

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

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22027 FOR THE ROCKET SWD  
NO. 1 WELL OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO**                      **CASE NO. \_\_\_\_\_**

**APPLICATION**

Empire New Mexico LLC (“Empire”) respectfully applies for an order revoking the injection authority granted under Order No. R-22506 in Case No. 21527 (“Order”). In support, Empire states as follows:

1. Goodnight Midstream Permian, LLC (“Goodnight”) is the operator of record for the Rocket SWD Well No. 1, API# 30-025-pending (“Well”), a produced water disposal well to be located 565 feet from the South line and 245 feet from the West line (Unit M) of Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico.

2. The Well is located approximately 4,715’ from the Unit and will dispose of water at the same depths as the unitized interval of the Eunice Monument South Unit (“Unit”), which is operated by Empire.

3. The unitized interval of the Unit extends from the top of the Grayburg formation to the bottom of the San Andres formation (“Unitized Interval”). The vertical limits of the Unitized Interval are the same as the vertical limits of the Eunice Monument Grayburg-San Andres Pool covering the Grayburg and San Andres formations.

4. The Well will dispose into the San Andres formation through an open-hole interval from 4330 feet to 5750 feet below surface, and disposed water has the potential to migrate into the Unitized Interval.

5. At the time of the application, Goodnight misrepresented that the San Andres is a non-productive zone known to be compatible with formation water from the Bone Spring, Delaware, and Wolfcamp formations (“Produced Water”).

6. However, residual oil zones (“ROZ”) are found within the San Andres, and Empire has the right to recover hydrocarbons therein.

7. Moreover, the salinity levels of Produced Water are substantially greater than the salinity levels of water in the Unitized Interval, including the San Andres formation.

8. Disposal in the Well will impair the ability of Empire to recover hydrocarbons within the Unitized Interval and thereby adversely affects the correlative rights of Empire and other interest owners in the Unit and results in waste.

9. Empire has requested that Goodnight voluntarily refrain from drilling the Well, but as of the date of filing this application, Goodnight has not indicated it will do so.

10. Revocation of the disposal authority granted by Order No. R-22506 will prevent the waste of recoverable hydrocarbons and will protect correlative rights.

WHEREFORE, Empire requests that this case be heard as a status conference on December 7, 2023 and, at that time, be set for a contested hearing on the same docket as Case No. 23775.

Respectfully submitted,

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***Application of Empire New Mexico LLC to Revoke the Injection Authority Granted Under Order No. R-22506 for the Rocket SWD Well No. 1 Operated by Goodnight Midstream Permian LLC, Lea County, New Mexico.*** Applicant in the above-styled cause seeks an order revoking the injection authority granted by Order No. R-22506, issued in Case No. 21527 on March 2, 2023, to dispose of produced water in the Rocket SWD Well No. 1, API# 30-025-pending (“Well”), a produced water disposal well to be located 565 feet from the South line and 245 feet from the West line (Unit M) of Section 28, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The approved injection zone is the San Andres formation, an interval which is potentially productive of hydrocarbons since the advent of horizontal drilling. The Well is located approximately 7 miles West of Eunice City, New Mexico.