

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

**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-22026/SWD-2403  
TO INCREASE THE APPROVED INJECTION RATE  
IN ITS ANDRE DAWSON SWD #1,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 23775**

**EMPIRE'S NOTICE OF NON-APPEARANCE**

COMES NOW Empire New Mexico, LLC ("Empire"), and hereby gives notice that it will not present a corporate representative at the deposition that is noticed to take place on August 2, 2024 for the reasons discussed in its motion to quash Goodnight's subpoena.

Respectfully submitted,

**HINKLE SHANOR LLP**

By: /s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

(505) 982-4554

[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

Ernest L. Padilla

**PADILLA LAW FIRM**

P.O. Box 2523

Santa Fe, NM 87504

(505) 988-7577

[padillalawnm@outlook.com](mailto:padillalawnm@outlook.com)

Sharon T. Shaheen

**MONTGOMERY & ANDREWS, P.A.**

P.O. Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.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 counsel by electronic mail on July 26, 2024:

Michael H. Feldewert  
Adam G. Rankin  
Nathan R. Jurgensen  
Julia Broggi  
Paula M. Vance  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504-2208  
Telephone: (505) 986-2678  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[nrjurgensen@hollandhart.com](mailto:nrjurgensen@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)  
***Attorneys for Goodnight Midstream  
Permian, LLC***

Matthew M. Beck  
PEIFER, HANSON, MULLINS & BAKER,  
P.A.  
P.O. Box 25245  
Albuquerque, NM 87125-5245  
Tel: (505) 247-4800  
[mbeck@peiferlaw.com](mailto:mbeck@peiferlaw.com)  
***Attorneys for Rice Operating Company and  
Permian Line Service, LLC***

Jesse K. Tremaine  
Christopher L. Moander  
New Mexico Energy, Minerals and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Tel (505) 709-5687  
[Jessek.tremaine@emnrd.nm.gov](mailto:Jessek.tremaine@emnrd.nm.gov)  
[chris.moander@emnrd.nm.gov](mailto: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](mailto:msuazo@bwenergylaw.com)  
[sgraham@bwenergylaw.com](mailto:sgraham@bwenergylaw.com)  
[kluck@bwenergylaw.com](mailto:kluck@bwenergylaw.com)  
***Attorneys for Pilot Water Solutions SWD,  
LLC***

/s/ Dana S. Hardy