

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

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

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

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

DIV. 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.**

DIV. CASE NO. 23775

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

DIV. CASE NOS. 24018-24020, 24025

NOTICE OF DEPOSITION DUCES TECUM – PRESTON McGUIRE

PLEASE TAKE NOTICE that pursuant to Rules 1-030 and 1-032 NMRA, Empire New Mexico LLC (“Empire”), by and through its attorneys, will take the video/oral deposition of **Preston McGuire**, before a certified court reporter via Zoom. The deposition will commence at **9:00 a.m.** (Mountain Time) on **January 21, 2025** and continue until completed.

Empire may use the deposition at the trial of this matter and for any purposes permissible under the New Mexico rules of Civil Procedure.

YOU ARE ALSO COMMANDED pursuant to Section 70-2-8 and Rule 19.15.4.16.A NMAC to provide electronically to undersigned counsel, prior to the deposition, the following document(s) or object(s):

1. Any documents or data you reviewed or relied upon to develop your opinions set forth in your written testimony filed with the Oil Conservation Commission on August 26, 2024 as Exhibit B (“Exhibit B”); and
2. Any additional reports or analyses prepared by you, or at your direction, regarding your opinions on the subject matter set forth in Exhibit B.

Respectfully submitted,

By: /s/ Sharon T. Shaheen

Sharon T. Shaheen

SPENCER FANE LLP

P.O. Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

sshaheen@spencerfane.com

Dana S. Hardy

Jaelyn M. McLean

Timothy Rode

HINKLE SHANOR LLP

P.O. Box 2068

Santa Fe, NM 87504-2068

(505) 982-4554

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

trode@hinklelawfirm.com

Ernest L. Padilla

PADILLA LAW FIRM, P.A.

P.O. Box 2523

Santa Fe, NM 87504

(505) 988-7577

padillalawnm@outlook.com

Attorneys for Empire New Mexico, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following by electronic mail on January 13, 2025.

/s/ Sharon T. Shaheen

Mathew M. Beck
Peifer, Hanson, Mullins & Baker, P.A.
P.O. Box 25245
Albuquerque, NM 87125-5245
(505) 247-4800
mbeck@peiferlaw.com

Ernest L. Padilla
Padilla Law Firm
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577
padillalawnm@outlook.com

Attorneys for Rice Operating Company and Permian Line Company, LLC

Christopher Moander
Jesse Tremaine
Office of General Counsel
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
(505) 476-3441
Chris.Moander@emnrd.nm.gov
Jessek.tremaine@emnrd.nm.gov

Dana S. Hardy
Jaclyn M. McLean
Timothy Rode
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
trode@hinklelawfirm.com

Attorneys for Empire New Mexico LLC

Attorneys for Oil Conservation Division

Miguel A. Suazo
Sophia Graham
Kaitlyn Luck
James Parrot
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com
jparrot@bwenergylaw.com

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Nathan Jurgensen
Holland & Hart LLP
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
nrjurgensen@hollandhart.com

Attorneys for Pilot Water Solutions SWD, LLC

Attorneys for Intervenor Goodnight Midstream, LLC