

# Protested SWD Application

Empire New Mexico LLC

**From:** [Gebremichael, Million, EMNRD](#)  
**To:** [agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
**Cc:** [padillalawnm@outlook.com](mailto:padillalawnm@outlook.com); [Goetze, Phillip, EMNRD](#); [Tremaine, Jesse, EMNRD](#); [Wrinkle, Justin, EMNRD](#)  
**Subject:** Notification of Protest for Application to Inject: Hernandez SWD #1, Hodge SWD #1, Seaver SWD #1 and Doc Gooden SWD #1  
**Date:** Wednesday, May 31, 2023 1:24:00 PM  
**Attachments:** [image001.png](#)

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Greetings Mr. Rankin:

The OCD was notified by Empire New Mexico LLC (Empire) that it is protesting the following administrative applications of Goodnight Midstream Permian, LLC (Goodnight) for produced water disposal in Lea County, NM:

1. Hernandez SWD #1 located in Unit P, Sec 10, T21S, R36E, NMPM
2. Hodge SWD #1 located in Unit C, Sec 4, T21S, R36E, NMPM
3. Seaver SWD #1 located in Unit K, Sec 10, T21S, R36E, NMPM
4. Doc Gooden SWD #1 located in Unit J, Sec 3, T21S, R36E, NMPM

Empire is identified as an affected person for the referenced applications. For these applications to proceed, Goodnight has two options; either resolve the matter with the protesting party or to go to a hearing before the Division. If the protest is withdrawn, then the applications could be processed administratively. Meanwhile, OCD will retain your applications until a resolution is reached on the status of the submittals. If you have any questions, please don't hesitate to reach out to UIC group.

Contact for Empire New Mexico LLC:

Ernst Padilla

PADILLA LAW FIRM, P.A.

1512 S. ST. FRANCIS DRIVE

SANTA FE, NM 87505

MAILING ADDRESS

P.O. BOX 2523

SANTA FE, NEW MEXICO 87504-2523

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

Regards,

***Million Gebremichael***

PADILLA LAW FIRM, P.A.

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1512 S. ST. FRANCIS DRIVE  
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TELEPHONE  
505-988-7577

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May 24, 2023

**VIA EMAIL & USMAIL**

[Dylan.Fuge@emnr.d.nm.gov](mailto:Dylan.Fuge@emnr.d.nm.gov)  
[OCD.Hearings@emnr.d.nm.gov](mailto:OCD.Hearings@emnr.d.nm.gov)

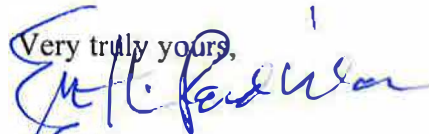
Mr. Dylan Fuge, Acting Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Mineral and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re: Administrative Applications of Goodnight Midstream Permian, LLC for salt water disposal wells in Lea County, NM of the following wells;  
Hernandez SWD #1 Class IID;  
Hodge SWD #1 Class IID;  
Seavers SWD #1 Class IID;  
Doc Gooden SWD #1 Class IID.

Dear Director Fuge:

Empire New Mexico LLC is an interest owner and operator within the area of the proposed Salt Water Disposal well. It therefore, objects to Goodnight Midstream Permian, LLC's administrative applications to convert the referenced wells to a SWD. This action could cause potential damage to Empire's correlative rights.

Empire requests that these administrative applications be set for hearing.

Very truly yours,  


ERNEST L. PADILLA

ELP:jbg

xc: Eugene Sweeney  
cc: All Consulting

**From:** [Adam Rankin](#)  
**To:** [Gebremichael, Million, EMNRD](#)  
**Cc:** [padillalawnm@outlook.com](#); [Goetze, Phillip, EMNRD](#); [Tremaine, Jesse, EMNRD](#); [Wrinkle, Justin, EMNRD](#)  
**Subject:** [EXTERNAL] RE: Notification of Protest for Application to Inject: Hernandez SWD #1, Hodge SWD #1, Seaver SWD #1 and Doc Gooden SWD #1  
**Date:** Wednesday, May 31, 2023 1:32:01 PM  
**Attachments:** [image001.png](#)

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Thank you. Goodnight has been unable to get responses from Empire. We therefore request that all four applications be set for a hearing before a Division examiner at the earliest available hearing docket.

**Adam Rankin**  
Partner, Holland & Hart LLP

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**From:** Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>  
**Sent:** Wednesday, May 31, 2023 1:25 PM  
**To:** Adam Rankin <AGRankin@hollandhart.com>  
**Cc:** padillalawnm@outlook.com; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Tremaine, Jesse, EMNRD <JesseK.Tremaine@emnrd.nm.gov>; Wrinkle, Justin, EMNRD <Justin.Wrinkle@emnrd.nm.gov>  
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Ernst Padilla  
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 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
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**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 222428

**CONDITIONS**

Operator: GOODNIGHT MIDSTREAM PERMIAN, LLC 5910 North Central Expressway Dallas, TX 75206	OGRID: 372311
	Action Number: 222428
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

**CONDITIONS**

Created By	Condition	Condition Date
mgebremichael	None	5/31/2023