

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

**APPLICATION OF GOODNIGHT
MIDSTREAM PERMIAN, LLC TO AMEND
ORDER NO. R-7767 TO EXCLUDE THE SAN
ANDRES FORMATION FROM THE EUNICE
MONUMENT OIL POOL WITHIN THE
EUNICE MONUMENT SOUTH UNIT AREA,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24277

**APPLICATION OF GOODNIGHT
MIDSTREAM PERMIAN, LLC TO AMEND
ORDER NO. R-7765, AS AMENDED TO
EXCLUDE THE SAN ANDRES FORMATION
FROM THE UNITIZED INTERVAL OF THE
EUNICE MONUMENT SOUTH UNIT,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24278

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

CASE NOS. 23614-23617

**APPLICATIONS OF EMPIRE NEW MEXICO LLC
TO REVOKE INJECTION AUTHORITY,
LEA COUNTY, NEW MEXICO**

CASE NOS. 24018-24027

**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN LLC TO AMEND ORDER NO. R-22026/SWD-2403
TO INCREASE THE APPROVED INJECTION RATE
IN ITS ANDRE DAWSON SWD #1,
LEA COUNTY, NEW MEXICO.**

CASE NO. 23775

**APPLICATION OF GOODNIGHT PERMIAN MIDSTREAM,
LLC FOR APPROVAL OF A SALTWATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO; ORDER NO. R-22869-A.**

CASE NO. 24123

**ENTRY OF APPEARANCE AND
NOTICE OF INTERVENTION**

Miguel A. Suazo, Sophia A. Graham, and Kaitlyn A. Luck of Beatty & Wozniak, P.C., hereby enter their appearances on behalf of Pilot Water Solutions SWD, LLC ("Pilot") in the above-referenced matter, pursuant to 19.15.4.10 and 19.15.4.11 NMAC. As an interested party in the proceedings, Pilot intervenes in these cases and states:

1. Empire New Mexico, LLC is an oil-and-gas production company that operates the Eunice Monument South Unit (“EMSU”). The EMSU is an oil-and-gas production area subject to a unitization order issued under the Statutory Unitization Act, NMSA 1978 §§ 70-7-1 through -21, that includes the Grayburg formation and the San Andres formation underlying the EMSU.

2. Pilot is a salt water disposal company that is the designated operator of injection wells within the EMSU that are injecting into the San Andres formation, authorized by Oil Conservation Division injection permits issued pursuant to 19.15.24 NMAC,

3. Pilot’s injection permits into the San Andres formation may be adversely affected by any decision or order of the Commission issued during the proceedings which are the subject of the applications in these cases.

4. In Case No. 24432 before the Oil Conservation Division, Empire filed an Application to Revoke the Injection Authority Granted Under Administrative Order SWD-1750 for the P 15 #001 Well Operated by OWL SWD Operating, LLC, Lea County, New Mexico; OWL SWD Operating, LLC is an affiliate of Pilot.

5. Empire also filed a Complaint against Pilot in State of New Mexico Fifth Judicial District Court Case No. D-506-CV-2024-0377 related to its ownership of the EMSU and Pilot’s subsurface interests in its injection wells that are injecting into the San Andres formation.

6. Due to Pilot’s interests in the San Andres formation and potential adverse implications to its disposal wells, Pilot seeks to intervene to preserve its rights that may be adversely affected by any disposition of these cases involving a determination regarding the San Andres formation.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Miguel A. Suazo
Sophia A. Graham
Kaitlyn A. Luck
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenerylaw.com
sgraham@bwenerylaw.com
kluck@bwenerylaw.com

*Attorneys for Pilot Water Solutions
SWD, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 17th day of June 2024, as follows:

Jesse Tremaine
Chris Moander
Assistant General Counsels
New Mexico Energy, Minerals, and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 741-1231
(505) 231-9312
jessek.tremaine@emnrd.nm.gov
chris.moander@emnrd.nm.gov
**Attorneys for New Mexico Oil
Conservation
Division**

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com
**Attorneys for Goodnight Midstream
Permian, LLC**

Ernest L. Padilla
Padilla Law Firm, P.A.
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalawnm@outlook.com

Dana S. Hardy
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

Shaon T. Shaheen
Daiel B. Goldberg
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@montand.com
dgoldberg@montand.com
cc: wmcginnis@montand.com

Attorneys for Empire New Mexico, LLC



Rachael Ketchledge