

**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. 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

**APPLICATION OF GOODNIGHT PERMIAN
MIDSTREAM, LLC FOR APPROVAL OF A
SALTWATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24123
ORDER NO. R-22869-A**

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 Montgomery & Andrews, P.A., Sharon T. Shaheen, P. O. Box 2307 Santa Fe, NM 87504-2307 325 Paseo de Peralta Santa Fe, NM 87501.

1. All modeling of proposed injection operations or of existing disposal within the Eunice Monument South Unit (“Unit”).
2. All economic projections for the proposed injection operations underling the Unit and all disposal wells operated by Goodnight Midstream Permian, LLC (“Goodnight”).
3. Dynamic interaction studies or other studies between produced water and the San Andres formation water, including water compatibility studies of Delaware Basin injected water with San Andres formation water.
4. Aside from the water analysis contained in Goodnight’s applications, provide water chemistry and analysis of produced water proposed to be injected including:
 - Dissolved solids,
 - pH,
 - suspended solids,
 - temperature,
 - specific gravity, and
 - dissolved gasses
5. Raster images of open hole logs run on the following wells:
 - a. Andre Dawson SWD No. 1 (API #30- 025-50634);
 - b. Ernie Banks SWD No. 1 (API #30-025-50633);
 - c. Pedro SWD No. 1 (API #30-025-50079).

6. Summaries, including but not limited to internal and external correspondence and emails, memoranda, assessments, and projections that address, and justification for installation of the Llano Produced Water Pipeline System constructed in Lea County, NM.
7. Summaries, including but not limited to internal and external correspondence and emails, memoranda, and assessments, that address justification for the purchase of the following well:
 - a. Penroc State E Tr 27 SWD #2 (30-025-26491)
8. Summaries, including but not limited to internal and external correspondence and emails, memoranda, and assessments, that address, justification for the drilling of the following wells:
 - a. Andre Dawson SWD #1 (30-025-50634);
 - b. Ernie Banks SWD #1 (30-025-60633);
 - c. Nolan Ryan SWD #1 (30-025-45349);
 - d. Pedro SWD #1 (30-025-50079);
 - e. Snyder SWD #1 with name change to Ryno SWD #1 (30-025-43901);
 - f. Scully State SWD #1 (30-025-46398);
 - g. Sosa SA 17 SWD #2 (30-025-47947);
 - h. Ted 28 SWD #1 (30-025-44386);
 - i. Yaz 28 SWD #1 (30-025-46382).
9. All bottomhole pressure information acquired in the Grayburg and San Andres intervals on all 10 wells in items No. 7 and 8.
10. All Grayburg and San Andres formations reservoir pressure information and data on other wells in Lea County used to justify construction of Llano pipeline network.
11. Daily water injection rates and wellhead pressures for all wells in items Nos. 7 and 8 since start of injection.
12. All sidewall or rotary core information obtained on any of the wells in items Nos. 7 and 8.
13. All interpreted logs which calculate water saturation on the wells in items Nos. 7 and 8.
14. All mud logs taken on wells in items No. 7 and 8.
15. All documents relating to the calculation, determination or redetermination by Goodnight, or on its behalf by a third party, of the oil and gas reserves within the San Andres formation underlying the Unit and within two miles of the exterior boundaries of the Unit.

16. All water analyses of injected water into the San Andres formation for each well in items Nos. 7 and 8.
17. Provide water samples (in sample bottles) for injected water into wells in items No. 7 and 8 and #3 so that Empire can have them analyzed.
18. Top of structure maps for Grayburg and San Andres intervals with subsea elevation for each well used to generate Goodnight's structure map.
19. List of chemicals and monthly chemical bill for Wrigley SWD facility.
20. Facility drawing with list of equipment at Wrigley SWD facility.
21. All records of separator or tank cleanouts at Wrigley SWD facility.
22. Documents, correspondence, e-mails, data, analyses, reports, or summaries that address, reflect on, or indicate concerns for the existence or non-existence of hydrocarbons in the San Andres formation within the Unit.
23. All correspondence, emails, contracts or any other written materials by and between the Millard Deck Estate and its representatives, managers or employees, and Goodnight.
24. Please produce all well logs for wells operated by Goodnight within two miles of the exterior boundaries of the Unit that were drilled below 4000'.
25. All side wall or rotary core information for wells operated by Goodnight within two miles of the exterior boundaries of the Unit that were drilled below 4000'.
26. All mud logs for wells operated by Goodnight within two miles of the exterior boundaries of the Unit that were drilled below 4000'.
27. All cuttings and chromatograph data for wells operated by Goodnight within two miles of the exterior boundaries of the Unit that were drilled below 4000'.
28. All geochemical data for the Grayburg and San Andres formations showing the potential seal or lack thereof.
29. All San Andres formation top picks and or proof of seal from cross-sections or other calculated methods.
30. Please produce all documents and data supporting Preston McGuire's representations of formation tops in paragraphs 12-15 of his Exhibit B of Goodnight's exhibits in Case Nos.

23614-23617 and that the San Andres formation underlying the Unit is a “depleted formation”.


31. With respect to each person Goodnight may call as an expert witness at hearing, please provide:

- a. the name, address, and qualifications of the expert;
- b. the subject matter on which the expert is expected to testify;
- c. the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- d. any reports prepared by the expert regarding the pending action;
- e. a list of all publications authored by the witness within the preceding ten (10) years; and
- f. a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four (4) years.

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 3rd day of June, 2024.

NEW MEXICO OIL CONSERVATION COMMISSION

BY:  _____

Date: Dylan Fuge, Acting Director, 6/3/2024