Box 2523, Santa Fe, New Mexico, 87504, within fifteen (15) days of the service of this subpoena on or before Friday, September 29, 2023:

1. All documents, communications, correspondence, emails, data, analyses, reports, and summaries, including but not limited to internal and external correspondence, memoranda, and assessments, that address, reflect on, or concern the existence or non-existence of hydrocarbons in the San Andres formation within the Eunice Monument South Unit, including any logs, reports, or other data providing downhole information.
2. Raster images of openhole logs run on the Andre Dawson SWD No. 1 (API #30-025-50634), Ernie Banks SWD No. 1 (API #30-025-50633), and Pedro SWD No. 1 (API #30-025-50079).

3. Daily water injection volumes and wellhead pressures for the Andre Dawson SWD No. 1 (API #30-025-50634) and Ernie Banks SWD No. 1 (API #30-025-50633).
4. All water analyses of injected water into the San Andres formation by Goodnight Midstream Permian, LLC SWD wells in Lea County, New Mexico.
5. Copies of the surface use agreements or other agreements by and between Goodnight Midstream Permian LLC, or its affiliates, and surface owners or other persons purporting to have ownership of the San Andres formation within the Eunice Monument South Unit underlying the surface locations of SWD wells proposed in Oil Conservation Division Cases 23614, 23615, 23616, and 23617.

This subpoena is issued on application of Empire New Mexico, LLC through its attorneys, Ernest L. Padilla, Padilla Law Firm, P.A., Dana Hardy, Hinkle Shanor, LLP. and Sharon T. Shaheen, Montgomery & Andrews, P.A.

Dated this 18th day of September, 2023.

**NEW MEXICO OIL CONSERVATION DIVISION**

BY:  \_\_\_\_\_

Date: 9/18/2023