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

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

CASE NO. 22626

MOTION TO WITHHOLD EMPIRE'S ALLOWABLE FOR ITS EMSU #462 AND REQUEST FOR STATUS CONFERENCE

Goodnight Midstream Permian, LLC ("Goodnight Midstream") moves the Oil Conservation Division ("Division") to issue an order withholding Empire New Mexico, LLC's ("Empire") allowable for its EMSU #462 well until the well's status and construction is confirmed to the Division by filing a Form C-105 well recompletion report and the required well tests. Goodnight Midstream further requests a status conference on the January 19, 2023, hearing docket to address this motion and Goodnight Midstream's motion to compel filed on November 3, 2022. In support of this motion, Goodnight Midstream states the following:

INTRODUCTION

Division rules require that a C-105 and confirmatory tests be filed after recompletion of a well; otherwise, the Division is <u>required</u> to withhold the allowable for the well authorized by an approved C-104. *See* 19.15.7.16.A NMAC. The Division's well file for the EMSU #462 reflects that the well was proposed to be recompleted from a San Andres water supply well to a Grayburg oil production well. The production records reflect that the recompletion was performed; however, the EMSU #462 well file does not contain a C-105 well re-recompletion report confirming that the work was done, and Empire has confirmed that it does not have any such documentation in its possession. Until Empire complies with the Division's rules and files the required C-105 and

confirmatory test reports for the EMSU #462, the Division is required to suspend Empire's allowable for the EMSU #462.

BACKGROUND

- 1. On September 15, 2022, the Division Hearing Examiner gave Empire 15 days to produce documents relating to the EMSU #462 well construction and completion status. *See* Case No. 22626, Hrg. Tr. 273:11-17.
- 2. Empire did not produce documents by the deadline. Counsel for Goodnight Midstream inquired into the status of document production on October 6 and again on October 12. On October 14, counsel for Empire produced a 36-page PDF that contained only a portion of the documents within the 56-page Division well file. The documents Empire produced did not contain documents or pages not already available in the Division's public online well file.
- 3. Counsel for Goodnight Midstream sought to confirm with Empire on October 14 that the production included all responsive documents and electronic records in Empire's possession or control relating to the EMSU #462 well. Counsel for Empire did not respond.
- 4. On November 3, 2022, counsel for Goodnight Midstream filed a Motion to Compel, requesting that Empire be required to produce all responsive documents, including electronic records, relating to the status and construction of the EMSU #462 well or confirm in a sworn statement submitted to the Division that it has produced all such records.
- 5. On November 9, 2022, counsel for Empire responded by email that Empire does not have any other records on the EMSU #462 well and that Empire will submit a sworn statement to that effect. *See* Email from E. Padilla to A. Rankin, dated 11/9/22, attached as **Exhibit A**. Accordingly, Goodnight Midstream has not pursued an order on its Motion to Compel to date; however, Empire has not yet provided a sworn statement as promised.

ARGUMENT

- 6. As explained by Division Examiner Phil Goetze at the hearing on September 15, 2022, confirmation on the status and construction of the EMSU #462 well is critical to the Division's resolution of this case. *See id.* Tr. 273:2–10. Not only is it critical to this case, but it is also required under Division rules.
- 7. Among the 36-page PDF Empire produced to Goodnight Midstream was a Form C-101, Application for Permit to Drill, Re-Enter, Deepen, Plugback, or Add a Zone, dated April 26, 2012, attached as **Exhibit B**. In this Form C-101, the "proposed program" was to "convert EMSU #462 from a Water Source Well to an Oil Producer." *Id*. The proposed re-completion program was to (1) set a cast iron bridge plug at 4,260 feet, closing off the Grayburg-San Andres open hole; (2) run 5-1/2 inch production casing to 4,200 feet; (3) cement with 760 sacks of cement; (4) perforate only the Grayburg from 3,794 feet to 3,900 feet; (5) acidize the new Grayburg perforations; and (6) put the well on production. *Id*. The Form C-101 was approved by the Division on May 2, 2012. *Id*. The Form C-101 includes a stamp, which states "Permit Expires 2 Years From Approval Date Unless Drilling [Plugback] Underway." *Id*. (noting that the word "Drilling" is crossed out and the word "Plugback" is written in).
- 8. In other words, the Form C-101 approved by the Division for the EMSU #462 proposed to plug back the well from the San Andres to the Grayburg and to convert it from a water supply well to an oil producer.
- 9. Under 19.15.7.16 NMAC, a Form C-105 should have been filed "within 45 days following the . . . recompletion of a well." 19.15.7.16.A NMAC. An operator is also required to file with the C-105 "a summary of special tests conducted on the well, including drill tests" and "shall file a copy of electrical and radio-activity logs run on the well." *Id.* If an operator fails to

submit the C-105 and accompanying data requirements to the Division within the 45-day period, the "division shall withhold the allowable for the well or suspend injection authority, as appropriate, <u>until</u> the operator has complied with 19.15.7.16 NMAC." *Id.* (emphasis added).

- 10. No Form C-105 or any other subsequent report filings are available in the well file confirming that the recompletion was done as planned, and Empire has confirmed by email that it has no records on the status or construction of the well and has been unable to provide confirmation that a C-105 or any subsequent report was ever filed.
- 11. Notwithstanding the fact that there is no paper record of the proposed work being performed, production reports for the EMSU #462 show that the well clearly flipped from producing water to producing oil within the two-year timeframe under the Division's C-101 permit approval, providing strong indication that the well was plugged back from the San Andres and converted to oil production in the Grayburg, as proposed. *See* Exhibit C.
- 12. Under the Division's rules, Empire, as current operator of the EMSU #462 well, must be required to confirm the well's status and construction through wireline logs, a temperature survey, or other confirmatory well tests, and to file with the Division a C-105 report with the confirmatory logs and summaries. *See* 19.15.7.16 NMAC. If Empire refuses to do so, the Division must withhold Empire's allowable for the EMSU #462 and suspend its authority to transport oil under its C-104 authorization until Empire confirms the well's construction and status by filing a C-105 report with the required confirmatory logs and summaries required by the Division's regulations. *See Bd. of Educ. v. Jennings*, 1982-NMCA-135, ¶ 94, 651 P.2d 1037 ("An administrative agency must follow its own regulations." (emphasis added)).

CONCLUSION

Goodnight Midstream has had to expend considerable time and resources attempting to confirm the status and construction of Empire's EMSU #462 well, which is critical to the resolution of this case and required to be provided to the Division under the governing regulations. If Empire fails or refuses to conduct the necessary tests to submit an accurate C-105, the Division must withhold Empire's allowable for the EMSU #462 and suspend its authority to transport oil under its C-104 authorization until Empire, as the current operator, submits a C-105 and the accompanying data requirements. Every other operator is required to adhere to the Division's administrative filing requirements. The Division must impose the same requirements on Empire.

For the foregoing reasons, Goodnight Midstream respectfully requests that this Motion be granted and that this matter, and the pending Motion to Compel, be set for a Status Conference on the January 19, 2023, hearing docket.

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR GOODNIGHT MIDSTREAM PERMIAN, LLC

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2023, 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

Attorney for Empire New Mexico, LLC

Adam G. Rankin

Adam Rankin

From: Ernest Padilla <PadillaLawNM@outlook.com>
Sent: Wednesday, November 9, 2022 4:24 PM

To: Adam Rankin

Subject: RE: Goodnight Midstream - Case 22626 - Reminder to request documents from Empire on the EMSU

#462 well

External Email

Adam—Empire says that it does not have any other records on the 462 well. I will prepare to the effect that it produced everything that it received from XTO/Exxon. I will send you a sworn statement to that effect.

Ernie

From: Adam Rankin < AGRankin@hollandhart.com>

Sent: Friday, October 14, 2022 2:54 PM

To: Ernest Padilla < PadillaLawNM@outlook.com>

Subject: RE: Goodnight Midstream - Case 22626 - Reminder to request documents from Empire on the EMSU #462 well

Ernie,

This file appears to be a partial copy of 36 of the 56 pages in the OCD's well file for this well. Are these the <u>only</u> well file records Empire has for this well? Is this 3MB document everything that Empire has in its possession and control relating to the construction status of this well, including electronic databases and files that it received from XTO? And there is nothing in their files after 05/01/2012? Thanks for confirming.

Adam Rankin

Partner, Holland & Hart LLP 110 North Guadalupe Street, Suite 1 Santa Fe, NM 87501 E agrankin@hollandhart.com T (505) 954-7294 M (505) 570-0377



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From: Ernest Padilla < PadillaLawNM@outlook.com>

Sent: Friday, October 14, 2022 1:51 PM

To: Adam Rankin < AGRankin@hollandhart.com>

Subject: RE: Goodnight Midstream - Case 22626 - Reminder to request documents from Empire on the EMSU #462 well

External Email

Adam—attached are the well records for the EMSU 462 well.

Ernie



From: Adam Rankin <<u>AGRankin@hollandhart.com</u>>
Sent: Wednesday, October 12, 2022 12:49 PM
To: Ernest Padilla <<u>PadillaLawNM@outlook.com</u>>
Cc: Paula M. Vance <<u>PMVance@hollandhart.com</u>>

Subject: RE: Goodnight Midstream - Case 22626 - Reminder to request documents from Empire on the EMSU #462 well

Ernie,

Just following up to see if Empire has responded to your reminder last week to provide the well file for the EMSU #462, the current completion status of the well. From the well's production history, it is apparent that the work proposed in 2012 was actually done and the well was plugged back from the San Andres and converted from a water supply well to an oil well producing from the Grayburg.

I've posted a snippet of the well's production history below (link here: https://www.apps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-025-29622) and you can see that water production stops in 2003 and oil production commences in 2014 after the APD to recomplete was filed in 2012.

My strong preference is to work with Empire to obtain the documents without getting the OCD involved, but if Empire is not going to cooperate we won't have any choice but to seek some form of relief/remedy from the OCD.

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± 2014	3,661	1,707	261,663	319	0	0	0
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I am in Houston through Thursday but will be in the office on Friday – hopefully we will have the documents by then. Talk to you soon.

Best, Adam

Adam Rankin

Partner, Holland & Hart LLP 110 North Guadalupe Street, Suite 1 Santa Fe, NM 87501 E <u>agrankin@hollandhart.com</u> T (505) 954-7294 M (505) 570-0377





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From: Adam Rankin

Sent: Thursday, October 6, 2022 5:48 PM

To: Ernest Padilla < PadillaLawNM@outlook.com Cc: Paula M. Vance < PMVance@hollandhart.com PMVance

Subject: Goodnight Midstream - Case 22626 - Reminder to request documents from Empire on the EMSU #462 well

Ernie.

Good to see you at NMOGA and to catch up this evening. As discussed, the Division Examiner had given Empire 15 days from the hearing date (which would have been September 30) to produce to Goodnight the documents and files it has relating to the EMSU #462 well and in particular its current completion status. I've attached Goodnight's Rebuttal Exhibit I which is the APD to plugback from the San Andres to the Grayburg to convert the well from water production in the San Andres to an oil producer in the Grayburg. September 30 has come and gone but we haven't received any documents from Empire.

Can you please remind the folks at Empire to produce its paper and electronic records that reflect the current completion status and configuration of the well?

I've included a link to a OneDrive folder below. Right now only you have access to it. I can give additional people access to the folder so they can upload files, etc. but need their email addresses to do so.

Separately, I will ask Nathan if he has an analysis of wells in the 1-mile area of review.

Thanks and have a great weekend in Durango.

EMSU #462 - Well File Records

Adam G. Rankin

Partner, Holland & Hart LLP

110 N. Guadalupe, Suite 1, Santa Fe, NM 87501

Direct 505.954.7294 Cell 505.570-0377 Main 505.988.4421





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District III

State of New Mexico Energy, Minerals & Natural Resources

OIL CONSERVATION DIVISION 1220 South St. Francis Dr.

Form C-102 Revised October 12, 2005

Submit to Appropriate District Office State Lease - 4 Copies

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Eunice Monument South Unit #462 WSW Convert Well from WSW to Oil Producer in Grayburg Lea County, New Mexico December 1, 2011

ELEVATION:

GL - 3590'

TD - 4998'

KB - 3607'

PBTD - 4998'

WELL DATA:

Current Status:

Shut in (Water Source Well).

Surface Casing:

16" 65ppf set at 416' cemented with 472 sx. TOC circ to

surface.

Intermediate Csg:

11-3/4" 54ppf set at 2700' cemented with 1100 sx. TOC circ

to surface.

Prod. Casing:

8-5/8" 32ppf set at 4315' cemented with 850 sx. TOC circ to

surface.

COMPLETION:

Тор	Bottom	Length	Туре	Formation	SPF	Shots	Date	Comments
4315	4998	683	OH	San Andres	0	0	1987	Open Hole

OBJECTIVE:

Convert WSW to Grayburg Oil Producer.

PROCEDURE BY JWP

PAGE 1 OF 4



Eunice Monument South Unit #462 WSW Convert Well from WSW to Oil Producer in Grayburg Lea County, New Mexico December 1, 2011

RECOMMENDED PROCEDURE

(Verify that anchors have been set and tested per NMOCD and OSHA guidelines)

This is a STATE well.

- 1. MIRU PU. MI and rack 4300' 2-7/8" 6.5ppf, N-80, EUE, 8rd work string.
- 2. ND WH. NU BOP with 2-7/8" rams.
- 3. RU wireline company. RIH with gauge ring to 4280'. POOH and LD gauge ring.
- 4. RIH with 8-5/8" CIBP on wireline and set CIBP at 4260'. POOH and RD wireline.
- 5. RIH with 8-5/8" packer on 2-7/8" WS and set packer at 4250'.
- 6. Load tubing and test CIBP with brine water to 1000 psig. POOH with 2-7/8" tubing and LD 8-5/8" packer.
- 7. MI and rack 4400' of 5-1/2" 17ppf, J-55, LTC casing. ND BOP with 2-7/8" rams. RU welder. Weld on new 5-1/2" casing bowl to WH. NU BOP with 5-1/2" rams.
- 8. RIH with 5-1/2" float shoe, 1jt of 5-1/2" 17ppf casing, float collar, 5-1/2" 17ppf casing to CIBP at 4260'. Space 5-1/2" centralizers from 4260' to 3600'.
- 9. RU cement company. Establish circulation out 8-5/8" x 5-1/2" annulus with 20 bbls fresh water with the following mixture:

Lead Slurry: Mix and circulate 275 sx EconoCem-HLC (Halliburton)

cement at 12.4ppg.

Tail Slurry: Mix and circulate 260 sx VersaCem-C (Halliburton) cement at 14.4ppg

Circulate out 8-5/8 x 5-1/2" annulus at surface. Drop wiper plug and displace with brine water. RD cement company. WOC over night.

- 10. Set 5-1/2" casing slips. ND BOP with 5-1/2" rams. Cut off excess 5-1/2" 17ppf casing and weld on WH. NU BOP with 2-7/8" rams.
- 11. RIH with 4-3/4" bit on 2-7/8" WS and CO to 4210'. POOH with 2-7/8" WS and LD 4-3/4" bit.

PROCEDURE BY JWP PAGE 2 OF 4



Eunice Monument South Unit #462 WSW Convert Well from WSW to Oil Producer in Grayburg Lea County, New Mexico December 1, 2011

- 12. Load and test 5-1/2" 17ppf casing with brine water to 500 psig.
- 13. RU wireline company. RIH with 3-1/8" casing gun on wireline loaded with premium charges and perforate 2 SPF the following intervals:

Тор	Bottom	Length	Туре	Formation	SPF	Shots	Date	Comments
3794	3797	3	Perf	Grayburg	2	6	2011	
3811	3814	3	Perf	Grayburg	2	6	2011	
3818	3821	3	Perf	Grayburg	2	6	2011	
3826	3828	2	Perf	Grayburg	2	4	2011	
3835	3842	7	Perf	Grayburg	2	14	2011	
3859	3862	3	Perf	Grayburg	2	6	2011	1
3873	3887	14	Perf	Grayburg	2-3	28	2011	
3890	3893	3	Perf	Grayburg	2	6	2011	
3898	3900	2	Perf	Grayburg	2	4	2011	
. Total = 80								

- 14. RIH with 5-1/2" treating packer on 2-7/8" WS. Set packer at 3730'.
- 15. MIRU acid company. Test lines to 4000 psig. Load and test TCA with brine to 500 psig and monitor during job. Acidize Grayburg perforations from 3794' 3900' with 3650 gal of 20% 90/10 acid while spacing 120 1.3 SG ball sealers at 5 BPM and a maximum pressure of 3000 psig with the following schedule.
 - a. Load tubing with brine.
 - b. Spot 150 gal acid across perforations and let sit 30 minutes.
 - c. Establish injection rate with brine water.
 - d. Pump 500 gal acid.
 - e. Pump 3000 gal acid while dropping 120 1.3 SG ball sealers evenly throughout stage.
 - f. Flush to bottom perf with brine.

Note: Record ISIP and 5-10-15 minute pressures.

- 16. RDMO acid company. Shut well in for two hours for acid to spend. Release packer. RIH with 5-1/2" packer to 3900' to knock balls off of perforations. PUH with 5-1/2" packer and set at 3730'.
- 17.RU swab and swab back acid load. Determine flow rate and oil cut. Report results to Midland. POOH and LD 5-1/2" packer and 2-7/8" WS.

PROCEDURE BY JWP

PAGE 3 OF 4



Eunice Monument South Unit #462 WSW Convert Well from WSW to Oil Producer in Grayburg Lea County, New Mexico December 1, 2011

18. MI and rack 4000' of 2-7/8" 6.5ppf, J-55, EUE, 8rd tubing. RIH with production equipment sized as per swab results. Land pump intake at 3900'. ND BOP. Set TAC. NU WH. Make electrical and flow line connections.

19. RWTP. Put well in test. RDMO PU.

Prepared by:

Approved by:

Joseph/Patterson Date

Pate

PROCEDURE BY JWP

XTO ENERGY

Well: Location: EMSU 462 WSW

Section 9-21S-36E

2590' FSL & 50' FWL

County: Lea

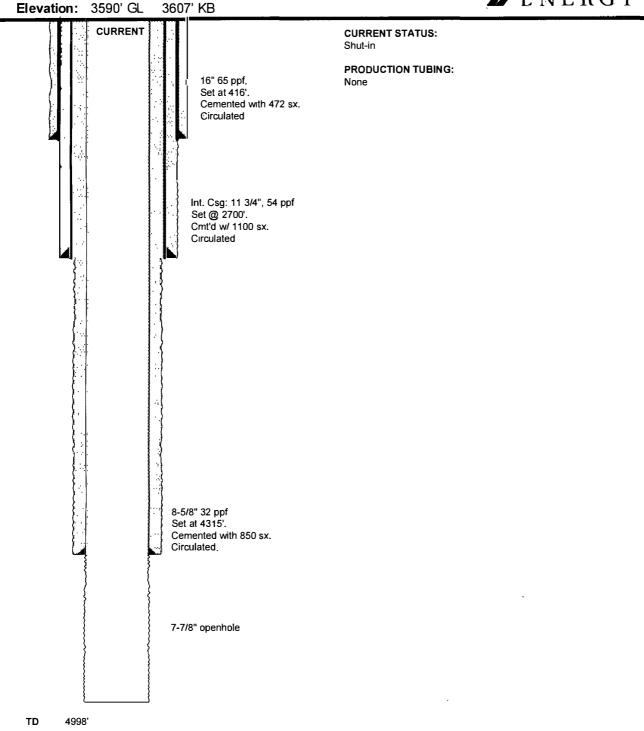
Elevation: 3590' GL WI:

NRI:

Spud: 7/87

State: **New Mexico**





PREPARED BY: Jeff Gasch

DATE: 10/26/05_

XTO ENERGY

Well: EMSU 462 WSW Location:

Section 9-21S-36E

2590' FSL & 50' FWL

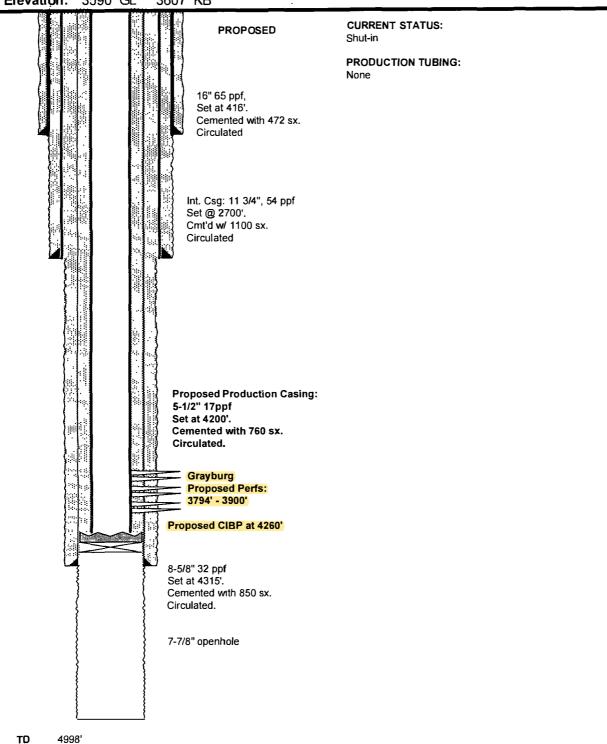
County: Lea

Elevation: 3590' GL 3607' KB WI: NRI:

Spud: 7/87

State: **New Mexico**





PREPARED BY: JWP DATE: 11/17/2011 Production Summary Report API: 30-025-29622 EUNICE MONUMENT SOUTH UNIT #462 Printed On: Tuesday, October 18 2022

Printed On: Tuesday, October 18 2022					Injection				
Pool	Oil(BBLS)	Gas(MCF)	Water(BBLS)	Davs P/I	-	Co2(MCF)	Gas(MCF)	Other	Pressure
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	1/1/1994	(,	658,662	0		,	(,		
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/1994		588,000	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1994		673,894	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/1994		666,990	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/1994		690,653	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/1994		671,850	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/1994		635,739	0					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/1994		690,126						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1994		662,854	30					
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	10/1/1994 11/1/1994		694,581 660,186	31 30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/1994		660,428	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/1995		679,184	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/1995		609,529	28					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1995		649,957	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/1995		659,365	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/1995		634,699	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/1995		660,940	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/1995		683,786	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/1995		654,105	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1995		649,544	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/1995		677,194	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/1995		658,338	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/1995		697,177	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/1996		670,461	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/1996		630,843	29					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1996		669,253 645,836	31 30					
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	4/1/1996 5/1/1996		640,925	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/1996		620,250	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/1996		653,715	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/1996		674,531	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1996		650,994	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/1996		671,449	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/1996		645,781	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/1996		505,227	24					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/1997		190,828	11					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/1997		76,343	12					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1997		303,286	28					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/1997		530,084	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/1997		696,579	31					
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	6/1/1997		445,144	22 31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/1997 8/1/1997		518,214 679,878	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1997		643,021	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/1997		116,900	8					
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/1997		50,372	17					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/1998		764,190	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/1998		589,857	28					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1998		660,287	31					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/1998		666,680	30					
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/1998		694,387						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/1998		210,411						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/1998		229,536						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/1998		59,823						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1998		0						
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	10/1/1998 11/1/1998		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/1998		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/1999		0	0					
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/1999		0						
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/1999		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/1999		0	0					
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/1999		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/1999		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/1999		0						
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	12/1/1999		0						
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES [23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2000 2/1/2000		0						
[25000] LOWICE MICHONUMENT, GRATBURG-SAIN AMDRES	2/1/2000		U	U					

[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2000			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2000			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2000			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2000			0	0
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES				727,330	29
	8/1/2000				
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2000			0	0
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2001			0	0
				0	
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2001				0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2001			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2001			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2001			0	0
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2002			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2002			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2002			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2002			603,197	29
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2002			679,933	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2002			446,672	22
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES					
	7/1/2002			393,737	19
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2002			289,900	15
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2002			0	0
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2002			30,499	3
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2003			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2003			325,150	17
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2003			28,236	3
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2003			39,111	5
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2003			216,097	12
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2003			0	0
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[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2004			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2004			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2004			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2004			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2004			0	0
	11/1/2004				
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2014	72	25	7,954	13
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2014	222	149	20,959	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2014	252	169	22,159	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2014	334	183	25,428	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2014	424	177	26,243	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2014	402	176	27,402	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2014	407	193	26,861	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2014	380	159	27,045	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2014	368	161	25,731	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2014	389	165	25,372	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2014	411	150	26,509	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2015	401	142	25,391	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2015	360	152	21,920	28
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2015	396	159	24,271	31
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	4/1/2015	388	148	22,811	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2015	405	141	24,370	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2015	391	144	23,269	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES					
	7/1/2015	400	152	23,822	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2015	373	153	23,034	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2015	307	133	20,708	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2015	316	138	21,752	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2015	298	141	20,804	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2015	287	167	21,472	31

[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2016	291	167	21,838	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2016	274	164	19,806	29
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2016	297	156	21,225	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2016	281	156	20,403	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2016	289	164	21,427	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2016	268	147	20,528	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2016	287	143	21,516	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2016	288	133	21,593	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2016	278	146	20,772	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2016	252	135	20,181	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2016	197	114	17,697	26
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES					
• •	12/1/2016	254	126	21,221	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2017	238	119	20,459	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2017	215	116	18,680	28
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2017	230	129	19,922	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2017	226	123	19,447	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2017	225	130	19,526	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2017	217	126	18,887	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2017	230	127	19,718	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2017	210	119	18,303	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2017	230	109	17,653	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2017	229	106	17,569	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2017	211	97	16,484	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2017	214	120	17,190	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2018	207	115	20,038	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2018	190	115	17,733	28
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2018	213	130	17,307	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2018	192	127	20,486	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2018	210	145	23,033	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2018	202	131	21,366	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2018	219	133	22,337	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2018	224	136	22,663	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2018	202	123	21,474	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2018	207	111	20,606	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2018	189	96	0	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2018	203	111	19,720	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2019	187	121	19,456	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2019	170	116	19,449	28
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2019	185	123	21,786	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2019	198	143	21,668	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2019	68	73	11,019	13
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2019	193	166	27,404	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2019	221	149	26,640	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2019	217	142	26,386	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2019	223	141	26,026	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2019	170	116	20,857	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2019	137	328	19,740	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES					
	12/1/2019	143	280	20,695	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2020	143	212	21,534	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2020	117	77	20,724	29
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2020	116	104	20,625	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2020			0	0
				0	
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2020			0	0
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2020	114	88	21,316	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2020	142	118	24,708	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES				25,190	
• •	8/1/2020	138	115		30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2020	196	134	26,684	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2020	189	127	24,716	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2020	169	106	23,600	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2020	166	95	23,243	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2021	138	86	22,302	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2021	72	53	10,226	15
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2021	15	23	4,189	6
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2021	110	45	22,559	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2021	112	51	23,741	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2021	125	59	22,860	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2021	174	41	27,158	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2021	176	147	26,713	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	9/1/2021	145	160	25,520	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	10/1/2021	139	130	21,903	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	11/1/2021	121	105	18,264	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	12/1/2021	119	62	20,630	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	1/1/2022	117	47	19,187	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	2/1/2022	90	71	15,238	28
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	3/1/2022	109	79	19,111	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	4/1/2022	88	74	17,582	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	5/1/2022	92	53	20,275	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	6/1/2022	106	91	17,760	30
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	7/1/2022	103	43	15,328	31
[23000] EUNICE MONUMENT; GRAYBURG-SAN ANDRES	8/1/2022	103	12	14,921	31
[25000] LOTVICE INICINOIVILINI, GRATBURG-SAN ANDRES	0/1/2022	103	12	14,341	31