

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

**APPLICATIONS OF GOODNIGHT MIDSTREAM  
PERMIAN, LLC FOR APPROVAL OF  
SALTWATER DISPOSAL WELLS  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 23614-23617**

**APPLICATION OF GOODNIGHT MIDSTREAM  
PERMIAN LLC TO AMEND ORDER NO. R-22026/SWD-2403  
TO INCREASE THE APPROVED INJECTION RATE  
IN ITS ANDRE DAWSON SWD #1,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 23775**

**APPLICATIONS OF EMPIRE NEW MEXICO LLC  
TO REVOKE INJECTION AUTHORITY,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 24018-24020, 24025**

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

**DIVISION CASE NO. 24123  
ORDER NO. R-22869-A**

**NOTICE TO TAKE DEPOSITION DUCES TECUM OF DR. ROBERT LINDSAY**

To: Dr. Robert Lindsay  
c/o Padilla Law Firm, P.A.  
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**YOU ARE HEREBY COMMANDED** pursuant to NMSA 1978, §70-2-8 and

Rule 19.15.4.16.A NMAC TO APPEAR as follows:

Place: By video deposition

Date: January 17, 2025

Time: 9:00 a.m. mountain time

to testify at the taking of a deposition regarding the topics attributed to you in Empire New Mexico, LLC's July 8, 2024, Witness Disclosure (the "Empire Witness Disclosure"). The deposition will be recorded by a certified court reporter and videotaped. This deposition testimony may be used at hearing for any and all purposes permitted by the New Mexico Oil Conservation Commission, the New Mexico Rules of Civil Procedure, and the New Mexico Rules of Evidence.

**YOU ARE ALSO COMMANDED** pursuant to Section 70-2-8 and Rule 19.15.4.16.A

NMAC to bring with you the following document(s) or object(s):

1. Any documents you reviewed or relied upon to develop your opinions on the subject matter set forth in the Empire Witness Disclosure or with regard to the subject matter set forth in your written direct testimony filed on August 26, 2024; and
2. Any reports or analyses prepared by you, or at your direction, regarding your opinions on the subject matter set forth in the Empire Witness Disclosure or with regard to the subject matter set forth in your written direct testimony filed on August 26, 2024;

to produce the following documents at the offices of Holland & Hart LLP, 110 North Guadalupe, Santa Fe, New Mexico, 87501, contemporaneous with the taking of the deposition of Empire New Mexico, LLC, to the extent any such document has not already been timely produced by Empire under the December 5, 2024, Amended Pre-Hearing Order issued in this matter.

This subpoena is issued on application of Goodnight Midstream Permian, LLC through its attorney, Adam G. Rankin of Holland & Hart LLP.

DATED: January 13, 2025

Respectfully submitted,

**HOLLAND & HART LLP**

*/s/ Adam G. Rankin*

By: \_\_\_\_\_

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**ATTORNEYS FOR GOODNIGHT MIDSTREAM  
PERMIAN, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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***Attorneys for Pilot Water  
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