

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

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

Case No. 22626

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Empire New Mexico, LLC. (“EMPIRE”) by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT: Goodnight Midstream Permian, LLC

ATTORNEY: Michael H. Feldewert
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OPPOSITION OR OTHER PARTY: Empire New Mexico, LLC

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STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Empire is the operator of the Eunice Monument South Unit (“Unit”) and operates a waterflood secondary recovery operation in the Unit, which was approved by Order R-7765 by the Oil Conservation Division pursuant to the Statutory Unitization Act for secondary recovery operations through waterflood operations.

Decretory Paragraph 3 of Order R-7765 defined the vertical limits of the Unit and includes the San Andres formation which is the disposal interval of the Applicant’s proposed commercial SWD well which is to be located in Unit K of Section 9, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico

The Applicant does not have a working interest or any other interest within the unit area which would allow it to operate a commercial SWD well within the vertical and horizontal limits of the Unit or otherwise to operate a commercial salt water well to dispose of water in the San Andres formation, which is not pore space under surface ownership as Applicant contends.

The proximity of the proposed SWD well to Empire’s EMSU 200H well, which has produced 22,115 barrel of oil, will be damaged by the proposed injection well. Additionally, Empire is studying new oil recovery trends in the San Andres formation and implement such new techniques in the San Andres formation.

The Unit and the oil and gas leases committed to the Unit give Empire the exclusive right to oil and gas operation with the unitized interval of the Unit.

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

Eugene Sweeney
Chief Operating Officer and Engineer

30 minutes

Approximately 7

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.

/s/ Ernest L. Padilla

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served upon the following by electronic mail on this 8th day of September, 2022:

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/s/ Ernest L. Padilla
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 141871

QUESTIONS

Operator: Empire New Mexico LLC 2200 S. Utica Place Tulsa, OK 74114	OGRID: 330679
	Action Number: 141871
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>