

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

**APPLICATION OF GOODNIGHT
MIDSTREAM PERMIAN, LLC TO
WITHHOLD THE ALLOWABLE FOR
THE EMSU #462 WELL, LEA
COUNTY, NEW MEXICO.**

CASE NO. _____

APPLICATION

Goodnight Midstream Permian, LLC (“Goodnight Midstream”) files this application with the Oil Conservation Division (“Division”) pursuant to 19.15.4 NMAC and 19.15.7.16.A NMAC for an order withholding Empire New Mexico, LLC’s (“Empire”) allowable for its EMSU #462 well until Empire confirms the well’s status and construction by filing a Form C-105 well recompletion report and the required well tests with the Division. In support of this application, Goodnight Midstream states the following:

1. Empire (OGRID 330679) is the designated operator of the EMSU #462 well (API No. 30-25-29622).

2. Goodnight has standing under 19.15.4.8 NMAC to file this application. Confirmation of the construction status of the EMSU #462 well affects the Division’s determination of Goodnight’s application to inject currently pending under Case No. 22626.

3. Division rules require that a C-105 and confirmatory tests be filed after recompletion of a well; otherwise, the Division is required to withhold the allowable for the well authorized by an approved C-104. *See* 19.15.7.16.A NMAC.

4. 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

EXHIBIT A

file does not contain a C-105 well re-completion report confirming that the work was done, and Empire has confirmed that it does not have any such documentation in its possession.

5. 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.

6. In the Division's well file for the EMSU #462 is a Form C-101, Application for Permit to Drill, Re-Enter, Deepen, Plugback, or Add a Zone, dated April 26, 2012. In this Form C-101, the "proposed program" was to "convert EMSU #462 from a Water Source Well to an Oil Producer." 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. The Form C-101 was approved by the Division on May 2, 2012. 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).

7. 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.

8. 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, until the operator has complied with 19.15.7.16 NMAC.” *Id.* (emphasis added).

9. 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.

10. 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 following 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 A.*

11. 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)).

WHEREFORE, Goodnight Midstream Permian, LLC requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 2, 2023, and, after notice and hearing as required by law, the Division enter an order approving this application.

Respectfully submitted,

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**ATTORNEYS FOR GOODNIGHT MIDSTREAM
PERMIAN, LLC**

CASE _____: Application of Goodnight Midstream Permian, LLC to Withhold the Allowable for the EMSU #462 Well, Lea County, New Mexico. Applicant in the above-styled cause seeks an order pursuant to 19.15.4 NMAC and 19.15.7.16.A NMAC withholding Empire New Mexico, LLC's ("Empire") allowable for its EMSU #462 well (API No. 30-25-29622) until the well's status and construction is confirmed to the New Mexico Oil Conservation Division by filing a Form C-105 well recompletion report and the required well tests. The subject well is located approximately 8 miles northwest of Eunice, N.M.

EXHIBIT A

Production Summary Report
 API: 30-025-29622
 EUNICE MONUMENT SOUTH UNIT #462
 Printed On: Tuesday, October 18 2022

Pool	Oil(BBLS)	Gas(MCF)	Water(BBLS)	Days P/I	Injection			
					Water(BBLS)	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	31				
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	9/1/1994		662,854	30				
[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	10/1/1994		694,581	31				
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[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				
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[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	2/1/1996		630,843	29				
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[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	4/1/1996		645,836	30				
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EXHIBIT A

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[23000] EUNICE MONUMENT;GRAYBURG-SAN ANDRES	10/1/2014	368	161	25,731	31
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[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
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EXHIBIT A

[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
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[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
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[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
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[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
[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	8/1/2020	138	115	25,190	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

EXHIBIT A