

**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.

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

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

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

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  
agrankin@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  
*sshahen@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