

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

**APPLICATION OF GOODNIGHT
MIDSTREAM PERMIAN, LLC TO AMEND
ORDER NO. R-22506 (SWD-2392) FOR A
ONE-YEAR EXTENSION TO COMMENCE
INJECTION OPERATIONS, LEA COUNTY,
NEW MEXICO.**

CASE NO. 24491

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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APPLICANT’S STATEMENT OF CASE

Goodnight Midstream Permian, LLC seeks an order amending Order No. R-22506 (SWD-2392) for a one-year extension to commence injection operations until March 2, 2025. Under the provisions of the UIC Class II Permit SWD-2392, the authorization to inject is valid for one year after the date of issuance, or until March 2, 2024. Goodnight Midstream submitted a timely request for a one-year extension in accordance with the terms of SWD-2392. The extension request was

protested by Empire New Mexico LLC on the grounds that the proposed injection would interfere with its operation of the Eunice Monument South Unit (“EMSU”) more than a mile away.

The proposed **Rocket SWD #1** will be located approximately 565 feet from the south line and 245 feet from the west line (Unit M) in Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The EMSU is more than a mile away from this location. Empire has not established any valid basis to protest the application. The proposed injection disposal interval will be within the San Andres formation [SWD; San Andres (Pool Code 96121)] between approximately 4,380 feet and 5,750 feet below the ground through a perforated completion. Disposal fluid will be produced saltwater from oil and gas wells in the area producing from the Delaware Mountain Group, Wolfcamp, and Bone Spring formations. The estimated average surface injection pressure is expected to be approximately 438 psi. The maximum surface injection pressure will be 876 psi. Approving this application will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

As more fully explained in the self-affirmed statement submitted contemporaneously herewith, good cause exists for granting a one-year extension to commence injection operations and approving this application.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Matthew Osborn, President and Chief Operating Officer	Self-Affirmed Statement	Approx. 6

PROCEDURAL MATTERS

Goodnight Midstream intends to present this case by self-affirmed statement if it is uncontested at the time of the hearing. Goodnight Midstream filed this application with the Division but initially requested that it be referred to the Commission for a status conference on

June 20, 2024, for it to be heard with other Goodnight Midstream/Empire cases pending before the Commission, including Case No. 24021 filed by Empire that seeks to revoke Goodnight Midstream's authority to inject into the Rocket SWD #1. The Division denied the motion. Separately, Goodnight Midstream filed a motion with the Commission to Dismiss Empire's Case No. 24021 on the grounds that it is more than a mile away from the EMSU and Empire has not showed that it has standing to challenge the Rocket SWD #1.

Respectfully submitted,

HOLLAND & HART LLP

By:  _____

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 351815

QUESTIONS

Operator: GOODNIGHT MIDSTREAM PERMIAN, LLC 5910 North Central Expressway Dallas, TX 75206	OGRID: 372311
	Action Number: 351815
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.