ALL CONSULTING
GOVERNMENT RELATIONS · ENERGY · PLANNING · TECHNOLOGY
ENGINEERING · ENVIRONMENTAL

June 28, 2019

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: Goodnight Midstream Permian, LLC – Ryno SWD 1
Application for Authorization to Inject

To Whom It May Concern,

On behalf of Goodnight Midstream Permian, LLC (Goodnight), ALL Consulting, LLC (ALL) is submitting the enclosed Application for Authorization to Inject for the Ryno SWD 1, a proposed salt water disposal well, in Lea County, NM.

Should you have any questions regarding the enclosed application, please contact Nate Alleman at (918) 382-7581 or nalleman@all-llc.com.

Sincerely,
ALL Consulting

Nate Alleman
Sr. Regulatory Specialist

7/2/2019 DATE IN	SUSPENSE	ENGINEER	LOGGED IN	TYPE	pKAM1928247158, 2307 APP NO.

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
- Engineering Bureau -
1220 South St. Francis Drive, Santa Fe, NM 87505

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Simultaneous Dedication
☐ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☒ SWD ☐ IPI ☐ EOR ☐ PPR

[D] Other: Specify _____

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

[A] ☐ Working, Royalty or Overriding Royalty Interest Owners

[B] ☒ Offset Operators, Leaseholders or Surface Owner

[C] ☒ Application is One Which Requires Published Legal Notice

[D] ☐ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office

[E] ☒ For all of the above, Proof of Notification or Publication is Attached, and/or,

[F] ☐ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Nate Alleman	Nathan Alleman	Regulatory Specialist - ALL Consulting	6/28/2019
Print or Type Name	Signature	Title	Date

nalleman@all-llc.com
Date e-mail Address

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

FORM C-108
Revised June 10, 2003

APPLICATION FOR AUTHORIZATION TO INJECT

I. PURPOSE: _____Secondary Recovery _____Pressure Maintenance ___X___Disposal
_____Storage Application qualifies for administrative approval? ___X___Yes _____No

II. OPERATOR: Goodnight Midstream Permian, LLC

ADDRESS: 5910 N Central Expressway, Suite 850, Dallas, TX 75206

CONTACT PARTY: Grant Adams PHONE: 214-444-7388(0)

III. WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.

IV. Is this an expansion of an existing project? _____Yes ___X___No
If yes, give the Division order number authorizing the project: _____

V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.

VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.

VII. Attach data on the proposed operation, including:

1. Proposed average and maximum daily rate and volume of fluids to be injected;
2. Whether the system is open or closed;
3. Proposed average and maximum injection pressure;
4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,
5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).

*VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.

IX. Describe the proposed stimulation program, if any.

*X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).

*XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.

XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.

XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.

XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Nathan Alleman _____ TITLE: Regulatory Specialist - ALL Consulting

SIGNATURE: Nate Alleman _____ DATE: 06/28/2018

E-MAIL ADDRESS: nalleman@all-llc.com

* If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: _____

DISTRIBUTION: Original and one copy to Santa Fe with one copy to the appropriate District Office

Side 2

III. WELL DATA

A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:

(1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.

(2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.

(3) A description of the tubing to be used including its size, lining material, and setting depth.

(4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.

(1) The name of the injection formation and, if applicable, the field or pool name.

(2) The injection interval and whether it is perforated or open-hole.

(3) State if the well was drilled for injection or, if not, the original purpose of the well.

(4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.

(5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

(1) The name, address, phone number, and contact party for the applicant;

(2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;

(3) The formation name and depth with expected maximum injection rates and pressures; and,

(4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

Application for Authorization to Inject
Well Name: Ryno SWD 1

III – Well Data (*The Wellbore Diagram is included as **Attachment 1***)

A.

(1) General Well Information:

Operator: Goodnight Midstream Permian, LLC (OGRID No. 372311)
Lease Name & Well Number: Ryno SWD 1
Location Footage Calls: 1,450' FNL & 708' FEL
Legal Location: Unit Letter H, S17 T21S R36E
Ground Elevation: 3,612'
Proposed Injection Interval: 4,320' – 5,625'
County: Lea

(2) Casing Information:

Type	Hole Size	Casing Size	Casing Weight	Setting Depth	Sacks of Cement	Estimated TOC	Method Determined
Surface	17-1/2"	13-3/8"	48.0 lb/ft	1,348'	495	Surface	Circulation
Intermediate 1	12-1/4"	9-5/8"	40.0 lb/ft	5,893'	815	Surface	Circulation/ CBL
Production (Plugged)	8-3/4"	7"	26.0 lb/ft	10,556'	1,578	Surface	Circulation/ CBL
Tubing	6-2/7"	4-1/2"	20.0 lb/ft	4,300'	N/A	N/A	N/A

(3) Tubing Information:

4-1/2" (composite weight string) of fiberglass-coated tubing with setting depth of 4,300

(4) Packer Information: Lok-set or equivalent packer set at 4,300'

B.

(1) Injection Formation Name: San Andres
Pool Name: SWD; SAN ANDRES
Pool Code: 96121

(2) Injection Interval: Perforated Injection between 4,320' – 5,625'

(3) Drilling Purpose: Plugback for Salt Water Disposal

(4) Other Perforated Intervals: No other perforated intervals exist.

(5) Overlying Oil and Gas Zones: Below are the approximate formation tops for known oil and gas producing zones in the area.

- Grayburg (3,790')

Underlying Oil and Gas Zones: Below are the approximate formation tops for known oil and gas producing zones in the area.

- Tubb (6,315')

V – Well and Lease Maps

The following maps are included in ***Attachment 2***:

- 2-mile Oil & Gas Well Map
- 2-mile Lease Map
- 1/2-mile Well Detail List
- Potash Lease Map

VI – AOR Well List

There are no wells within the 1/2-mile AOR that penetrate the proposed injection zone.

A list of the wells within the 1/2-mile AOR is included in ***Attachment 2***.

VII – Proposed Operation

(1) Proposed Maximum Injection Rate: 25,000 bpd
Proposed Average Injection Rate: 17,500 bpd

(2) Proposed Maximum Injection Pressure: 900 psi (surface)
Proposed Average Injection Pressure: approximately 450 psi (surface)

(3) Source Water Analysis: It is expected that the injectate will consist of produced water from production wells completed in the Wolfcamp and Bone Springs formations. Analysis of water from these formations is included in ***Attachment 3***.

(4) Injection Formation Water Analysis: The proposed SWD will be injecting water into the San Andres formation which is a non-productive zone known to be compatible with formation water from the Wolfcamp and Bone Springs formations. Water analyses from the San Andres formations in the area are included in ***Attachment 4*.**

VIII – Geologic Description

The proposed injection interval includes the San Andres formations from 4,320 – 5,625 feet. This formation consists of interbedded carbonate rocks including dolomites and limestone. Several thick intervals of porous and permeable rock capable of taking water are present within the subject formation in the area.

The freshwater formation is the Rustler at a depth of approximately 1,330 feet. Water well depths in the area range from approximately 140 - 212 feet below ground surface.

IX – Proposed Stimulation Program

A small cleanup acid job may be used to remove mud and drill cuttings from the formation. However, no other formation stimulation is currently planned.

X – Logging and Test Data

Logs will be submitted to the Division upon completion of the well.

XI – Fresh Groundwater Samples

Based on a review of data from the New Mexico Office of the State Engineer, 4 groundwater wells are located within 1 mile of the proposed SWD location; however, state water well data and conversations with water well owners have revealed that only one water well (CP-01485 POD 1) is currently in use. A water sample was previously collected on 01/28/2019.

A water well map, details of water wells within 1-mile, and any associated water analyses are included in ***Attachment 5***.

XII – No Hydrologic Connection Statement

No faulting is present in the area that would provide a hydrologic connection between the injection interval and overlying USDWs. Additionally, the casing program has been designed to ensure there will be no hydrologic connection between the injection interval and overlying USDWs.

XIII – Proof of Notice

A Public Notice was filed with the Hobbs News-Sun newspaper and an affidavit is included in ***Attachment 6***.

A copy of the application was mailed to the OCD District Office, landowner, and leasehold operators within 1/2-mile of the proposed SWD location. A list of the recipients, as well as delivery confirmations, are included in ***Attachment 6***.

Attachments

Attachment 1: Wellbore Diagram

Attachment 2: Area of Review Information:

- 2-mile Oil & Gas Well Map
- 2-mile Lease Map
- 1/2-mile Well Detail List
- Potash Lease Map

Attachment 3: Source Water Analyses

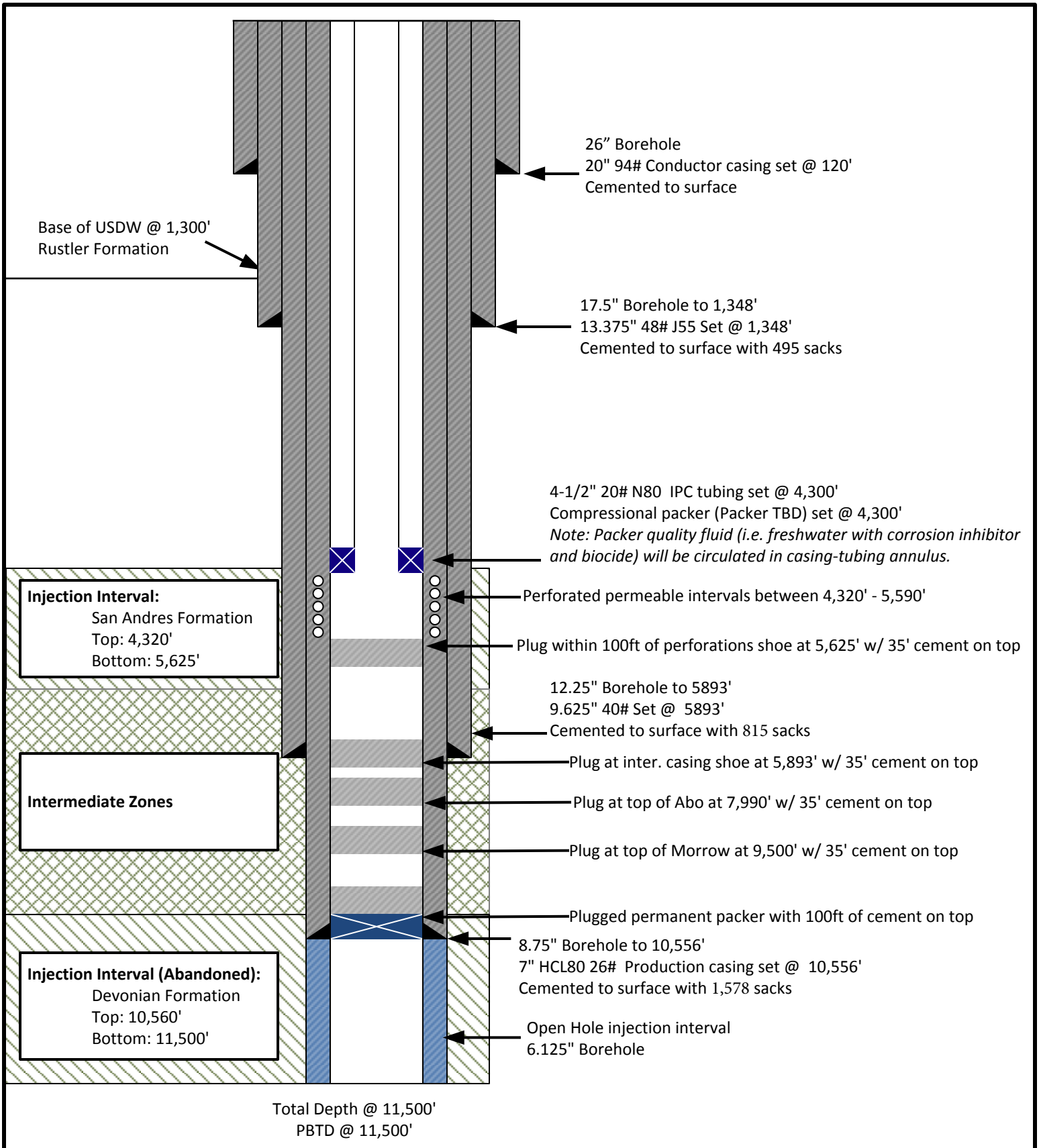
Attachment 4: Injection Formation Water Analyses

Attachment 5: Water Well Map and Well Data

Attachment 6: Public Notice Affidavit and Notice of Application Confirmations

Attachment 1

Wellbore Diagram



NOT TO SCALE

Note: Listed depths and cement volumes are approximates based on available information.

Prepared by: ALL CONSULTING	Drawn by: Joshua Ticknor	Goodnight Midstream Permian, LLC
	Project Manager: Nathan Alleman	Ryno SWD 1
	Date: 06/25/2019	Section 17, Twp 21S, Rng 36E 1,450' FNL & 708' FEL Lea County, NM

A-3 and AL-2 LOK-SET Retrievable Casing Packers

Product Family No. H64630 and H64628

APPLICATION

The A-3™ LOK-SET™ packer combines advantages of a retrievable packer with the features of a permanent packer. An ability to lock down tubing forces makes the A-3 suitable for a broad range of applications, including production, injection, zone isolation, and remedial operations. The AL-2™ LOK-SET packer is similar to the A-3, and has a larger bore.

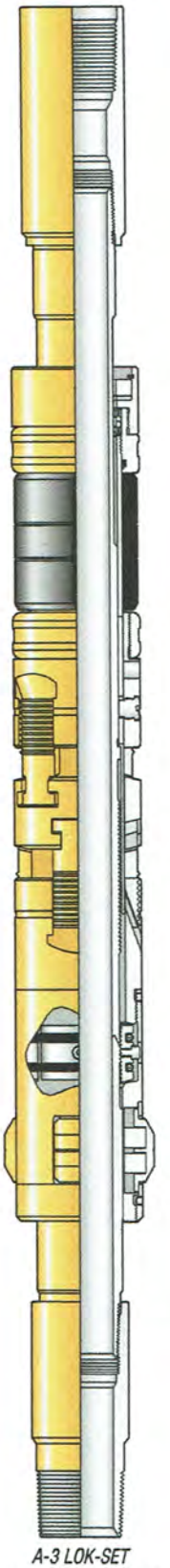
Advantages

- Holds pressure from above and below, without relying on set-down weight, tubing tension, or hydraulic hold down
- Provides tubing anchoring with tension applied, suitable for pumping wells or injection, controlling tubing forces related to change fluid temperatures
- Opposed, non-transferring, dovetail slips prevent packer movement associated with changing differential pressures, while allowing the landing of the tubing in tension, neutral or compression
- Right-hand tubing rotation controls setting and releasing
- Packing element compression locks in by ratcheting action of lock segments, which restricts rotation to one direction

Accessories

To provide a simple and reliable injection system for retrieving an injection string without having to unseat the packer:

L-10 or L-316 on-off sealing connectors, Product Family Nos. H68420 and H68422. Baker Hughes blanking plug can be used in the seating nipple profile of the on-off sealing connector to provide a means of plugging the lower zone while the tubing is being pulled.



A-3 LOK-SET Retrievable Casing Packer Product Family No. H64630

SPECIFICATION GUIDES

A-3™ LOK-SET Retrievable Casing Packer, Product Family No. H64630

Casing			Packer				
OD		Weight •	Size	Nom ID		Max Gage Ring OD	
in.	mm	lb/ft		in.	mm	in.	mm
4	101.6	9.5–12.9	41A2	1.500	38.1	3.244	82.4
4-1/2	144.3	21.6–23.6	41A2	1.500	38.1	3.244	82.4
4	101.6	9.5	41A4	1.500	38.1	3.423	112.4
4-1/2	114.3	18.8	41A4	1.500	38.1	3.423	112.4
		13.5–17.7	41B			3.578	90.9
		11.6–13.5	43A2	1.978	50.2	3.786	96.2
		9.5–10.5	43A4			3.786	96.2
5	127.0	15–18	43B	1.978	50.2	4.140	105.2
		11.5–15	43C			4.265	108.3
5-1/2	139.7	26	43C	1.978	50.2	4.265	108.3
		20–23	45A2			4.515	114.7
		15.5 –20	45A4			4.656	118.3
		13–15.5	45B			4.796	121.8
6	152.4	26	45B	1.978	50.2	4.796	121.8
		20–23	45C			5.078	129.0
		15–18	45D			5.171	131.3
6-5/8	168.3	34	45E	1.978	50.2	5.421	137.7
		24–32	45F			5.499	139.7
		24	47A2	2.441	62.0	5.671	144.0
		17–24	45G	1.978	50.2	5.796	147.2
		17–20	47A4	2.441	62.0	5.827	148.0
7	177.8	38	47A2	2.441	62.0	5.671	144.0
		32–35	47A4			5.827	148.0
		26–29	47B2			5.983	152.0
		23–26	47B4			6.093	154.8
		17–20	47C2			6.281	159.5
7-5/8	193.7	33.7–39	47C4	2.441	62.0	6.468	164.3
		24–29.7	47D2			6.687	169.9
		20–24	47D4			6.827	173.4
8-5/8	219.1	44–49	49A2	3.500	88.9	7.327	186.1
		32–40	49A4			7.546	191.7
		20–28	49B			7.796	198.0
9-5/8	244.5	47–53.5	51A2	3.500	88.9	8.234	209.1
		40–47	51A4			8.452	214.7
		29.3–36	51B			8.608	218.6

AL-2™ Large Bore LOK-SET Retrievable Casing Packer Product Family No. H64628

Casing		Packer							
OD		Weight •	Size	Nom ID		Max Gage Ring OD		Max Diameter of Compressed Drag Block	
in.	mm	lb/ft		in.	mm	in.	mm	in.	mm
5-1/2	139.7	20	45A2 x 2-3/8	2.375	60.3	4.562	115.9	4.592	116.6
		15.5–17	45A4 x 2-3/8			4.656	118.3	4.750	120.7
		13	45B x 2-3/8			4.796	121.8	4.902	124.5
6	152.4	26	45B x 2-3/8	2.375	60.3	4.796	121.8	4.902	124.5

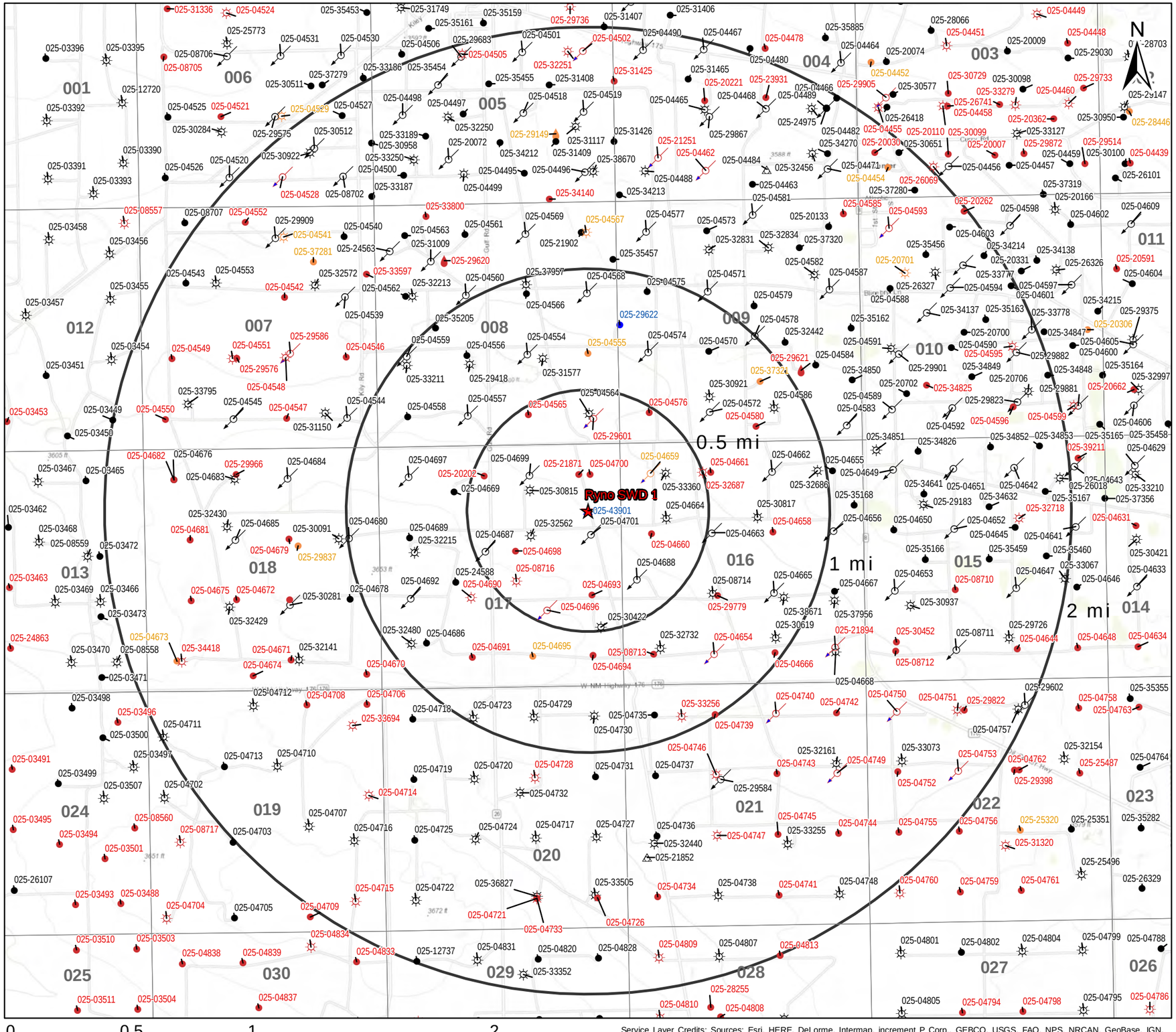
• *When selecting a packer for a casing weight common to two weight ranges (same OD), choose the packer size shown for the lighter of the two weight ranges. Example: for 7-in. (177.8 mm) OD 26 lb/ft casing use packer size 47B4. Under certain circumstances the other packer size may be run, such as when running in mixed casing strings.*

Repair kits, including such items as packing elements, seal rings, etc., are available for redressing Baker Retrievable Packers. Contact your Baker Hughes representative. Use only Baker Hughes repair parts.

Attachment 2

Area of Review Information:

- 2-mile Oil & Gas Well Map
- 2-mile Lease Map
- 1/2-mile Well Detail List
- Potash Lease Map



Legend

- Proposed SWD
- Gas, Active (123)
- Gas, Plugged (40)
- Gas, Temporarily Abandoned (4)
- Injection, Active (88)
- Injection, Plugged (15)
- Injection, Temporarily Abandoned (1)
- Oil, Active (150)
- Oil, New (1)
- Oil, Plugged (118)
- Oil, Temporarily Abondoned (11)
- Salt Water Injection, Active (2)
- Salt Water Injection, New (1)
- Salt Water Injection, Plugged (1)
- Water, Plugged (2)
- Water, Temporarily Abandoned (1)

O&G Wells Area of Review

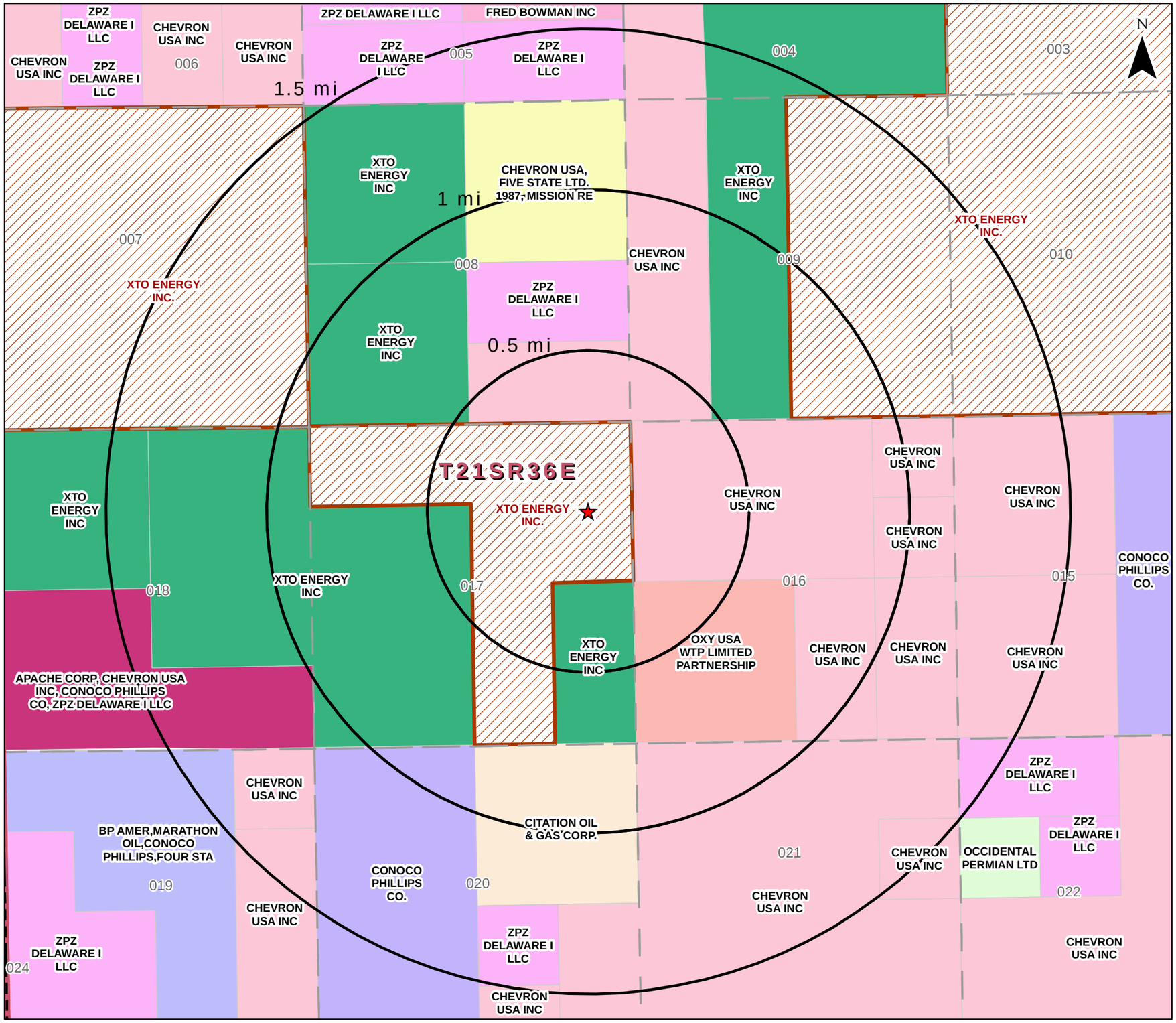
Ryno SWD 1

Lea County, New Mexico

Proj Mgr: Dan Arthur	May 29, 2019	Mapped by: Ben Bockelmann

Prepared by:

ALL CONSULTING



Legend

- Proposed SWD
- Private Mineral Leases

BLM Mineral Leases

- APACHE CORP, CHEVRON USA INC, CONOCO PHILLIPS CO, ZPZ DELAWARE I LLC
- XTO ENERGY INC

NMSLO Mineral Leases

- BP AMER,MARATHON OIL,CONOCO PHILLIPS,FOUR STA
- CHEVRON USA INC
- CHEVRON USA, FIVE STATE LTD. 1987, MISSION RE
- CITATION OIL & GAS CORP.
- CONOCO PHILLIPS CO.
- FRED BOWMAN INC
- OCCIDENTAL PERMIAN LTD
- OXY USA WTP LIMITED PARTNERSHIP
- SLASH EXPLORATION LP
- ZPZ DELAWARE I LLC

Mineral Lease Area of Review

Ryno SWD 1

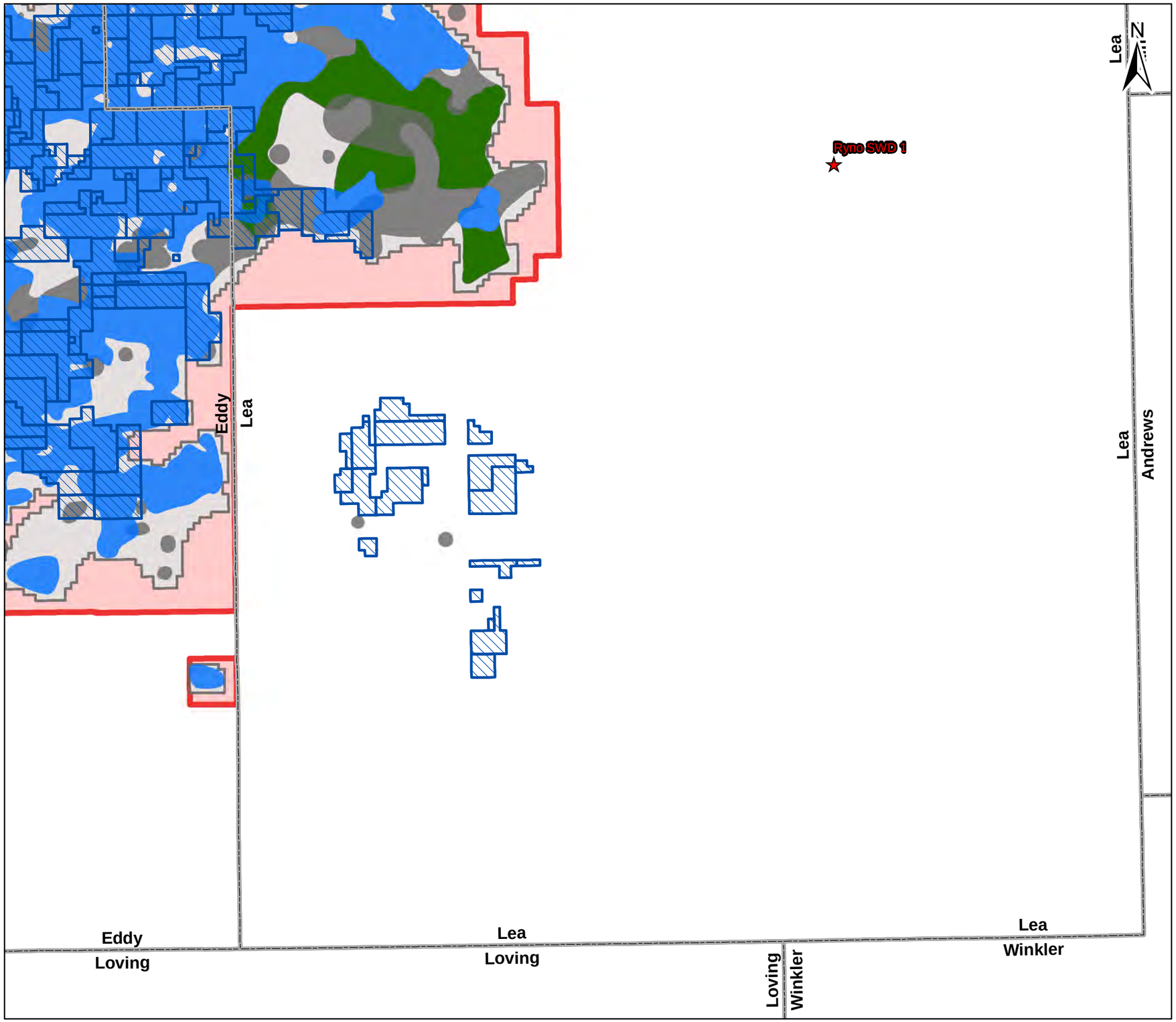
Lea County, New Mexico

Proj Mgr: Nate Alleman	June 12, 2019	Mapped by: Ben Bockelmann

Prepared by:

ALL CONSULTING

AOR Tabulation for Ryno SWD 1 (Top of Injection Interval: 4,500')							
Well Name	**API#**	**Well Type**	**Operator**	**Spud Date**	**Location (Sec., Tn., Rng.)**	**Total Vertical Depth (feet)**	**Penetrate Inj. Zone?**
EUNICE MONUMENT SOUTH UNIT #364	30-025-04659	Approved TA	XTO ENERGY, INC	11/18/1934	D-16-21S-36E	4026	No
EUNICE MONUMENT SOUTH UNIT #365	30-025-21871	Plugged	XTO ENERGY, INC	10/1/1966	A-17-21S-36E	Plugged (4168)	No
EUNICE MONUMENT SOUTH UNIT #337	30-025-04565	Plugged	XTO ENERGY, INC	5/11/1934	O-08-21S-36E	Plugged (3925)	No
EUNICE MONUMENT SOUTH UNIT #378	30-025-04687	I	XTO ENERGY, INC	*Unknown	F-17-21S-36E	4048	No
EUNICE MONUMENT SOUTH UNIT #406	30-025-04696	Plugged	XTO ENERGY, INC	11/6/1954	J-17-21S-36E	Plugged (4116)	No
EUNICE MONUMENT SOUTH UNIT #366	30-025-04699	I	XTO ENERGY, INC	4/16/1934	B-17-21S-36E	4053	No
EUNICE MONUMENT SOUTH UNIT #339	30-025-04576	Plugged	XTO ENERGY, INC	2/17/1987	M-09-21S-36E	Plugged (3906)	No
EUNICE MONUMENT SOUTH UNIT #380	30-025-04701	I	XTO ENERGY, INC	10/21/1934	H-17-21S-36E	4095	No
EUNICE MONUMENT SOUTH UNIT #404	30-025-04688	I	XTO ENERGY, INC	5/20/1935	L-16-21S-36E	4026	No
EUNICE MONUMENT SOUTH UNIT #338	30-025-29601	Plugged	XTO ENERGY, INC	5/6/1986	P-08-21S-36E	Plugged (4250)	No
R R BELL NCT A COM #002	30-025-04564	G	XTO ENERGY, INC	11/8/1934	P-08-21S-36E	3916	No
EUNICE MONUMENT SOUTH UNIT #367	30-025-20202	Plugged	XTO ENERGY, INC	8/17/1963	C-17-21S-36E	Plugged (4003)	No
O L COLEMAN #007	30-025-32562	G	PENROC OIL CORP	9/29/1994	G-17-21S-36E	3875	No
O L COLEMAN #006	30-025-30815	G	PENROC OIL CORP	5/5/1990	B-17-21S-36E	3750	No
MEYER B 17 #003	30-025-30422	G	PENROC OIL CORP	8/10/1988	P-17-21S-36E	3750	No
SKELLY B STATE COM #005	30-025-33360	G	PENROC OIL CORP	4/24/1996	D-16-21S-36E	3750	No
SKELLY B STATE COM #007	30-025-04664	G	PENROC OIL CORP	1/26/1952	E-16-21S-36E	3480	No
SKELLY B STATE COM #004	30-025-32687	Plugged	CONOCOPHILLIPS COMPANY	10/4/1994	C-16-21S-36E	Plugged (3730)	No
O L COLEMAN #003	30-025-04700	Plugged	CONOCOPHILLIPS COMPANY	8/29/1934	A-17-21S-36E	Plugged (3925)	No
EUNICE MONUMENT SOUTH UNIT #405	30-025-04693	Plugged	CHEVRON U S A INC	9/30/1956	I-17-21S-36E	Plugged (4084)	No
EUNICE MONUMENT SOUTH UNIT #381	30-025-04660	Plugged	CHEVRON U S A INC	3/6/1935	E-16-21S-36E	Plugged (4150)	No
EUNICE MONUMENT SOUTH UNIT #379	30-025-04698	Plugged	CHEVRON U S A INC	6/7/1930	G-17-21S-36E	Plugged (4147)	No
COLEMAN #001	30-025-08716	Plugged	CIMAREX ENERGY CO. OF COLORADO	10/19/1930	J-17-21S-36E	Plugged (4005)	No
Notes: No wells within the 1/2-mile AOR penetrate the injection interval.							



Legend

- Proposed SWD
- Potash Leases
- Ore Type - Measured
- Ore Type - Indicated
- Ore Type - Inferred
- KPLA
- SOPA

Potash Leases
Area of Review

Ryno SWD 1
Lea County, New Mexico

Proj Mgr: Dan Arthur	May 30, 2019	Mapped by: Ben Bockelmann

Prepared by:

ALL CONSULTING

Attachment 3

Source Water Analyses

PRDUCED WATER FROM BONE SPRING, DELAWARE, DEVONIAN, WOLFCAMP

API	SECTION	TOWNSHIP	RANGE	FORMATION	tds mgL	chloride mgL	bicarbonate mgL	sulfate mgL
3002502424	11	20S	34E	BONE SPRING	29436	16720	634	1142
3002502427	12	20S	34E	BONE SPRING	15429			
3002502427	12	20S	34E	BONE SPRING	180701	108300	1016	670
3002502429	12	20S	34E	BONE SPRING	202606	118100	5196	992
3002502429	12	20S	34E	BONE SPRING	121800			
3002502431	12	20S	34E	BONE SPRING	147229	89640	108	1038
3002531696	2	20S	34E	DELAWARE	152064	102148	404	691
3002532105	2	20S	34E	DELAWARE	296822	215237	143	294
3002532466	2	20S	34E	DELAWARE	340838	245270	229	147
3002502427	12	20S	34E	DELAWARE	214787	132700	208	1816
3002502431	12	20S	34E	DEVONIAN	33414	18570	227	1961
3002502432	13	20S	34E	DEVONIAN	45778	26440	1145	729
3002501912	16	16S	34E	WOLFCAMP	164004	102500	4204	1249
3002501922	20	16S	34E	WOLFCAMP	104541	64290	280	541
3002501922	20	16S	34E	WOLFCAMP	104033	64080	268	515
3002501922	20	16S	34E	WOLFCAMP	105175	65570	207	192
3002501925	21	16S	34E	WOLFCAMP	86355	51800	610	665
3002501928	21	16S	34E	WOLFCAMP	119102	73300	227	454
3002501928	21	16S	34E	WOLFCAMP	35422	19170	979	1949
3002501930	22	16S	34E	WOLFCAMP	30015	14800	750	3300
3002501931	22	16S	34E	WOLFCAMP	87680	53000	301	681
3002501933	28	16S	34E	WOLFCAMP	59960	35100	515	1500
3002501933	28	16S	34E	WOLFCAMP	60309	35350	586	1297
3002501940	30	16S	34E	WOLFCAMP	82422	49890	361	787
3002501944	30	16S	34E	WOLFCAMP	83960	51410	418	641
3002520222	27	16S	34E	WOLFCAMP	85457	51020	544	1201
3001542895	2	23S	31E	WOLFCAMP	119472	73173		1036

EXHIBIT F

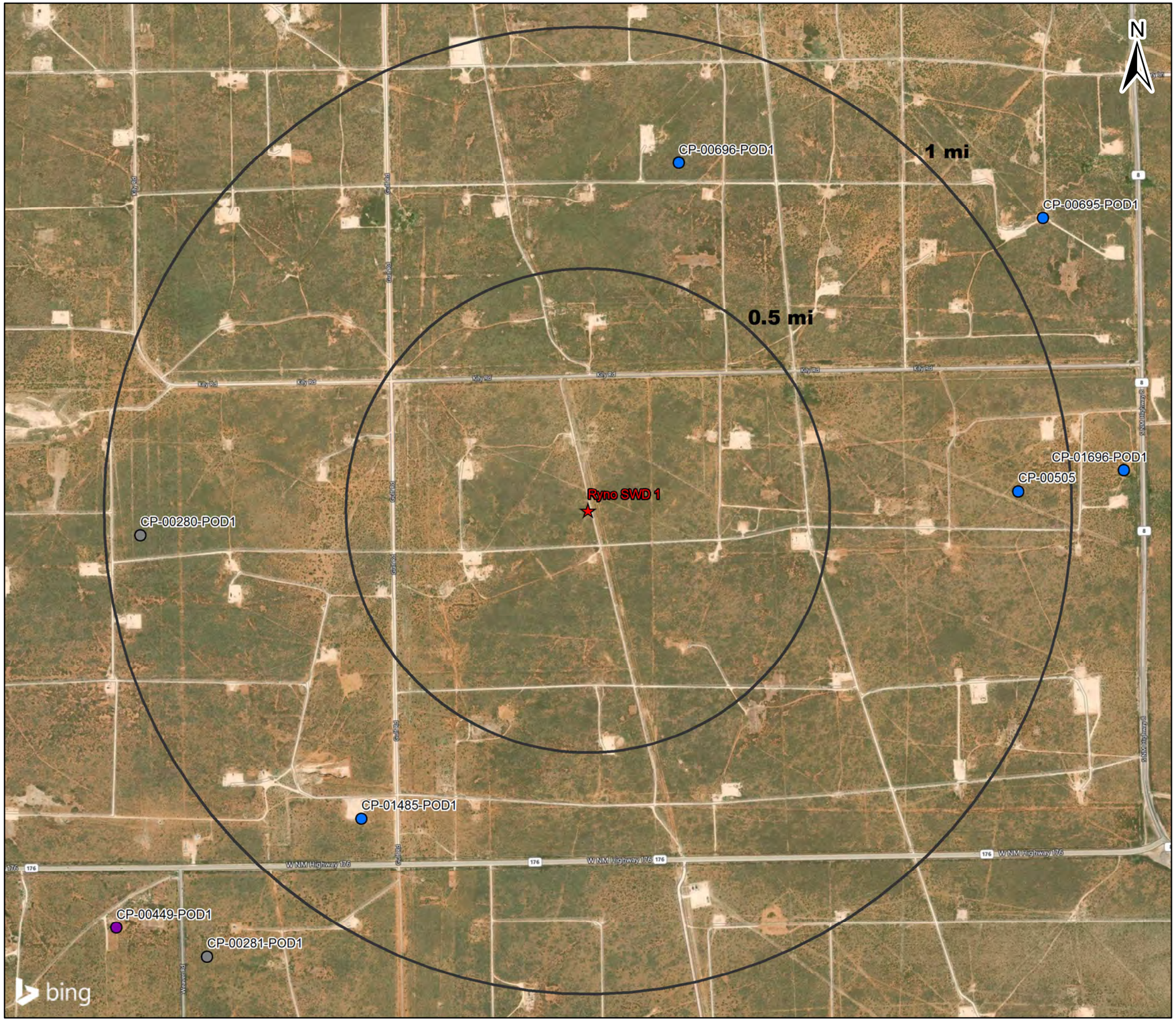
Attachment 4

Injection Formation Water Analyses

Injection Formation Water Analysis																		
Goodnight Midstream Permian, LLC - San Andres Formation																		
Wellname	API	Latitude	Longitude	Section	Township	Range	Unit	Ftgns	Ftgew	County	State	Company	Field	Formation	Tds_mgL	Chloride_mgL	Bicarbonate_mgL	Sulfate_mgL
STATE AV #001	3002504706	32.470715	-103.297081	19	21S	36E	A	330N	330E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	6334.0	2553.0	1732.0	2.0
STATE AV #001	3002504706	32.470715	-103.297081	19	21S	36E	A	330N	330E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	8560.0	3600.0	671.0	1330.0
EUNICE MONUMENT SOUTH UNIT #409	3002504678	32.47707	-103.2981644	18	21S	36E	I	1980S	660E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	9161.2	4248.7	1360.8	416.3
EUNICE MONUMENT SOUTH UNIT #416	3002504670	32.47253	-103.2970886	18	21S	36E	P	330S	330E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	9303.0	5218.0	264.0	382.0
EUNICE MONUMENT SOUTH UNIT #370	3002504684	32.484352	-103.3024521	18	21S	36E	B	660N	1980E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	11598.0	6380.0	1380.0	18.0
EUNICE MONUMENT SOUTH UNIT #409	3002504678	32.47707	-103.2981644	18	21S	36E	I	1980S	660E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	10943.9	4990.0	1585.6	553.6
EUNICE MONUMENT SOUTH UNIT #409	3002504678	32.47707	-103.2981644	18	21S	36E	I	1980S	660E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	14155.7	6186.4	1721.4	982.5
EUNICE MONUMENT SOUTH UNIT #404	3002504688	32.477978	-103.2778244	16	21S	36E	L	2310S	330W	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	20286.0	10900.0	1818.0	231.0
EUNICE MONUMENT SOUTH UNIT #388	3002504641	32.480713	-103.2467194	15	21S	36E	H	1980N	660E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	8809.0	3632.0	677.0	1342.0
EUNICE MONUMENT SOUTH UNIT #400	3002504653	32.477051	-103.2595901	15	21S	36E	L	1980S	660W	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	8822.0	2980.0	2197.0	610.0
EUNICE MONUMENT SOUTH UNIT #294	3002504562	32.49519	-103.2938995	8	21S	36E	E	1980N	660W	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	16408.0	8357.3	846.9	1410.1
EUNICE MONUMENT SOUTH UNIT #282	3002521902	32.498848	-103.2813873	8	21S	36E	A	660N	760E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	17899.1	9016.5	1378.0	1192.5
EUNICE MONUMENT SOUTH UNIT #282	3002521902	32.498848	-103.2813873	8	21S	36E	A	660N	760E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	13209.4	6315.7	1172.8	1069.6
EUNICE MONUMENT SOUTH UNIT #284	3002504561	32.498829	-103.2896271	8	21S	36E	C	660N	1980W	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	149764.0	94400.0	427.0	734.0
EUNICE MONUMENT SOUTH UNIT #305	3002504597	32.495224	-103.2467194	10	21S	36E	H	1980N	660E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	11739.0	4975.0	2412.0	181.0
EUNICE MONUMENT SOUTH UNIT #639	3002531409	32.504314	-103.2830811	5	21S	36E	Q	1330S	1280E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	15676.5	8807.4	884.5	304.6
EUNICE MONUMENT SOUTH UNIT #639	3002531409	32.504314	-103.2830811	5	21S	36E	Q	1330S	1280E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	14661.2	7176.1	1055.5	1249.8
EUNICE MONUMENT SOUTH UNIT #638	3002531426	32.504265	-103.2789612	5	21S	36E	X	1310S	10E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	15965.1	7859.9	1000.8	1451.6
EUNICE MONUMENT SOUTH UNIT #244	3002504497	32.506084	-103.2896271	5	21S	36E	S	1980S	1980W	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	11164.9	5067.2	1590.2	623.6
EUNICE MONUMENT SOUTH UNIT #244	3002504497	32.506084	-103.2896271	5	21S	36E	S	1980S	1980W	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	10814.5	5199.4	1289.5	528.7
EUNICE MONUMENT SOUTH UNIT #244	3002504497	32.506084	-103.2896271	5	21S	36E	S	1980S	1980W	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	12315.3	5695.0	1686.4	640.0
EUNICE MONUMENT SOUTH UNIT #459	3002529826	32.519482	-103.2845917	5	21S	36E	B	1020N	1740E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	18030.8	8710.6	524.8	2463.2
EUNICE MONUMENT SOUTH UNIT #184	3002504513	32.520489	-103.2810898	5	21S	36E	A	651N	660E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	9090.0	4000.0	1828.0	192.0
EUNICE MONUMENT SOUTH UNIT #244	3002504497	32.506084	-103.2896271	5	21S	36E	S	1980S	1980W	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	13861.8	5971.5	1855.6	902.5
EUNICE MONUMENT SOUTH UNIT #260	3002504463	32.501545	-103.2692261	4	21S	36E	W	330S	2310E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	13534.0	6519.9	1096.9	1173.8
EUNICE MONUMENT SOUTH UNIT #231	3002504464	32.508781	-103.2628021	4	21S	36E	P	2970S	330E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	15797.0	6393.0	1889.0	2020.0
EUNICE MONUMENT SOUTH UNIT #620	3002530511	32.507885	-103.3003693	6	21S	36E	R	2630S	1330E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	13744.8	6544.2	1313.3	1057.5
EUNICE MONUMENT SOUTH UNIT #620	3002530511	32.507885	-103.3003693	6	21S	36E	R	2630S	1330E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	11099.5	5174.2	1460.0	599.3
EUNICE MONUMENT SOUTH UNIT #195	3002504532	32.516903	-103.2982025	6	21S	36E	A	5940S	660E	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	11208.0			
EUNICE MONUMENT SOUTH UNIT #620	3002530511	32.507885	-103.3003693	6	21S	36E	R	2630S	1330E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	12124.0	5481.6	1856.2	607.6
EUNICE MONUMENT SOUTH UNIT #620	3002530511	32.507885	-103.3003693	6	21S	36E	R	2630S	1330E	LEA	NM	CHEVRON USA INC.	EUNICE MONUMENT	GRAYBURG/SAN ANDRES	15150.6	6306.2	2105.1	1050.5
EUNICE MONUMENT SOUTH UNIT #221	3002508706	32.509762	-103.3062668	6	21S	36E	N	3300S	1980W	LEA	NM		EUNICE MONUMENT	GRAYBURG/SAN ANDRES	5482.0	2200.0	1494.0	0.0
EUNICE KING #024	3002506864	32.451386	-103.1740341	28	21S	37E	E	2086N	760W	LEA	NM		SWD	SAN ANDRES	97871.0	57350.0	223.0	3405.0
EUNICE KING #024	3002506864	32.451386	-103.1740341	28	21S	37E	E	2086N	760W	LEA	NM		SWD	SAN ANDRES	57304.0	31970.0	618.0	3301.0
C P FALBY B FEDERAL #004	3002510106	32.40453	-103.1914597	8	22S	37E	L	1980S	660W	LEA	NM		CARY	SAN ANDRES	80540.0	43500.0	755.0	5950.0
C P FALBY A FEDERAL #003	3002510118	32.408142	-103.1871872	8	22S	37E	F	1980N	1980W	LEA	NM		EUNICE SOUTHWEST	SAN ANDRES	59766.0			
C P FALBY A FEDERAL #004	3002510120	32.408134	-103.1914673	8	22S	37E	E	1980N	660W	LEA	NM		EUNICE SOUTHWEST	SAN ANDRES	10925.0	5312.0	1620.0	201.0
SIMMONS #001	3002510070	32.423267	-103.1821976	5	22S	37E	G	1760N	1760E	LEA	NM		EUNICE SOUTHWEST	SAN ANDRES	78653.0	46510.0	580.0	2184.0
PENROSE #002	3002510146	32.407871	-103.1739807	9	22S	37E	E	2086N	776W	LEA	NM		EUNICE SOUTHWEST	SAN ANDRES	64895.0	38010.0	488.0	2100.0
HUGH COI #013	3002523275	32.398216	-103.1396637	14	22S	37E	D	330N	820W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	14215.2	6494.7	2528.5	191.1
LOU WORTHAM #020	3002510216	32.411808	-103.1401749	11	22S	37E	D	660N	660W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	10946.6	6526.6	19.8	236.3
LOU WORTHAM #005	3002523606	32.4109	-103.1369629	11	22S	37E	C	990N	1650W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	18587.3	9460.0	13.2	2517.7
LOU WORTHAM #006	3002523756	32.407272	-103.1410828	11	22S	37E	E	2310N	380W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	9192.4	4442.6	12.3	1491.3
LOU WORTHAM #006	3002523756	32.407272	-103.1410828	11	22S	37E	E	2310N	380W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	14867.5	9040.2	24.0	112.3
LOU WORTHAM #006	3002523756	32.407272	-103.1410828	11	22S	37E	E	2310N	380W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	13827.5	7297.7	17.7	1388.8
LOU WORTHAM #006	3002523756	32.407272	-103.1410828	11	22S	37E	E	2310N	380W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	14957.4	8867.1	17.9	405.8
LOU WORTHAM #006	3002523756	32.407272	-103.1410828	11	22S	37E	E	2310N	380W	LEA	NM	ANADARKO PETROLEUM CORP.	EUNICE SOUTH	SAN ANDRES	14823.9	7018.4	2343.5	207.3

Attachment 5

Water Well Map and Well Data



0 0.25 0.5 1 Miles

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Legend

★ Proposed SWD

NMOSE PODs

Status

- Active (5)
- Incomplete (1)
- Unknown (2)

Water Wells Area of Review

Ryno SWD 1

LEA County, New Mexico

Proj Mgr: Dan Arthur	May 28, 2019	Mapped by: Ben Bockelmann

Prepared by:

ALL CONSULTING

Water Well Sampling Rationale						
Goodnight Midstream Permian, LLC - Ryno SWD 1						
SWD	**Water Wells**	**Owner**	**Available Contact Information**	**Use**	**Sampling Required**	**Notes**
Ryno SWD 1	CP-00505	Snyder Ranches LTD.	P.O. Box 726 Lovington, NM 88260 Phone: 575-602-8863	Livestock Watering	No	Owner was unaware of a well at this location, believes there to be a caliche pit located there.
Ryno SWD 1	CP-00696 POD 1	Chevron USA Inc.	6301 Deauville Blvd. Midland, TX 79706	Secondary Recovery of Oil	No	Not a freshwater well.
Ryno SWD 1	CP-00280 POD 1	Continental Oil Company	P.O. Box 460 Hobbs, NM	Industrial	No	Temporarily abandoned, may re-enter in the future for industrail use.
Ryno SWD 1	CP-01485 POD 1	Dasco Cattle Co., LLC	Dasco Cattle Co., LLC Atlee Snyder Contact: 575-631-9438 & 575-391-0309	Commercial	Yes	Sampled on 01-28-2019. Results are shown below.

Phillips Freshwater Analysis– Attachment XI-2

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For: CP-01485 Pod 1

Etech Environmental & Safety Solutions P.O. Box 301 Lovington NM, 88260	Project: GOODNIGHT MIDSTREAM Project Number: NONE GIVEN Project Manager: LANCE CRENSHAW Fax To: (575) 396-1429	Reported: 05-Feb-19 17:18

PHILLIPS WELL & STOCK TANK

H900304-04 (Water)

Sampled: January 28th, 2019.

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
Cardinal Laboratories										
Inorganic Compounds										
Alkalinity, Bicarbonate	**224**		5.00	mg/L	1	9012407	AC	30-Jan-19	310.1	
Alkalinity, Carbonate	<1.00		1.00	mg/L	1	9012407	AC	30-Jan-19	310.1	
Chloride*	**176**		4.00	mg/L	1	9012811	AC	31-Jan-19	4500-Cl-B	
Conductivity*	**1200**		1.00	uS/cm	1	9013002	AC	30-Jan-19	120.1	
pH*	**8.87**		0.100	pH Units	1	9013002	AC	30-Jan-19	150.1	
Resistivity	**8.35**			Ohms/m	1	9013002	AC	30-Jan-19	120.1	
Specific Gravity @ 60° F	**1.002**		0.000	[blank]	1	9013007	AC	30-Jan-19	SM 2710F	
Sulfate*	**242**		50.0	mg/L	5	9013006	AC	30-Jan-19	375.4	
TDS*	**644**		5.00	mg/L	1	9012801	AC	31-Jan-19	160.1	
Alkalinity, Total*	**184**		4.00	mg/L	1	9012407	AC	30-Jan-19	310.1	
Green Analytical Laboratories										
Total Recoverable Metals by ICP (E200.7)										
Barium*	<0.050		0.050	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	
Calcium*	**69.8**		0.100	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	
Iron*	**0.097**		0.050	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	
Magnesium*	**36.1**		0.100	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	
Potassium*	**6.36**		1.00	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	
Sodium*	**119**		1.00	mg/L	1	B901226	AES	04-Feb-19	EPA200.7	

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

Attachment 7

Public Notice Affidavit and Notice of Application Confirmations

Affidavit of Publication

STATE OF NEW MEXICO
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated
June 12, 2019
and ending with the issue dated
June 12, 2019.

Dan Russell

Publisher

Sworn and subscribed to before me this
12th day of June 2019.

Gussie Black

Business Manager

My commission expires
January 29, 2023
(Seal)

OFFICIAL SEAL
GUSSIE BLACK
Notary Public
State of New Mexico
My Commission Expires 1-29-23

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

LEGAL NOTICE
JUNE 12, 2019

APPLICATION FOR AUTHORIZATION TO INJECT

NOTICE IS HEREBY GIVEN: That Goodnight Midstream, 5910 N Central Expressway, Suite 850, Dallas, TX 75206, is requesting that the New Mexico Oil Conservation Division administratively approve the APPLICATION FOR AUTHORIZATION TO INJECT as follows:

PURPOSE: The intended purpose of the injection well is to dispose of salt water produced from permitted oil and gas wells.

WELL NAME AND LOCATION: Ryno SWD 1
SE ¼ NE ¼, Section 17, Township 21S, Range 36E
1,450' FNL & 708' FEL
Lea County, NM

NAME AND DEPTH OF DISPOSAL ZONE: San Andres (4,500' – 5,350')
EXPECTED MAXIMUM INJECTION RATE: 25,000 Bbls/day
EXPECTED MAXIMUM INJECTION PRESSURE: 900 psi (surface)

Objections or requests for hearing must be filed with the New Mexico Oil Conservation Division within fifteen (15) days. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Additional information may be obtained by contacting Nate Alleman at 918-382-7581.
#34287

67115320 00229473

DANIEL ARTHUR
ALL CONSULTING
1718 S. CHEYENNE AVE.
TULSA, OK 74119

Ryno SWD 1 - Notice of Application Recipients				
Entity	**Address**	**City**	**State**	**Zip Code**
Landowner				
Dasco Cattle Company (Atlee Snyder)	P.O. Box 727	Hobbs	NM	88241
OCD District				
NMOCD District 1	1625 N. French Drive	Hobbs	NM	88240
Leasehold Operators				
Bureau of Land Management - Carlsbad Field Office	620 E. Greene Street	Carlsbad	NM	88220-6292
Chevron USA Inc	6301 Deauville	Midland	TX	79706
Commission of Public Lands - State Land Office	310 Old Santa Fe Trail	Santa Fe	NM	87501
Goodnight Midstream Permian, LLC	5910 N. Central Expressway, Suite 850	Dallas	TX	75206
OXY WTP Limited Partnership	5 Greenway Plaza, Suite 110	Houston	TX	77046
Penroc Oil Corp	P.O. Box 2769	Hobbs	NM	88241
XTO Energy Inc.	200 N. Loraine St., Suite 800	Midland	TX	79701
Note: Tidewater Oil Co. has been acquired by Chevron USA Inc. according to the 2018 NADOA Mergers and Acquisitions 2018 handbook				

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