

Protested SWD Application

Empire New Mexico LLC

From: [Gebremichael, Million, EMNRD](#)
To: agrarkin@hollandhart.com
Cc: 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](#)

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 If the protest is withdrawn, then the applications could be processed administratively.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

Regards,

Million Gebremichael

PADILLA LAW FIRM, P.A.

STREET ADDRESS
1512 S. ST. FRANCIS DRIVE
SANTA FE, NM 87505

TELEPHONE
505-988-7577

MAILING ADDRESS
P.O. BOX 2523
SANTA FE, NEW MEXICO 87504-2523

FACSIMILE
505-988-7592

EMAIL ADDRESS
padillalawnm@outlook.com

May 24, 2023

VIA EMAIL & USMAIL

Dylan.Fuge@emnrd.nm.gov
OCD.Hearings@emnrd.nm.gov

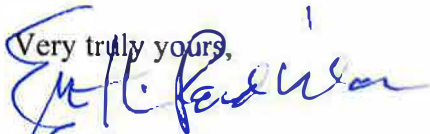
Mr. Dylan Fuge, Acting Director
Oil Conservation Division
New Mexico Department of Energy,
Mineral and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

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](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

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

agrarkin@hollandhart.com | T: (505) 954-7294 | M: (505) 570-0377

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

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>
Subject: Notification of Protest for Application to Inject: Hernandez SWD #1, Hodge SWD #1, Seaver SWD #1 and Doc Gooden SWD #1

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.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
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 222455

CONDITIONS

Operator: GOODNIGHT MIDSTREAM PERMIAN, LLC 5910 North Central Expressway Dallas, TX 75206	OGRID: 372311
	Action Number: 222455
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

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