

January 28, 2020

Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: Goodnight Midstream Permian, LLC – Ryno SWD #1 (pKAM1928247158)
Application for Authorization to Inject

To Whom It May Concern,

The purpose of this letter is to describe the background of Goodnight Midstream's (Goodnight) Ryno SWD #1 and provide the rationale behind the application to change the injection formation from Devonian to San Andres.

The Ryno SWD #1 (API #30-025-43901) was originally permitted to dispose of produced water into the Devonian formation via Injection Order # SWD-1700 in November 2017. After Goodnight began operating the subject SWD, it was noticed that surface injection pressures were increasing to the point that the well could not be operated at commercially viable injection rates within the permitted maximum surface injection pressure. Because of these increasing pressures in the Devonian formation, Goodnight is seeking approval to plugback this SWD for injection into the shallower San Andres formation.

Should you have any questions, please contact Nate Alleman at (918) 382-7581 or nalleman@all-llc.com.

Sincerely,

ALL Consulting



Nate Alleman
Sr. Regulatory Specialist

Engineer, OCD, EMNRD

From: Nathan Alleman <nalleman@all-llc.com>
Sent: Friday, January 31, 2020 11:32 AM
To: Engineer, OCD, EMNRD
Cc: 'Steve Drake'; 'Grant Adams'; 'bhochheiser'
Subject: [EXT] Goodnight - Ryno SWD #1 (pKAM1928247158)
Attachments: Goodnight - Ryno SWD #1 - Background - 01312020.pdf

Mr. Goetze,

Following up on our conference call from last Friday, January 24, 2020, Goodnight is submitting the requested information in support of their application to recomplete the Ryno SWD #1 (API# 30-025-43901, App# pKAM1928247158). The purpose of their application is to obtain authorization to plugback the wellbore and recomplete the Ryno SWD #1 as a San Andres SWD, instead of a Devonian SWD.

- **Ryno SWD #1 Background:** At OCD's request, a cover letter has been prepared that describes the background of the Ryno SWD #1, including details associated with the original injection order and why Goodnight is requesting authorization to plug back the well from Devonian injection to San Andres injection. *This background letter is attached for OCD's review.*
- **Devonian Completion Record:** OCD indicated that the record was not complete with regard to the Ryno SWD #1's Devonian completion. Goodnight has worked with the Hobbs District Office and has submitted the necessary additional materials to complete the record. We are continuing to follow up with Paul Kautz at the District Office to confirm that all of the necessary materials have been submitted and accepted as complete. The following materials have been uploaded via eDocs or submitted directly to the Hobbs District Office via email:
 - Well Log
 - Completion C-103
 - C-105

Please let us know if OCD has any additional questions or data requests or if it would be helpful to have a conference call to discuss the submittal or application.

Regards,

Nate Alleman

Energy & Environmental Consultant
ALL Consulting
1718 South Cheyenne Avenue
Tulsa, OK 74119
Office: 918-382-7581
Cell: 918-237-0559