

**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. 24123

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

CASE NOS. 23614-23617

**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

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

CASE NOS. 24018-24027

GOODNIGHT MIDSTREAM’S WITNESS DISCLOSURE

Goodnight Midstream Permian, LLC (“Goodnight Midstream”), through undersigned counsel, respectfully submits the following witness disclosures as required under Order No. R-23208.

<u>Witness</u>	<u>Area of Expertise</u>	<u>Subject Matter of Testimony</u>
Nathan Alleman	OCD Regulatory Matters and SWD Permitting, Ace Energy Advisors	<ul style="list-style-type: none"> • Overview of Goodnight’s administrative applications
Preston McGuire	Petroleum Geology and Reservoir Engineering, Goodnight Midstream	<ul style="list-style-type: none"> • Overview of Goodnight • Overview of Goodnight’s existing and proposed injection • Overview of geologic setting and discussion of Grayburg and San Andres formations • Overview of geologic barriers isolating the target San Andres disposal zone • Confirmation that disposal of produced water in the San Andres will not affect underground sources of drinking water or freshwater • Overview addressing claims that San Andres disposal impairs EMSU operations • Overview addressing claims that San Andres is an economic residual oil zone in the EMSU
Thomas E. Tomastik	Petroleum Geology, Petroleum Engineering, UIC Regulatory and Geochemistry, ALL Consulting	<ul style="list-style-type: none"> • Overview and history of Eunice and Monument fields • Overview of development of EMSU and waterflood operations • Geochemical analysis and overview of water chemistry

		<p>and formation compatibility issues in the EMSU</p> <ul style="list-style-type: none"> • Well corrosion issues in the EMSU • Overview of Goodnight’s chemical treatment and filtering protocols and injection well operation parameters • Assessment and evaluation of EMSU operations and wells • Overview and addressing claims of communication between Grayburg and San Andres formations
William J. Knights	Petroleum Geology and Geophysics, Netherland, Sewell & Associates, Inc.	<ul style="list-style-type: none"> • Geology and depositional environment of the San Andres and Grayburg at the EMSU • Overview of Mother Nature’s Waterflood • San Andres development history around the EMSU • Evaluation of geologic barriers between the Grayburg and San Andres • OIP assessment for San Andres at the EMSU
Dr. James A. Davidson	Petrophysics, Ph.D., Netherland, Sewell & Associates, Inc.	<ul style="list-style-type: none"> • Petrophysical interpretation of core and log data for San Andres formation • Evaluation and assessment of the presence of oil and potential for an ROZ in the San Andres within the EMSU • Evaluation of geologic barriers between the Grayburg and San Andres formations
John McBeath	Reservoir Engineering, P.E., Austin Consulting Petroleum Engineers	<ul style="list-style-type: none"> • Evaluation of ROZ projects and what is required

		<ul style="list-style-type: none"> • Evaluation and assessment of Empire’s plans to conduct ROZ operation in San Andres within the EMSU • Assessment and evaluation of economic feasibility of San Andres ROZ operation • Analysis and assessment of impacts from injection to EMSU operations
Dr. Larry Lake	Reservoir Engineering and Enhanced Oil Recovery, Ph.D.	<ul style="list-style-type: none"> • Summary analysis of Empire’s proposal to develop San Andres as ROZ • Summary analysis of Empire’s claims that San Andres disposal impairs EMSU operations • Summary analysis on suitability of San Andres formation as a produced water disposal zone

Discovery is ongoing and Goodnight reserves the right to supplement this expert witness disclosure and the scope of opinions as additional information becomes available. Goodnight reserves the right to call and/or rely upon expert testimony by any expert identified by any other party. Goodnight reserves the right to identify and call rebuttal experts in response to expert witness testimony that Empire discloses or elicits.

DATED: July 8, 2024

Respectfully submitted,

HOLLAND & HART LLP

/s/ Nathan R. Jurgensen

By: _____

Michael H. Feldewert
Adam G. Rankin
Nathan R. Jurgensen
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
nrjurgensen@hollandhart.com
pmvance@hollandhart.com

**ATTORNEYS FOR GOODNIGHT MIDSTREAM
PERMIAN, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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

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

Attorneys for Empire New Mexico, LLC

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***

Miguel A. Suazo
Sophia A. Graham
Kaitlyn A. Luck
BEATTY & WOZNIAK, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
Tel: (505) 946-2090
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com

***Attorneys for Pilot Water Solutions SWD,
LLC***

Nathan R. Jurgensen
Nathan R. Jurgensen

32373534_v1