

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

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

CASE NOS. 20720, 20721, 20722, and 20723

CONSOLIDATED PRE-HEARING STATEMENT

Goodnight Midstream Permian, LLC ("Goodnight Midstream"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Goodnight Midstream Permian, LLC

ATTORNEY

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OTHER PARTIES

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APPLICANT'S STATEMENT OF CASE

Goodnight Midstream Permian, LLC seeks authorization to inject produced salt water for purposes of disposal through four proposed injection wells in four different pending cases. The

applications were originally filed administratively but each were protested. Accordingly, Goodnight Midstream set each of the cases for hearing before a Division examiner. Goodnight Midstream seeks authority for the following:

- In **Case No. 20720**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Pudge SWD G No. 1 Well** (API No. pending), which will be located 2,043 feet from the north line and 2,504 feet from the east line (Unit G), Section 10, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the Glorieta formation [SWD; Glorieta (Pool Code 91606)] between 5,750 feet and 6,500 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 575 psi. The maximum surface injection pressure will be 1,150 psi.

- In **Case No. 20721**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Sosa SA 17 No. 2 Well** (API No. pending), which will be located 470 feet from the south line and 1,815 feet from the west line (Unit N), Section 17, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the San Andres formation [SWD; San Andres (Pool Code 96121)] between 4,500 feet and 5,350 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 450 psi. The maximum surface injection pressure will be 900 psi.

- In **Case No. 20722**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Beltre SWD SA No.**

1 Well (API No. pending), which will be located 2,118 feet from the north line and 2,374 feet from the east line (Unit G), Section 10, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the San Andres formation [SWD; San Andres (Pool Code 96121)] between 4,450 feet and 5,750 feet below the ground through an open-hole completion. The estimated average surface injection pressure is expected to be approximately 445 psi. The maximum surface injection pressure will be 890 psi.

- In **Case No. 20723**, Goodnight Midstream proposes to drill and operate a new commercial salt water disposal well to be named **Nolan Ryan G No. 2 Well** (API No. pending), which will be located 785 feet from the south line and 1,605 feet from the east line (Unit O), Section 13, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the Glorieta formation [SWD; Glorieta (Pool Code 91606)] between 5,200 feet and 5,600 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 520 psi. The maximum surface injection pressure will be 1,040 psi.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME (each case)	EXHIBITS (each case)
Coley Kellogg, Goodnight Midstream Permian, LLC	Approx. 10 minutes	Approx. 2
Nate Alleman, ALL Consulting	Approx. 15 minutes	Approx. 5
Steve Drake, Geologist	Approx. 10 minutes	Approx. 3
Tom Tomastik, ALL Consulting, Geologist and Regulatory Specialist	Approx. 10 minutes	Approx. 3

PROCEDURAL MATTERS

For administrative efficiency, Goodnight Midstream requests that Case Nos. 20720, 20721, 20722, and 20723 be consolidated for purposes presenting the cases together at hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR GOODNIGHT MIDSTREAM
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CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2019 I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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Adam G. Rankin

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