

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

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

CASE NOS. 20825

PRE-HEARING STATEMENT

Goodnight Midstream Permian, LLC (“Goodnight Midstream”), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Goodnight Midstream Permian, LLC

ATTORNEY

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OTHER PARTIES

New Mexico State Land Office

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APPLICANT’S STATEMENT OF CASE

Goodnight Midstream Permian, LLC seeks authorization to inject produced salt water for purposes of disposal through its proposed **Verlander SWD No. 1 Well** (API No. pending), which

will be located 2,482 feet from the north line and 1,277 feet from the east line (Unit H), Section 12, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The proposed injection disposal interval will be within the San Andres-Glorieta formation [SWD; San Andres-Glorieta (Pool Code 96127)] between 4,251 feet and 5,550 feet below the ground through a perforated completion. The estimated average surface injection pressure is expected to be approximately 600 psi. The maximum surface injection pressure will be 850 psi.

The application was filed administratively but protested by the State Land Office. Accordingly, Goodnight Midstream has requested that this application be set for hearing before a Division examiner.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Nate Alleman, ALL Consulting	By Affidavit	Approx. 1
Steve Drake, Petroleum Geologist	By Affidavit	Approx. 1
Tom Tomastik, ALL Consulting, Petroleum Engineer and Geologist	By Affidavit	Approx. 1

PROCEDURAL MATTERS

Goodnight Midstream intends to present this case by affidavit. Counsel for Goodnight Midstream has conferred with counsel for the State Land Office and has confirmed that the State Land Office does not object to the presentation of this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR GOODNIGHT MIDSTREAM
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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2019 I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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