

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

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

CASE NOS. 24123

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. 24018-24027

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**Revised Expert Report of: William J. Knights, P.G.  
January 16, 2025**



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## INTRODUCTION

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Netherland, Sewell & Associates, Inc. (NSAI) has been retained by Goodnight Midstream Permian, LLC (Goodnight) to (1) conduct a geologic study of the lands in and around the Eunice Monument South Unit (EMSU) and in particular the San Andres Formation; (2) evaluate and confirm the presence of geologic barriers isolating the San Andres Formation from the overlying Grayburg Formation; and (3) prepare an oil-in-place (OIP) assessment for the San Andres Aquifer within the EMSU.

## SUMMARY OF QUALIFICATIONS

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My name is William J. Knights. I work for NSAI as a Vice President and Senior Technical Advisor. I have been with NSAI since 1991. I earned my Bachelor and Master of Science degrees from Texas Christian University in 1981 and 1984, respectively. I am a licensed Professional Geoscientist in the State of Texas since 2003, license number 1532. I am also an AAPG Certified Petroleum Geologist since 1994, license number 5188, and have over 40 years of experience in the oil and gas industry. My Curriculum Vitae is attached herein as Appendix A.

Before joining NSAI, I worked as an independent petroleum geologist, evaluating domestic and international exploration and development projects. Since 2002, I have had extensive experience in all of the productive and emerging unconventional shale plays in the United States and Canada, as well as in many prospective unconventional plays internationally. I have been involved in the estimation and classification of hydrocarbon volumes from prospective and contingent resources through proved, probable, and possible reserves in both unconventional and conventional reservoirs. I have extensive experience preparing and reviewing oil and gas reserves reports and performing due diligence reviews for financial transactions in the oil and gas industry. My responsibilities include structural/stratigraphic analysis using geophysical, geological, and petrophysical data interfaced with reservoir modeling to determine reservoir quality and in-place hydrocarbon volumes. With respect to tertiary recovery projects, I have worked the Altura property divestiture (Occidental Petroleum Corporation acquisition of BP and Shell Permian Basin assets), Yates Field (specifically, the Grayburg and San Andres Formations oil field), and Cantarell Field in southern offshore Mexico (the largest nitrogen injection project in the world). I have not previously testified before the New Mexico Oil Conservation Commission as an expert witness in petroleum geology.

## SUMMARY

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The San Andres Formation is a laterally extensive, high-permeability aquifer. Any injected water can be displaced over large lateral areas, and, since the San Andres Formation is in a migration pathway, oil saturations ( $S_o$ ), while not unexpected, are not concentrated enough to be considered a target for recovery. Four separate depth intervals have been evaluated based on their evidence of movable fluids, yet no evidence of significant movable hydrocarbons is demonstrated below -500 feet (ft) true vertical depth subsea (TVDSS). Water being injected into the deeper San Andres Aquifer is vertically separated from the producing Grayburg Reservoir and from any potential residual oil zones (ROZs) by numerous vertical permeability barriers that extend across the EMSU. When evaluating potential OIP targets for tertiary recovery, the producing Grayburg Reservoir is the only interval above -500 ft TVDSS that has sufficient OIP concentration to warrant an economic evaluation to determine viability. Reservoirs below -500 ft TVDSS in the EMSU have insufficient OIP concentration to warrant economic evaluation.



## FIELD OVERVIEW

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The EMSU is a secondary recovery project in the Permian Grayburg Formation reservoir. The Grayburg Formation is part of the large Permian Grayburg and San Andres Formation petroleum system that extends across the Delaware Basin and the Central Basin Platform (CBP) as shown in Figure 1. The Grayburg and San Andres Formations on the CBP are created by the migration of oil from the deeper Delaware Basin source rocks and into updip stratigraphic and structural traps as shown in Figure 2. Because of its thickness and lateral extent, the San Andres Formation is the more prolific of the two. The San Andres fields are located on the eastern edge of the CBP, while the Grayburg fields are more prevalent on the flanks of both the eastern and western edges of the CBP. These are depletion drive reservoirs with weak water drive, requiring additional pressure support from water injection to increase recovery. In some fields, additional recovery can be achieved by injecting carbon dioxide (CO<sub>2</sub>) as an additional drive mechanism to improve residual oil mobility. Economic recovery from secondary and tertiary methods typically occurs in rocks with very little variation in permeability and porosity. This allows a large portion of the oil to be contacted by the injectant. Poor secondary and tertiary recoveries would occur in formations with significant variations in permeability and porosity. Oil concentration in the interval targeted for secondary and tertiary recovery methods is a key component for economic viability. In other words, the higher the oil concentration, the more likely it is to achieve economic recovery. The concentration of oil in a formation is calculated using hydrocarbon pore volume (HCPV) estimates from a combination of both  $S_o$  and porosity. Enhanced secondary and tertiary recovery methods require sources of water or gas for injection and a formation suitable for the disposal of any excess nonhydrocarbons produced. EMSU is a complete secondary recovery, economic hydrocarbon system in a concentrated oil reservoir with significant volume of primary oil recovery. The high-permeability and nonhydrocarbon aquifer in the San Andres Formation provides a source for injection water and can be used to dispose of excess fluids.

## EMSU FIELD HISTORY

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Eunice Field was discovered in March 1929. The field was initially slow to develop because of a lack of infrastructure, but by January 1, 1939, 474 wells had been completed across the field's 18,960 acres at approximately 40-acre spacing. Recovery in the field continued until a waterflood program was initiated in 1986 by Chevron Corporation (Chevron). Much of the early reservoir data reviewed in this report came from the 1983 Technical Committee Report on the proposed EMSU secondary recovery project.

The EMSU in Eunice Field is currently developed across 14,190 acres. The drive mechanism is characterized by a rapid decline in reservoir pressure without a rise in water production, leading to the conclusion that it is a solution gas drive reservoir. Early water encroachment from the south and east areas of the field supplied only a minor amount of aquifer pressure support. In the 1983 study, it was found that the primary oil production through October of 1982 amounted to 120 millions of barrels of oil (MMBO), the estimated ultimate recovery was 134 MMBO, the water-to-oil production ratio was four-to-one, the oil cut was 20 percent, and an original oil-in-place (OOIP) was estimated at 671 MMBO, based on an assumed 20 percent recovery factor. Chevron became the primary operator in February 1985. Initial water injection began in 1986 at a rate of about 85,000 barrels (BBL) of water per day and is still continuing as a waterflood project as of July 2024.

Opinions discussed herein are based on my review of electric logs, sample logs, core descriptions, core analysis, completion reports, and production data associated with the EMSU and in the surrounding area, as shown in Figure 3. NSAI collected data from public sources for 461 wells in the immediate EMSU area along with additional nearby wells, to create TVDSS cross sections of the well bore paths and perforated intervals. Core data for the EMSU 679 well were only available below the current producing interval. Additional representative core samples describing the lithology, porosity, and permeability in the EMSU area were presented in the Reservoir Characteristics of the Eunice Oil Field report by Anderson, Hinson, and Schroeder, which was prepared for the U.S. Bureau of Mines. There are seven wells with mudlog data that we also reviewed that relate to lithology and fluid



saturation depths in the EMSU area. These are the EMSU 577, 628, 658, 660, 673, 713, and 746 wells. NSAI performed petrophysical analysis for eight wells: EMSU 628, 658, 660, 673, 679, 713, 746, and Ryno (previously Snyder). We also reviewed two area wells with spectral gamma ray logs: SEMU BTD 123 and Central Drinkard Unit 441. The EMSU 679 is the only one of these wells to have both core and log data below the producing oil-water contact (OWC) of -350 ft TVDSS, so it was used to calibrate the NSAI petrophysical model. We used these data for an analysis of porosity, permeability, fluid saturations, and OIP estimates in the EMSU.

We examined ten historical water supply wells that have produced water from reservoirs below the producing Grayburg Reservoir in the San Andres Formation, with six of these wells within the EMSU. These are the EMSU 457, 458, 459, 460, 461, and 462 wells, operated by Chevron. The other four water supply wells are located to the south of the EMSU in the Arrowhead Grayburg Units: the AGU 600 and 601, the Janda 060, and the State 060. The performance of the San Andres Formation water supply wells indicates both the size and permeability of the formation.

There are 18 water disposal wells in the area injecting into the San Andres Aquifer below the producing Grayburg Formation, of which 8 are on EMSU acreage. The Dawson, Sosa, Snyder, and Banks wells are operated by Goodnight; the Rice N11 and EME 21 (also known as the Rice 21) wells are operated by Permian Line Service, LLC; the Owl P15 well is operated by Pilot Water Solutions; and the Empire 1 well is operated by Empire Petroleum Corporation (Empire). Outside the EMSU, Goodnight operates the Piper, Ted Williams, Nolan Ryan, Yaz, Scully, and Pedro wells; Rice Operating Company operates the Rice N7, EME 33 (also known as the Rice 33), and the State E Tract 27 (also known as Rice E27) wells; and Parker Energy Support operates the Parker well.

A list of materials relied upon for this analysis is included in Appendix B. Other resources used in the analysis for this report are listed in Appendix C, and a list of abbreviations is included in Appendix D.

## GEOLOGIC CONCLUSIONS

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### I. San Andres Regional Geologic Setting - Regional Aquifer

*The San Andres Formation is a laterally extensive, high-permeability aquifer. Any injected water can be displaced over large lateral areas, and, since the San Andres Formation is in a migration pathway, So, while not unexpected, are not concentrated enough to be considered a target for recovery.*

The San Andres Formation can be up to 1,600 ft thick and has depositional trends based on historical bathymetry. These trends include a deepwater depositional environment generating low-permeability carbonates, a nearshore ramp environment creating high-porosity carbonates, and a shallow tidal depositional environment producing low-porosity carbonates. Depositional environments have changed over time creating distinct stratigraphic pay intervals that can be correlated from the Guadalupe Mountains in the west to the CBP in the east. There are five regional pay units that are productive along the oil migration pathways: Holt, McKnight, Intermediate, Judkins, and Lovington (Trentham, 2012). Most of the oil that migrated through the San Andres Formation in the New Mexico portion of the CBP continued to move updip and into the eastern flank of the CBP in Texas. The five regional pay units were sourced by oil generated in the deeper Delaware Basin to the west.

Oil entered the San Andres Aquifer and migrated through a complicated porosity system to create several isolated reservoirs with varying compositions of salinity and hydrocarbon saturation. These reservoirs include both mobile oil in productive fields across the CBP and residual oil scattered along the migration pathways. A map of the migration in the EMSU is shown in Figure 4. Subsequent structural movement has caused some secondary flushing of previously trapped oil. This leaves behind more continuous ROZs associated with conventional traps that are predominantly on the east side of the CBP. There are 15 major updip San Andres fields that have produced over 1.9 billion BBL of oil, as of March 2024, from the San Andres Formation reservoirs, as shown in Figure 5. The





EMSU is along the downdip migration pathways and is not a part of a major structural or stratigraphic trap in the San Andres Formation. The major San Andres Formation reservoirs are distributed across the updip portions of the CBP. These reservoirs are the result of the regional extent of the aquifer and migration pathways and indicate that any withdrawal or injection volumes into these reservoirs could be displaced across large areas.

The San Andres Formation in the EMSU has been used as a source for water injection operations and is currently being used as a water disposal interval by numerous companies including Empire. Chevron developed one of these isolated and permeable San Andres Formation reservoirs beneath the EMSU as a source for injection water. The six Chevron-operated water supply wells have produced over 340 millions of barrels (MMBBL) of water from 1987 to the present.

The significant withdrawal of water volumes from the EMSU water supply wells over the 30 years of production history has not diminished their ability to produce at high rates. Although 340 MMBBL of water was extracted from this aquifer, no oil was reported to have been produced from these wells. These large volumes of water are an indication of both the extent of the connected reservoir and the good permeability throughout the reservoir, establishing this as a large aquifer rather than an oil reservoir. Our well log analysis and review of mud log data do indicate some scattered areas of elevated  $S_o$  in these water production intervals, but not at  $S_o$  levels high enough or laterally continuous enough to be a target for oil production.

More recently, seven water disposal wells that Goodnight drilled to the south of the Chevron water supply wells found a consistent zone of lost circulation below the producing Grayburg Reservoir. The lost circulation zones encountered by Goodnight while drilling its water disposal wells are in the same stratigraphic interval as the Chevron water supply wells that extracted over 340 MMBBL of water. These lost circulation zones are typically caused by extremely high permeability and/or lower pressure relative to the surrounding strata. This evidence suggests that the current Goodnight water injection intervals in the aquifer are most likely injecting into the same extensive reservoir from which the water supply wells produced. The similar stratigraphic interval of the lost circulation zones across all seven Goodnight water injection wells also indicates that this is a laterally extensive, high-permeability zone. The large volumes of water extracted from the EMSU, and the indications of laterally extensive, high-permeability zones from the recent San Andres injection wells, suggest that any injected water will be displaced over a large lateral area.

## II. Evidence of Movable Hydrocarbons

*Four separate depth intervals have been evaluated based on their evidence of movable fluids, yet no evidence of movable hydrocarbons is demonstrated below -500 ft TVDSS.*

NSAI's independent petrophysical analysis does not indicate any significant  $S_o$  below -661 ft TVDSS, which corroborates the low  $S_o$  observations in core data and lack of any oil recovery from the water supply wells. In the EMSU, the original gas-oil contact (GOC) in the Grayburg Formation reservoir is defined at -100 ft TVDSS, and the OWC is estimated between -325 to -350 ft TVDSS, as defined in the unitization document. We have defined -350 ft TVDSS as the producing oil-water contact (POWC). We reviewed the three deepest wells with perforations in the EMSU below -500 ft TVDSS: the EMSU 577, 658, and 660. The EMSU 577 well tested the interval from -457 to -588 ft TVDSS, in which 220 BBL of water and 1 BBL of oil were swabbed on February 22, 2006, with an oil cut of 0.5 percent. Later, it tested with an oil cut of 6.6 percent with 45 BBL of oil, 636 BBL of water, and 63 thousands of cubic feet of gas produced with an electrical submersible pump (ESP) on February 26, 2006. Eighteen days later, on March 14, 2006, a cast iron bridge plug was set above these perforations at -422 ft TVDSS. The EMSU 577 well is the deepest indication of any movable oil in the EMSU. The next two intervals perforated in the EMSU 577 well were above the POWC, and these intervals produced both oil and water. The EMSU 658 well tested the interval from -395 to -576 ft TVDSS and recovered 667 BBL of salt water with no indications of oil on February 9, 2006. This interval was then tested using an ESP and produced 1,856 BBL of water and 2 BBL of oil on March 10, 2006, resulting in an oil cut of 0.1 percent. The EMSU 658 well was then perforated above the POWC and tested



oil and water on June 4, 2006. From December 2005 to January 2006, the EMSU 660 well tested the interval from -548 to -661 ft TVDSS. The well was acidized, then pump tested 4,056 BBL of water and 7 BBL of oil with an oil cut of 0.2 percent. A cast iron bridge plug was set at -422 ft TVDSS on March 3, 2006, then the well was perforated above the POWC from -206 to -334 ft TVDSS and tested oil and water on March 10, 2006. The average oil cut for these three deep tests was 0.8 percent, which is significantly lower than the 20 percent oil cut obtained in the period from 1980 to 1981, after 40 years of primary production and prior to waterflood. Oil cut and water cut for the deep well tests and the pre-waterflood EMSU are summarized in Figure 6. Data for key wells and their completion intervals are shown in Figure 7.

The six water supply wells within the EMSU have produced over 340 MMBBL of water from below the producing Grayburg Formation reservoir with no reported oil production. The upper perforations in these wells are at -500 ft TVDSS in the EMSU 458 well and they have no indications of produced oil. This establishes an upper limit of the aquifer at -500 ft TVDSS at this location.

Our analysis of core data suggests that the deepest continuous  $S_o$  above 20 percent is in the EMSU 679 well at -650 ft TVDSS. The NSAI log analysis in the EMSU 679 well has consistent  $S_o$  greater than 20 percent down to -660 ft TVDSS and scattered  $S_o$  as deep as -704 ft TVDSS. These data could indicate a possible base of a ROZ at this well location. The EMSU 679 well was completed from -256 to -500 ft TVDSS and produced oil and water. Additional log analysis in the EMSU 713 and EMSU 746 wells indicated continuous  $S_o$  greater than 20 percent down to -450 and -524 ft TVDSS, respectively. Additionally, the EMSU 713 and EMSU 746 wells indicated scattered  $S_o$  greater than 20 percent at -486 ft TVDSS and -672 ft TVDSS, respectively. An  $S_o$  comparison for the EMSU 679 core analysis to log analysis for the EMSU 679, EMSU 713, and EMSU 746 wells are shown in Figure 8. These  $S_o$  intervals indicate an uneven base of possible ROZ with a variability in depth for a minimal ROZ depth target between -450 and -704 ft TVDSS. Figure 9 shows the interpreted depth of deepest potential ROZ, based on a continuous  $S_o$  greater than 20 percent in the EMSU. Therefore, based on our analysis, any targeted oil recovery above -450 ft TVDSS would have the best chance to extend across a larger area, but  $S_o$  below -450 ft TVDSS would be restricted to the local area around the EMSU 679 and 746 wells to a maximum depth of -660 ft TVDSS.

Our review of available mud log data had indicated  $S_o$  and/or oil staining in intervals below -661 ft TVDSS down to as deep as -1,036 ft TVDSS. The seven wells with mud logs we reviewed had various oil staining and fluorescence. These shows of oil are not indications of any likely economic oil recovery targets based on the POWC at -350 ft TVDSS, a highest test of water without any oil at -500 ft TVDSS, and the lowest indication of scattered  $S_o$  above 20 percent at -704 ft TVDSS based on log and core data. The lack of data supporting significant movable oil below the POWC makes these depth intervals questionable for any significant oil recoveries. The highest upper perforations in the Goodnight injection wells are at -720 ft TVDSS, which is below both the estimated POWC, the highest water only test, and the lowest indication of oil. We have found no data to support that the current disposal intervals in the EMSU, or any interval below the highest water only test at -500 ft TVDSS, as being a reasonable target for economic oil recovery.

### III. Separation of Reservoir from Aquifer - Permeability Barriers

*Water being injected in the deeper San Andres Formation is vertically separated from the producing Grayburg Reservoir and any potential ROZ by numerous vertical permeability barriers.*

The EMSU is located along the northwestern edge of the CBP, as shown in Figure 1. The unit is composed of the producing Grayburg Reservoir and the underlying San Andres Aquifer. These formations were deposited in typical marine and restricted-marine environments, with most of the EMSU deposition occurring in a predominantly shallow-water, carbonate ramp environment. These carbonate deposits are controlled by water depths that change over time with short-term tidal action and longer-term eustatic sea level changes. These changes cause the various carbonate rock types to change positions both vertically and laterally. In general, the shallower the water, the more the carbonate rock types will change over shorter distances. The best reservoirs are deposited in shallow, higher-



energy environments (e.g., grainstones), which transition to lower-energy environments. Lower-quality carbonate reservoirs deposited in slightly deeper water (e.g., packstones and wackestones) are generally thicker and more laterally extensive. Porosity is highest in the grainstones and packstones, with mud-rich wackestones forming low-permeability barriers. The higher gamma ray response in the underlying San Andres Formation, caused by the retention of uranium, indicates that these carbonates were deposited in slightly deeper waters relative to the producing Grayburg Reservoir and are more likely to be low-permeability barriers. Early diagenesis, caused by periodic variation in sea level, has further complicated reservoir distribution by allowing for dissolution, dolomitization, and the deposition of pore-filling secondary calcite, dolomite, and anhydrite in the producing Grayburg Reservoir.

The initial deposition and subsequent diagenetic activity created the stratigraphic variability and compartmentalization that define the eastern trapping mechanism in the EMSU producing Grayburg Reservoir. A northwest-to-southeast-trending anticline creates an oil trap on the southern and western portions of the field. A representative set of 12 core plugs in the EMSU Grayburg Formation was described and included a variety of lithologies, including porous oolitic dolomite, fine-grained dolomitic sandstone, dolomites with local dark streaks, and oolitic dolomites embedded in sandy dolomite (Anderson, 1939). The significant amount of fine-grained sand, oolites, and dolomite all indicate a very shallow-water, nearshore environment in the Grayburg Formation reservoir. It was noted by Anderson that these lithologies cut across structures, making correlations using lithology or log character difficult. Oil production in the EMSU is restricted to higher-permeability carbonates above the POWC. These complex carbonate environments make it difficult to estimate fluid saturations and permeabilities using a simple petrophysical model with standard values and to explain why actual oil production is a key component in any analysis of future potential.

In addition to petrophysical models, various publications have presented evidence of permeability barriers throughout the Grayburg Formation as an indication of the type of barriers that exist within and below the producing Grayburg Reservoir. Early initial potential (IP) tests showed variable gas-oil ratios at similar subsea depths, which indicates vertically isolated completions within the producing Grayburg Reservoir. Based on lithology and performance, three potential isolated reservoirs, called Zone A, Zone B, and Zone C, were interpreted. Cross sections showing lithologies, perforations, shows, IP test results, and casing seat points across the EMSU are shown in Figures 10 and 11. The highlighted permeability barriers (Anderson, 1939) were interpreted early in the analysis of the field and range from 20 to 40 ft thick and extend laterally across the field.

A 1998 Society of Petroleum Engineers (SPE) paper (Love, McCarty, Miller, and Semmelbeck, 1998) was published and attempted to diagnose the poor performance in the EMSU. This paper identified the main issue as poor vertical conformance primarily due to extensive horizontal permeability streaks, indicating that low-permeability streaks confined movement of fluids along horizontal layers. This confined movement caused a good portion of the oil in lower-permeability rock to be bypassed with water cycling mainly through the high-permeability layers. As shown in Figure 12, the complex stratigraphy and horizontal layering are exemplified by a stratigraphic cross section showing up to 82 separate depositional cycles, simplified into seven practical zones for the EMSU Grayburg Formation (Lindsay, 2014). The 1998 SPE paper described the EMSU as having six zones, similar to Lindsay's description, and described Zone 4 as a clastic-rich (sandy/silty) rock that forms a pressure barrier. "It is vertically impermeable, can have good porosity zones, and the upper surface of this zone is described as a karsted surface" (Love, et al., 1998).

Based on our review of spectral gamma ray logs, there is an interval of increasing gamma ray at the base of the Grayburg Formation correlated across the EMSU, as shown in Figure 13. This interval correlates across the EMSU and could act as a permeability barrier between the overlying reservoir and the underlying aquifer. NSAI petrophysical analysis of permeability in three Goodnight injection wells on the south end of the EMSU shows a significant number of vertical permeability barriers in the same correlative interval at the base of the Grayburg section. Additional permeability barriers are present throughout the interval as shown on Figure 14. The dark blue line on the logs identifies the depth of lost circulation while drilling. These indicate a significant change in the





reservoir characteristics from the overlying strata with both higher permeability and lower pressure at that depth. The red bar in the center of the wells in Figure 14 represents the perforated interval where the current water injection occurs. The key, continuous, thick permeability barrier above the Goodnight San Andres water injection intervals and above the lost circulation zones is also shown. Multiple vertical permeability barriers can be seen throughout the Grayburg Formation that clearly show separation between the water-injection and oil-producing intervals.

The permeability barriers in the 1939 Anderson analysis, the spectral gamma ray cross section, and the loss circulation intervals in the NSAI petrophysical analysis all indicate that the interval between the producing Grayburg Reservoir and the San Andres Aquifer is a consistent permeability barrier across the EMSU area.

#### IV. Concentration of Hydrocarbons - Quality of Potential

*When evaluating potential OIP targets for tertiary recovery, the producing Grayburg Reservoir is the only interval above -500 ft TVDSS that has sufficient OIP concentration to warrant an economic evaluation to determine viability. Reservoirs below -500 ft TVDSS in the EMSU have insufficient OIP concentration to warrant economic evaluation.*

After reviewing data across the area, NSAI evaluated four potential future oil recovery targets using an HCPV model. The four intervals evaluated include the currently developed EMSU producing Grayburg Reservoir extending from the GOC down to POWC, the potential ROZ extending below the POWC to the highest water only tested based on the water supply wells, the transition zone spanning from the base of potential ROZ to -700 ft TVDSS used to approximate the lowest indication of  $S_o$  from log analysis, and below the transition zone is designated as an aquifer. The saturation profiles reviewed in the EMSU did not conform to the continuous gradational ROZ models proposed in various articles by Trentham and Meltzer. Instead, I have defined four intervals to evaluate hydrocarbon potential with slightly different nomenclature. These intervals were evaluated based on indicators of reservoir quality such as gross OIP, the size of the target, and oil concentration. The EMSU producing Grayburg Reservoir is a reasonable target for tertiary recovery. The potential ROZ in the Grayburg Formation has no indications of significant movable hydrocarbons but does have a reasonable OIP concentration that could possibly be targeted for tertiary recovery. The transition interval below that zone has significantly less OIP distributed across a much larger rock volume and would not make a reasonable target for oil recovery. The deeper aquifer that serves as Goodnight's disposal interval has no potential as an oil recovery target since there is no significant indication of OIP.

##### A. *Summary of OOIP Distribution Above 20 Percent Oil Saturation*

Economic viability is dependent on a number of factors, especially the defining of a continuous concentration of  $S_o$ . The higher the concentration of  $S_o$ , the more likely a development is to be economic. Since any secondary or tertiary recovery project has to develop the entire available gross rock volume, a large OIP spread across a thick interval is significantly less attractive from an economic perspective. The ability to identify areas of potentially recoverable oil is determined by calculating porosity and  $S_o$ , with higher porosity and  $S_o$  indicating that the hydrocarbons are more concentrated and movable. We used HCPV estimates to determine OIP per unit volume, which is an indicator of reservoir quality that is directly related to potential recovery factors.

To estimate the HCPV within the EMSU, we used the NSAI petrophysical model results to analyze the potential quantity of the OIP in each of the four potential future oil recovery intervals. While Meltzer has defined ROZ  $S_o$  to be as low as 20 percent, typically, mean  $S_o$  ranges from 27 to 39 percent in carbonate reservoirs at the start of CO<sub>2</sub> projects (Olea, 2017; Verma, 2017). For the purposes of our initial analysis, we used the more practical threshold of 30 percent  $S_o$ , which more closely represents an average to better-than-average reservoir quality of existing CO<sub>2</sub> projects. The 30 percent OOIP was created by summing the hydrocarbon pore volume values, but the calculations did not adjust for petrophysical data presented in ½-foot increments. Therefore, the correct estimates should have been half of the values in the previous report. For our updated analysis, we used a cutoff of  $S_o$  greater than 20



percent, which aligns more closely with a minimal saturation used by Meltzer to define an ROZ. The NSAI model calculated HCPV across the entire stratigraphic section and subdivided it into three reservoir quality groups. Tier 1 was based on standard industry water saturation cut-offs of 60 percent or greater than 40 percent  $S_o$ . Tier 1 reservoirs represent the highest concentration of oil that can be targeted for conventional primary recovery and an optimum target for secondary or tertiary recovery. Tier 2 reservoirs have between 40 and 30 percent  $S_o$ . These are generally not targets for primary recovery and in certain circumstances have been targeted for tertiary recovery by use of  $CO_2$ , steam, or nitrogen injection. Tier 3 reservoirs are between 30 and 20 percent  $S_o$ . Intervals with scattered  $S_o$  above 20 percent are defined as aquifers. Intervals with less than 20 percent  $S_o$  and are best described as "oil-stained." These reservoirs are not a reasonable target for oil recovery by primary or tertiary means and are well below the threshold for consideration as an ROZ.

### *B. Summary of the OIP and OIP Concentration Analysis*

On average, the producing Grayburg Reservoir has a significant amount of OIP, with 22.3 MMBO per section across a 250-ft gross interval or a concentration of 139 BBL of oil per acre-foot (BO/ac-ft). Extrapolating this OIP across the 14,190 developed acres in the EMSU yields 494 MMBBL of OIP. Figure 15 shows the distribution of  $S_o$  and OIP across the various depth intervals in the EMSU. In the 1983 Technical Committee Report, pre-waterflood primary recovery was estimated to be 134 MMBO, or about 27 percent of OIP, and secondary recovery was estimated between 24 and 66 MMBO over the next 30 years. The current secondary oil recovery is based on EMSU cumulative oil. As of March 2024, the EMSU has produced 147 MMBO, or about 30 percent of OIP. This is approximately 13 MMBO, or about 3 percent of OIP, more than the initial estimates of primary recovery. This low recovery factor for the waterflood can be explained by the highly variable depositional environment that can produce relatively thin beds with highly variable permeability and very limited areal extent. These reservoir characteristics would also indicate that the current EMSU Grayburg Formation reservoir would be a poor tertiary recovery candidate.

The potential Grayburg ROZ between -350 and -500 ft TVDSS has a reasonable amount of OIP. On average, this zone has 9.7 MMBO per section across a 150-ft gross interval or a concentration of 101 BO/ac-ft. Extrapolating this OIP across the 14,190 developed acres in the EMSU yields 215 MMBBL of OIP, which is less than 50 percent of the estimated OIP in the EMSU producing Grayburg Reservoir. This potential Grayburg ROZ has lower OIP, which would make this a less desirable target for any recovery relative to the developed EMSU Grayburg Reservoir. We have found no indications of oil recovery or movable hydrocarbons across this interval that could indicate that this may be a ROZ target for tertiary recovery.

The transition zone between -500 and -700 ft TVDSS has a small amount of OIP. On average, this zone has 6.4 MMBO per section across a 200-ft gross interval with a concentration of 49 BO/ac-ft. Extrapolating this OIP across the 14,190 developed acres in the EMSU yields 141 MMBBL of OIP, which is less than 30 percent of the developed OIP in the EMSU. The low concentration of OIP in this interval would not be a reasonable target for any type of recovery.

The aquifer below -700 ft TVDSS has a small amount of OIP. On average, the aquifer has 3.2 MMBO per section across a 1,000-ft gross interval with a concentration of 5 BO/ac-ft. Extrapolating this OIP across the 14,190 developed acres in the EMSU yields 71 MMBBL of OIP, which is less than 15 percent of the developed OIP in the EMSU. The low concentration of OIP in the San Andres Aquifer interval would not be a reasonable target for any type of recovery.

### **CONCLUSION**

There is a lack of significant oil concentration below -500 ft TVDSS, making it an unreasonable target for enhanced oil recovery within either the Grayburg or San Andres Formations below that depth. The producing Grayburg



Reservoir is isolated and separated from the underlying San Andres Aquifer by multiple, laterally extensive permeability barriers. The San Andres Aquifer is a regionally extensive reservoir that has data supporting pressure separation from the overlying producing Grayburg Reservoir in the EMSU. The San Andres Aquifer has a significant areal extent, with sufficient high-permeability intervals to handle a large volume of disposed water without impacting the overlying EMSU. The poor performance of the secondary recovery project within the producing Grayburg Reservoir is a strong indication of the magnitude of recovery that may occur from any tertiary project in that interval. Significant additional evaluation would be required to determine if a tertiary recovery project could be economically viable in the oil-producing EMSU.

#### DISCLAIMER

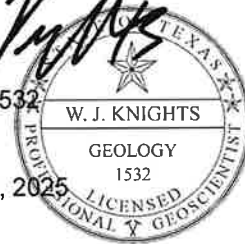
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This report summarizes my analysis and opinions to date. I reserve the right to amend or supplement this report, if necessary, should additional information become available to me, and to rebut any related opinions reached by experts related to these cases. All the opinions and conclusions herein are rendered to a reasonable degree of professional certainty.

I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.

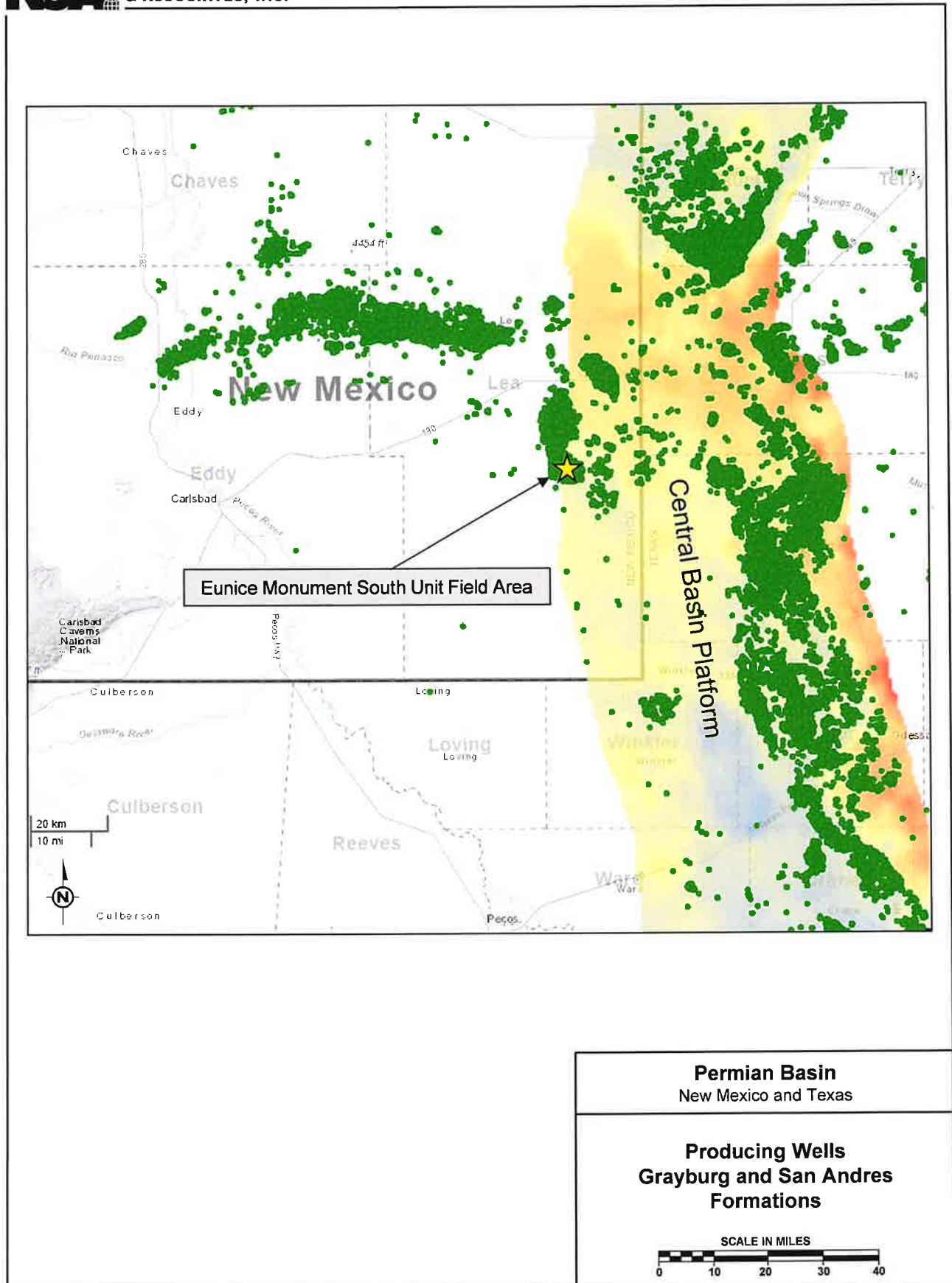
Sincerely,

  
William J. Knights, P.G. 1532  
Vice President



Date Signed: January 16, 2025

WJK:LMS

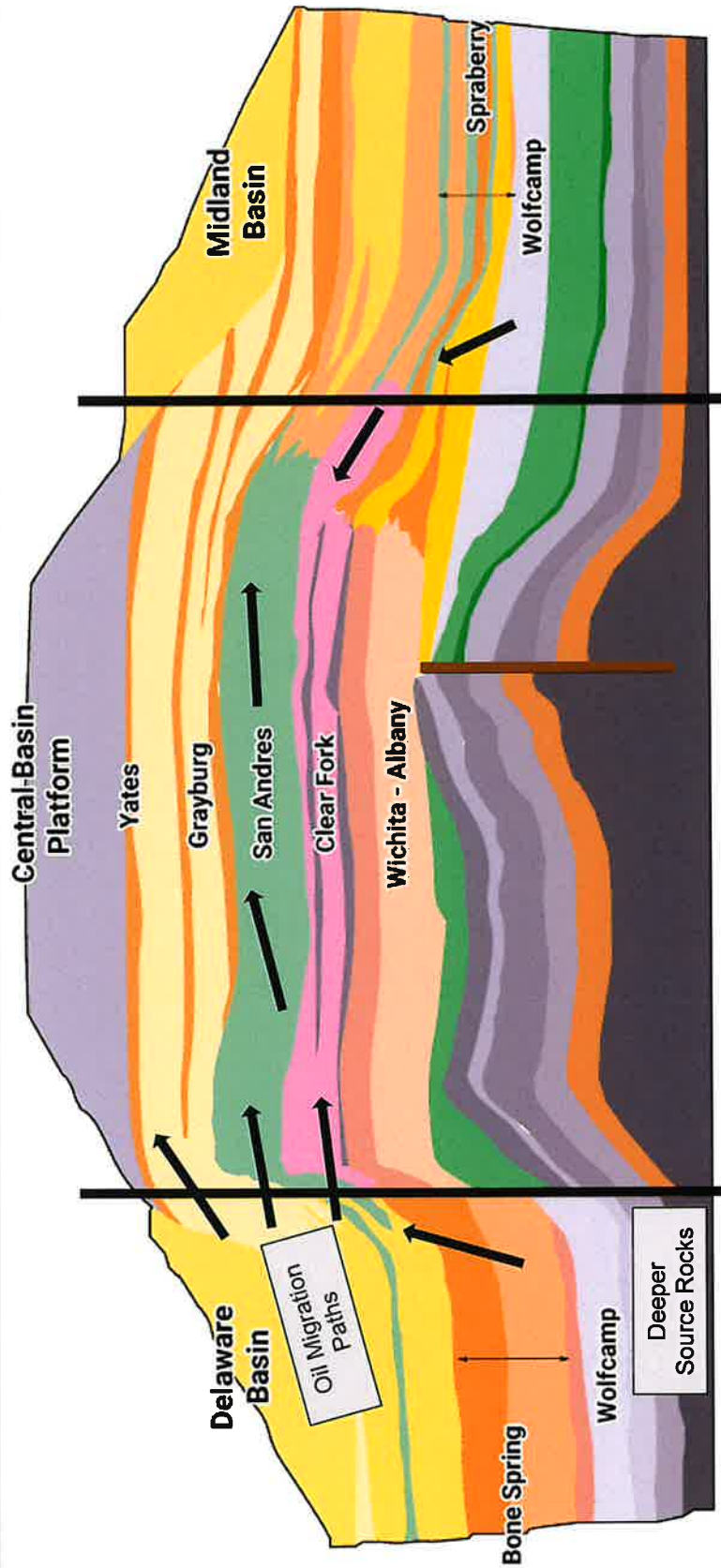


All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 1



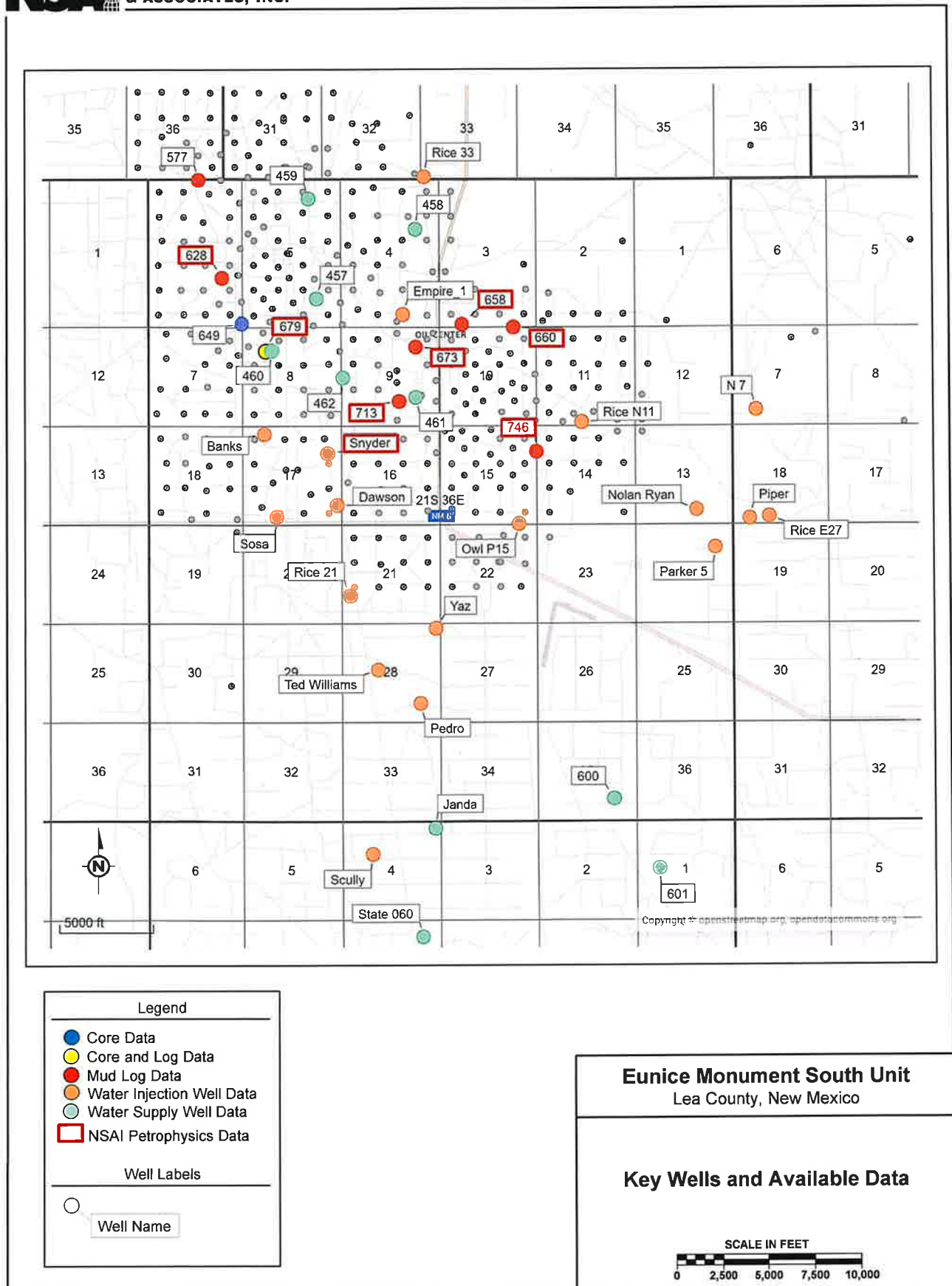
Basin Geology  
Permian Basin  
New Mexico and Texas



Adapted from <https://www.enverus.com/permian-basin/central-basin/>

All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

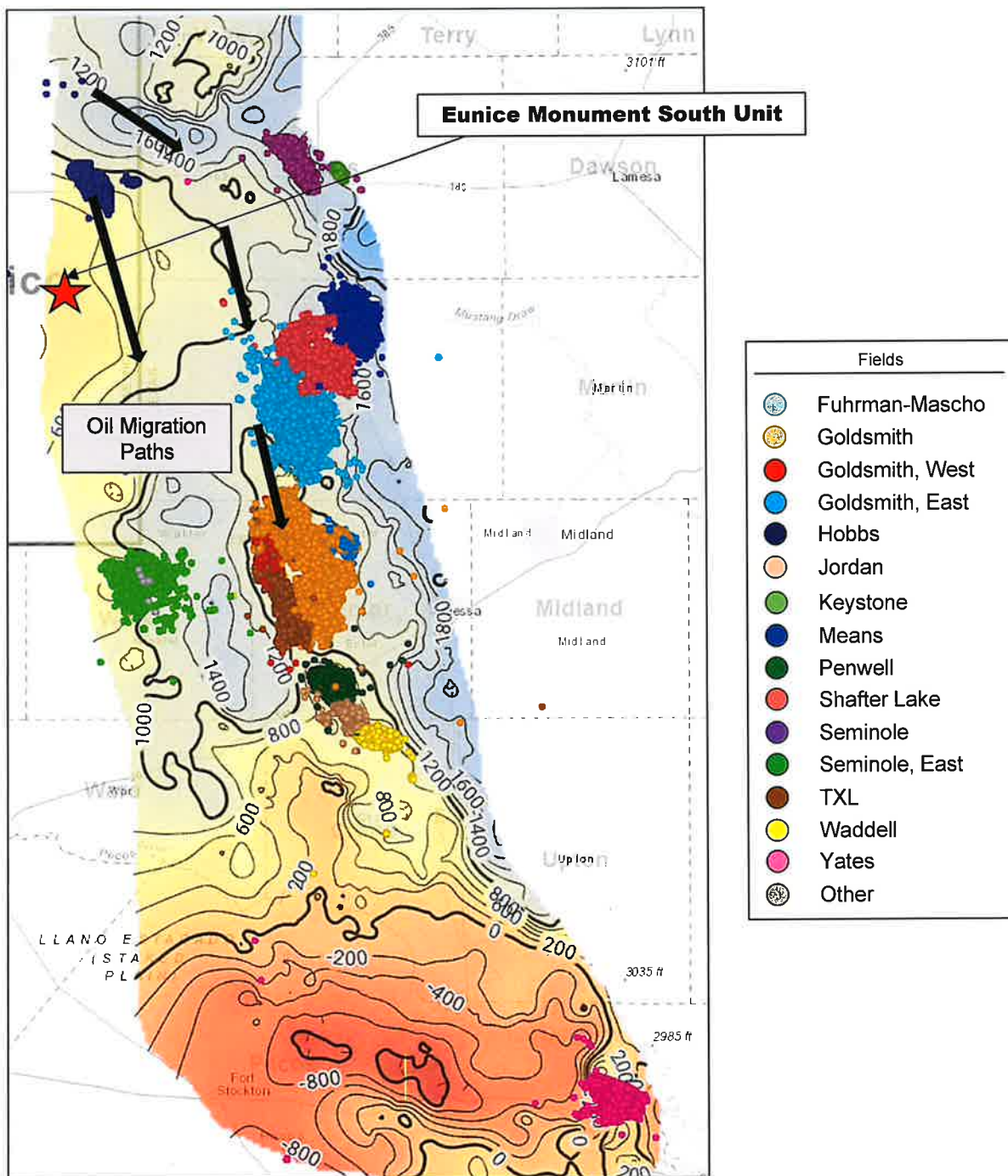
Figure 2



All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 3

Major Producing Fields  
San Andres Formation  
Permian Basin, New Mexico and Texas

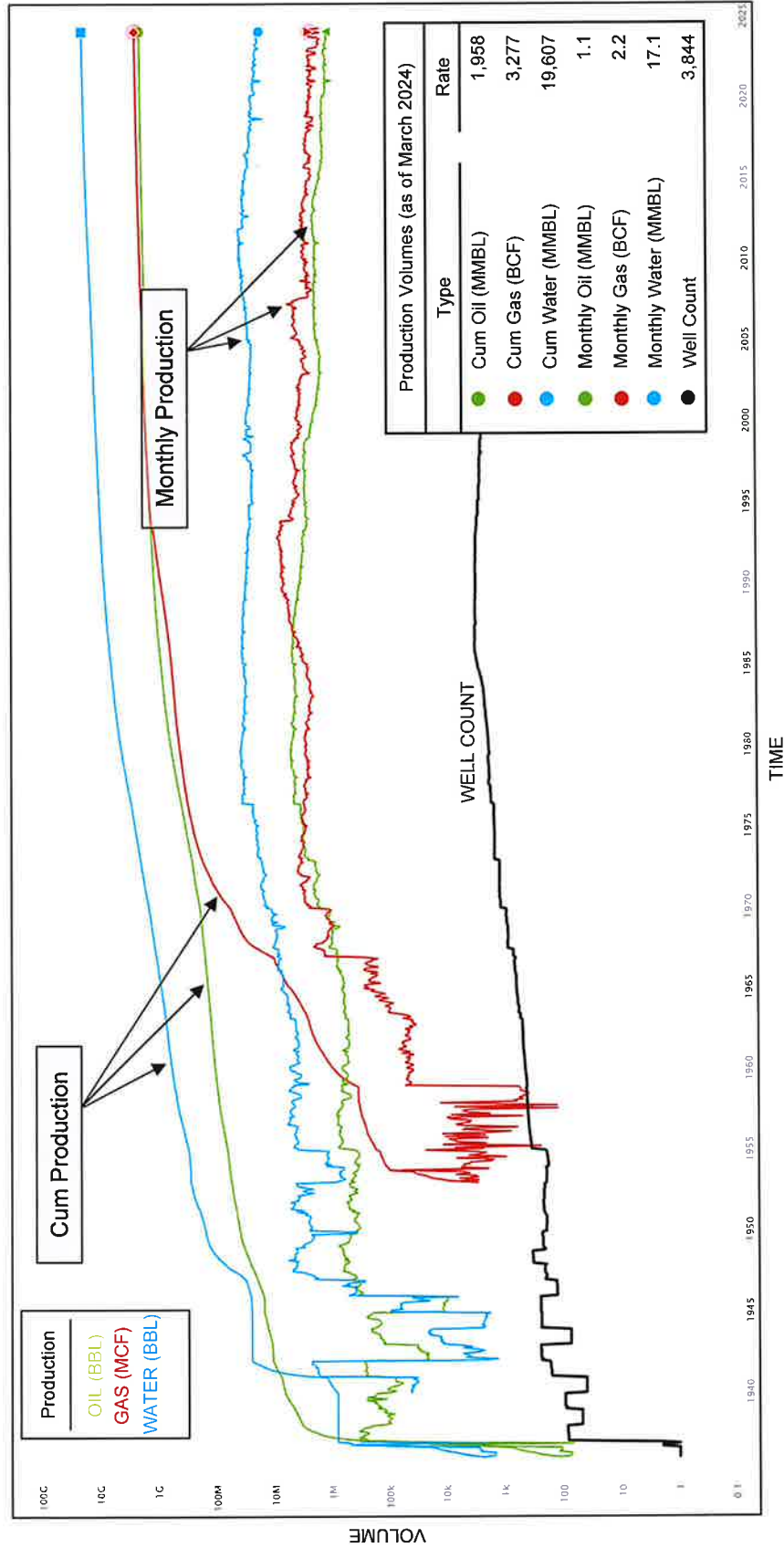


All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 4



SAN ANDRES PRODUCTION – MAJOR FIELDS  
HISTORICAL VOLUME VERSUS TIME  
PERMIAN BASIN

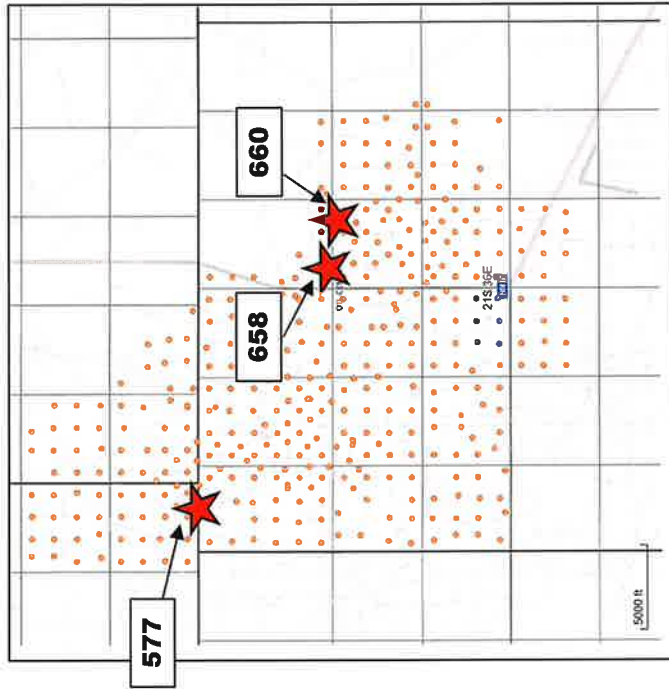


All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 5



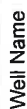
Deep Oil Tests  
Eunice Monument South Unit  
Lea County, New Mexico



| Well                        | Test      | Upper Perf<br>(TVDSS) | Lower Perf<br>(TVDSS) | Oil<br>(BBL) | Water<br>(BBL) | Oil Cut<br>(%) | Water Cut<br>(%) |
|-----------------------------|-----------|-----------------------|-----------------------|--------------|----------------|----------------|------------------|
| EMSU Field                  | 1980-1981 | All                   | All                   | 800,000      | 3,100,000      | 20.5           | 79.5             |
| EMSU 577                    | Swab      | -457                  | -588                  | 1            | 220            | 0.5            | 99.5             |
| EMSU 577                    | ESP       | -457                  | -588                  | 45           | 636            | 6.6            | 93.4             |
| EMSU 658                    | Swab      | -395                  | -576                  | 0            | 667            | 0.0            | 100.0            |
| EMSU 658                    | ESP       | -395                  | -576                  | 2            | 1,856          | 0.1            | 99.9             |
| EMSU 660                    | Pump      | -548                  | -661                  | 7            | 4,056          | 0.2            | 99.8             |
| Highest Oil Tests Below OWC |           |                       |                       | 54           | 6,548          | 0.8            | 99.2             |

All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

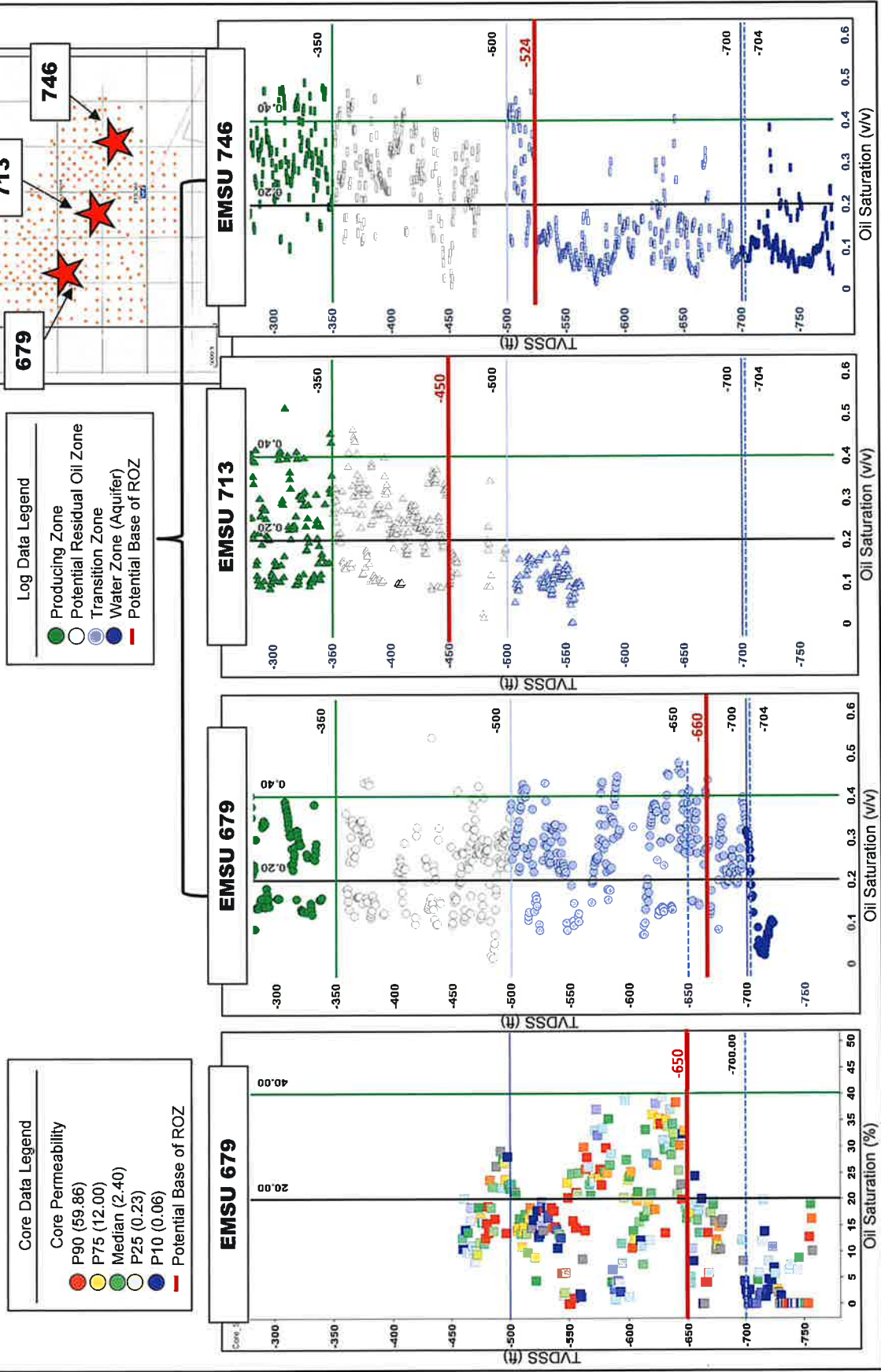
Figure 6



*All estimates and exhibits herein are part of this NSA/ report and are subject to its parameters and conditions.*

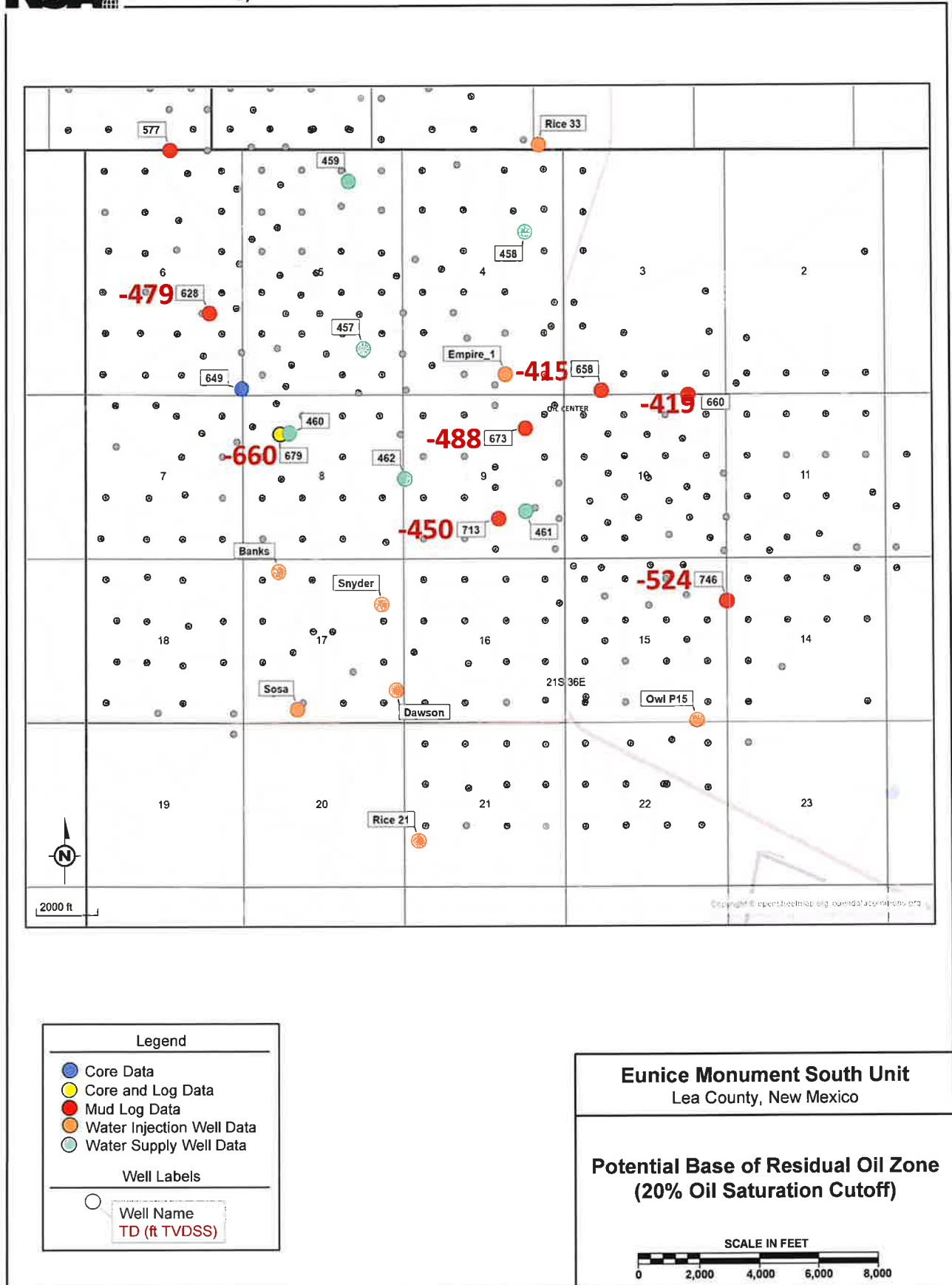
Figure 7

Oil Saturation Comparison  
Eunice Monument South Unit  
Lea County, New Mexico



All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 8



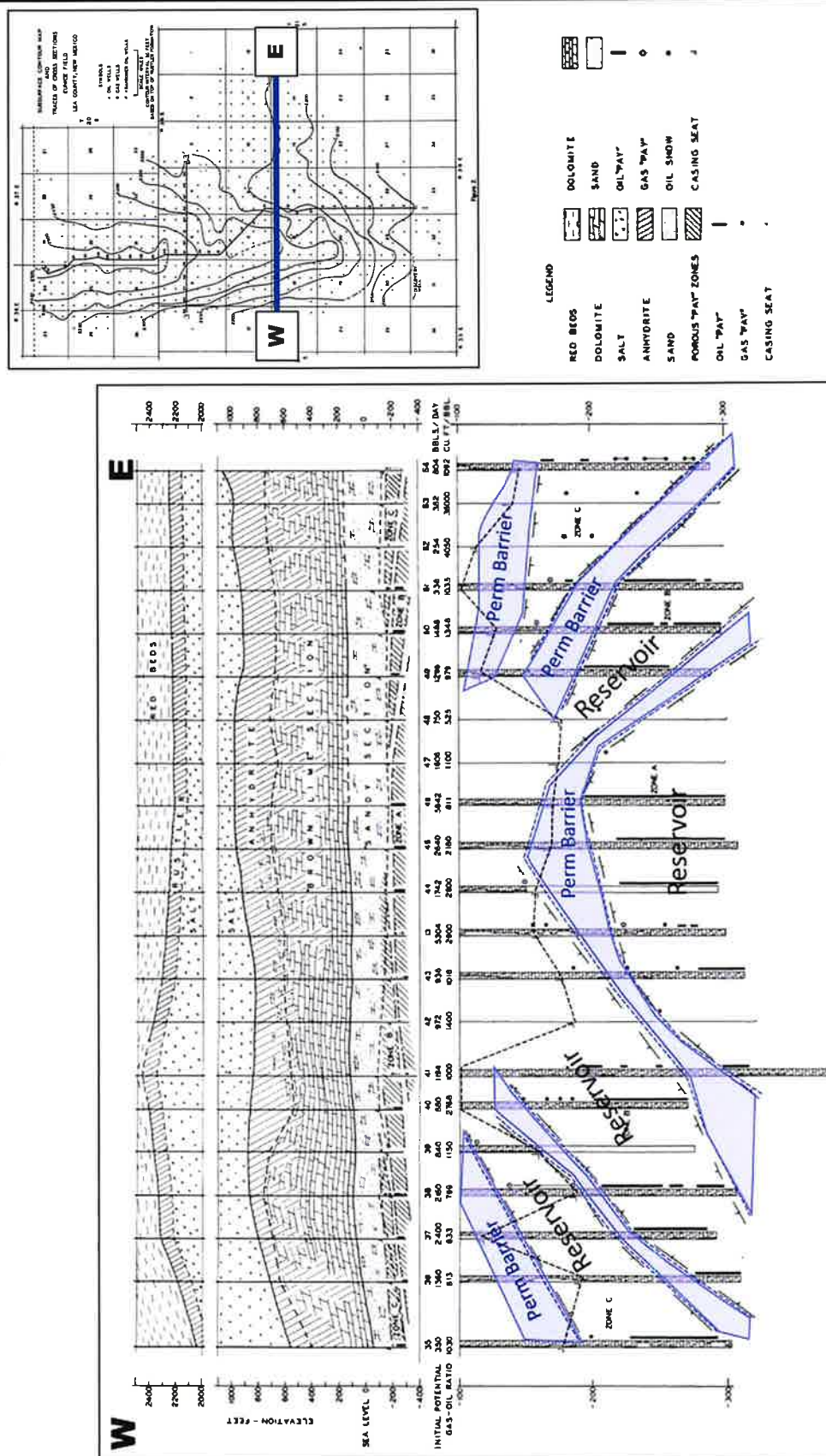
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Figure 9



**NSA**  **NETHERLAND, SEWELL  
& ASSOCIATES, INC.**

Early Stratification and Permeability Barriers (West – East)  
 Eunice Monument South Unit  
 Lea County, New Mexico

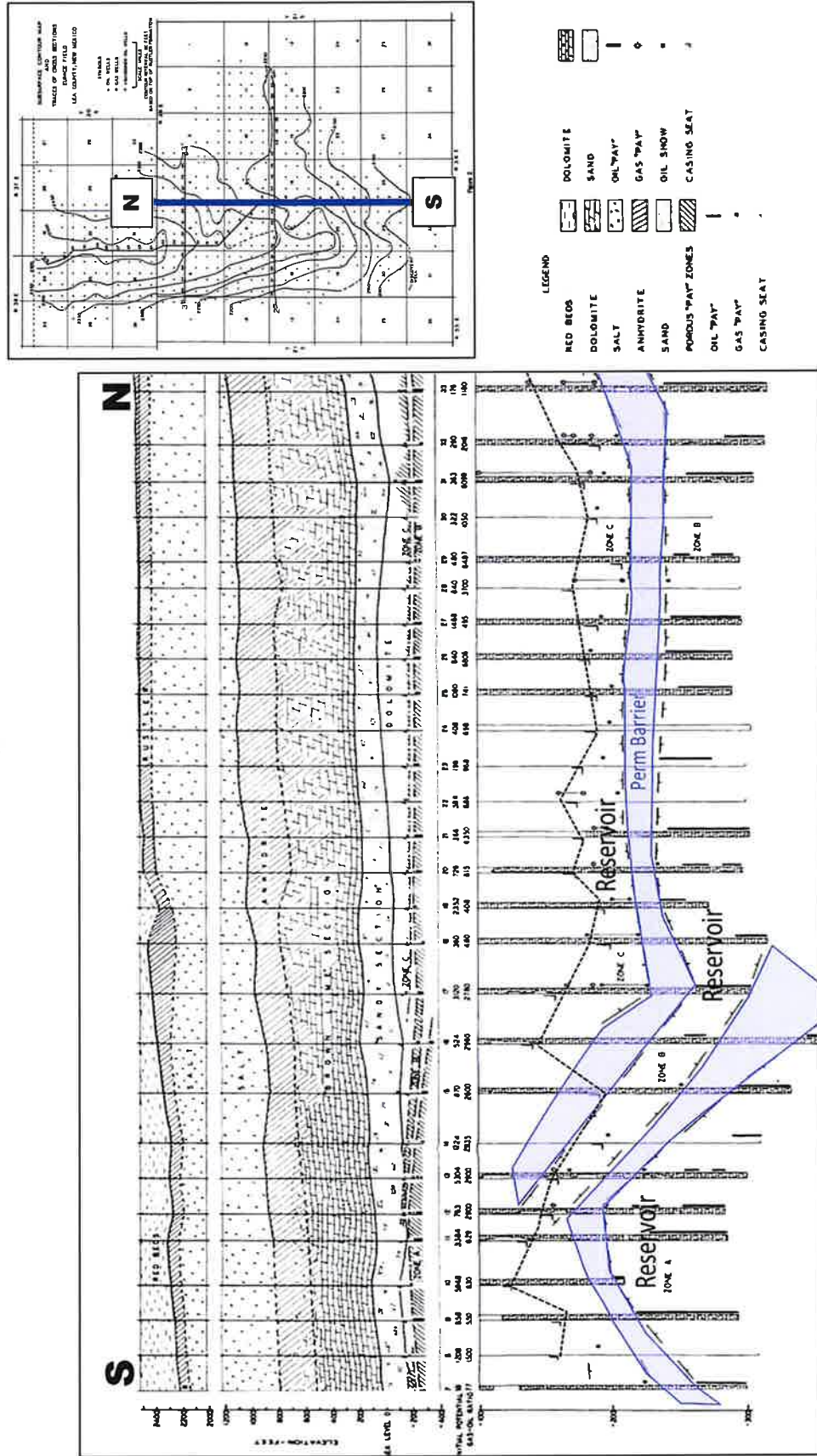


Adapted from Anderson, H.H. Hinson, and H.J. Schroeder, July 1939, *Reservoir Characteristics of the Eunice Oil Field, Lea County, N. Mex.*, United States Department of the Interior - Bureau of Mines, R.I. 3456.

*All estimates and exhibits herein are part of this NSA report and are subject to its parameters and conditions.*

Figure 10

Early Stratification and Permeability Barriers (South – North)  
Eunice Monument South Unit  
Lea County, New Mexico



Adapted from Anderson, H.H. Hinson, and H.J. Schroeder, July 1939, *Reservoir Characteristics of the Eunice Oil Field, Lea County, N. Mex.*, United States Department of the Interior – Bureau of Mines, R.I. 3456.

All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 11



Stratigraphic Cross Section - Grayburg and San Andres Formations  
Eunice Monument South Unit  
Lea County, New Mexico

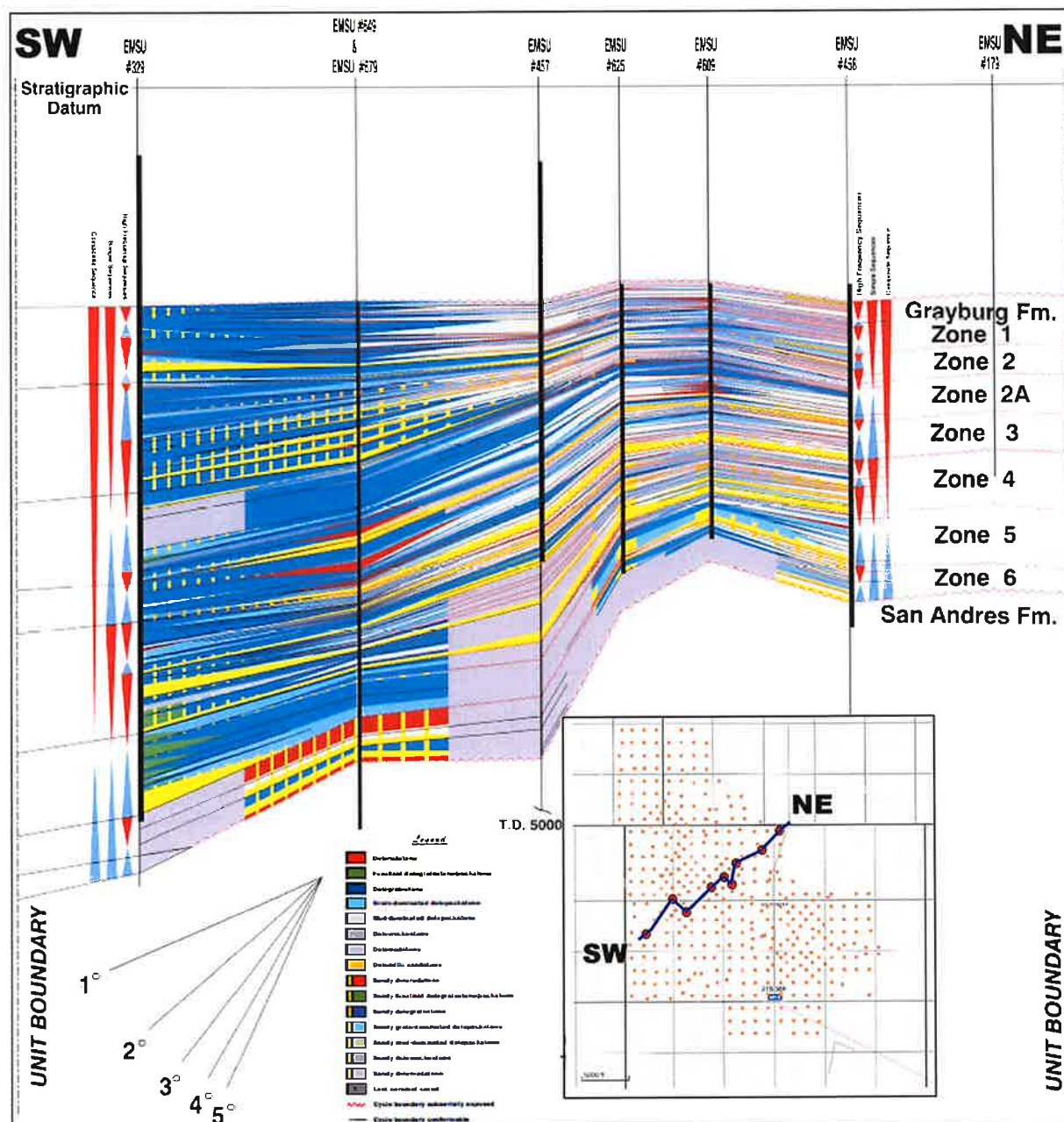


Figure 8.11. Subsurface core descriptions of the Grayburg Formation in-dwive through the center of Sive Monument South Unit (E845). The Grayburg Formation composite sequence can be divided into a Lower Grayburg (lime sequence) and Upper Grayburg (cherty). The high frequency sequences have been identified in the Lower Grayburg and in the Upper Grayburg. These will be reviewed in chapters 4 and 5. Note how the Grayburg Formation thins and loses accommodation space up-dip, with minimal drap. The lower two Grayburg Formation high frequency sequences 1-2 (GHSs 1-2) were deposited further down-dip and not in E845. The remainder of the Grayburg Formation high frequency sequences 3-12 (GHSs 3-12) flooded onto the northwest corner of the Central Basin Platform.

*Adapted from Lindsey, Robert, F., April 2014. Grayburg Formation Reservoir-Scale Architecture and Sequence Stratigraphy Permian Basin, USA, University of Aberdeen, Doctoral Thesis, OCD 23614-17 00566.*

*All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.*

Figure 12

Permeability Barrier - Lower Grayburg Formation  
Eunice Monument South Unit Area  
Lea County, New Mexico

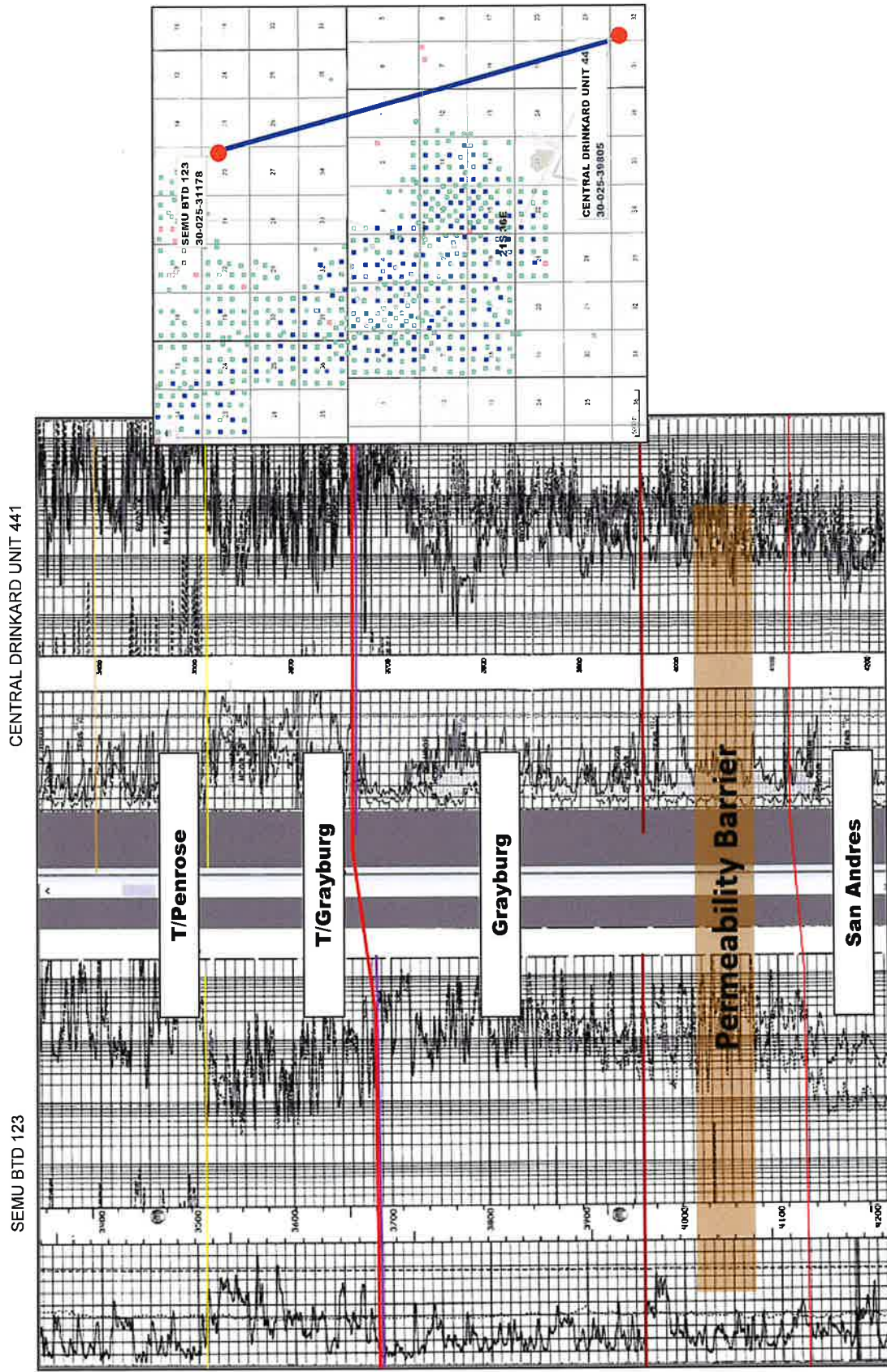
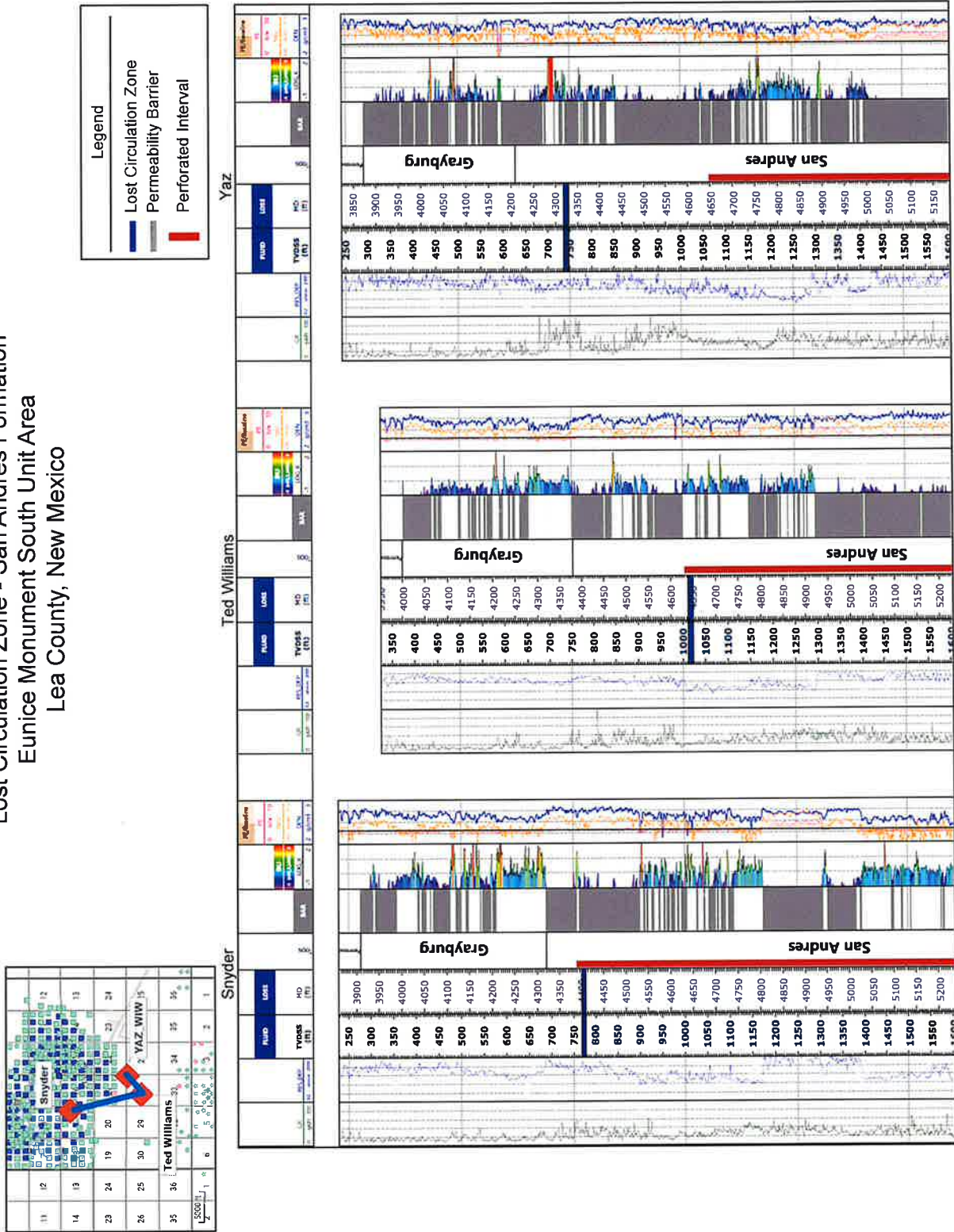


Figure 13

All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.



Lost Circulation Zone - San Andres Formation  
Eunice Monument South Unit Area  
Lea County, New Mexico



All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

Figure 14

**Tiered Estimated Original Oil-in-Place**  
Eunice Monument South Unit Area  
Lea County, New Mexico

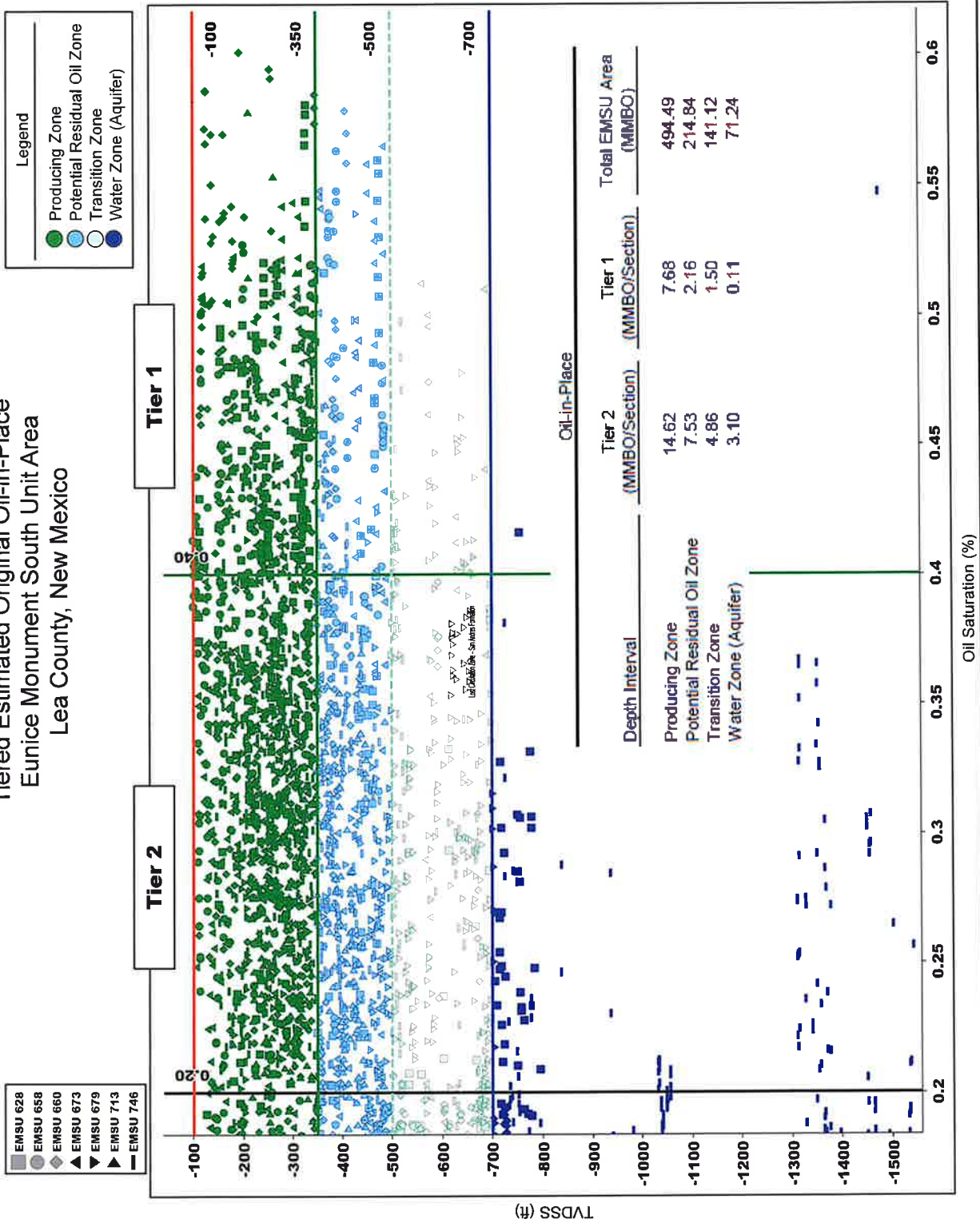


Figure 15

All estimates and exhibits herein are part of this NSAI report and are subject to its parameters and conditions.

## APPENDIX A - Curriculum Vitae

**WILLIAM J. KNIGHTS**

Vice President – Senior Technical Advisor

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[www.linkedin.com/in/william-knights-29a15118/](https://www.linkedin.com/in/william-knights-29a15118/)

**Education:** M.S., Geology, Texas Christian University; B.S., Geology, Texas Christian University.

**Certifications/Associations:** Licensed Professional Geoscientist in the State of Texas. AAPG Certified Petroleum Geologist. Member of the American Association of Petroleum Geologists, Dallas Geological Society, and Society of Professional Well Log Analysts.

Bill has been a petroleum geologist with NSAI since 1991. His work includes oil and gas resources and reserves classification and estimation using both deterministic and probabilistic methods. He performs field studies with an emphasis on integrating geological, geophysical, petrophysical, and engineering data. Responsibilities include structural/stratigraphic analysis using geophysical, geological, and petrophysical data interfaced with reservoir modeling. His primary focus is on unconventional resources and reserves evaluations.

**PROJECT EXPERIENCE****UNCONVENTIONAL OIL AND GAS**

Bill's unconventional work began in the Barnett Shale in 1986, but he has been immersed in unconventional play evaluations since 2002 with the first successful horizontal well in the Barnett Shale. He has been the lead geologist for reserves analysis for the Bakken, Barnett, Bone Spring, Eagle Ford, Fayetteville, Haynesville, Mancos, Marcellus, Montney, Muskwa, Spraberry, Utica, Vaca Muerta, Wolfcamp, and Woodford Shales and has been involved since their inception. This has given Bill the unique opportunity to evaluate the full unconventional reservoir development cycle, from initial exploration and resources delineation to reserves and resources evaluations, for fields throughout North America and the world. Bill has also developed unique and innovative unconventional data analysis and mapping applications to integrate horizontal and vertical well data with completion and performance data on both the basin and play levels and to integrate these smart data sets into basinwide databases for analysis.

Listed below are some of Bill's significant and recent projects focusing on shales:

- Annual reserves evaluations for Ascent Resources Utica Holdings, LLC; Chesapeake Energy Corporation; Chief Oil & Gas LLC; Eclipse Resources Corporation; Endeavor Energy Resources, LP; Exco Resources, Inc.; Korea National Oil Company; Ovintiv USA Inc.; Reliance Holding USA, Inc.; and Southwestern Energy Production Company, including evaluations of the Barnett Shale in North Texas, Eagle Ford Shale in South Texas, Fayetteville Shale in Arkansas, Haynesville Shale in East Texas and Louisiana, Marcellus Shale in Pennsylvania and West Virginia, Mississippian and Woodford Shales in Central Oklahoma, Utica Shale and Point Pleasant Formation in Ohio, and Wolfcamp and Spraberry Formations in the Midland Basin.
- Acquisition work for Eagle Ford, Fayetteville, Haynesville, Marcellus, Utica, and Wolfcamp properties for Ares Management LLC; BHP Billiton Petroleum Holdings (USA) Inc.; The Blackstone Group; Elliott Management Corporation; EQT Production Company; Kohlberg Kravis Roberts & Co.; Magnetar Capital LLC; Petrocap, LLC; Pioneer Natural Resources USA, Inc.; Riverstone Holdings, LLC; and Seneca Resources Corporation.



## APPENDIX A - Curriculum Vitae

- Reserves and acquisition work on various Marcellus Shale properties in Pennsylvania and West Virginia, including annual reserves evaluations for CONSOL Energy Inc./CNX Gas Corporation; Enerplus Resources (USA) Corporation; EQT Production Company; Pennsylvania General Energy, LLC; Range Resources Corporation; Rex Energy Corporation; Seneca Resources Corporation; Tug Hill Operating Company; and Ultra Petroleum Corp.
- Resources assessments for Alpine Energy; Hallwood Petroleum, LLC; and Kerogen Exploration LLC of the Barnett and Woodford Shales of West Texas.
- Resources assessments for Armour Energy Ltd., AWE Ltd., Beach Energy Ltd., Buru Energy Ltd., Drillsearch Energy Ltd., Falcon Oil and Gas Ltd., New Standard Energy Ltd., Pangaea Resources Pty Ltd., and Santos Ltd. in the Beetaloo, Canning, Cooper, and MacArthur Basins of Australia.
- Resources assessments for 3Legs Resources plc of the Silurian/Ordovician and Cambrian Shales in the Baltic Basin in Poland.
- Resources assessments for Questerre Energy Corp., Junex Inc., and Canadian Quantum Energy Corp. of the Utica Shale in the St. Lawrence Lowlands area, Quebec, Canada.
- Presented seminars on unconventional oil and gas exploration and evaluation worldwide, including in Adelaide, Austin, Brisbane, Buenos Aires, Dallas, Kassel (Germany), London, Mumbai, New York, Neuquen (Argentina), Perth, Singapore, and Sydney.
- Evaluations of the Montney Shale in eastern British Columbia, the Muskwa Shale in the Horn River Basin in northeastern British Columbia, the Duvernay Shale in southern Alberta, the Bakken Shale in Montana and North Dakota in northern United States, the Mancos and Niobrara Shales in the Uinta and Piceance Basins in the western United States, the Vaca Muerta Shale in the Neuquen Basin in Argentina, the Karoo Shale in the Karoo Basin in South Africa, and various exploration projects in South America, Africa, Europe, and Asia.



## NORTH AMERICA

- Recent experience in Piceance and Uinta Basins tight gas and oil sands.
- Performed geologic evaluations and reserves estimations for properties located onshore Gulf Coast and offshore Gulf of Mexico; in the Anadarko Basin, Permian Basin, and Delaware Basin of New Mexico and Texas; and in the Michigan Basin, North Louisiana Basin, Williston Basin, and Rocky Mountain Region.
- Conducted petrophysical evaluations of Natural Buttes (Cretaceous) Field, Uinta County, Utah; various Lodgepole (Mississippian) fields, Stark County, North Dakota; McAllen Ranch (Vicksburg) Field, Hidalgo County, Texas; Southwest Speaks (Wilcox) Field, Lavaca County, Texas; Berry R. Cox (Wilcox) Field, Webb County, Texas; various Travis Peak Sandstone (Cretaceous) fields in East Texas; various Red Fork Sandstone (Pennsylvanian) fields in western Oklahoma; and Middle Ground Shoal and Beluga River (Tertiary) Fields, Cook Inlet, Alaska.
- Evaluated multiple fields for Pemex Exploración y Producción, including the Burgos Basin fields Arcabuz-Culebra-Peña Blanca, OCP, Reynosa, Monterey, Brasil, and Geminis-Quitrín-Troncón; Southern Onshore fields Jujo-Teco, Eden-Jolote, and Jacinto-Paredon; Southern Offshore fields Ku-Maloob-Zaap and Cantarell; Northern Onshore Tamaulipas-Constituciones Field; and Northern Offshore fields Arenque and Jurel.



## SOUTH AMERICA

- Performed geologic evaluations for fields in the Oriente, Talara, and Marañon Basins of Peru.
- Performed geologic field studies and exploration projects in the Ucayali Basin of Peru.
- Conducted behind-pipe reserves study of fields in southern Trinidad.
- Conducted petrophysical evaluation of El Trapiel (Cretaceous) Field, Argentina.
- Conducted resources review of the Vaca Muerta Shale in the Neuquen Basin in Argentina.



## OTHER INTERNATIONAL

- Performed integrated geologic evaluations for all major onshore and offshore fields of Qatar.

## APPENDIX A - Curriculum Vitae

- Conducted petrophysical evaluations of Soku, Ibewa, and Obiafu/Obrikom (Tertiary) Fields in Nigeria.
- Conducted petrophysical evaluations of Mokoko-Abana, Ekoundou, and Kombo Centre (Tertiary) Fields, offshore Cameroon.
- Involved in evaluations in Bolivia, offshore Côte d'Ivoire, Egypt, Kazakhstan, and offshore China.
- Participated in the second equity redetermination of Markham Field located in the Netherlands and United Kingdom Continental Shelf North Sea.
- Participated in the third-party resolution of the Snorre Field equity redetermination in the Norwegian sector of the North Sea on behalf of a consortium of 8 companies.

**ENHANCED OIL RECOVERY**

- Performed review of integrated CO<sub>2</sub> flood models for Altura Energy Permian Basin property divestiture.
- Analyzed CO<sub>2</sub>, waterflood, gravity drainage, and steamflooding performance at Yates Field for Conoco internal reserves group.

**PRIOR EXPERIENCE**

---

Bill's prior experience consists of 10 years in reservoir analysis for both onshore and offshore projects in the Gulf Coast area. His work included a regional horizontal drilling potential study of the Cretaceous Austin and Selma Chalks for Harper Petroleum Engineering; a field study of Pewitt Ranch Field, Texas, for Hall Exploration; field and well-site work in the Lower Magdalena Valley of Colombia for Eglington Oil and Gas; prospect generation and well-site work in the Fort Worth Basin for Circle Seven Oil and Gas; acquisition evaluations of oil and gas properties in the Devonian shales of West Virginia and Mission Canyon carbonates of the Williston Basin for Snyder Oil Corporation; and prospect generation in the Fort Worth Basin for Originala Petroleum. Bill has attended open-hole logging seminars by Schlumberger, Gearhart Industries, and Welex and a cased-hole logging seminar by N. L. McCullough.

**REFERENCES**

---

Marcia Simpson – Chief Oil & Gas LLC, Dallas, Texas  
Angelo Acconcia – The Blackstone Group, New York, New York  
Ward Polzin – Camino Natural Resources, LLC, Denver, Colorado  
Greg Avra – Diamondback Energy, Inc., Midland, Texas  
Kevin Ryan – Independent Consultant, Houston, Texas  
Bhabesh Deka – Reliance Holding USA, Inc., Houston, Texas



## APPENDIX B – MATERIALS RELIED UPON

I reviewed and considered documents including:

DuChene, Harvey, R., 2013, Tectonic Influences on Petroleum Migration and Speleogenesis in the Guadalupe Mountains, New Mexico and Texas, Search and Discovery Article #120139, posted March 13, 2013.

Lindsay, Robert, F., 2018, Hybrid Model of Dolomitization, Permian Basin, Search and Discovery Article #11109, Posted August 6, 2018.

Meddaugh, W. Scott, 2018, Capturing Reservoir Heterogeneity in Reservoir Models – How Much Is Enough? Search and Discovery Article #42261, Posted August 13, 2018.

Meddaugh, W. Scott, 2019, An Updated Semivariogram "Atlas" for Carbonate Reservoirs Impact on Geologic Models and Dynamic Model Production Forecasts, Search and Discovery Article #42443, Posted September 23, 2019.

Trentham, Robert, and L. Stephen Melzer, A "Cookbook" Approach to Exploring for, and Evaluating, Residual Oil Zones in the San Andres Formation of the Permian Basin, Search and Discovery Article #51259, Posted May 23, 2016.

Waite, Lowell, 2022, Geology of the Permian Basin, Middle & Upper Permian, Post Permian, Permian Basin System, Permian Basin Research Laboratory, UT Dallas.





## APPENDIX C - BIBLIOGRAPHY

Lindsay, R., April 2014. Grayburg Formation Reservoir-Scale Architecture and Sequence Stratigraphy Permian Basin, USA.

Olea, R., 2017. Carbon Dioxide Enhanced Oil Recovery Performance According to the Literature, U.S. Geological Survey, Chapter D.

Verma, M., 2017. Summary of the Analyses for Recovery Factors, U.S. Geological Survey, Chapter E.

Love, Tracy, Andrew McCarty, Matthew J. Miller, and Mark Semmelbeck, 1998, Problem Diagnosis, Treatment Design, and Implementation Process Improves Waterflood Conformance, SPE International, SPE 49201.

Anderson, C.C., H.H. Hinson, and H.J. Schroeder, July 1939, Reservoir Characteristics of the Eunice Oil Field, Lea County, N. Mex., United States Department of the Interior – Bureau of Mines, R.I. 3456.

Trentham, Dr. Robert, L. Steven Melzer, and David Vance, June 28, 2012, Commercial Exploitation and the Origin of Residual Oil Zones: Developing a Case History in the Permian Basin of New Mexico and West Texas, Research Partnership to Secure Energy for America, Contract 81.089 08123-19-RPSEA.



## APPENDIX D - ABBREVIATIONS

|                 |                                       |
|-----------------|---------------------------------------|
| %               | percent                               |
| BBL             | barrels                               |
| BCF             | billions of cubic feet                |
| BO/ac-ft        | barrels of oil per acre-foot          |
| CBP             | Central Basin Platform                |
| Chevron         | Chevron Corporation                   |
| CO <sub>2</sub> | carbon dioxide                        |
| Empire          | Empire Petroleum Corporation          |
| EMSU            | Eunice Monument South Unit            |
| ESP             | electrical submersible pump           |
| ft              | feet                                  |
| GOC             | gas-oil contact                       |
| Goodnight       | Goodnight Midstream Permian, LLC      |
| HCPV            | hydrocarbon pore volume               |
| IP              | initial potential                     |
| MCF             | thousands of cubic feet               |
| MMBO            | millions of barrels of oil            |
| MMBL            | millions of barrels                   |
| NSAI            | Netherland, Sewell & Associates, Inc. |
| OIP             | oil-in-place                          |
| OOIP            | original oil-in-place                 |
| OWC             | oil-water contact                     |
| POWC            | producing oil-water contact           |
| ROZ             | residual oil zones                    |
| S <sub>o</sub>  | oil saturation                        |
| SPE             | Society of Petroleum Engineers        |
| TD              | total depth                           |
| TVDSS           | true vertical depth subsea            |

**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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