

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

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

**CASE NOS. 23614
23615
23616
23617**

SUBPOENA

TO: Goodnight Midstream Permian, LLC
c/o Adam Rankin
Holland & Hart LLP
P.O. Box 2208
Santa Fe, NM 87504-2208

YOU ARE HEREBY COMMANDED pursuant to NMSA 1978, §70-2-8 and Rule 19.15.4.16.A NMAC to produce the following documents at the offices of Padilla Law Firm, P.A., Ernest L. Padilla, PO Box 2523, Santa Fe, New Mexico, 87504, within fifteen (15) days of the service of this subpoena on or before Friday, September 29, 2023:

1. All documents, communications, correspondence, emails, data, analyses, reports, and summaries, including but not limited to internal and external correspondence, memoranda, and assessments, that address, reflect on, or concern the existence or non-existence of hydrocarbons in the San Andres formation within the Eunice Monument South Unit, including any logs, reports, or other data providing downhole information.
2. Raster images of openhole logs run on the Andre Dawson SWD No. 1 (API #30-025-50634), Ernie Banks SWD No. 1 (API #30-025-50633), and Pedro SWD No. 1 (API #30-025-50079).

3. Daily water injection volumes and wellhead pressures for the Andre Dawson SWD No. 1 (API #30-025-50634) and Ernie Banks SWD No. 1 (API #30-025-50633).

4. All water analyses of injected water into the San Andres formation by Goodnight Midstream Permian, LLC SWD wells in Lea County, New Mexico.

5. Copies of the surface use agreements or other agreements by and between Goodnight Midstream Permian LLC, or its affiliates, and surface owners or other persons purporting to have ownership of the San Andres formation within the Eunice Monument South Unit underlying the surface locations of SWD wells proposed in Oil Conservation Division Cases 23614, 23615, 23616, and 23617.

This subpoena is issued on application of Empire New Mexico, LLC through its attorneys, Ernest L. Padilla, Padilla Law Firm, P.A., Dana Hardy, Hinkle Shanor, LLP. and Sharon T. Shaheen, Montgomery & Andrews, P.A.

Dated this 18th day of September, 2023.

NEW MEXICO OIL CONSERVATION DIVISION

BY:  _____

Date: 9/18/2023