

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

**APPLICATION OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC TO AMEND  
ORDER NO. R-7765, AS AMENDED TO  
EXCLUDE THE SAN ANDRES FORMATION  
FROM THE UNITIZED INTERVAL OF THE  
EUNICE MONUMENT SOUTH UNIT,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24278**

**APPLICATION OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC TO AMEND  
ORDER NO. R-7767 TO EXCLUDE THE SAN  
ANDRES FORMATION FROM THE EUNICE  
MONUMENT OIL POOL WITHIN THE  
EUNICE MONUMENT SOUTH UNIT AREA,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24277**

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

**CASE NOS. 23614-23617**

**APPLICATIONS OF EMPIRE NEW MEXICO LLC  
TO REVOKE INJECTION AUTHORITY,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 24018-24027**

**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**

**EMPIRE’S OBJECTIONS TO AND MOTION TO QUASH  
GOODNIGHT’S SUBPOENA DUCES TECUM**

Empire New Mexico, LLC (“Empire”) submits the following Objections to and Motion to Quash Goodnight Midstream Permian, LLC’s (“Goodnight”) Subpoena seeking to depose a

corporate witness of Empire under Rule 1-030(B)(6) NMRA. For the reasons discussed below, the Oil Conservation Commission (“Commission”) should issue an order quashing the subpoena.<sup>1</sup>

## I. INTRODUCTION

These applications arise from Goodnight’s current and proposed injection of produced water into the San Andres formation within and surrounding the 14,189.84-acre Eunice Monument South Unit (“EMSU”) operated by Empire, and Goodnight’s effort to unilaterally amend the unitized interval that was approved by the Division, Commission, New Mexico State Land Office, and Bureau of Land Management. The EMSU has existed since 1984, when it was approved by the Commission via Order Nos. R-7765, R-7766, and R-7767. Empire also operates the Arrowhead Grayburg Unit (“AGU”), which is located approximately 1 mile to the southeast of the EMSU, under Order No. R-9482. Chevron and XTO operated the units before Empire’s acquisition in 2021.

Goodnight’s Motion to Issue a Deposition Subpoena and Showing Good Cause to Depose Empire New Mexico, LLC (“Goodnight’s Motion”) seeks to depose a corporate representative of Empire regarding Empire’s business plan for tertiary recovery within the EMSU. In addition to the fact that the Commission’s regulations do not adopt Rule 1-030(B)(6) NMRA or contemplate corporate representative depositions, Goodnight misstates the scope of the Commission’s inquiry in these matters and falsely claims that Empire has failed to provide a plan for tertiary recovery development within the EMSU. The crux of Goodnight’s Motion is that Empire cannot prevail at the hearing in September unless it presents a business plan to economically recover hydrocarbons in the San Andres formation within the EMSU. *See* Goodnight’s Motion at 5. But no such plan is required for the Commission to determine that Goodnight’s injection operation results in waste of

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<sup>1</sup> For the reasons discussed herein, Empire is filing a Notice of Non-Appearance contemporaneously with this motion.

hydrocarbons and impairs correlative rights under the Oil and Gas Act, and Empire has produced numerous documents regarding tertiary recovery within the EMSU in any event. Further, this issue will be the subject of expert testimony at the hearing. It seems Goodnight is actually seeking to dispute the sufficiency of Empire's *business* plan – an issue that is not within the Commission's jurisdiction – and that no plan will satisfy Goodnight's endless demands. Goodnight even goes so far as to complain that Empire has “suddenly” produced a document that resembles a “plan” but still does not meet Goodnight's standard of what a “plan” should encompass. *See* Goodnight's Motion at 2. Goodnight claims that the lack of a formal, written “plan” constitutes extraordinary circumstances that justify a deposition of a corporate representative before the September hearing. *Id.*

Goodnight's Motion primarily lodges unfounded accusations that Empire must be concealing its plans to develop the San Andres Residual Oil Zone (“ROZ”), which will lead to Goodnight being “prejudicially surprised” at the September hearing. Goodnight must cease its harassing and baseless accusations regarding Empire. For example, Goodnight claims that Empire's counsel failed to respond to e-mails about the “plan” Goodnight believes should exist, *see* Goodnight's Motion at 8, when Empire's counsel had numerous telephone conversations with Goodnight's counsel about the document requests during that time period, and Empire supplemented its discovery responses on February 1, 2024, in response to Goodnight's January 30, 2024 e-mail. *See* Empire's Second Supplemental Subpoena Response, attached to Goodnight's Motion as Exh. 4.

Further, Empire has produced numerous documents regarding development plans within the EMSU, including the 2024 Plan of Development it submitted to the Bureau of Land Management on February 27, 2024, which Goodnight's Motion falsely claims was not produced.

Empire has produced approximately 3,230 pages of documents in response to Goodnight's multiple subpoenas and has also responded to a subpoena issued by Goodnight in the unrelated case of *DASCO Cattle Company, LLC v. Goodnight Midstream Permian, LLC* (Case No. D-506-CV-2023-00122). It appears that Goodnight's main reasons for continuing to file motions accusing Empire of bad faith is to prejudice Empire before the Commission and to harass Empire with needless discovery. It is not fair to Empire or the Commission, and wastes resources, for Goodnight to engage in these tactics.

Finally, Goodnight has obtained a subpoena seeking a deposition of a corporate representative to testify on topics that have already been identified as the areas of testimony for several of Empire's witnesses. *See* Subpoena, attached as Exh. A; Empire's Witness Disclosure (filed July 8, 2024). The Division should not allow Goodnight to utilize a Commission subpoena for this purpose. The subpoena should be quashed.

## I. ARGUMENT

**Goodnight's subpoena should be quashed because it does not comply with the Commission's Rules and there is no extraordinary circumstance that necessitates the deposition of a corporate representative.**

Moving to quash a subpoena is among the "appropriate avenues for redress" when a subpoena constitutes an abuse of process. *See Poorbaugh v. Mullen*, 1982-NMCA-141, ¶ 18, 99 N.M. 11. A subpoena that is unreasonable or oppressive should be quashed. *See Blake v. Blake*, 1985-NMCA-009, ¶ 21, 102 N.M. 354. Under the New Mexico Rules of Civil Procedure, a party is only entitled to seek information that is not privileged and is reasonably calculated to lead to the discovery of admissible evidence in the pending action. Rule 1-026(B)(1) NMRA. Goodnight's subpoena should be quashed because it fails to comply with the Division Rules, and with the New

Mexico Rules of Civil Procedure's requirements, is unreasonable, oppressive, and amounts to an abuse of process.

**A. The Commission's Rules do not allow depositions of corporate representatives.**

The Oil and Gas Act delegates to the Division authority to prevent waste and protect correlative rights. NMSA 1978, §§ 70-2-6; 70-2-11. While this grant of authority is broad, it is limited in scope. Discovery is an exception in Commission and Division proceedings rather than the rule. Unlike in district court, "[t]he commission and director or the director's authorized representative shall issue subpoenas for witness depositions in advance of [a] hearing *only in extraordinary circumstances for good cause shown.*" 19.15.4.16(A) NMAC (emphasis added). 19.15.4.16(A) NMAC contemplates depositions of fact or expert witnesses only and does not make any mention of or allow corporate representative depositions.

Corporate representative depositions are governed by Rule 1-030(B)(6) of the New Mexico Rules of Civil Procedure, which has not been incorporated into the Commission's rules. This omission is logical given the extremely limited scope of depositions in Commission proceedings. Corporate representatives differ from fact witnesses or expert witnesses in that a fact or expert witness provides testimony based on personal knowledge, observations, and opinions, while a corporate representative acts as a spokesperson for the corporate entity. *See* Rule 1-030(B)(6) NMRA; *Valerio v. San Mateo Enterprises, Inc.*, 2017-NMCA-059, 400 P.3d 275. The Commission's rules provide that subpoenas can be issued for *witness* depositions, but no party has identified a corporate representative as a witness. Goodnight's subpoena for a corporate representative deposition is outside the scope of 19.15.4.16(A) NMAC and should be quashed.

**B. Goodnight fails to demonstrate any “extraordinary circumstances” or “good cause” that necessitate the deposition of an Empire corporate representative.**

In addition to Rule 19.15.4.16(A) NMAC’s omission of corporate representative depositions, the Rule provides that subpoenas for witness depositions may only be issued “*in extraordinary circumstances for good cause shown.*” 19.15.4.16(A) NMAC (emphasis added). The term “extraordinary circumstances for good cause shown” generally requires a showing that the circumstances are beyond the normal scope of discovery and that not making an exception could result in unfairness or prejudice. *See Pincheira v. Allstate Insurance Co.* 2007-NMCA-094, ¶ 46, 164 P.3d 982 (“good cause is established by showing . . . a ‘clearly defined and serious injury’”).

Here, there is no need to go beyond the scope of the discovery contemplated in the Commission’s rules. Goodnight argues that Empire’s failure to provide a detailed, written “economic plan to recover hydrocarbons from the San Andres formation” is an “extraordinary circumstance” necessitating the issuance of a subpoena for the deposition of a corporate representative. *See* Goodnight’s Motion at 9-10. Goodnight’s argument hinges on allegations of impropriety on the part of Empire and claims that Goodnight must take a corporate representative deposition because “Empire has not produced [a] complete plan” about the economic viability of hydrocarbon recovery from the San Andres formation. Goodnight goes on to argue that the “complete plan” “is centrally necessary information for Goodnight to test Empire’s allegations that the San Andres has an economically recoverable ROZ, and Goodnight has no other source for Empire’s plan than from the documents or testimony of Empire.” Goodnight’s Motion at 13. Goodnight’s arguments have no merit and should be rejected.

First, Goodnight argues that exceptional circumstances for a deposition exist based on the false premise that Empire cannot prevail at hearing unless it presents a written business plan to

economically develop the San Andres ROZ. Goodnight's Motion at 6, 9-12. Neither the Oil and Gas Act nor the Commission's regulations support Goodnight's claim. Rather, the Oil and Gas Act delegates to the Commission broad authority to prevent waste and protect correlative rights. *See* NMSA 1978, § 70-2-11(A). The Commission is not charged with evaluating companies' business plans to determine whether they are economic and does not have experts available to do so. The Commission's role is to determine whether Goodnight's injection is causing waste and impairing correlative rights – not whether Empire has an economically viable business plan. *See id.* Further, Empire's duly disclosed expert witnesses will present extensive testimony and exhibits to establish that a producible ROZ exists within the San Andres. *See* Empire's Expert Disclosure (July 8, 2024). Empire is not required to possess or prepare a business plan for development of the San Andres ROZ to prevail at hearing.

Second, contrary to Goodnight's claims, Empire has, in fact, produced numerous documents regarding the ROZ and tertiary recovery plans within the EMSU. *See* Empire's Second Supplemental Response to Goodnight's Subpoena, attached to Goodnight's Motion as Exhibit 4. Goodnight even claims Empire refused to produce its plans of development for the EMSU that were submitted to the New Mexico State Land Office, when Empire produced its 2023 Summary of Operations and 2024 Plan of Development on April 4, 2024. *See* Goodnight's Motion at 12-13; Empire's Response to Goodnight Midstream Permian LLC's March 5, 2024 Subpoena Duces Tecum, attached as Exh. B.<sup>2</sup> Goodnight concedes that Empire produced its Eunice Monument and Arrowhead Field CO<sub>2</sub> Development Plan, attached to Goodnight's Motion as Exhibit 2, and then proceeds to attack the plan as insufficient. It seems Empire will never produce a "plan" that might satisfy Goodnight. At hearing, the Commission will evaluate witness testimony and exhibits to

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<sup>2</sup> As stated in Empire's Motion to Quash filed on April 5, 2024, Empire agreed to produce development plans in its possession that were submitted to the State Land Office or BLM, and it has done so.

determine whether a San Andres ROZ exists. Goodnight's apparent desire to berate Empire regarding the alleged insufficiencies in a tertiary recovery business plan – which is not required by any statute, regulation, or Commission decision – does not create exceptional circumstances that justify a corporate representative deposition.

Third, Empire can only produce those documents within its possession, custody, or control. There is no requirement for a party to create a document for the purpose of producing it in discovery. Empire continues to supplement its production with documents it finds in its possession, custody and control to fulfill its duty to seasonably supplement discovery responses and production. *See* Rule 1-026(E). It is not required to prepare a business plan to satisfy Goodnight.

Finally, there is no good cause for the deposition of a corporate representative because Goodnight could have sought to depose Empire's witness who was designated to testify at hearing about development plans within the EMSU. *See* Empire New Mexico LLC's Witness Disclosure at 1-2 (July 8, 2024) (identifying Jack Wheeler who will testify about development plans, *inter alia*). Further, Empire has eight other witnesses to testify about the topics specifically identified by the Commission for hearing, that is, "the existence, extent of and possible interference with a residual oil zone [in] the Eunice Monument South Unit . . . by produced water injection activities undertaken by Goodnight." Joint Order on Goodnight's Motion to Limit Scope of Hearing on Cases Within the EMSU and the Oil Conservation [Division] Motion Concerning the Scope of the Evidentiary Hearing Set for September 23-27, 2024 at 2, ¶ 2. Goodnight could have sought to depose any of the witnesses identified by Empire to offer testimony within the scope of the hearing determined by the Commission, including on the following topics:

- Dr. Robert Lindsay, who will testify about the existence of a ROZ within the San Andres formation underlying the EMSU, the Eunice Monument South Unit Expansion Area B, and the Arrowhead Grayburg Unit;



- Laurence Melzer, who will testify about the history and process of Residual Oil Zone mapping, exploration, and hydrocarbon recovery, including relevant diagnostic tools;
- Frank Marek, who will testify regarding evidence that water is being injected into the San Andres interval and the documented ROZ along with its resulting impairment of Empire's correlative rights to hydrocarbon retrieval;
- Galen Dillewyn, who will testify about analysis of data relating to characterizations for the San Andres and Grayburg formations;
- Joe McShane, who will testify about evidence of a ROZ within the San Andres Reservoir;
- William West, who will testify about historical evidence of communication between the San Andres and Grayburg intervals;
- Dr. James. L. Buchwalter, who will testify about his simulation model detailing projections for the EMSU according to production and injection rates; and
- Dr. Robert Trentham, who will testify about the history of development and successful recovery from Residual Oil Zones as well as the impact of Goodnight's continued injection and resulting impairment to the economics of enhanced oil recovery in the San Andres and Grayburg within the EMSU.

Clearly, based on Empire's detailed Witness List, it does not intend to surprise Goodnight at the hearing. Although Goodnight could have sought subpoenas for the depositions of these witnesses – as Empire has done for Goodnight's witnesses – it instead elected to seek a corporate representative deposition that is not authorized by the Commission's rules for the purpose of exploring a subject outside of the scope of the hearing set by the Commission and for which there is no good cause. If Goodnight wanted to take a Rule 1-030(B)(6) deposition of an Empire corporate representative, it should have done so in the ongoing district court litigation. Instead, Goodnight obtained a stay of discovery in that litigation and now seeks to conduct improper discovery here, presumably to obtain some sort of tactical advantage.

The parties' testimony and exhibits for the hearing are not yet due. However, just like every other hearing, Goodnight will have the ability to review the witness's testimony and develop

rebuttal exhibits. There will be no “surprises” and Goodnight will not be prejudiced if it is not permitted to depose a corporate representative about the “plan” it believes is so important to these proceedings.

### III. CONCLUSION

The Commission’s rules do not authorize Rule 1-030(B)(6) depositions of corporate representatives, and Goodnight has failed to demonstrate that extraordinary circumstances for good cause necessitate such a deposition. Accordingly, the subpoena should be quashed.

Respectfully submitted,

**HINKLE SHANOR LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel by electronic mail on July 26, 2024:

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

**APPLICATION OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC TO AMEND  
ORDER NO. R-7767 TO EXCLUDE THE SAN  
ANDRES FORMATION FROM THE EUNICE  
MONUMENT OIL POOL WITHIN THE  
EUNICE MONUMENT SOUTH UNIT AREA,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24277**

**APPLICATION OF GOODNIGHT  
MIDSTREAM PERMIAN, LLC TO AMEND  
ORDER NO. R-7765, AS AMENDED TO  
EXCLUDE THE SAN ANDRES FORMATION  
FROM THE UNITIZED INTERVAL OF THE  
EUNICE MONUMENT SOUTH UNIT,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24278**

**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**

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

**DIVISION CASE NO. 22626  
ORDER NO. R-22869-A  
COMMISSION CASE NO. 24123**

**SUBPOENA**

To: Empire New Mexico, LLC  
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cc: wmcginnis@montand.com

**YOU ARE HEREBY COMMANDED** pursuant to NMSA 1978, §70-2-8 and

Rule 19.15.4.16.A NMAC TO APPEAR as follows:

Place: Holland & Hart LLP, 110 North Guadalupe, Santa Fe, New Mexico, 87501

Date: August 2, 2024      Time: 10:00 a.m.

to testify at the taking of the deposition of Empire New Mexico, LLC's Rule 1-30(B)(6)  
Representative, with knowledge known, or reasonably available to Empire New Mexico, LLC,

pertaining to the topics listed in **Exhibit A**. It will be recorded by a certified court reporter and videotaped by Bean & Associates. This deposition testimony may be used at trial for any and all purposes permitted by the New Mexico Rules of Civil Procedure and the New Mexico Rules of Evidence.

**YOU ARE ALSO COMMANDED** pursuant to Section 70-2-8 and Rule 19.15.4.16.A to bring with you the following document(s) or object(s):

Any documents requested in **Exhibit B**.

to produce the following documents at the offices of Holland & Hart LLP, 110 North Guadalupe, Santa Fe, New Mexico, 87501, contemporaneous with the taking of the deposition of Empire New Mexico, LLC.

This subpoena is issued on application of Goodnight Midstream Permian, LLC through its attorney, Adam G. Rankin of Holland & Hart LLP.

Dated this 19<sup>th</sup> day of July 2024.

**NEW MEXICO OIL CONSERVATION COMMISSION**

**BY:**   
\_\_\_\_\_  
Gerasimos Razatos, Acting Division Director

**Date:** July 19, 2024

## EXHIBIT A: CORPORATE REPRESENTATIVE TOPICS

Goodnight Midstream Permian, LLC respectfully requests a corporate representative of Empire New Mexico, LLC to testify regarding the following topics:

1. Engineering and reservoir plans for recovery of the alleged San Andres ROZ as a part of Empire's project plan;
2. The reservoir engineering data and analyses underlying Empire's alleged project to inject carbon dioxide "CO<sub>2</sub>" to free the supposed San Andres ROZ oil for production, including but not limited to:
  - a. Reservoir characterization studies for the San Andres ROZ target zone;
  - b. Pilot holes to gather actual data on the San Andres ROZ target zone;
  - c. Geologic studies on the San Andres ROZ target zone;
  - d. Analysis of existing core data, acquisition of additional cores and core analysis;
  - e. Miscibility studies including laboratory tests;
  - f. Project staging and number of deepened or new drill wells;
  - g. Reservoir simulation studies;
  - h. Injection scheme study and design;
  - i. Production and recycle facility design;
  - j. CO<sub>2</sub> requirements, sourcing, and schedule;
3. Costs for each of the above enumerated items, estimates of project capital expenses and operating expenses, and the economic tools used to generate such estimates;
4. Estimates of future production and revenue and their references used to perform economic analyses using all project costs;
5. Any sensitivity studies using ranges of potential future revenues and costs to judge the profit margin, if any, from such economic analyses.



**EXHIBIT B: DOCUMENT REQUESTS PURSUANT TO RULE 1-034 NMRA**

Plaintiffs request production of the following documents contemporaneous with the deposition of Empire New Mexico, LLC:

1. All documents reviewed, referred to or relied upon by the witnesses to prepare for their deposition.
2. All documents used to refresh the recollection of the witnesses to prepare for their deposition.
3. All documents reviewed by witnesses as part of their preparation for the deposition on the topics above.

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

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22026 FOR THE ANDRE DAWSON  
SWD #001 OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO. CASE NO. 24018**

**APPLICATION OF EMPIRE NEW MEXICO LLC  
TO REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22027 FOR THE ERNIE BANKS  
SWD NO. 1 WELL OPERATED BY GOODNIGHT  
MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24019**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED BY  
ADMINISTRATIVE ORDER SWD-2307 FOR THE RYNO  
SWD #001 F/K/A SNYDER SWD WELL NO. 1 OPERATED  
BY GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24020**

**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. 24021**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ADMINISTRATIVE ORDER NO. SWD-2391 FOR  
THE PEDRO SWD #001 WELL OPERATED BY  
GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24022**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22030 FOR THE VERLANDER  
SWD WELL NO. 1 OPERATED BY  
GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24023**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER ORDER NO. R-20855 FOR THE NOLAN RYAN SWD #001 OPERATED BY GOODNIGHT MIDSTREAM PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24024**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER ORDER NO. R-21190 FOR THE SOSA SA 17 NO. 2 WELL OPERATED BY GOODNIGHT MIDSTREAM PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24025**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER ADMINISTRATIVE ORDER NO. SWD-2075 FOR THE TED 28 SWD WELL NO. 1 OPERATED BY GOODNIGHT MIDSTREAM PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24026**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER ORDER NO. R-20865 FOR THE YAZ 28 SWD WELL NO. 1 OPERATED BY GOODNIGHT MIDSTREAM PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24027**

**EMPIRE NEW MEXICO LLC'S RESPONSE TO GOODNIGHT MIDSTREAM PERMIAN LLC'S MARCH 5, 2024 SUBPOENA DUCES TECUM**

Empire New Mexico, LLC ("Empire") submits the following response to the subpoena issued by the New Mexico Oil Conservation Division on March 5, 2024 at the request of Goodnight Midstream Permian LLC ("Goodnight"). Empire objects to the requests included in the subpoena for the reasons set forth in Empire's Objection to and Motion to Quash Goodnight Midstream Permian, LLC's Subpoena Duces Tecum ("Motion to Quash"), which was filed on April 4, 2024. Subject to the objections set forth in its Motion to Quash, Empire provides the following responses to Goodnight's requests.

1. **Request Nos. 1 through 17.** Please refer to Empire's Motion to Quash.

2. **Request No. 10:** All plans of development for the EMSU submitted to the New Mexico State Land Office from approval of the EMSU to the present, including all internal and external communications, emails, memoranda, and summaries, that reflect on, discuss, reference, or concern such plans of development.

**Response:** Subject to the objections set forth in Empire's Motion to Quash, Empire is producing its 2023 Summary of Operations and 2024 Plan of Development for the EMSU, which was submitted to the Bureau of Land Management (and copied to the New Mexico State Land Office) on February 27, 2024 with bates numbers OCD 23614-17 03298 to 03326.

3. **Request No. 11:** All monthly reports submitted to the Division required under Order R-22869-A, including all internal and external communications, emails, memoranda, and summaries, that reflect on, discuss, reference, or concern such monthly reports.

**Response:** Subject to the objections set forth in Empire's Motion to Quash, Empire states that it is working with the New Mexico Oil Conservation Division to determine the content and format of the reports. Once the reports are submitted, they will be produced.

4. **Request No. 12:** All documents, data, reports, and analyses, including internal and external communications, emails, memoranda, and summaries that reflect on, discuss, reference, or concern the alleged EMSU well failures and alleged increased well costs referred to in footnote No. 2 of Empire New Mexico LLC's Motion to Refer Cases to New Mexico Oil Conservation Commission, filed on January 3, 2024.

**Response:** Subject to the objections set forth in Empire's Motion to Quash, Empire is producing a list of its wells that require remedial action with bates numbers OCD 23614-

17 03327 to 03329. This list may not be comprehensive and is subject to change, as Empire is continuing to evaluate the impacts of Goodnight's injection on its wells.

Respectfully submitted,

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February 27, 2024

United States Department of Interior  
Bureau of Land Management  
Reservoir Management  
New Mexico State Office  
301 Dinosaur Trail  
Santa Fe, NM 87508

RE: **EUNICE MONUMENT SOUTH A & B UNITS  
(NMNM 070948X)/MLRS (NMNM105450732)**  
2024 Plan of Development  
LEA County, New Mexico

Empire Petroleum Corporation (Empire), in its capacity as the Unit Operator of the EUNICE MONUMENT SOUTH A & B UNITS (EMSU & EMSUB) (NMNM 070948X)/MLRS (NMNM105450732), hereby presents our 2023 Summary of Operations and 2024 Plan of Development for your consideration. The following plan outlines our strategy for the ongoing development of potential oil and gas reserves situated in the Grayburg/San Andres formations in Empire's Units.

Included herewith are the following documents for your review and approval:

1. Summary of Operations for the previous year (2023).
2. Planned operations for the year 2024.
3. Current status report on all wells within the Units.
4. Production/injection graphs for each unit.
5. Detailed maps encompassing geological interpretation of structural maps, isopach, area boundaries, and types of leases, wells, flow lines, roads, and facilities.

Please note that approval of this Plan does not constitute approval for the actual execution of the work outlined therein. Individual approval is still required for specific items such as APDs/ROWs/etc. Any modifications to the Plan of Development will be filed as supplements to the Plan.

If you have questions or want additional information, please contact Sr. Reservoir Engineer Anibal Araya at [aaraya@empirepetrocorp.com](mailto:aaraya@empirepetrocorp.com) or (832) 525-7575.

Sincerely,

Jack Wheeler  
Vice President Land & Legal

## 2023 Summary of Operations and 2024 Plan of Development

### **EUNICE MONUMENT SOUTH A & B UNITS (EMSU & EMSUB) (NMNM 070948X)/MLRS (NMNM105450732) Operator: Empire Petroleum Corporation**

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Attached herewith are the following documents for your reference:

1. Review of 2023 Operations & 2024 Plan of Development (POD)
2. Figures 1 to 4: units' production/injection rates and cumulative, and Water-Oil Ratio (WOR) plots.
3. Figures 5 to 10: Maps of the Units showcasing outlines, flow lines, facilities, leases, roads, satellite views, structural maps of the top of the Grayburg Formation, isopach maps of the Grayburg Formation, and injection patterns.
4. Tabular listing of production and injection well statuses.

Note: no confidential or proprietary information.

#### **Review of 2023 Operations:**

As of February, 2024, the average production of the Eunice Monument South Unit A (EMSU) and Eunice Monument South Unit B (EMSUB) (NMNM 070948X)/MLRS (NMNM105450732) stands at 975 barrels of oil per day (bopd), 525 thousand standard cubic feet of gas per day (mscfd), 89 thousand barrels of water per day (mbwpd), and 90 thousand barrels of water injected per day (mbwpd).

Tables 1 and 2 provide a list of the wells we worked on throughout 2023.

Summary of operational activities:

- Executed 45 remedial workover operations, encompassing 33 well failure repairs/reactivations and 12 temporary abandonments.
- No plug and abandonment wells were recorded.
- Evaluated failed wells for potential fill and acid treatments.
- No drilling, completion, or conversion activities took place within EMSU A or EMSU B.
- In June, 2023, Empire New Mexico began working on the Inactive Wells List, which had steadily grown since the acquisition of the field from XTO Energy Inc. (XTO) in April 2021. Initially comprising 74 wells, this list required, in accordance with the stipulations of the New Mexico Oil Conservation Division (NMOCD), that Empire remove wells from said list through operations such as Plugging & Abandoning, Temporary Abandoning, Returning to Production/Injection, or updating reported production/injection volumes. Additionally, XTO requested Empire to complete the inactive list to facilitate the transfer of remaining wells from the acquisition to Empire New Mexico's operatorship. By November, 2023, Empire New Mexico successfully resolved the list, leading XTO to submit Change of Operatorship paperwork for an additional 77 inactive wells, which was finalized within the same month.



Subsequently, following the ownership transfer of the 77 inactive wells, the NMOCD initiated an Inactive Well Agreed Compliance Order (ACOI) with Empire New Mexico. Under this Agreement, Empire is mandated to remove 10 wells per month from the original list of 96 wells. Moreover, the Agreement stipulates that Empire New Mexico must furnish a \$1 Million Bond as an incentive to expedite the resolution process. Notably, each well removed results in \$10,000 being returned from the Bond to Empire New Mexico. The scope of work includes Plugging & Abandoning, Temporary Abandoning, Returning to Production/Injection, and updating reported production/injection volumes. As of February 15, 2024, Empire has successfully removed 63 wells from the original list of 96 wells. The list includes EMSU and EMSU B wells.

#### **Plan of Development for 2024:**

- Through February 2024, activity includes 7 remedial workovers.
- Focus on well repairs and reactivations, ensuring continuous monitoring of units' production and timely well service repairs.
- Assessment of additional pay and infill opportunities, involving reservoir analysis, evaluation for behind-pipe, deepening opportunities, and new drills.
- Waterflood surveillance and optimization efforts, featuring the creation of WF pattern analysis dashboard tools, evaluation of injector/producer conformance opportunities to enhance sweep efficiency, and analysis/surveillance of waterflood patterns to address unswept layers and poorly waterflooded areas, along with the identification and correction of water channeling and preferential flood paths.
- Continued evaluation of injector/producer wells for remedial work to boost injectivity/productivity.
- Assessment of wells currently producing at uneconomic rates for Temporary Abandonment (TA) and Plug & Abandonment (P&A).
- Continued compliance with the ACOI list.

#### **Waterflood Surveillance and Optimization:**

The inception of waterflood operations dates to 1986 for EMSU and subsequently in 1992 for EMSU-B.

A comprehensive waterflood performance analysis commenced in late 2023 for EMSU, aiming to optimize the flood and maximize areal and vertical recovery where feasible. This analysis entails allocating production and injection data of each well to its pattern based on the pattern's geometry.

To analyze the patterns, they had to be compared on dimensionless basis to make the process "apples to apples". The analysis was accomplished by estimating the hydrocarbon pore

volume (HCPV) of each pattern by considering factors such as pattern area, thickness (isopach map), average porosity, and water saturation, facilitating a dimensionless comparison of patterns based on injected and produced HCPV. The process, coupled with conformance analysis, enables Empire to identify areas with low waterflood sweep efficiency and "thief" zones, which are characterized by high permeability preferential flow paths that undermine waterflood performance due to water channeling. Subsequently, corrective measures can be implemented to enhance the recovery factor. These remedial measures include, but are not limited to, water shut-off campaigns of the offending flow units, squeeze perforations in both injectors and producers, perforate additional intervals, deepen wells, new wells, etc.

In the upcoming year, each pattern will undergo analysis, and adjustments will be recommended and executed in alignment with Empire's budget and financial objectives. Empire has already identified patterns with short-lived injection, previously classified as poor performing waterflood areas. However, it has become evident that these areas were simply poorly executed, with some lacking waterflood operations altogether.

Another initiative undertaken by Empire involves an evaluation of past conformance campaigns to assess their effectiveness and replicate successful strategies, thereby enhancing conformance and sweep efficiency. Additionally, Empire has identified areas where wells were drilled or completed only to the top third of the Grayburg formation, presenting an opportunity to deepen or recomplete these wells into the mid and lower Grayburg formation to target additional recoverable reserves in unswept areas.

Further analysis will be conducted to identify potential areas for improvement, encompassing the examination of historical and new injection profile logs, as well as a comprehensive review of perforated zones histories (including recompletions) and their impact on the historical production performance of the waterflood.

**Table 1. 2023 Well Work Activity EMSU**

| Well Name | API10      | Legal Location       | Formation | Status | ACTIVITY |
|-----------|------------|----------------------|-----------|--------|----------|
| EMSU-104  | 3002504321 | 20S 36E 25C NE NW    | Grayburg  | Active | RTI      |
| EMSU-108  | 3002504330 | 20S 36E 25G          | Grayburg  | Active | RTI      |
| EMSU-111  | 3002506283 | 20S 37E 30F SE NW    | Grayburg  | Active | RTI      |
| EMSU-185  | 3002504512 | 21S 36E 5B           | Grayburg  | Active | RTI      |
| EMSU-278  | 3002520133 | 21S 36E 9A           | Grayburg  | Active | RTI      |
| EMSU-318  | 3002529901 | 21S 36E 10L NW SW    | Grayburg  | Active | RTI      |
| EMSU-332  | 3002504545 | 21S 36E 7N SE SW     | Grayburg  | Active | RTI      |
| EMSU-362  | 3002504662 | 21S 36E 16B          | Grayburg  | Active | RTI      |
| EMSU-369  | 3002504676 | 21S 36E 18A          | Grayburg  | Active | RTI      |
| EMSU-380  | 3002504701 | 21S 36E 17H SE NE    | Grayburg  | Active | RTI      |
| EMSU-390  | 3002504635 | 21S 36E 14F SE NW    | Grayburg  | Active | RTI      |
| EMSU-194  | 3002529599 | 21S 36E 6G SW NE     | Grayburg  | Active | RTP      |
| EMSU-202  | 3002529866 | 21S 36E 4G           | Grayburg  | Active | RTP      |
| EMSU-260  | 3002504463 | 21S 36E 4O           | Grayburg  | Active | RTP      |
| EMSU-282  | 3002521902 | 21S 36E 8A           | Grayburg  | Active | RTP      |
| EMSU-353  | 3002504630 | 21S 36E 14A          | Grayburg  | Active | RTP      |
| EMSU-384  | 3002504656 | 21S 36E 16H SE NE    | Grayburg  | Active | RTP      |
| EMSU-392  | 3002504632 | 21S 36E 14H          | Grayburg  | Active | RTP      |
| EMSU-561  | 3002533595 | 20S 36E 36P          | Grayburg  | Active | RTP      |
| EMSU-623  | 3002535455 | 21S 36E 5S NE NE SW  | Grayburg  | Active | RTP      |
| EMSU-736  | 3002534852 | 21S 36E 15B NW NW NE | Grayburg  | Active | RTP      |
| EMSU-200H | 3002504492 | 21S 36E 4E           | Grayburg  | TA     | TA       |
| EMSU-110  | 3002506284 | 20S 37E 30E SW NW    | Grayburg  | TA     | TA       |
| EMSU-112  | 3002506282 | 20S 37E 30G SW NE    | Grayburg  | TA     | TA       |
| EMSU-143  | 3002504424 | 20S 36E 36F SE NW    | Grayburg  | TA     | TA       |
| EMSU-165  | 3002504427 | 20S 36E 36L          | Grayburg  | TA     | TA       |
| EMSU-186  | 3002504516 | 21S 36E 5C NW        | Grayburg  | TA     | TA       |
| EMSU-299  | 3002504571 | 21S 36E 9F           | Grayburg  | TA     | TA       |
| EMSU-311  | 3002529600 | 21S 36E 11I NE SE    | Grayburg  | TA     | TA       |
| EMSU-450  | 3002525320 | 21S 36E 22J          | Grayburg  | TA     | TA       |
| EMSU-577  | 3002537318 | 21S 36E 6B           | Grayburg  | TA     | TA       |
| EMSU-597  | 3002535158 | 21S 36E 5E SW NW     | Grayburg  | TA     | TA       |
| EMSU-747  | 3002535167 | 21S 36E 15A SW NE NE | Grayburg  | TA     | TA       |

\*RTI: Return to injection, RTP: Return to production, TA: Temporarily abandoned

**Table 2. 2023 Well Work Activity EMSU B**

| Well Name | API10      | Legal Location       | Formation | Status | ACTIVITY |
|-----------|------------|----------------------|-----------|--------|----------|
| EMSUB-855 | 3002531080 | 20S 36E 11E SW NW    | Grayburg  | Active | RTI      |
| EMSUB-865 | 3002504216 | 20S 36E 11N          | Grayburg  | Active | RTI      |
| EMSUB-885 | 3002504272 | 20S 36E 14K NE SW    | Grayburg  | Active | RTI      |
| EMSUB-857 | 3002504220 | 20S 36E 11G          | Grayburg  | Active | RTP      |
| EMSUB-861 | 3002512723 | 20S 36E 11L NE NW SW | Grayburg  | Active | RTP      |
| EMSUB-864 | 3002504217 | 20S 36E 11M SW SW    | Grayburg  | Active | RTP      |
| EMSUB-895 | 3002504308 | 20S 36E 24A          | Grayburg  | Active | RTP      |
| EMSUB-903 | 3002504290 | 20S 36E 23E          | Grayburg  | Active | RTP      |
| EMSUB-906 | 3002504295 | 20S 36E 23H          | Grayburg  | Active | RTP      |
| EMSUB-909 | 3002504314 | 20S 36E 24G          | Grayburg  | Active | RTP      |
| EMSUB-919 | 3002504303 | 20S 36E 23N          | Grayburg  | Active | RTP      |
| EMSUB-921 | 3002504296 | 20S 36E 23P          | Grayburg  | Active | RTP      |

\*RTI: Return to injection, RTP: Return to production, TA: Temporarily abandoned

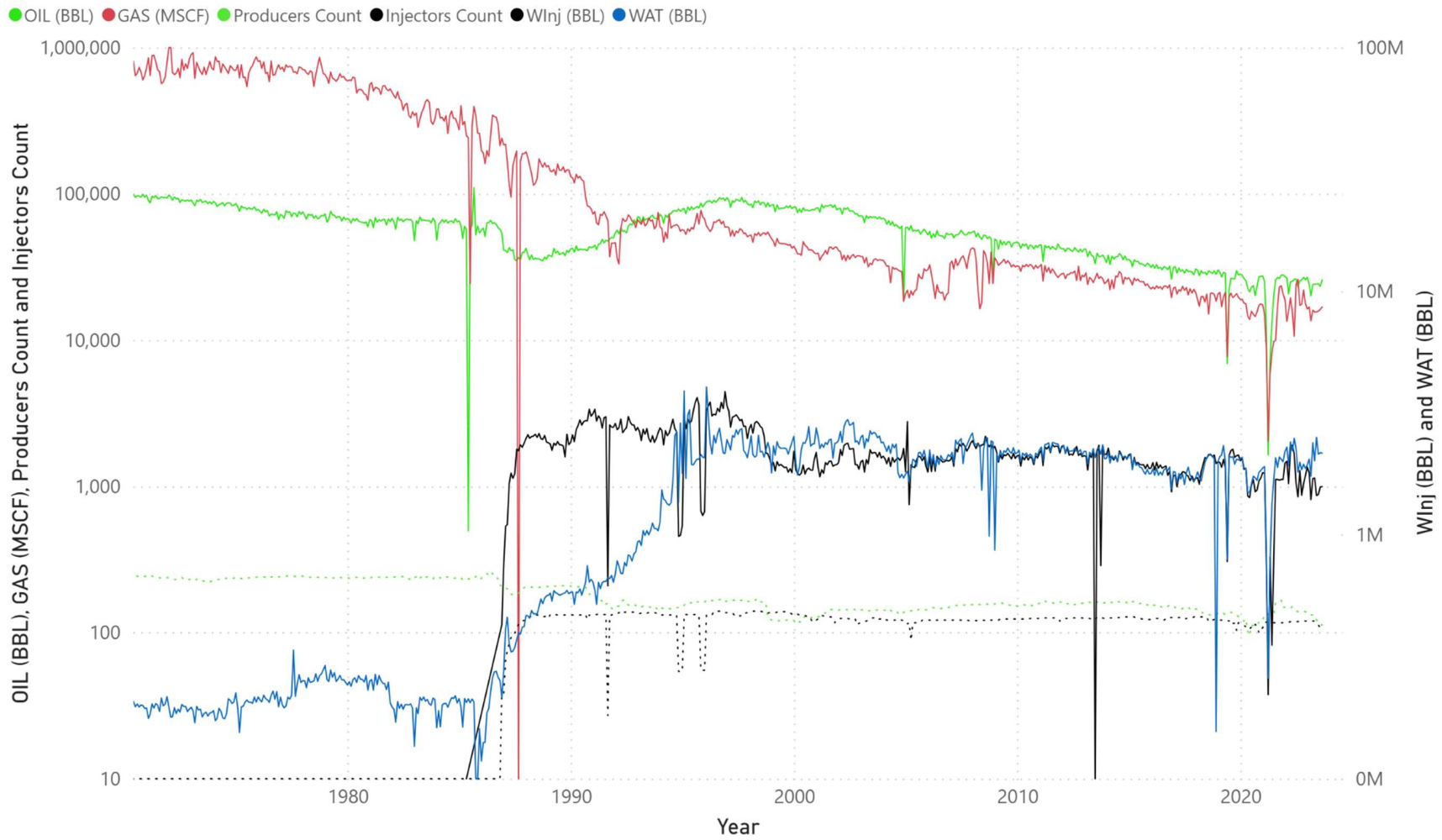


Figure 1. Monthly Production and Injection History for EMSU.

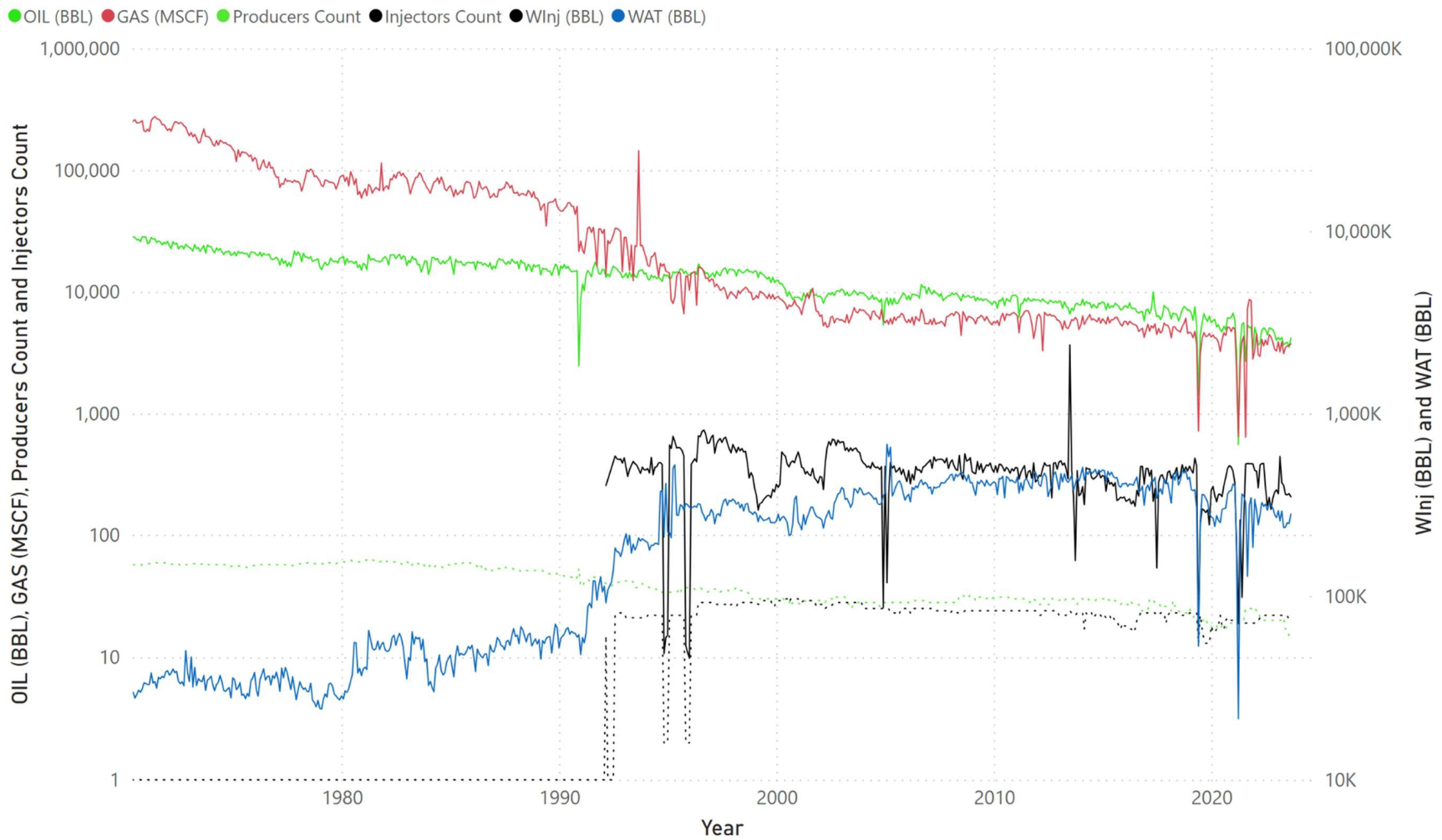


Figure 2. Monthly Production and Injection History for EMSU-B.

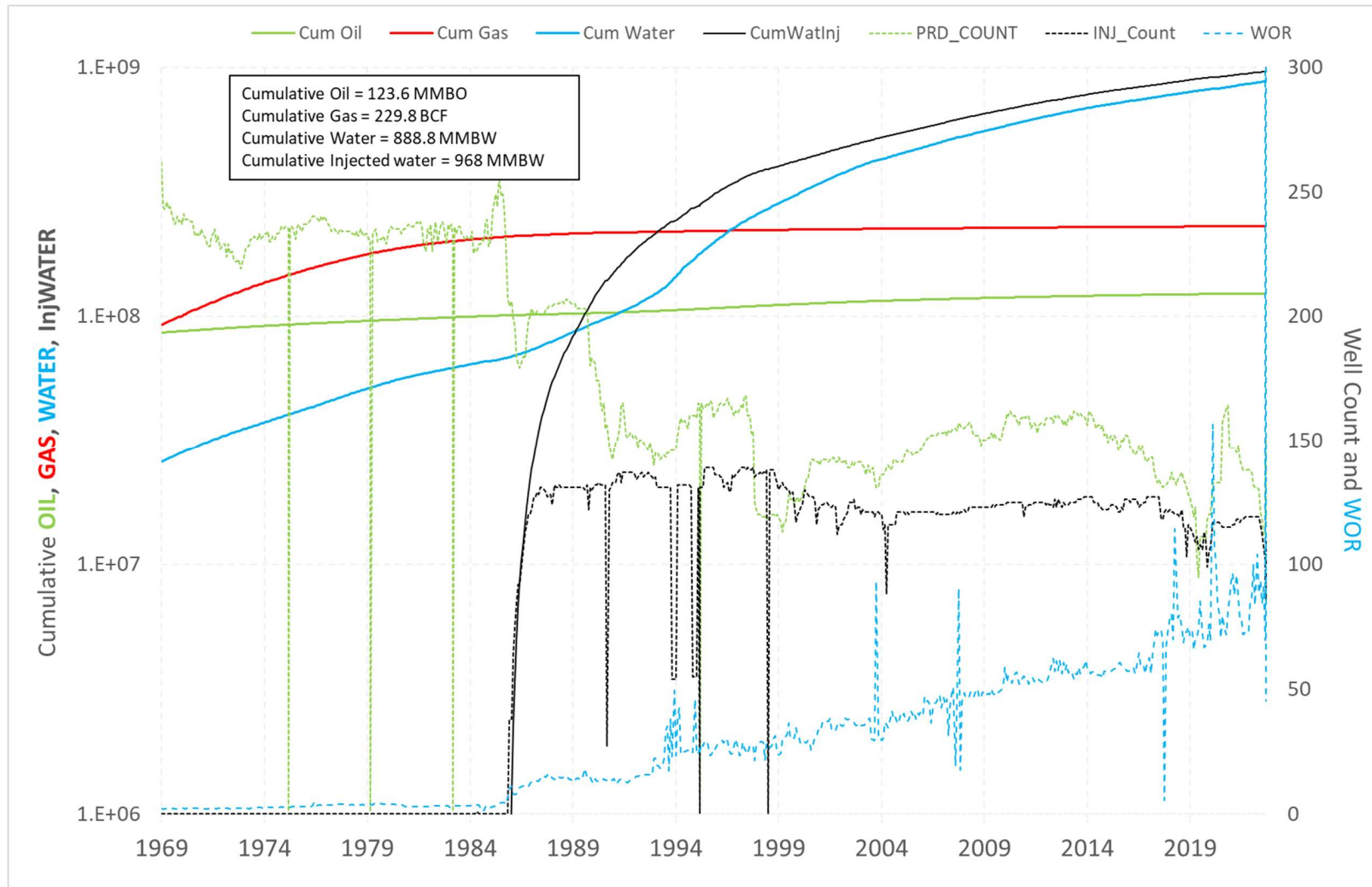


Figure 3. Cumulative Production, Injection, and Water-Oil Ratio (WOR) History for EMSU Up To The End Of The Year 2023 (YE2023).



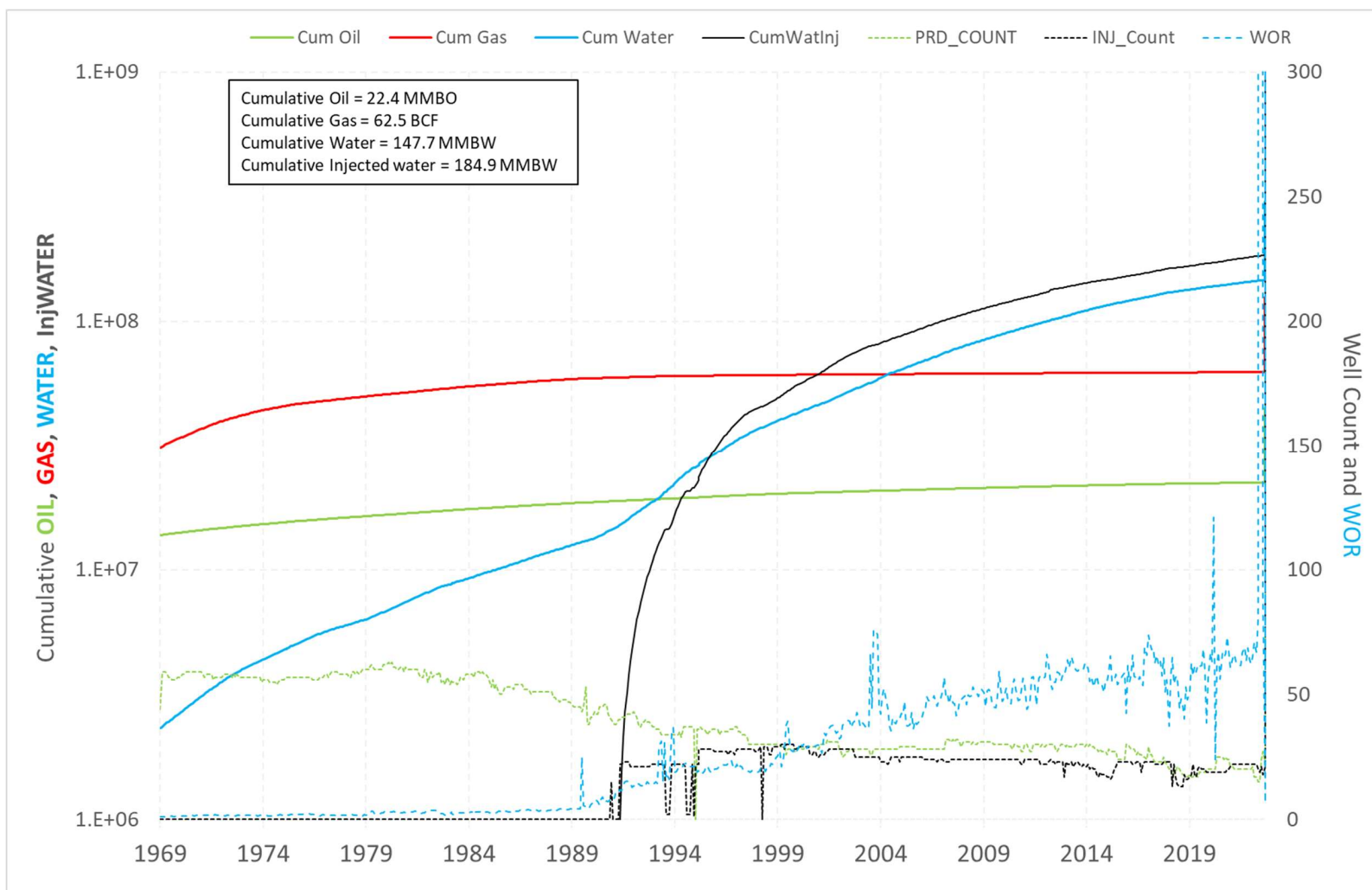


Figure 4. Cumulative Production, Injection, and Water-Oil Ratio (WOR) History for EMSU B Up To The End Of The Year 2023 (YE2023).



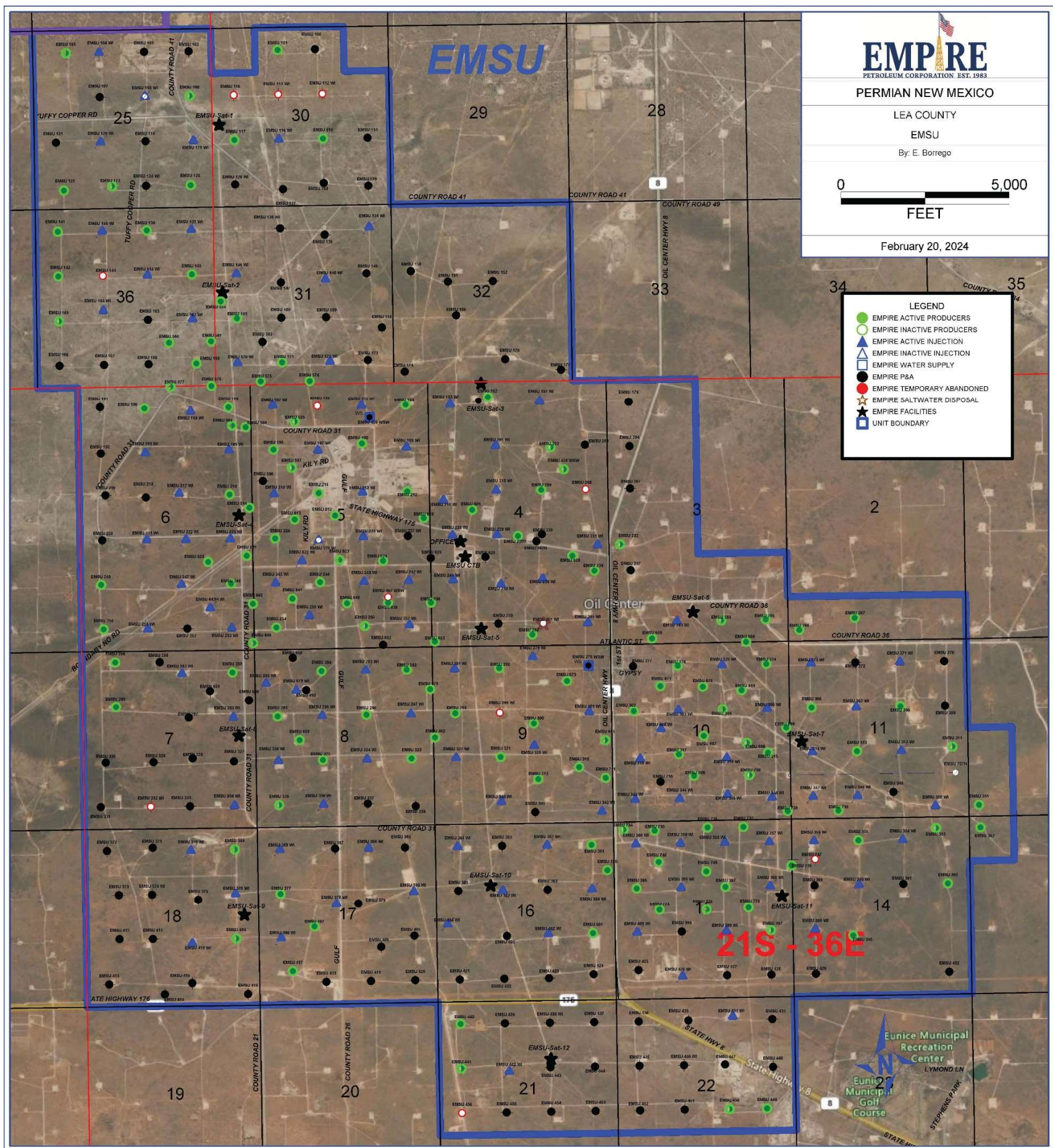


Figure 5. Satellite view showing Well Locations, Surface Facilities, and Lease Roads for the EMSU.



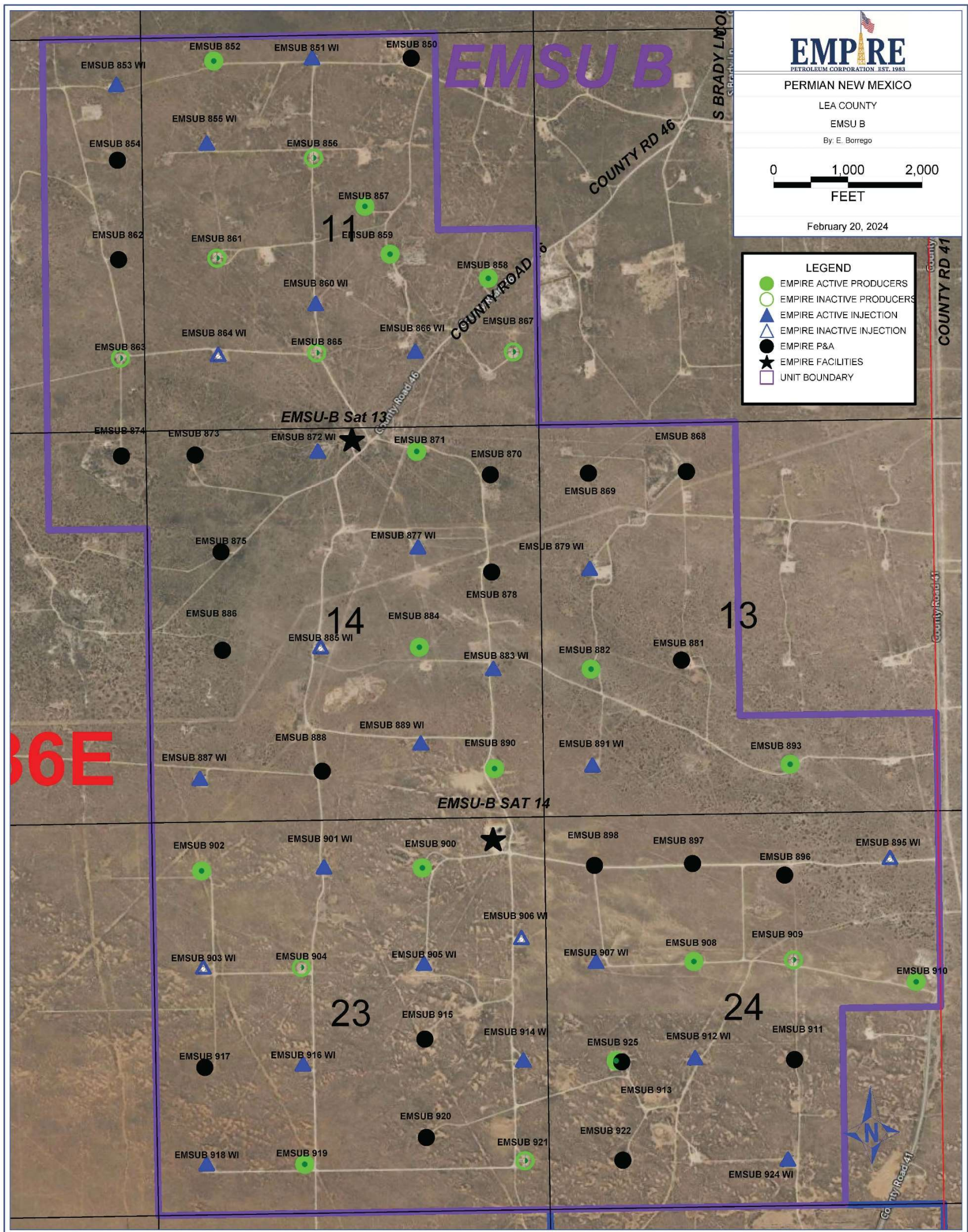


Figure 6. Satellite view showing Well Locations, Surface Facilities, and Lease Roads for the EMSU B.



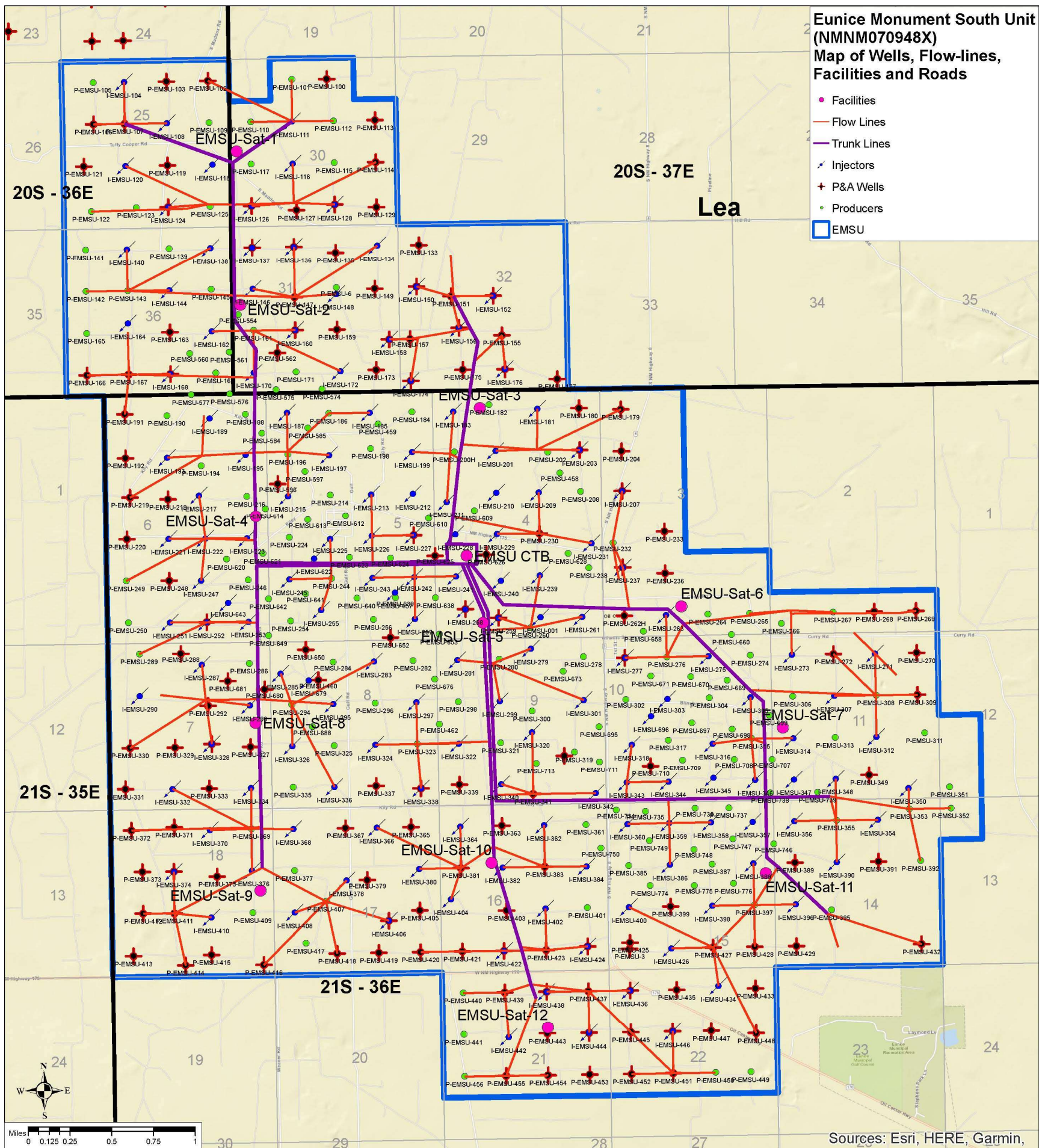


Figure 7. Map showing the Wells, Flow Lines, Surface Facilities, and Lease Roads.



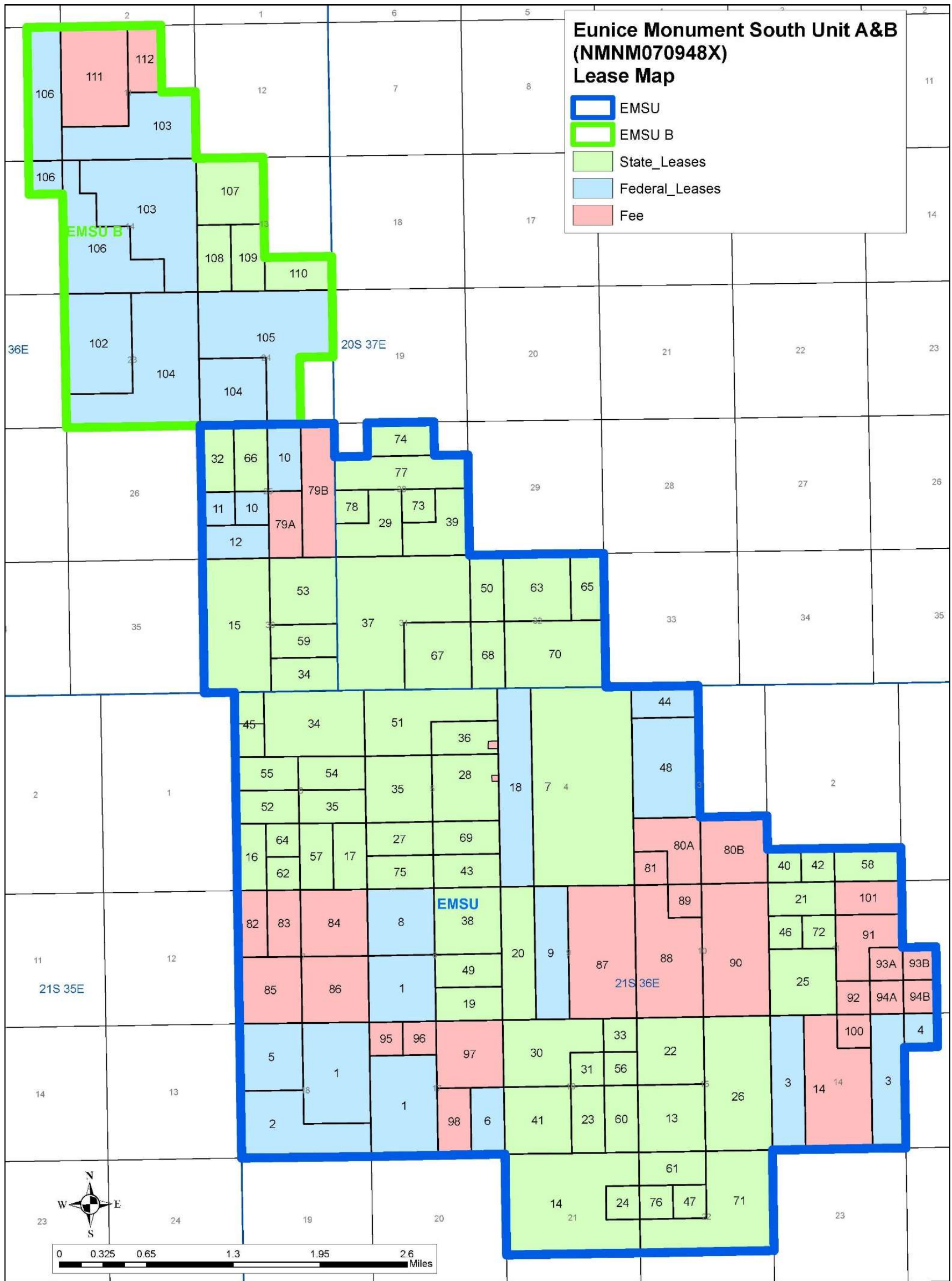


Figure 8. Map showing Lease Types and Unit Boundaries for EMSU A & B.

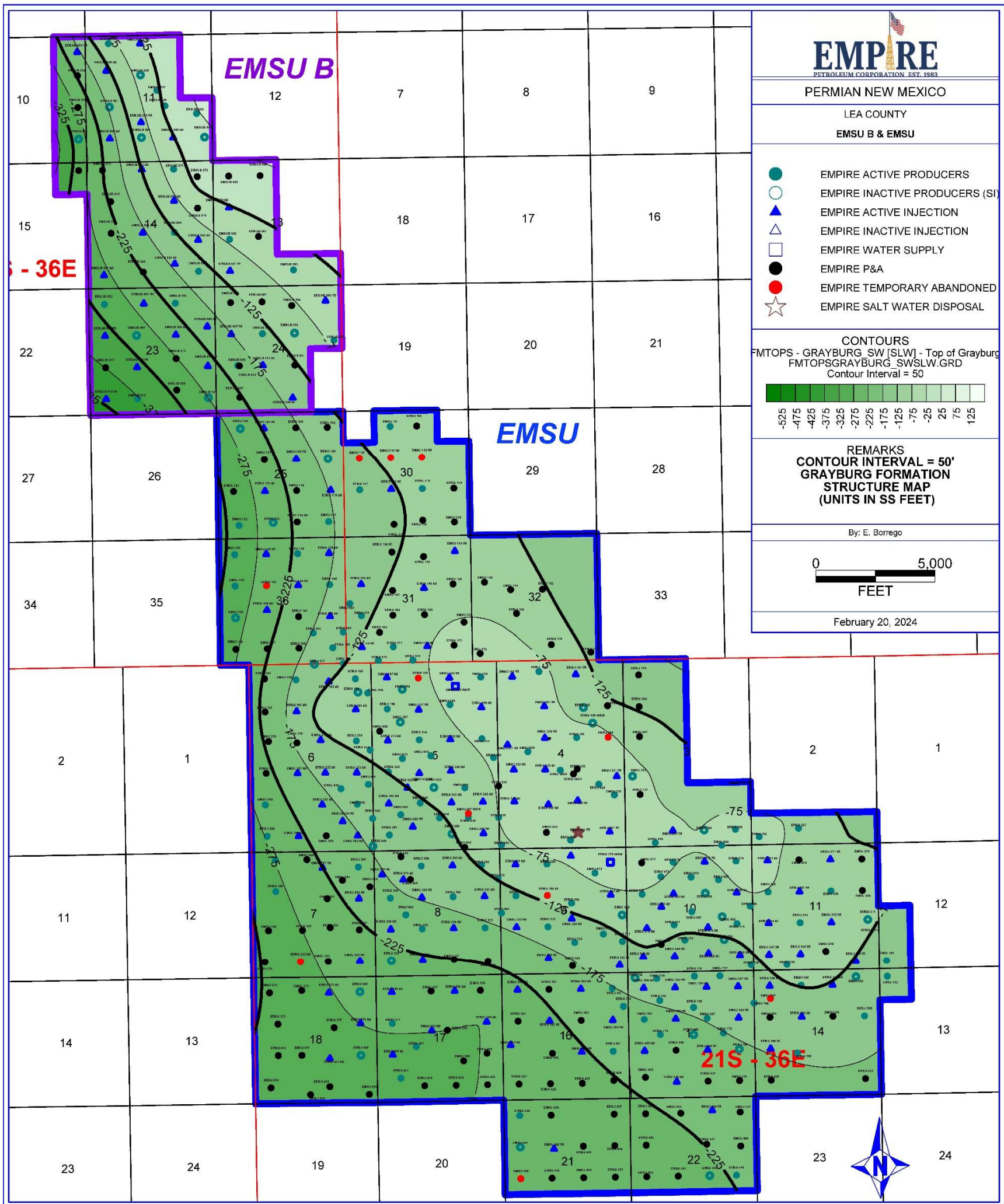


Figure 9. Structural Map. Top of Grayburg Formation.



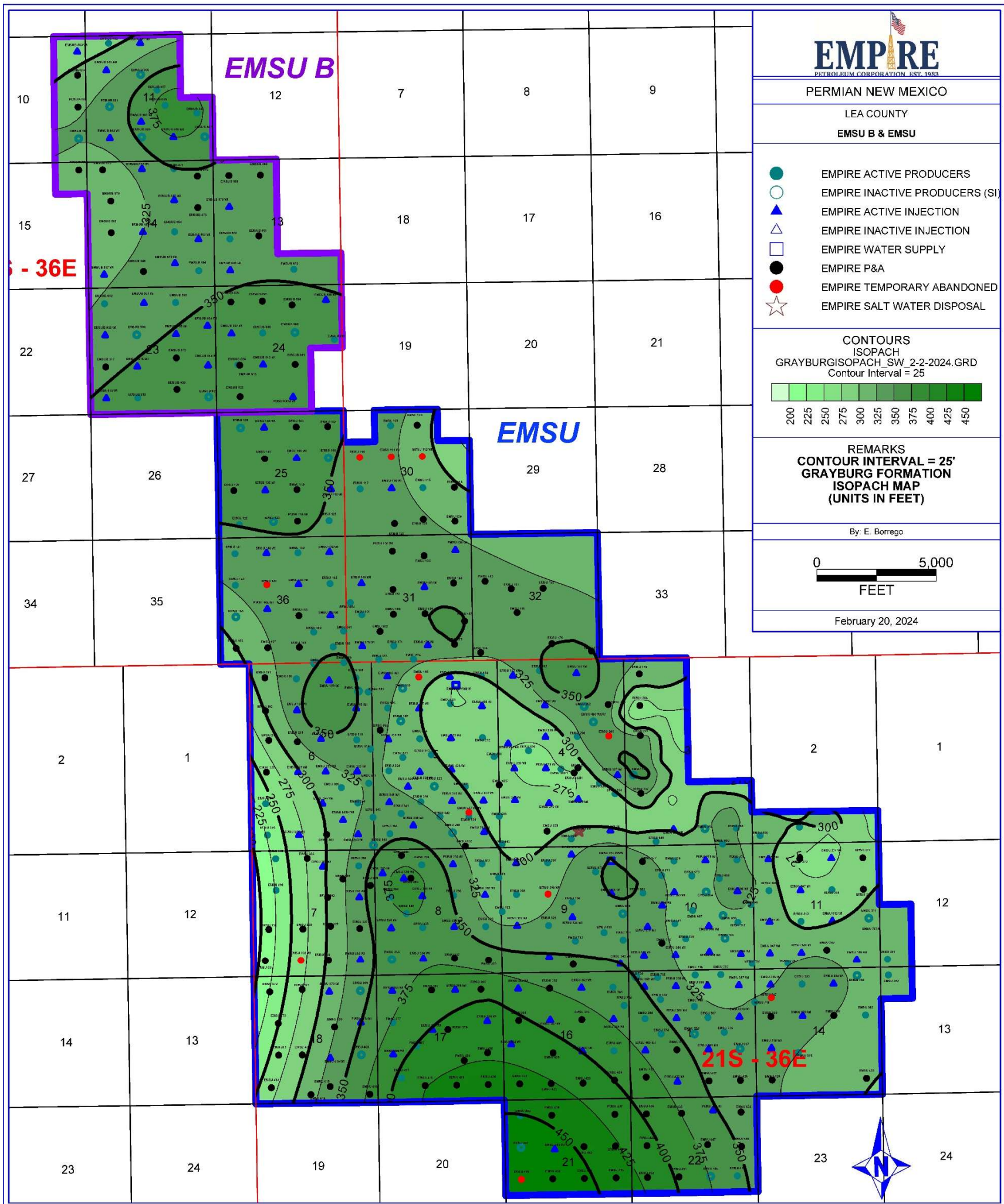


Figure 10. Isopach Map. Grayburg Formation.

**Table 3. EMSU Production and Injection Wells Status**

| Well Name | API10      | Legal Location    | Formation | Status |
|-----------|------------|-------------------|-----------|--------|
| EMSU-001  | 3002504484 | 21S 36E 4 SE      | Grayburg  | Active |
| EMSU-101  | 3002530220 | 20S 37E 30C NE NW | Grayburg  | Active |
| EMSU-104  | 3002504321 | 20S 36E 25C NE NW | Grayburg  | Active |
| EMSU-108  | 3002504330 | 20S 36E 25G       | Grayburg  | Active |
| EMSU-109  | 3002504324 | 20S 36E 25H       | Grayburg  | Active |
| EMSU-111  | 3002506283 | 20S 37E 30F SE NW | Grayburg  | Active |
| EMSU-115  | 3002506295 | 20S 37E 30J       | Grayburg  | Active |
| EMSU-116  | 3002506290 | 20S 37E 30K NE SW | Grayburg  | Active |
| EMSU-117  | 3002529396 | 20S 37E 30L       | Grayburg  | Active |
| EMSU-118  | 3002529598 | 20S 36E 25I NE SE | Grayburg  | Active |
| EMSU-120  | 3002504332 | 20S 36E 25K SE SW | Grayburg  | Active |
| EMSU-122  | 3002530277 | 20S 36E 25M SW SW | Grayburg  | Active |
| EMSU-123  | 3002529957 | 20S 36E 25N SE SW | Grayburg  | Active |
| EMSU-125  | 3002504322 | 20S 36E 25P       | Grayburg  | Active |
| EMSU-134  | 3002506306 | 20S 37E 31A NE NE | Grayburg  | Active |
| EMSU-138  | 3002504432 | 20S 36E 36A NE NE | Grayburg  | Active |
| EMSU-139  | 3002512544 | 20S 36E 36B       | Grayburg  | Active |
| EMSU-140  | 3002504425 | 20S 36E 36C NE NW | Grayburg  | Active |
| EMSU-141  | 3002504429 | 20S 36E 36D       | Grayburg  | Active |
| EMSU-142  | 3002504428 | 20S 36E 36E SW NW | Grayburg  | Active |
| EMSU-144  | 3002512543 | 20S 36E 36G SW NE | Grayburg  | Active |
| EMSU-145  | 3002512545 | 20S 36E 36H       | Grayburg  | Active |
| EMSU-146  | 3002506304 | 20S 37E 31E SW NW | Grayburg  | Active |
| EMSU-148  | 3002529946 | 20S 37E 31G SW NE | Grayburg  | Active |
| EMSU-161  | 3002506305 | 20S 37E 31L       | Grayburg  | Active |
| EMSU-162  | 3002504419 | 20S 36E 36I NE SE | Grayburg  | Active |
| EMSU-164  | 3002529820 | 20S 36E 36K NE SW | Grayburg  | Active |
| EMSU-169  | 3002529583 | 20S 36E 36P SE SE | Grayburg  | Active |
| EMSU-170  | 3002506297 | 20S 37E 31M SW SW | Grayburg  | Active |
| EMSU-171  | 3002506296 | 20S 37E 31N       | Grayburg  | Active |
| EMSU-172  | 3002529912 | 20S 37E 31O SW SE | Grayburg  | Active |
| EMSU-181  | 3002504479 | 21S 36E 4B        | Grayburg  | Active |
| EMSU-182  | 3002529868 | 21S 36E 4C NE NW  | Grayburg  | Active |
| EMSU-183  | 3002504493 | 21S 36E 4D        | Grayburg  | Active |
| EMSU-184  | 3002504513 | 21S 36E 5A        | Grayburg  | Active |
| EMSU-185  | 3002504512 | 21S 36E 5B        | Grayburg  | Active |
| EMSU-187  | 3002504515 | 21S 36E 5D NW     | Grayburg  | Active |
| EMSU-188  | 3002504533 | 21S 36E 6A        | Grayburg  | Active |
| EMSU-189  | 3002529614 | 21S 36E 6B        | Grayburg  | Active |
| EMSU-190  | 3002504536 | 21S 36E 6C        | Grayburg  | Active |
| EMSU-193  | 3002504535 | 21S 36E 6F SE NW  | Grayburg  | Active |

| Well Name | API10      | Legal Location   | Formation | Status |
|-----------|------------|------------------|-----------|--------|
| EMSU-194  | 3002529599 | 21S 36E 6G SW NE | Grayburg  | Active |
| EMSU-195  | 3002504532 | 21S 36E 6H       | Grayburg  | Active |
| EMSU-196  | 3002504514 | 21S 36E 5E       | Grayburg  | Active |
| EMSU-197  | 3002504511 | 21S 36E 5F SE NW | Grayburg  | Active |
| EMSU-198  | 3002529682 | 21S 36E 5G       | Grayburg  | Active |
| EMSU-199  | 3002504510 | 21S 36E 5H       | Grayburg  | Active |
| EMSU-201  | 3002504472 | 21S 36E 4F       | Grayburg  | Active |
| EMSU-202  | 3002529866 | 21S 36E 4G       | Grayburg  | Active |
| EMSU-209  | 3002504473 | 21S 36E 4J       | Grayburg  | Active |
| EMSU-210  | 3002504469 | 21S 36E 4C NE NW | Grayburg  | Active |
| EMSU-211  | 3002529615 | 21S 36E 4L       | Grayburg  | Active |
| EMSU-212  | 3002504504 | 21S 36E 5I       | Grayburg  | Active |
| EMSU-213  | 3002504503 | 21S 36E 5B NW NE | Grayburg  | Active |
| EMSU-214  | 3002504507 | 21S 36E 5B       | Grayburg  | Active |
| EMSU-215  | 3002504508 | 21S 36E 5L NW NW | Grayburg  | Active |
| EMSU-216  | 3002508704 | 21S 36E 6I       | Grayburg  | Active |
| EMSU-217  | 3002529911 | 21S 36E 6J       | Grayburg  | Active |
| EMSU-221  | 3002508706 | 21S 36E 6N       | Grayburg  | Active |
| EMSU-222  | 3002504531 | 21S 36E 6G SW NE | Grayburg  | Active |
| EMSU-223  | 3002504530 | 21S 36E 6P SE NE | Grayburg  | Active |
| EMSU-224  | 3002504506 | 21S 36E 5E       | Grayburg  | Active |
| EMSU-225  | 3002529683 | 21S 36E 5N       | Grayburg  | Active |
| EMSU-226  | 3002504501 | 21S 36E 5O SW NE | Grayburg  | Active |
| EMSU-228  | 3002504490 | 21S 36E 4M SW NW | Grayburg  | Active |
| EMSU-229  | 3002504467 | 21S 36E 4N SW    | Grayburg  | Active |
| EMSU-231  | 3002504464 | 21S 36E 4P       | Grayburg  | Active |
| EMSU-238  | 3002504466 | 21S 36E 4I       | Grayburg  | Active |
| EMSU-239  | 3002504468 | 21S 36E 4J NW SE | Grayburg  | Active |
| EMSU-240  | 3002529867 | 21S 36E 4K NE SW | Grayburg  | Active |
| EMSU-241  | 3002504489 | 21S 36E 4L NW SW | Grayburg  | Active |
| EMSU-242  | 3002504519 | 21S 36E 5I NE SE | Grayburg  | Active |
| EMSU-243  | 3002504518 | 21S 36E 5J NW SE | Grayburg  | Active |
| EMSU-244  | 3002504497 | 21S 36E 5S       | Grayburg  | Active |
| EMSU-245  | 3002504498 | 21S 36E 5L NW SW | Grayburg  | Active |
| EMSU-246  | 3002504527 | 21S 36E 6I       | Grayburg  | Active |
| EMSU-247  | 3002529575 | 21S 36E 6J       | Grayburg  | Active |
| EMSU-249  | 3002504525 | 21S 36E 6L       | Grayburg  | Active |
| EMSU-250  | 3002504526 | 21S 36E 6U       | Grayburg  | Active |
| EMSU-251  | 3002504520 | 21S 36E 6N SE SW | Grayburg  | Active |
| EMSU-253  | 3002508702 | 21S 36E 6P SE SE | Grayburg  | Active |
| EMSU-254  | 3002504500 | 21S 36E 5U       | Grayburg  | Active |
| EMSU-255  | 3002520072 | 21S 36E 5N SE SW | Grayburg  | Active |
| EMSU-256  | 3002504495 | 21S 36E 5O       | Grayburg  | Active |



| Well Name | API10      | Legal Location     | Formation | Status |
|-----------|------------|--------------------|-----------|--------|
| EMSU-257  | 3002504496 | 21S 36E 5P SE SE   | Grayburg  | Active |
| EMSU-260  | 3002504463 | 21S 36E 4O         | Grayburg  | Active |
| EMSU-261  | 3002504471 | 21S 36E 4P         | Grayburg  | Active |
| EMSU-263  | 3002504456 | 21S 36E 3N NW SW   | Grayburg  | Active |
| EMSU-264  | 3002504457 | 21S 36E 3W         | Grayburg  | Active |
| EMSU-265  | 3002504459 | 21S 36E 3X         | Grayburg  | Active |
| EMSU-266  | 3002526101 | 21S 36E 2U         | Grayburg  | Active |
| EMSU-267  | 3002504440 | 21S 36E 2N SE SW   | Grayburg  | Active |
| EMSU-271  | 3002504612 | 21S 36E 11B NW NE  | Grayburg  | Active |
| EMSU-273  | 3002504609 | 21S 36E 11D NW NW  | Grayburg  | Active |
| EMSU-274  | 3002504602 | 21S 36E 10A        | Grayburg  | Active |
| EMSU-275  | 3002504598 | 21S 36E 10B        | Grayburg  | Active |
| EMSU-276  | 3002504603 | 21S 36E 10C        | Grayburg  | Active |
| EMSU-278  | 3002520133 | 21S 36E 9A         | Grayburg  | Active |
| EMSU-279  | 3002504581 | 21S 36E 9B NW NE   | Grayburg  | Active |
| EMSU-280  | 3002504573 | 21S 36E 9C         | Grayburg  | Active |
| EMSU-281  | 3002504577 | 21S 36E 9D NW NW   | Grayburg  | Active |
| EMSU-282  | 3002521902 | 21S 36E 8A         | Grayburg  | Active |
| EMSU-283  | 3002504569 | 21S 36E 8B NW NE   | Grayburg  | Active |
| EMSU-284  | 3002504561 | 21S 36E 8C C NE NW | Grayburg  | Active |
| EMSU-285  | 3002524563 | 21S 36E 8D         | Grayburg  | Active |
| EMSU-286  | 3002504540 | 21S 36E 7A         | Grayburg  | Active |
| EMSU-287  | 3002529909 | 21S 36E 7B NW NE   | Grayburg  | Active |
| EMSU-289  | 3002508707 | 21S 36E 7D         | Grayburg  | Active |
| EMSU-290  | 3002504543 | 21S 36E 7E         | Grayburg  | Active |
| EMSU-293  | 3002504539 | 21S 36E 7H SE NE   | Grayburg  | Active |
| EMSU-294  | 3002504562 | 21S 36E 8E         | Grayburg  | Active |
| EMSU-295  | 3002504560 | 21S 36E 8F         | Grayburg  | Active |
| EMSU-296  | 3002504566 | 21S 36E 8G         | Grayburg  | Active |
| EMSU-297  | 3002504568 | 21S 36E 8H SE NE   | Grayburg  | Active |
| EMSU-298  | 3002504575 | 21S 36E 9E         | Grayburg  | Active |
| EMSU-300  | 3002504579 | 21S 36E 9G         | Grayburg  | Active |
| EMSU-301  | 3002504587 | 21S 36E 9H SE NE   | Grayburg  | Active |
| EMSU-302  | 3002504588 | 21S 36E 10E        | Grayburg  | Active |
| EMSU-303  | 3002504594 | 21S 36E 10F SE NW  | Grayburg  | Active |
| EMSU-304  | 3002504601 | 21S 36E 10G        | Grayburg  | Active |
| EMSU-305  | 3002504597 | 21S 36E 10H SE NE  | Grayburg  | Active |
| EMSU-306  | 3002504604 | 21S 36E 11E        | Grayburg  | Active |
| EMSU-307  | 3002508708 | 21S 36E 11F SE NW  | Grayburg  | Active |
| EMSU-308  | 3002504618 | 21S 36E 11G        | Grayburg  | Active |
| EMSU-312  | 3002504616 | 21S 36E 11J NW SE  | Grayburg  | Active |
| EMSU-313  | 3002504608 | 21S 36E 11K        | Grayburg  | Active |
| EMSU-314  | 3002504605 | 21S 36E 11L NW SW  | Grayburg  | Active |

| Well Name | API10      | Legal Location      | Formation | Status |
|-----------|------------|---------------------|-----------|--------|
| EMSU-315  | 3002504600 | 21S 36E 10I         | Grayburg  | Active |
| EMSU-316  | 3002529882 | 21S 36E 10J NW SE   | Grayburg  | Active |
| EMSU-317  | 3002504590 | 21S 36E 10K         | Grayburg  | Active |
| EMSU-318  | 3002529901 | 21S 36E 10L NW SW   | Grayburg  | Active |
| EMSU-319  | 3002504584 | 21S 36E 9I          | Grayburg  | Active |
| EMSU-320  | 3002504578 | 21S 36E 9J NW SE    | Grayburg  | Active |
| EMSU-321  | 3002504570 | 21S 36E 9K          | Grayburg  | Active |
| EMSU-322  | 3002504574 | 21S 36E 9L NW SW    | Grayburg  | Active |
| EMSU-323  | 3002504555 | 21S 36E 8I          | Grayburg  | Active |
| EMSU-324  | 3002504554 | 21S 36E 8J NW SE    | Grayburg  | Active |
| EMSU-325  | 3002504556 | 21S 36E 8K          | Grayburg  | Active |
| EMSU-326  | 3002504559 | 21S 36E 8L          | Grayburg  | Active |
| EMSU-332  | 3002504545 | 21S 36E 7N SE SW    | Grayburg  | Active |
| EMSU-334  | 3002504544 | 21S 36E 7P SE SE    | Grayburg  | Active |
| EMSU-335  | 3002504558 | 21S 36E 8M          | Grayburg  | Active |
| EMSU-336  | 3002504557 | 21S 36E 8N          | Grayburg  | Active |
| EMSU-340  | 3002504572 | 21S 36E 9N SE SW    | Grayburg  | Active |
| EMSU-342  | 3002504583 | 21S 36E 9P SE SE    | Grayburg  | Active |
| EMSU-343  | 3002504589 | 21S 36E 10M SW SW   | Grayburg  | Active |
| EMSU-344  | 3002504592 | 21S 36E 10N         | Grayburg  | Active |
| EMSU-345  | 3002529823 | 21S 36E 10O SW SE   | Grayburg  | Active |
| EMSU-346  | 3002529881 | 21S 36E 10P SE SE   | Grayburg  | Active |
| EMSU-347  | 3002504606 | 21S 36E 11M SW SW   | Grayburg  | Active |
| EMSU-348  | 3002504607 | 21S 36E 11N SE NW   | Grayburg  | Active |
| EMSU-350  | 3002504614 | 21S 36E 11P SE SE   | Grayburg  | Active |
| EMSU-351  | 3002504622 | 21S 36E 12M         | Grayburg  | Active |
| EMSU-352  | 3002504625 | 21S 36E 13D         | Grayburg  | Active |
| EMSU-353  | 3002504630 | 21S 36E 14A         | Grayburg  | Active |
| EMSU-354  | 3002504640 | 21S 36E 14B NW NE   | Grayburg  | Active |
| EMSU-355  | 3002504636 | 21S 36E 14C         | Grayburg  | Active |
| EMSU-356  | 3002504629 | 21S 36E 14D         | Grayburg  | Active |
| EMSU-357  | 3002504643 | 21S 36E 15A NE NE   | Grayburg  | Active |
| EMSU-358  | 3002504642 | 21S 36E 15B C NW NE | Grayburg  | Active |
| EMSU-359  | 3002504651 | 21S 36E 15C NE NW   | Grayburg  | Active |
| EMSU-360  | 3002504649 | 21S 36E 15D NW NW   | Grayburg  | Active |
| EMSU-361  | 3002504655 | 21S 36E 16A         | Grayburg  | Active |
| EMSU-362  | 3002504662 | 21S 36E 16B         | Grayburg  | Active |
| EMSU-366  | 3002504699 | 21S 36E 17B NW NE   | Grayburg  | Active |
| EMSU-368  | 3002504697 | 21S 36E 17D C NW NW | Grayburg  | Active |
| EMSU-369  | 3002504676 | 21S 36E 18A         | Grayburg  | Active |
| EMSU-370  | 3002504684 | 21S 36E 18B NW NE   | Grayburg  | Active |
| EMSU-376  | 3002504680 | 21S 36E 18H C SE NE | Grayburg  | Active |
| EMSU-377  | 3002504689 | 21S 36E 17E         | Grayburg  | Active |

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSU-378  | 3002504687 | 21S 36E 17F SE NW    | Grayburg  | Active |
| EMSU-380  | 3002504701 | 21S 36E 17H SE NE    | Grayburg  | Active |
| EMSU-382  | 3002504663 | 21S 36E 16F SE NW    | Grayburg  | Active |
| EMSU-384  | 3002504656 | 21S 36E 16H SE NE    | Grayburg  | Active |
| EMSU-385  | 3002504650 | 21S 36E 15E          | Grayburg  | Active |
| EMSU-386  | 3002504652 | 21S 36E 15F SE NW    | Grayburg  | Active |
| EMSU-387  | 3002504645 | 21S 36E 15G          | Grayburg  | Active |
| EMSU-388  | 3002504641 | 21S 36E 15H          | Grayburg  | Active |
| EMSU-390  | 3002504635 | 21S 36E 14F SE NW    | Grayburg  | Active |
| EMSU-392  | 3002504632 | 21S 36E 14H          | Grayburg  | Active |
| EMSU-395  | 3002529821 | 21S 36E 14K NE SW    | Grayburg  | Active |
| EMSU-396  | 3002504633 | 21S 36E 14L NW SW    | Grayburg  | Active |
| EMSU-397  | 3002504646 | 21S 36E 15I          | Grayburg  | Active |
| EMSU-398  | 3002504647 | 21S 36E 15J          | Grayburg  | Active |
| EMSU-400  | 3002504653 | 21S 36E 15L NW SW    | Grayburg  | Active |
| EMSU-401  | 3002504667 | 21S 36E 16I          | Grayburg  | Active |
| EMSU-402  | 3002504665 | 21S 36E 16J NW SE    | Grayburg  | Active |
| EMSU-404  | 3002504688 | 21S 36E 16L NW SW    | Grayburg  | Active |
| EMSU-407  | 3002524588 | 21S 36E 17K          | Grayburg  | Active |
| EMSU-408  | 3002504692 | 21S 36E 17L NW SW    | Grayburg  | Active |
| EMSU-409  | 3002504678 | 21S 36E 18I          | Grayburg  | Active |
| EMSU-410  | 3002530281 | 21S 36E 18J NW SE    | Grayburg  | Active |
| EMSU-417  | 3002504686 | 21S 36E 17M          | Grayburg  | Active |
| EMSU-426  | 3002508711 | 21S 36E 15N SE SW    | Grayburg  | Active |
| EMSU-434  | 3002529602 | 21S 36E 22B NW NE    | Grayburg  | Active |
| EMSU-440  | 3002504735 | 21S 36E 21D          | Grayburg  | Active |
| EMSU-441  | 3002504737 | 21S 36E 21E          | Grayburg  | Active |
| EMSU-442  | 3002529584 | 21S 36E 21F SE NW    | Grayburg  | Active |
| EMSU-449  | 3002525351 | 21S 36E 22I          | Grayburg  | Active |
| EMSU-458  | 3002529618 | 21S 36E 4I           | Grayburg  | Active |
| EMSU-459  | 3002529826 | 21S 36E 5B           | Grayburg  | Active |
| EMSU-462  | 3002529622 | 21S 36E 9L NW SW     | Grayburg  | Active |
| EMSU-554  | 3002534845 | 20S 37E 31L NW NW SW | Grayburg  | Active |
| EMSU-560  | 3002535461 | 20S 36E 36O NE SW SE | Grayburg  | Active |
| EMSU-561  | 3002533595 | 20S 36E 36P          | Grayburg  | Active |
| EMSU-574  | 3002535160 | 20S 37E 31N SE       | Grayburg  | Active |
| EMSU-575  | 3002534824 | 20S 37E 31N          | Grayburg  | Active |
| EMSU-576  | 3002534640 | 21S 36E 6A           | Grayburg  | Active |
| EMSU-584  | 3002534139 | 21S 36E 6A           | Grayburg  | Active |
| EMSU-585  | 3002535157 | 21S 36E 5D SE NW NW  | Grayburg  | Active |
| EMSU-609  | 3002531406 | 21S 36E 4D           | Grayburg  | Active |
| EMSU-610  | 3002531407 | 21S 36E 5H           | Grayburg  | Active |
| EMSU-612  | 3002535159 | 21S 36E 5N NE SE NW  | Grayburg  | Active |

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSU-613  | 3002535161 | 21S 36E 5M NE SW NW  | Grayburg  | Active |
| EMSU-614  | 3002535453 | 21S 36E 6I SE NE SE  | Grayburg  | Active |
| EMSU-620  | 3002530511 | 21S 36E 6R           | Grayburg  | Active |
| EMSU-621  | 3002533186 | 21S 36E 6P           | Grayburg  | Active |
| EMSU-622  | 3002535454 | 21S 36E 5K           | Grayburg  | Active |
| EMSU-623  | 3002535455 | 21S 36E 5S NE NE SW  | Grayburg  | Active |
| EMSU-624  | 3002531408 | 21S 36E 5R           | Grayburg  | Active |
| EMSU-628  | 3002537279 | 21S 36E 4P           | Grayburg  | Active |
| EMSU-638  | 3002531426 | 21S 36E 5X SE SE     | Grayburg  | Active |
| EMSU-639  | 3002531409 | 21S 36E 5Q           | Grayburg  | Active |
| EMSU-640  | 3002534212 | 21S 36E 5J           | Grayburg  | Active |
| EMSU-641  | 3002533189 | 21S 36E 5T           | Grayburg  | Active |
| EMSU-642  | 3002530958 | 21S 36E 6Q           | Grayburg  | Active |
| EMSU-643H | 3002530512 | 21S 36E 6X           | Grayburg  | Active |
| EMSU-649  | 3002533187 | 21S 36E 6X           | Grayburg  | Active |
| EMSU-653  | 3002534213 | 21S 36E 4M           | Grayburg  | Active |
| EMSU-658  | 3002537280 | 21S 36E 3M SW SW     | Grayburg  | Active |
| EMSU-660  | 3002537319 | 21S 36E 3P SW SE SE  | Grayburg  | Active |
| EMSU-669  | 3002534138 | 21S 36E 10G          | Grayburg  | Active |
| EMSU-670  | 3002534214 | 21S 36E 10B NW NE    | Grayburg  | Active |
| EMSU-671  | 3002535456 | 21S 36E 10C NW       | Grayburg  | Active |
| EMSU-673  | 3002537320 | 21S 36E 9A NE NE     | Grayburg  | Active |
| EMSU-676  | 3002535457 | 21S 36E 8A SE NE NE  | Grayburg  | Active |
| EMSU-679  | 3002531009 | 21S 36E 8D NW NW     | Grayburg  | Active |
| EMSU-688  | 3002535205 | 21S 36E 8L NE NW SW  | Grayburg  | Active |
| EMSU-695  | 3002535162 | 21S 36E 9I NE NE SE  | Grayburg  | Active |
| EMSU-696  | 3002534137 | 21S 36E 10F          | Grayburg  | Active |
| EMSU-697  | 3002535163 | 21S 36E 10J NW NW SE | Grayburg  | Active |
| EMSU-698  | 3002534847 | 21S 36E 10I NE NW SE | Grayburg  | Active |
| EMSU-699  | 3002534215 | 21S 36E 10H SE NE    | Grayburg  | Active |
| EMSU-707  | 3002535164 | 21S 36E 10P SE       | Grayburg  | Active |
| EMSU-708  | 3002534848 | 21S 36E 10I SW NE SE | Grayburg  | Active |
| EMSU-709  | 3002534849 | 21S 36E 10K NE SW    | Grayburg  | Active |
| EMSU-711  | 3002534850 | 21S 36E 9P NE SE SE  | Grayburg  | Active |
| EMSU-713  | 3002537321 | 21S 36E 9O NW SW SE  | Grayburg  | Active |
| EMSU-734  | 3002534851 | 21S 36E 15D NW NW NW | Grayburg  | Active |
| EMSU-735  | 3002534826 | 21S 36E 15D NE NW NW | Grayburg  | Active |
| EMSU-736  | 3002534852 | 21S 36E 15B NW NW NE | Grayburg  | Active |
| EMSU-737  | 3002534853 | 21S 36E 15B NE NW NE | Grayburg  | Active |
| EMSU-738  | 3002535165 | 21S 36E 10P SE SE SE | Grayburg  | Active |
| EMSU-739  | 3002535458 | 21S 36E 11N SW SE SW | Grayburg  | Active |
| EMSU-746  | 3002537356 | 21S 36E 15H SE NE    | Grayburg  | Active |
| EMSU-748  | 3002534632 | 21S 36E 15G SW NE    | Grayburg  | Active |

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSU-749  | 3002534641 | 21S 36E 15C NE NW    | Grayburg  | Active |
| EMSU-750  | 3002535168 | 21S 36E 16H SE NE    | Grayburg  | Active |
| EMSU-774  | 3002535166 | 21S 36E 15F SW SE NW | Grayburg  | Active |
| EMSU-775  | 3002535459 | 21S 36E 15J NW NW SE | Grayburg  | Active |
| EMSU-776  | 3002535460 | 21S 36E 15H SW SE NE | Grayburg  | Active |
| EMSU-100  | 3002529943 | 20S 37E 30B NW NE    | Grayburg  | P&A    |
| EMSU-102  | 3002504326 | 20S 36E 25A          | Grayburg  | P&A    |
| EMSU-103  | 3002504331 | 20S 36E 25B NW NE    | Grayburg  | P&A    |
| EMSU-106  | 3002504334 | 20S 36E 25E          | Grayburg  | P&A    |
| EMSU-107  | 3002504320 | 20S 36E 25F          | Grayburg  | P&A    |
| EMSU-113  | 3002506281 | 20S 37E 30H          | Grayburg  | P&A    |
| EMSU-114  | 3002506286 | 20S 37E 30I          | Grayburg  | P&A    |
| EMSU-119  | 3002504327 | 20S 36E 25J          | Grayburg  | P&A    |
| EMSU-121  | 3002504333 | 20S 36E 25L          | Grayburg  | P&A    |
| EMSU-124  | 3002504325 | 20S 36E 25O SW SE    | Grayburg  | P&A    |
| EMSU-126  | 3002506288 | 20S 37E 30M SW SW    | Grayburg  | P&A    |
| EMSU-127  | 3002529819 | 20S 37E 30N SE SW    | Grayburg  | P&A    |
| EMSU-128  | 3002506285 | 20S 37E 30O          | Grayburg  | P&A    |
| EMSU-129  | 3002529397 | 20S 37E 30P          | Grayburg  | P&A    |
| EMSU-133  | 3002506314 | 20S 37E 32D          | Grayburg  | P&A    |
| EMSU-135  | 3002529910 | 20S 37E 31B NW NE    | Grayburg  | P&A    |
| EMSU-136  | 3002506303 | 20S 37E 31C          | Grayburg  | P&A    |
| EMSU-137  | 3002506298 | 20S 37E 31D          | Grayburg  | P&A    |
| EMSU-147  | 3002529913 | 20S 37E 31F SE NW    | Grayburg  | P&A    |
| EMSU-149  | 3002529394 | 20S 37E 31H          | Grayburg  | P&A    |
| EMSU-150  | 3002529668 | 20S 37E 32E SW NW    | Grayburg  | P&A    |
| EMSU-151  | 3002506317 | 20S 37E 32F          | Grayburg  | P&A    |
| EMSU-152  | 3002506318 | 20S 37E 32G NE       | Grayburg  | P&A    |
| EMSU-155  | 3002512518 | 20S 37E 32J          | Grayburg  | P&A    |
| EMSU-156  | 3002506324 | 20S 37E 32K          | Grayburg  | P&A    |
| EMSU-157  | 3002506207 | 20S 37E 32L          | Grayburg  | P&A    |
| EMSU-158  | 3002506311 | 20S 37E 31I          | Grayburg  | P&A    |
| EMSU-159  | 3002506310 | 20S 37E 31J          | Grayburg  | P&A    |
| EMSU-160  | 3002506300 | 20S 37E 31K          | Grayburg  | P&A    |
| EMSU-163  | 3002504420 | 20S 36E 36J          | Grayburg  | P&A    |
| EMSU-166  | 3002504426 | 20S 36E 36M          | Grayburg  | P&A    |
| EMSU-167  | 3002504421 | 20S 36E 36N          | Grayburg  | P&A    |
| EMSU-168  | 3002504431 | 20S 36E 36O          | Grayburg  | P&A    |
| EMSU-173  | 3002529395 | 20S 37E 31P SE SE    | Grayburg  | P&A    |
| EMSU-174  | 3002506206 | 20S 37E 32M          | Grayburg  | P&A    |
| EMSU-175  | 3002506321 | 20S 37E 32N          | Grayburg  | P&A    |
| EMSU-176  | 3002506322 | 20S 37E 32O          | Grayburg  | P&A    |
| EMSU-177  | 3002506323 | 20S 37E 32P          | Grayburg  | P&A    |



| Well Name | API10      | Legal Location     | Formation | Status |
|-----------|------------|--------------------|-----------|--------|
| EMSU-179  | 3002504447 | 21S 36E 3D         | Grayburg  | P&A    |
| EMSU-180  | 3002504477 | 21S 36E 4A         | Grayburg  | P&A    |
| EMSU-191  | 3002504523 | 21S 36E 6D         | Grayburg  | P&A    |
| EMSU-192  | 3002504522 | 21S 36E 6E         | Grayburg  | P&A    |
| EMSU-203  | 3002504476 | 21S 36E 4H         | Grayburg  | P&A    |
| EMSU-204  | 3002504453 | 21S 36E 3E         | Grayburg  | P&A    |
| EMSU-207  | 3002504450 | 21S 36E 3L         | Grayburg  | P&A    |
| EMSU-218  | 3002504657 | 21S 36E 6K         | Grayburg  | P&A    |
| EMSU-219  | 3002530225 | 21S 36E 6L         | Grayburg  | P&A    |
| EMSU-220  | 3002508705 | 21S 36E 6M         | Grayburg  | P&A    |
| EMSU-227  | 3002504502 | 21S 36E 5P         | Grayburg  | P&A    |
| EMSU-230  | 3002504478 | 21S 36E 4O         | Grayburg  | P&A    |
| EMSU-233  | 3002504451 | 21S 36E 3F         | Grayburg  | P&A    |
| EMSU-236  | 3002504458 | 21S 36E 3S         | Grayburg  | P&A    |
| EMSU-237  | 3002529905 | 21S 36E 3T NW SW   | Grayburg  | P&A    |
| EMSU-248  | 3002504521 | 21S 36E 6S         | Grayburg  | P&A    |
| EMSU-252  | 3002504528 | 21S 36E 6W C SW SE | Grayburg  | P&A    |
| EMSU-258  | 3002521251 | 21S 36E 4U         | Grayburg  | P&A    |
| EMSU-259  | 3002504462 | 21S 36E 4N         | Grayburg  | P&A    |
| EMSU-262H | 3002504454 | 21S 36E 3M         | Grayburg  | P&A    |
| EMSU-268  | 3002504446 | 21S 36E 2O         | Grayburg  | P&A    |
| EMSU-269  | 3002504445 | 21S 36E 2P         | Grayburg  | P&A    |
| EMSU-270  | 3002504611 | 21S 36E 11A        | Grayburg  | P&A    |
| EMSU-272  | 3002504610 | 21S 36E 11C        | Grayburg  | P&A    |
| EMSU-277  | 3002504593 | 21S 36E 10D        | Grayburg  | P&A    |
| EMSU-288  | 3002504552 | 21S 36E 7C NE NW   | Grayburg  | P&A    |
| EMSU-292  | 3002504542 | 21S 36E 7G         | Grayburg  | P&A    |
| EMSU-3    | 3002508712 | 21S 36E 15M SW SW  | Grayburg  | P&A    |
| EMSU-309  | 3002504617 | 21S 36E 11H        | Grayburg  | P&A    |
| EMSU-327  | 3002504546 | 21S 36E 7I         | Grayburg  | P&A    |
| EMSU-328  | 3002529586 | 21S 36E 7J NW SE   | Grayburg  | P&A    |
| EMSU-329  | 3002529576 | 21S 36E 7K NE SW   | Grayburg  | P&A    |
| EMSU-330  | 3002504549 | 21S 36E 7L         | Grayburg  | P&A    |
| EMSU-331  | 3002504550 | 21S 36E 7M SW SW   | Grayburg  | P&A    |
| EMSU-333  | 3002504547 | 21S 36E 7O SW SE   | Grayburg  | P&A    |
| EMSU-337  | 3002504565 | 21S 36E 8O         | Grayburg  | P&A    |
| EMSU-338  | 3002529601 | 21S 36E 8P SE SE   | Grayburg  | P&A    |
| EMSU-339  | 3002504576 | 21S 36E 9M         | Grayburg  | P&A    |
| EMSU-341  | 3002504580 | 21S 36E 9O         | Grayburg  | P&A    |
| EMSU-349  | 3002529838 | 21S 36E 11O SW SE  | Grayburg  | P&A    |
| EMSU-363  | 3002504661 | 21S 36E 16C        | Grayburg  | P&A    |
| EMSU-365  | 3002521871 | 21S 36E 17A        | Grayburg  | P&A    |
| EMSU-367  | 3002520202 | 21S 36E 17C        | Grayburg  | P&A    |

| Well Name | API10      | Legal Location    | Formation | Status |
|-----------|------------|-------------------|-----------|--------|
| EMSU-371  | 3002529966 | 21S 36E 18C NE NW | Grayburg  | P&A    |
| EMSU-372  | 3002504682 | 21S 36E 18D       | Grayburg  | P&A    |
| EMSU-373  | 3002504681 | 21S 36E 18E       | Grayburg  | P&A    |
| EMSU-374  | 3002504685 | 21S 36E 18F       | Grayburg  | P&A    |
| EMSU-375  | 3002529837 | 21S 36E 18G SW NE | Grayburg  | P&A    |
| EMSU-379  | 3002504698 | 21S 36E 17G       | Grayburg  | P&A    |
| EMSU-381  | 3002504660 | 21S 36E 16E       | Grayburg  | P&A    |
| EMSU-383  | 3002504658 | 21S 36E 16G       | Grayburg  | P&A    |
| EMSU-389  | 3002504631 | 21S 36E 14E SW NW | Grayburg  | P&A    |
| EMSU-391  | 3002504637 | 21S 36E 14G       | Grayburg  | P&A    |
| EMSU-399  | 3002508710 | 21S 36E 15K       | Grayburg  | P&A    |
| EMSU-403  | 3002529779 | 21S 36E 16K NE SW | Grayburg  | P&A    |
| EMSU-405  | 3002504693 | 21S 36E 17I       | Grayburg  | P&A    |
| EMSU-406  | 3002504696 | 21S 36E 17J       | Grayburg  | P&A    |
| EMSU-411  | 3002504672 | 21S 36E 18K       | Grayburg  | P&A    |
| EMSU-412  | 3002504675 | 21S 36E 18L       | Grayburg  | P&A    |
| EMSU-413  | 3002504673 | 21S 36E 18M SW SW | Grayburg  | P&A    |
| EMSU-414  | 3002504674 | 21S 36E 18N       | Grayburg  | P&A    |
| EMSU-415  | 3002504671 | 21S 36E 18O       | Grayburg  | P&A    |
| EMSU-416  | 3002504670 | 21S 36E 18P       | Grayburg  | P&A    |
| EMSU-418  | 3002504691 | 21S 36E 17N       | Grayburg  | P&A    |
| EMSU-419  | 3002504695 | 21S 36E 17O       | Grayburg  | P&A    |
| EMSU-420  | 3002504694 | 21S 36E 17P       | Grayburg  | P&A    |
| EMSU-421  | 3002508713 | 21S 36E 16M       | Grayburg  | P&A    |
| EMSU-422  | 3002504654 | 21S 36E 16N       | Grayburg  | P&A    |
| EMSU-423  | 3002504666 | 21S 36E 16O       | Grayburg  | P&A    |
| EMSU-424  | 3002521894 | 21S 36E 16P       | Grayburg  | P&A    |
| EMSU-425  | 3002530452 | 21S 36E 15M       | Grayburg  | P&A    |
| EMSU-427  | 3002504644 | 21S 36E 15O       | Grayburg  | P&A    |
| EMSU-428  | 3002504648 | 21S 36E 15P       | Grayburg  | P&A    |
| EMSU-429  | 3002504634 | 21S 36E 14M       | Grayburg  | P&A    |
| EMSU-432  | 3002524857 | 21S 36E 14P       | Grayburg  | P&A    |
| EMSU-433  | 3002504758 | 21S 36E 22A       | Grayburg  | P&A    |
| EMSU-435  | 3002529822 | 21S 36E 22C NE NW | Grayburg  | P&A    |
| EMSU-436  | 3002504750 | 21S 36E 22D       | Grayburg  | P&A    |
| EMSU-437  | 3002504742 | 21S 36E 21A       | Grayburg  | P&A    |
| EMSU-438  | 3002504740 | 21S 36E 21B NW NE | Grayburg  | P&A    |
| EMSU-439  | 3002504739 | 21S 36E 21C       | Grayburg  | P&A    |
| EMSU-443  | 3002504743 | 21S 36E 21G       | Grayburg  | P&A    |
| EMSU-444  | 3002504749 | 21S 36E 21H       | Grayburg  | P&A    |
| EMSU-445  | 3002504752 | 21S 36E 22E       | Grayburg  | P&A    |
| EMSU-446  | 3002504753 | 21S 36E 22F SE NW | Grayburg  | P&A    |
| EMSU-447  | 3002529398 | 21S 36E 22G SW NE | Grayburg  | P&A    |

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSU-448  | 3002525487 | 21S 36E 22H          | Grayburg  | P&A    |
| EMSU-451  | 3002504756 | 21S 36E 22K          | Grayburg  | P&A    |
| EMSU-452  | 3002504755 | 21S 36E 22L          | Grayburg  | P&A    |
| EMSU-453  | 3002504744 | 21S 36E 21I          | Grayburg  | P&A    |
| EMSU-454  | 3002504745 | 21S 36E 21J          | Grayburg  | P&A    |
| EMSU-455  | 3002504747 | 21S 36E 21K          | Grayburg  | P&A    |
| EMSU-460  | 3002529620 | 21S 36E 8C NE NW     | Grayburg  | P&A    |
| EMSU-562  | 3002535462 | 20S 37E 31N          | Grayburg  | P&A    |
| EMSU-596  | 3002534846 | 21S 36E 5L           | Grayburg  | P&A    |
| EMSU-6    | 3002506301 | 20S 37E 31G          | Grayburg  | P&A    |
| EMSU-625  | 3002531425 | 21S 36E 4T NW SW     | Grayburg  | P&A    |
| EMSU-626  | 3002531465 | 21S 36E 4F           | Grayburg  | P&A    |
| EMSU-650  | 3002533800 | 21S 36E 8D NW NW     | Grayburg  | P&A    |
| EMSU-652  | 3002534140 | 21S 36E 5O           | Grayburg  | P&A    |
| EMSU-680  | 3002533597 | 21S 36E 7H           | Grayburg  | P&A    |
| EMSU-681  | 3002537281 | 21S 36E 7B SE NW NE  | Grayburg  | P&A    |
| EMSU-710  | 3002534825 | 21S 36E 10N NW SE SW | Grayburg  | P&A    |
| EMSU-105  | 3002504335 | 20S 36E 25D NW       | Grayburg  | TA     |
| EMSU-110  | 3002506284 | 20S 37E 30E SW NW    | Grayburg  | TA     |
| EMSU-112  | 3002506282 | 20S 37E 30G SW NE    | Grayburg  | TA     |
| EMSU-143  | 3002504424 | 20S 36E 36F SE NW    | Grayburg  | TA     |
| EMSU-165  | 3002504427 | 20S 36E 36L          | Grayburg  | TA     |
| EMSU-186  | 3002504516 | 21S 36E 5C NW        | Grayburg  | TA     |
| EMSU-200H | 3002504492 | 21S 36E 4E           | Grayburg  | TA     |
| EMSU-208  | 3002504470 | 21S 36E 4I           | Grayburg  | TA     |
| EMSU-232  | 3002504452 | 21S 36E 3E SW NW     | Grayburg  | TA     |
| EMSU-299  | 3002504571 | 21S 36E 9F           | Grayburg  | TA     |
| EMSU-311  | 3002529600 | 21S 36E 11I NE SE    | Grayburg  | TA     |
| EMSU-364  | 3002504659 | 21S 36E 16D NW NW    | Grayburg  | TA     |
| EMSU-450  | 3002525320 | 21S 36E 22J          | Grayburg  | TA     |
| EMSU-456  | 3002504736 | 21S 36E 21L          | Grayburg  | TA     |
| EMSU-457  | 3002529149 | 21S 36E 5I           | Grayburg  | TA     |
| EMSU-577  | 3002537318 | 21S 36E 6B           | Grayburg  | TA     |
| EMSU-597  | 3002535158 | 21S 36E 5E SW NW     | Grayburg  | TA     |
| EMSU-747  | 3002535167 | 21S 36E 15A SW NE NE | Grayburg  | TA     |



**Table 4. EMSU B Production and Injection Wells Status**

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSUB-851 | 3002504221 | 20S 36E 11C NE NW    | Grayburg  | Active |
| EMSUB-852 | 3002504222 | 20S 36E 11D          | Grayburg  | Active |
| EMSUB-853 | 3002504198 | 20S 36E 10A NE NE    | Grayburg  | Active |
| EMSUB-855 | 3002531080 | 20S 36E 11E SW NW    | Grayburg  | Active |
| EMSUB-856 | 3002504224 | 20S 36E 11F          | Grayburg  | Active |
| EMSUB-857 | 3002504220 | 20S 36E 11G          | Grayburg  | Active |
| EMSUB-858 | 3002504212 | 20S 36E 11I          | Grayburg  | Active |
| EMSUB-859 | 3002504213 | 20S 36E 11J          | Grayburg  | Active |
| EMSUB-860 | 3002504223 | 20S 36E 11K NE SW    | Grayburg  | Active |
| EMSUB-861 | 3002512723 | 20S 36E 11L NE NW SW | Grayburg  | Active |
| EMSUB-864 | 3002504217 | 20S 36E 11M SW SW    | Grayburg  | Active |
| EMSUB-865 | 3002504216 | 20S 36E 11N          | Grayburg  | Active |
| EMSUB-866 | 3002504215 | 20S 36E 11O SW SE    | Grayburg  | Active |
| EMSUB-867 | 3002524297 | 20S 36E 11P          | Grayburg  | Active |
| EMSUB-871 | 3002504262 | 20S 36E 14B NW NE    | Grayburg  | Active |
| EMSUB-872 | 3002504265 | 20S 36E 14C          | Grayburg  | Active |
| EMSUB-877 | 3002504267 | 20S 36E 14G SW NE    | Grayburg  | Active |
| EMSUB-879 | 3002512542 | 20S 36E 13E SW NW    | Grayburg  | Active |
| EMSUB-882 | 3002504253 | 20S 36E 13L          | Grayburg  | Active |
| EMSUB-883 | 3002504264 | 20S 36E 14I          | Grayburg  | Active |
| EMSUB-884 | 3002504268 | 20S 36E 14J          | Grayburg  | Active |
| EMSUB-885 | 3002504272 | 20S 36E 14K NE SW    | Grayburg  | Active |
| EMSUB-887 | 3002531126 | 20S 36E 14M SW SW    | Grayburg  | Active |
| EMSUB-889 | 3002504271 | 20S 36E 14O SW SE    | Grayburg  | Active |
| EMSUB-890 | 3002504266 | 20S 36E 14P          | Grayburg  | Active |
| EMSUB-891 | 3002504254 | 20S 36E 13M          | Grayburg  | Active |
| EMSUB-893 | 3002504252 | 20S 36E 13O          | Grayburg  | Active |
| EMSUB-895 | 3002504308 | 20S 36E 24A          | Grayburg  | Active |
| EMSUB-900 | 3002504297 | 20S 36E 23B          | Grayburg  | Active |
| EMSUB-901 | 3002504288 | 20S 36E 23C NW       | Grayburg  | Active |
| EMSUB-902 | 3002504292 | 20S 36E 23D          | Grayburg  | Active |
| EMSUB-903 | 3002504290 | 20S 36E 23E          | Grayburg  | Active |
| EMSUB-904 | 3002504291 | 20S 36E 23F          | Grayburg  | Active |
| EMSUB-905 | 3002504301 | 20S 36E 23G          | Grayburg  | Active |
| EMSUB-906 | 3002504295 | 20S 36E 23H          | Grayburg  | Active |
| EMSUB-907 | 3002504317 | 20S 36E 24E          | Grayburg  | Active |
| EMSUB-908 | 3002504316 | 20S 36E 24F          | Grayburg  | Active |
| EMSUB-909 | 3002504314 | 20S 36E 24G          | Grayburg  | Active |
| EMSUB-910 | 3002504313 | 20S 36E 24H          | Grayburg  | Active |
| EMSUB-912 | 3002504305 | 20S 36E 24K SE SW    | Grayburg  | Active |
| EMSUB-914 | 3002504298 | 20S 36E 23I NE SE    | Grayburg  | Active |

| Well Name | API10      | Legal Location       | Formation | Status |
|-----------|------------|----------------------|-----------|--------|
| EMSUB-916 | 3002504289 | 20S 36E 23K NE SW    | Grayburg  | Active |
| EMSUB-918 | 3002504302 | 20S 36E 23M SW SW    | Grayburg  | Active |
| EMSUB-919 | 3002504303 | 20S 36E 23N          | Grayburg  | Active |
| EMSUB-921 | 3002504296 | 20S 36E 23P          | Grayburg  | Active |
| EMSUB-924 | 3002531119 | 20S 36E 24O SW SE    | Grayburg  | Active |
| EMSUB-925 | 3002532122 | 20S 36E 24L NW SW    | Grayburg  | Active |
| EMSUB-850 | 3002504218 | 20S 36E 11B NW NE    | Grayburg  | P&A    |
| EMSUB-854 | 3002504204 | 20S 36E 10H          | Grayburg  | P&A    |
| EMSUB-862 | 3002504205 | 20S 36E 10I NE NE SE | Grayburg  | P&A    |
| EMSUB-868 | 3002504255 | 20S 36E 13C          | Grayburg  | P&A    |
| EMSUB-869 | 3002504256 | 20S 36E 13D          | Grayburg  | P&A    |
| EMSUB-870 | 3002504261 | 20S 36E 14A          | Grayburg  | P&A    |
| EMSUB-873 | 3002504276 | 20S 36E 14D          | Grayburg  | P&A    |
| EMSUB-874 | 3002504279 | 20S 36E 15A          | Grayburg  | P&A    |
| EMSUB-875 | 3002504274 | 20S 36E 14E NE SW NW | Grayburg  | P&A    |
| EMSUB-876 | 3002504269 | 20S 36E 14F          | Grayburg  | P&A    |
| EMSUB-878 | 3002504263 | 20S 36E 14H SE NE    | Grayburg  | P&A    |
| EMSUB-881 | 3002531112 | 20S 36E 13K NE SW    | Grayburg  | P&A    |
| EMSUB-886 | 3002504275 | 20S 36E 14L          | Grayburg  | P&A    |
| EMSUB-888 | 3002504273 | 20S 36E 14N          | Grayburg  | P&A    |
| EMSUB-896 | 3002526076 | 20S 36E 24B NE       | Grayburg  | P&A    |
| EMSUB-897 | 3002504312 | 20S 36E 24C          | Grayburg  | P&A    |
| EMSUB-898 | 3002504315 | 20S 36E 24D          | Grayburg  | P&A    |
| EMSUB-899 | 3002504294 | 20S 36E 23A NE NE NE | Grayburg  | P&A    |
| EMSUB-911 | 3002504311 | 20S 36E 24J C NW SE  | Grayburg  | P&A    |
| EMSUB-913 | 3002504307 | 20S 36E 24L          | Grayburg  | P&A    |
| EMSUB-915 | 3002504300 | 20S 36E 23J          | Grayburg  | P&A    |
| EMSUB-917 | 3002504293 | 20S 36E 23L          | Grayburg  | P&A    |
| EMSUB-920 | 3002504299 | 20S 36E 23O          | Grayburg  | P&A    |
| EMSUB-922 | 3002504306 | 20S 36E 24M          | Grayburg  | P&A    |
| EMSUB-923 | 3002504304 | 20S 36E 24N          | Grayburg  | P&A    |
| EMSUB-863 | 3002504206 | 20S 36E 10P          | Grayburg  | TA     |

Empire New Mexico, LLC  
Wells Requiring Remedial Activities  
Must Be Returned to Production or Injection or TA/Plugged

| Item # | API #        | Well Name                       | UNIT | Lease Type | Well Type | Last Production / Injection Date on ACOI List | Comments                    |
|--------|--------------|---------------------------------|------|------------|-----------|---|-----------------------------|
| 1      | 30-025-31417 | ARROWHEAD GRAYBURG UNIT #155    | AGU  | State      | Producer  | Sep-19  |                             |
| 2      | 30-025-24272 | ARROWHEAD GRAYBURG UNIT #160    | AGU  | Federal    | Injector  | Mar-24  | Well recently failed MIT    |
| 3      | 30-025-31304 | ARROWHEAD GRAYBURG UNIT #174    | AGU  | State      | Producer  | Feb-17  |                             |
| 4      | 30-025-31559 | ARROWHEAD GRAYBURG UNIT #178    | AGU  | Private    | Producer  | Jul-17  |                             |
| 5      | 30-025-10094 | ARROWHEAD GRAYBURG UNIT #184    | AGU  | Private    | Producer  | Oct-23  |                             |
| 6      | 30-025-31723 | ARROWHEAD GRAYBURG UNIT #188    | AGU  | Private    | Producer  | Apr-19  | Plugged & Abandoned 5/2019  |
| 7      | 30-025-31752 | ARROWHEAD GRAYBURG UNIT #200    | AGU  | Private    | Producer  | Jul-18  | Temporary Abandoned Well    |
| 8      | 30-025-08890 | ARROWHEAD GRAYBURG UNIT #206    | AGU  | State      | Producer  | Apr-16  | Plugged & Abandoned 10/2018 |
| 9      | 30-025-26534 | ARROWHEAD GRAYBURG UNIT #209    | AGU  | Private    | Producer  | Jan-19  | Plugged & Abandoned 4/2020  |
| 10     | 30-025-31388 | ARROWHEAD GRAYBURG UNIT #212    | AGU  | State      | Injector  | Mar-23  |                             |
| 11     | 30-025-10096 | ARROWHEAD GRAYBURG UNIT #214    | AGU  | Private    | Injector  | May-23  |                             |
| 12     | 30-025-10351 | ARROWHEAD GRAYBURG UNIT #216    | AGU  | Private    | Producer  | Jun-23  |                             |
| 13     | 30-025-31246 | ARROWHEAD GRAYBURG UNIT #228    | AGU  | State      | Producer  | Oct-17  | Plugged & Abandoned 11/2018 |
| 14     | 30-025-31740 | ARROWHEAD GRAYBURG UNIT #229    | AGU  | State      | Injector  | Mar-24  | Well recently failed MIT    |
| 15     | 30-025-10355 | ARROWHEAD GRAYBURG UNIT #231    | AGU  | State      | Producer  | Aug-23  | Will P&A well               |
| 16     | 30-025-31610 | ARROWHEAD GRAYBURG UNIT #234    | AGU  | Private    | Producer  | Mar-20  | Temporary Abandoned Well    |
| 17     | 30-025-10359 | ARROWHEAD GRAYBURG UNIT #245    | AGU  | State      | Producer  | Jul-16  | Will P&A well               |
| 18     | 30-025-35419 | ARROWHEAD GRAYBURG UNIT #324    | AGU  | State      | Producer  | Feb-17  |                             |
| 19     | 30-025-34842 | ARROWHEAD GRAYBURG UNIT #329    | AGU  | State      | Producer  | Mar-20  |                             |
| 20     | 30-025-34665 | ARROWHEAD GRAYBURG UNIT #344    | AGU  | Federal    | Producer  | Aug-23  |                             |
| 21     | 30-025-34823 | ARROWHEAD GRAYBURG UNIT #352    | AGU  | State      | Producer  | Mar-19  |                             |
| 22     | 30-025-35423 | ARROWHEAD GRAYBURG UNIT #359    | AGU  | State      | Producer  | Jan-22  |                             |
| 23     | 30-025-37283 | ARROWHEAD GRAYBURG UNIT #360    | AGU  | Private    | Producer  | Jan-19  |                             |
| 24     | 30-025-34298 | ARROWHEAD GRAYBURG UNIT #369    | AGU  | Private    | Producer  | Jul-22  | Temporary Abandoned Well    |
| 25     | 30-025-37284 | ARROWHEAD GRAYBURG UNIT #391    | AGU  | Private    | Producer  | Oct-23  |                             |
| 26     | 30-025-37285 | ARROWHEAD GRAYBURG UNIT #398    | AGU  | State      | Producer  | Jun-23  |                             |
| 27     | 30-025-04321 | EUNICE MONUMENT SOUTH UNIT #104 | EMSU | State      | Injector  | Jun-23  |                             |
| 28     | 30-025-04335 | EUNICE MONUMENT SOUTH UNIT #105 | EMSU | State      | Producer  | Mar-18  | Will P&A well               |
| 29     | 30-025-06284 | EUNICE MONUMENT SOUTH UNIT #110 | EMSU | State      | Producer  | Mar-18  |                             |
| 30     | 30-025-06283 | EUNICE MONUMENT SOUTH UNIT #111 | EMSU | State      | Injector  | Oct-23  |                             |
| 31     | 30-025-06282 | EUNICE MONUMENT SOUTH UNIT #112 | EMSU | State      | Producer  | Mar-18  |                             |
| 32     | 30-025-06290 | EUNICE MONUMENT SOUTH UNIT #116 | EMSU | State      | Injector  | Sep-23  |                             |
| 33     | 30-025-30277 | EUNICE MONUMENT SOUTH UNIT #122 | EMSU | Federal    | Producer  | Aug-23  |                             |
| 34     | 30-025-29957 | EUNICE MONUMENT SOUTH UNIT #123 | EMSU | Federal    | Producer  | Apr-23  |                             |
| 35     | 30-025-06288 | EUNICE MONUMENT SOUTH UNIT #126 | EMSU | State      | Injector  | Jun-18  | Plugged & Abandoned 2/2019  |
| 36     | 30-025-12544 | EUNICE MONUMENT SOUTH UNIT #139 | EMSU | State      | Producer  | May-23  |                             |

Empire New Mexico, LLC  
 Wells Requiring Remedial Activities  
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| Item # | API #        | Well Name                        | UNIT | Lease Type | Well Type | Last Production / Injection Date on ACOI List | Comments                            |
|--------|--------------|----------------------------------|------|------------|-----------|---|-------------------------------------|
| 37     | 30-025-04428 | EUNICE MONUMENT SOUTH UNIT #142  | EMSU | State      | Producer  | Sep-23  |                                     |
| 38     | 30-025-04424 | EUNICE MONUMENT SOUTH UNIT #143  | EMSU | State      | Producer  | Feb-17  |                                     |
| 39     | 30-025-12543 | EUNICE MONUMENT SOUTH UNIT #144  | EMSU | State      | Injector  | May-23  |                                     |
| 40     | 30-025-06304 | EUNICE MONUMENT SOUTH UNIT #146  | EMSU | State      | Injector  | Mar-24  | Well recently failed MIT            |
| 41     | 30-025-29583 | EUNICE MONUMENT SOUTH UNIT #169  | EMSU | State      | Producer  | Sep-23  |                                     |
| 42     | 30-025-04516 | EUNICE MONUMENT SOUTH UNIT #186  | EMSU | State      | Producer  | Apr-22  |                                     |
| 43     | 30-025-04533 | EUNICE MONUMENT SOUTH UNIT #188  | EMSU | State      | Producer  | Oct-23  |                                     |
| 44     | 30-025-29599 | EUNICE MONUMENT SOUTH UNIT #194  | EMSU | State      | Producer  | Jun-23  |                                     |
| 45     | 30-025-04492 | EUNICE MONUMENT SOUTH UNIT #200H | EMSU | State      | Producer  | Jan-23  |                                     |
| 46     | 30-025-29866 | EUNICE MONUMENT SOUTH UNIT #202  | EMSU | Federal    | Producer  | Apr-23  | Well returned to Production 10/2023 |
| 47     | 30-025-04470 | EUNICE MONUMENT SOUTH UNIT #208  | EMSU | Federal    | Producer  | Nov-16  | Will P&A well                       |
| 48     | 30-025-08704 | EUNICE MONUMENT SOUTH UNIT #216  | EMSU | State      | Producer  | May-23  |                                     |
| 49     | 30-025-08706 | EUNICE MONUMENT SOUTH UNIT #221  | EMSU | State      | Injector  | Mar-24  | Well recently failed MIT            |
| 50     | 30-025-29683 | EUNICE MONUMENT SOUTH UNIT #225  | EMSU | State      | Injector  | Apr-23  |                                     |
| 51     | 30-025-04502 | EUNICE MONUMENT SOUTH UNIT #227  | EMSU | State      | Injector  | Jun-18  | Plugged & Abandoned 3/2019          |
| 52     | 30-025-04452 | EUNICE MONUMENT SOUTH UNIT #232  | EMSU | State      | Producer  | Jul-17  |                                     |
| 53     | 30-025-04468 | EUNICE MONUMENT SOUTH UNIT #239  | EMSU | Federal    | Injector  | Mar-24  | Well recently failed MIT            |
| 54     | 30-025-04495 | EUNICE MONUMENT SOUTH UNIT #256  | EMSU | State      | Producer  | Apr-22  |                                     |
| 55     | 30-025-04454 | EUNICE MONUMENT SOUTH UNIT #262  | EMSU | Private    | Producer  | Feb-18  | Plugged & Abandoned 8/2019          |
| 56     | 30-025-04457 | EUNICE MONUMENT SOUTH UNIT #264  | EMSU | Private    | Producer  | Apr-22  |                                     |
| 57     | 30-025-20133 | EUNICE MONUMENT SOUTH UNIT #278  | EMSU | Private    | Producer  | Apr-22  |                                     |
| 58     | 30-025-04568 | EUNICE MONUMENT SOUTH UNIT #297  | EMSU | State      | Injector  | Mar-24  | Well recently failed MIT            |
| 59     | 30-025-04571 | EUNICE MONUMENT SOUTH UNIT #299  | EMSU | Federal    | Injector  | Nov-23  |                                     |
| 60     | 30-025-04579 | EUNICE MONUMENT SOUTH UNIT #300  | EMSU | Private    | Producer  | Oct-23  |                                     |
| 61     | 30-025-04588 | EUNICE MONUMENT SOUTH UNIT #302  | EMSU | Private    | Producer  | Oct-23  |                                     |
| 62     | 30-025-08708 | EUNICE MONUMENT SOUTH UNIT #307  | EMSU | State      | Injector  | Mar-24  | Well recently failed MIT            |
| 63     | 30-025-29600 | EUNICE MONUMENT SOUTH UNIT #311  | EMSU | Private    | Producer  | Apr-22  |                                     |
| 64     | 30-025-04545 | EUNICE MONUMENT SOUTH UNIT #332  | EMSU | Private    | Injector  | Aug-23  |                                     |
| 65     | 30-025-04558 | EUNICE MONUMENT SOUTH UNIT #335  | EMSU | Federal    | Producer  | Apr-22  |                                     |
| 66     | 30-025-04659 | EUNICE MONUMENT SOUTH UNIT #364  | EMSU | State      | Injector  | Mar-24  | Well recently failed MIT            |
| 67     | 30-025-04701 | EUNICE MONUMENT SOUTH UNIT #380  | EMSU | Private    | Injector  | Nov-21  | Returned to Injection 6/2023        |
| 68     | 30-025-04656 | EUNICE MONUMENT SOUTH UNIT #384  | EMSU | State      | Injector  | Apr-23  | Returned to Injection 9/2023        |
| 69     | 30-025-04650 | EUNICE MONUMENT SOUTH UNIT #385  | EMSU | State      | Producer  | Oct-23  |                                     |
| 70     | 30-025-04635 | EUNICE MONUMENT SOUTH UNIT #390  | EMSU | Private    | Injector  | Apr-23  |                                     |
| 71     | 30-025-04632 | EUNICE MONUMENT SOUTH UNIT #392  | EMSU | Federal    | Producer  | Apr-23  |                                     |
| 72     | 30-025-04646 | EUNICE MONUMENT SOUTH UNIT #397  | EMSU | State      | Producer  | Aug-22  |                                     |

Empire New Mexico, LLC  
Wells Requiring Remedial Activities  
Must Be Returned to Production or Injection or TA/Plugged

| Item # | API #        | Well Name                       | UNIT | Lease Type | Well Type | Last Production /<br>Injection Date on<br>ACOI List | Comments                            |
|--------|--------------|---------------------------------|------|------------|-----------|---|-------------------------------------|
| 73     | 30-025-04678 | EUNICE MONUMENT SOUTH UNIT #409 | EMSU | Federal    | Producer  | Apr-23  |                                     |
| 74     | 30-025-04686 | EUNICE MONUMENT SOUTH UNIT #417 | EMSU | Federal    | Producer  | May-23  |                                     |
| 75     | 30-025-04695 | EUNICE MONUMENT SOUTH UNIT #419 | EMSU | Private    | Producer  | Jan-17  | Plugged & Abandoned 2/2020          |
| 76     | 30-025-04740 | EUNICE MONUMENT SOUTH UNIT #438 | EMSU | State      | Injector  | Jun-18  | Plugged & Abandoned 3/2019          |
| 77     | 30-025-04753 | EUNICE MONUMENT SOUTH UNIT #446 | EMSU | State      | Injector  | Jun-18  | Plugged & Abandoned 3/2019          |
| 78     | 30-025-25320 | EUNICE MONUMENT SOUTH UNIT #450 | EMSU | State      | Producer  | May-18  |                                     |
| 79     | 30-025-35461 | EUNICE MONUMENT SOUTH UNIT #560 | EMSU | State      | Producer  | Oct-23  |                                     |
| 80     | 30-025-33595 | EUNICE MONUMENT SOUTH UNIT #561 | EMSU | State      | Producer  | Nov-21  | Well returned to Production 12/2023 |
| 81     | 30-025-35462 | EUNICE MONUMENT SOUTH UNIT #562 | EMSU | State      | Producer  | Apr-18  | Plugged & Abandoned 3/2020          |
| 82     | 30-025-37318 | EUNICE MONUMENT SOUTH UNIT #577 | EMSU | State      | Producer  | Apr-14  |                                     |
| 83     | 30-025-35157 | EUNICE MONUMENT SOUTH UNIT #585 | EMSU | State      | Producer  | Apr-23  |                                     |
| 84     | 30-025-35158 | EUNICE MONUMENT SOUTH UNIT #597 | EMSU | State      | Producer  | Mar-17  |                                     |
| 85     | 30-025-35455 | EUNICE MONUMENT SOUTH UNIT #623 | EMSU | State      | Producer  | Jun-19  | Well returned to Production 9/2023  |
| 86     | 30-025-33187 | EUNICE MONUMENT SOUTH UNIT #649 | EMSU | State      | Producer  | Apr-23  |                                     |
| 87     | 30-025-37281 | EUNICE MONUMENT SOUTH UNIT #681 | EMSU | Private    | Producer  | Jan-18  | Plugged & Abandoned 3/2020          |
| 88     | 30-025-35162 | EUNICE MONUMENT SOUTH UNIT #695 | EMSU | State      | Producer  | Oct-22  |                                     |
| 89     | 30-025-35163 | EUNICE MONUMENT SOUTH UNIT #697 | EMSU | State      | Producer  | Oct-23  |                                     |
| 90     | 30-025-34851 | EUNICE MONUMENT SOUTH UNIT #734 | EMSU | State      | Producer  | Nov-22  |                                     |
| 91     | 30-025-35167 | EUNICE MONUMENT SOUTH UNIT #747 | EMSU | State      | Producer  | Apr-22  |                                     |
| 92     | 30-025-35459 | EUNICE MONUMENT SOUTH UNIT #775 | EMSU | State      | Producer  | Nov-23  |                                     |

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

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22026 FOR THE ANDRE DAWSON  
SWD #001 OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO. CASE NO. 24018**

**APPLICATION OF EMPIRE NEW MEXICO LLC  
TO REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22027 FOR THE ERNIE BANKS  
SWD NO. 1 WELL OPERATED BY GOODNIGHT  
MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24019**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED BY  
ADMINISTRATIVE ORDER SWD-2307 FOR THE RYNO  
SWD #001 F/K/A SNYDER SWD WELL NO. 1 OPERATED  
BY GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24020**

**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. 24021**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ADMINISTRATIVE ORDER NO. SWD-2391 FOR  
THE PEDRO SWD #001 WELL OPERATED BY  
GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24022**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-22030 FOR THE VERLANDER  
SWD WELL NO. 1 OPERATED BY  
GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO. CASE NO. 24023**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-20855 FOR THE NOLAN RYAN  
SWD #001 OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24024**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-21190 FOR THE SOSA SA 17 NO. 2  
WELL OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24025**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ADMINISTRATIVE ORDER NO. SWD-2075 FOR  
THE TED 28 SWD WELL NO. 1 OPERATED BY  
GOODNIGHT MIDSTREAM PERMIAN LLC,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 24026**

**APPLICATION OF EMPIRE NEW MEXICO LLC TO  
REVOKE THE INJECTION AUTHORITY GRANTED  
UNDER ORDER NO. R-20865 FOR THE YAZ 28 SWD  
WELL NO. 1 OPERATED BY GOODNIGHT MIDSTREAM  
PERMIAN LLC, LEA COUNTY, NEW MEXICO.**

**CASE NO. 24027**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Empire New Mexico, LLC's Response to Goodnight Midstream Permian LLC's Subpoena Duces Tecum was served on the following counsel of record by electronic mail on April 5, 2024.

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Respectfully submitted,

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