

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

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

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

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-22024/SWD-2403 TO INCREASE THE APPROVED INJECTION RATE IN ITS ANDRE DAWSON SWD #1, LEA COUNTY, NEW MEXICO.

CASE NO. 23775

EMPIRE NEW MEXICO LLC’S SUPPLEMENTAL RESPONSES TO GOODNIGHT MIDSTREAM PERMIAN LLC’S MARCH 5, 2024 SUBPOENA DUCES TECUM

In accordance with the June 4, 2024 Commission Order Partially Granting Empire’s Objections to and Motion to Quash Goodnight’s subpoena issued March 5, 2024, Empire New Mexico, LLC (“Empire”) submits the following supplemental response. A link to responsive documents is provided in the email transmitting this response.

Response to Request Nos. 1 through 3: Documents responsive to Request No. 1 are produced herewith as OCD 23614-17 03330 – OCD 23614-17 3451 and OCD 23614-17 03535 – OCD 23614-17 3544. Empire has no documents responsive to Request Nos. 2 and 3.

Response to Request No. 4: See OCD 23614-17 03452 produced herewith.

Response to Request Nos. 5-6: Empire has conducted a thorough and diligent search. All responsive documents identified to date were previously produced in response to Goodnight's prior requests.

Response to Request No. 10: See OCD 23614-17 03453 – OCD 23614-17 03521 produced herewith.

Response to Request No. 11: See NM OCD 23614-17 3522 produced herewith.

Response to Request No. 12: Empire has conducted a thorough and diligent search. A list of failed wells was previously produced in response to this request. To date, after a thorough and diligent search, Empire has discovered no other responsive documents.

Response to Request Nos. 13-14: See OCD 23614-17 03523 – OCD 23614-17 3527 produced herewith.

Response to Request Nos. 15-16: Empire has conducted a thorough and diligent search. Any responsive documents identified to date were previously produced as part of its exhibits filed in November and in response to Goodnight's prior requests relating to the exhibits.

Response to Request No. 17: See OCD 23614-17 03528 – OCD 23614-17 03534 produced herewith.

Respectfully submitted,

By: /s/ Sharon T. Shaheen
Sharon T. Shaheen
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678

sshaheen@montand.com

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

Ernest L. Padilla
PADILLA LAW FIRM, P.A.
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577
padillalawnm@outlook.com

Attorneys for Empire New Mexico, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following by electronic mail on June 26, 2024.

/s/ Sharon T. Shaheen

Mathew M. Beck
Peifer, Hanson, Mullins & Baker, P.A.
P.O. Box 25245
Albuquerque, NM 87125-5245
(505) 247-4800
mbeck@peifer.com

Attorneys for Rice Operating Company and Permian Line Company, LLC

Ernest L. Padilla
Padilla Law Firm
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577
padillalawnm@outlook.com

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

Attorneys for Empire New Mexico LLC

Christopher Moander
Office of General Counsel
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
(505) 476-3441
Chris.Moander@emnrn.gov
Attorneys for Oil Conservation Division

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Holland & Hart LLP
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

Attorneys for Intervenor Goodnight Midstream LLC

Miguel A. Suazo
Sophia Graham
Kaitlyn Luck
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com

Attorneys for Pilot Water Solutions SWD, LLC