

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

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-22026 FOR THE ANDRE DAWSON
SWD #001 OPERATED BY GOODNIGHT MIDSTREAM
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

CASE NO. 24018

**APPLICATION OF EMPIRE NEW MEXICO LLC
TO REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-22027 FOR THE ERNIE BANKS
SWD NO. 1 WELL OPERATED BY GOODNIGHT
MIDSTREAM PERMIAN LLC,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24019

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED BY
ADMINISTRATIVE ORDER SWD-2307 FOR THE RYNO
SWD #001 F/K/A SNYDER SWD WELL NO. 1 OPERATED
BY GOODNIGHT MIDSTREAM PERMIAN LLC,
LEA COUNTY, NEW MEXICO.
CASE NO. 24020**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-22027 FOR THE ROCKET SWD
NO. 1 WELL OPERATED BY GOODNIGHT MIDSTREAM
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

CASE NO. 24021

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ADMINISTRATIVE ORDER NO. SWD-2391 FOR
THE PEDRO SWD #001 WELL OPERATED BY
GOODNIGHT MIDSTREAM PERMIAN LLC,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24022

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-22030 FOR THE VERLANDER
SWD WELL NO. 1 OPERATED BY**

**GOODNIGHT MIDSTREAM PERMIAN LLC,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24023

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-20855 FOR THE NOLAN RYAN
SWD #001 OPERATED BY GOODNIGHT MIDSTREAM
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

CASE NO. 24024

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-21190 FOR THE SOSA SA 17 NO. 2
WELL OPERATED BY GOODNIGHT MIDSTREAM
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

CASE NO. 24025

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ADMINISTRATIVE ORDER NO. SWD-2075 FOR
THE TED 28 SWD WELL NO. 1 OPERATED BY
GOODNIGHT MIDSTREAM PERMIAN LLC,
LEA COUNTY, NEW MEXICO.**

CASE NO. 24026

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ORDER NO. R-20865 FOR THE YAZ 28 SWD
WELL NO. 1 OPERATED BY GOODNIGHT MIDSTREAM
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

CASE NO. 24027

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 the New Mexico Oil Conservation Division, Chris Moander, P. O. 1220 South St. Francis Drive, Santa Fe, NM 87505.

- 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 underlying 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) Top of structure maps for Grayburg and San Andres intervals with subsea elevation for each well used to generate Goodnight's structure map.
- 18) List of chemicals and monthly chemical bill for Wrigley SWD facility.
- 19) Facility drawing with list of equipment at Wrigley SWD facility.
- 20) All records of separator or tank cleanouts at Wrigley SWD facility.
- 21) 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.
- 22) All correspondence, emails, contracts or any other written materials by and between the Millard Deck Estate and its representatives, managers or employees, and Goodnight.
- 23) 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'.

- 24) 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’.
- 25) All mud logs for wells operated by Goodnight within two miles of the exterior boundaries of the Unit that were drilled below 4000’.
- 26) 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’.
- 27) All geochemical data for the Grayburg and San Andres formations showing the potential seal or lack thereof.
- 28) All San Andres formation top picks and or proof of seal from cross-sections or other calculated methods.
- 29) 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”.
- 30) 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
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.
- 31) All documents, data, reports, and analyses, including internal and external communications, emails, memoranda, and summaries relied upon by Goodnight or otherwise supporting the claims made by Goodnight in its applications in the above-captioned cases.
- 32) All documents, data, reports, and analyses, including internal and external communications, emails, memoranda, and summaries relied upon by Goodnight or otherwise supporting Goodnight’s anticipated case-in-chief in the September 2024 evidentiary hearing in the above-captioned cases.
- 33) All documents, data, reports, and analyses, including internal and external communications, emails, memoranda, and summaries relied upon by Goodnight regarding the water supply wells operated by Chevron in support of the EMSU waterflood and utilized by Goodnight to estimate total volumes of water withdrawn.

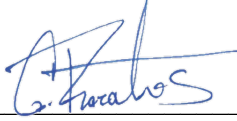
34) All documents, data, reports, and analyses, including internal and external communications, emails, memoranda, summaries, and materials relied upon, supplied to, provided by, created by, created for, and which Goodnight intends to use with the following witnesses, including Curriculum Vitae/resumes:

- a) Nathan Alleman;
- b) Preston McGuire;
- c) Thomas Tomastik;
- d) William J. Knights;
- e) Dr. James A. Davidson;
- f) John McBeath;
- g) Dr. Larry Lake

This subpoena is issued on application of the New Mexico Oil Conservation Division through its attorney Chris Moander.

Dated this 19th day of July, 2024.

**NEW MEXICO OIL CONSERVATION
COMMISSION**

BY: 
Gerasimos Razatos, Acting Division Director

Date: July 19, 2024