

**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.
Attn: Ernest L. Padilla
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577 telephone
padillalawnm@outlook.com

Dana S. Hardy
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068

Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

Sharon T. Shaheen
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshhaheen@montand.com
cc: wmcginnis@montand.com

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: _____

Michael H. Feldewert
Adam G. Rankin
Nathan R. Jurgensen
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
nrjurgensen@hollandhart.com
pmvance@hollandhart.com

**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:

Ernest L. Padilla
PADILLA LAW FIRM, P.A.
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalawnm@outlook.com

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

Sharon T. Shaheen
Daniel B. Goldberg
SPENCER FANE, LLP
325 Paseo De Peralta
Santa Fe, NM 87501-1860
(505) 986-2678
sshaheen@spencerfane.com
dgoldberg@spencerfane.com
cc: dortiz@spencerfane.com

Attorneys for Empire New Mexico, LLC

Matthew M. Beck
PEIFER, HANSON, MULLINS & BAKER, P.A.
P.O. Box 25245
Albuquerque, NM 8172-2545
(505) 247-4800
FAX: (505) 243-6458
mbeck@peiferlaw.com

***Attorney for Rice Operating Company
and Permian Line Service, LLC***

Jesse Tremaine
Chris Moander
Assistant General Counsels
NEW MEXICO ENERGY, MINERALS, AND
NATURAL RESOURCES DEPARTMENT
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 741-1231
(505) 231-9312
jessek.tremaine@emnrd.nm.gov
chris.moander@emnrd.nm.gov

***Attorneys for New Mexico Oil
Conservation Division***

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
BEATTY & WOZNIAK, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com

***Attorneys for Pilot Water
Solutions SWD, LLC***

Adam G. Rankin
Adam G. Rankin