

**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 CO2 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**

By: /s/ Dana S. Hardy  
Dana S. Hardy  
Jaclyn M. McLean  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

Ernest L. Padilla  
**PADILLA LAW FIRM**  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[padillalawnm@outlook.com](mailto:padillalawnm@outlook.com)

Sharon T. Shaheen  
**MONTGOMERY & ANDREWS, P.A.**  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
*Attorneys for Empire New Mexico, LLC*

**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:

Michael H. Feldewert  
Adam G. Rankin  
Nathan R. Jurgensen  
Julia Broggi  
Paula M. Vance  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504-2208  
Telephone: (505) 986-2678  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[nrjurgensen@hollandhart.com](mailto:nrjurgensen@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)  
***Attorneys for Goodnight Midstream  
Permian, LLC***

Matthew M. Beck  
PEIFER, HANSON, MULLINS & BAKER,  
P.A.  
P.O. Box 25245  
Albuquerque, NM 87125-5245  
Tel: (505) 247-4800  
[mbeck@peiferlaw.com](mailto:mbeck@peiferlaw.com)  
***Attorneys for Rice Operating Company and  
Permian Line Service, LLC***

Jesse K. Tremaine  
Christopher L. Moander  
New Mexico Energy, Minerals and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Tel (505) 709-5687  
[Jessek.tremaine@emnrd.nm.gov](mailto:Jessek.tremaine@emnrd.nm.gov)  
[chris.moander@emnrd.nm.gov](mailto:chris.moander@emnrd.nm.gov)

***Attorneys for New Mexico Oil Conservation  
Division***

Miguel A. Suazo  
Sophia A. Graham  
Kaitlyn A. Luck  
BEATTY & WOZNIAK, P.C.  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
Tel: (505) 946-2090  
[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)  
[sgraham@bwenergylaw.com](mailto:sgraham@bwenergylaw.com)  
[kluck@bwenergylaw.com](mailto:kluck@bwenergylaw.com)  
***Attorneys for Pilot Water Solutions SWD,  
LLC***

/s/ Dana S. Hardy

**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  
c/o Padilla Law Firm, P.A.  
Attn: Ernest L. Padilla  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577 telephone  
padillalawnm@outlook.com

Dana S. Hardy  
Jaclyn M. McLean  
HINKLE SHANOR LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
dhardy@hinklelawfirm.com  
jmclean@hinklelawfirm.com

Sharon T. Shaheen  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, NM 87504-2307  
(505) 986-2678  
sshhaheen@montand.com  
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:**



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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 "CO2" 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. CO2 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,

**HINKLE SHANOR LLP**

By: /s/ Dana S. Hardy  
Dana S. Hardy  
Jaclyn M. McLean  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

Ernest L. Padilla  
**PADILLA LAW FIRM, P.A.**  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[padillalawnm@outlook.com](mailto:padillalawnm@outlook.com)

Sharon T. Shaheen  
Daniel B. Goldberg  
**MONTGOMERY & ANDREWS, P.A.**  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[dgoldberg@montand.com](mailto:dgoldberg@montand.com)  
*Attorneys for Empire New Mexico, LLC*

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

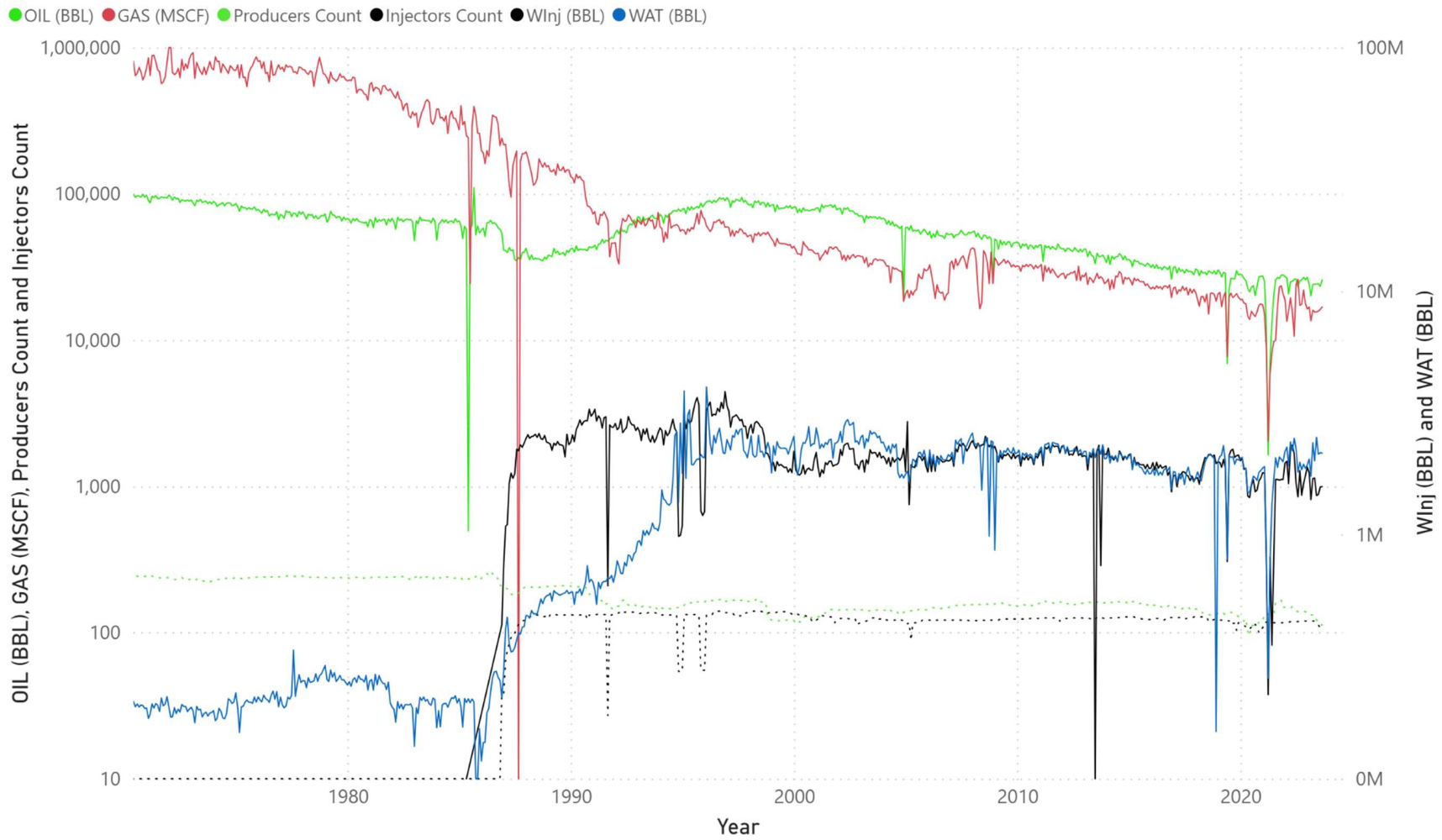


Figure 1. Monthly Production and Injection History for EMSU.

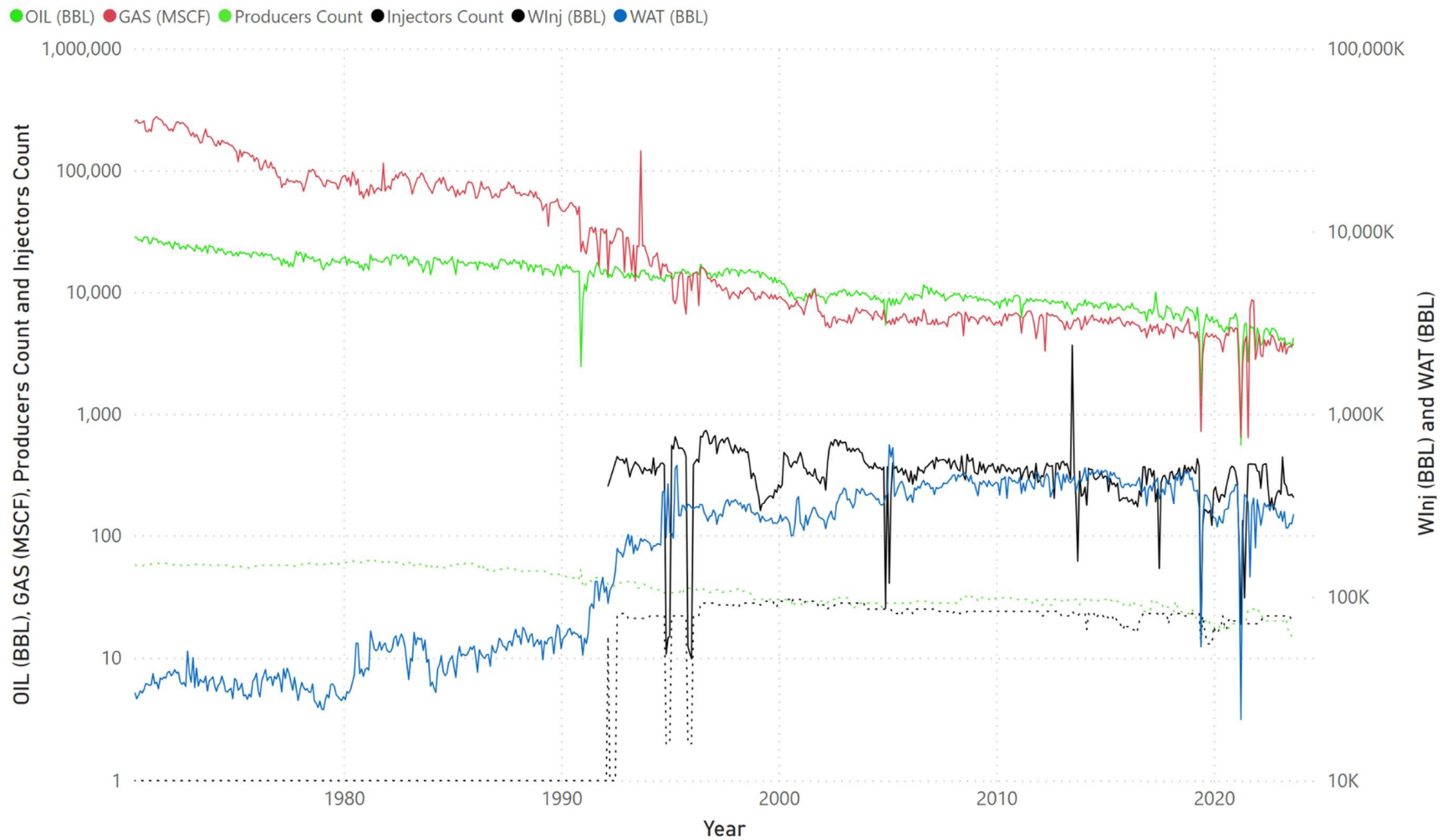


Figure 2. Monthly Production and Injection History for EMSU-B.

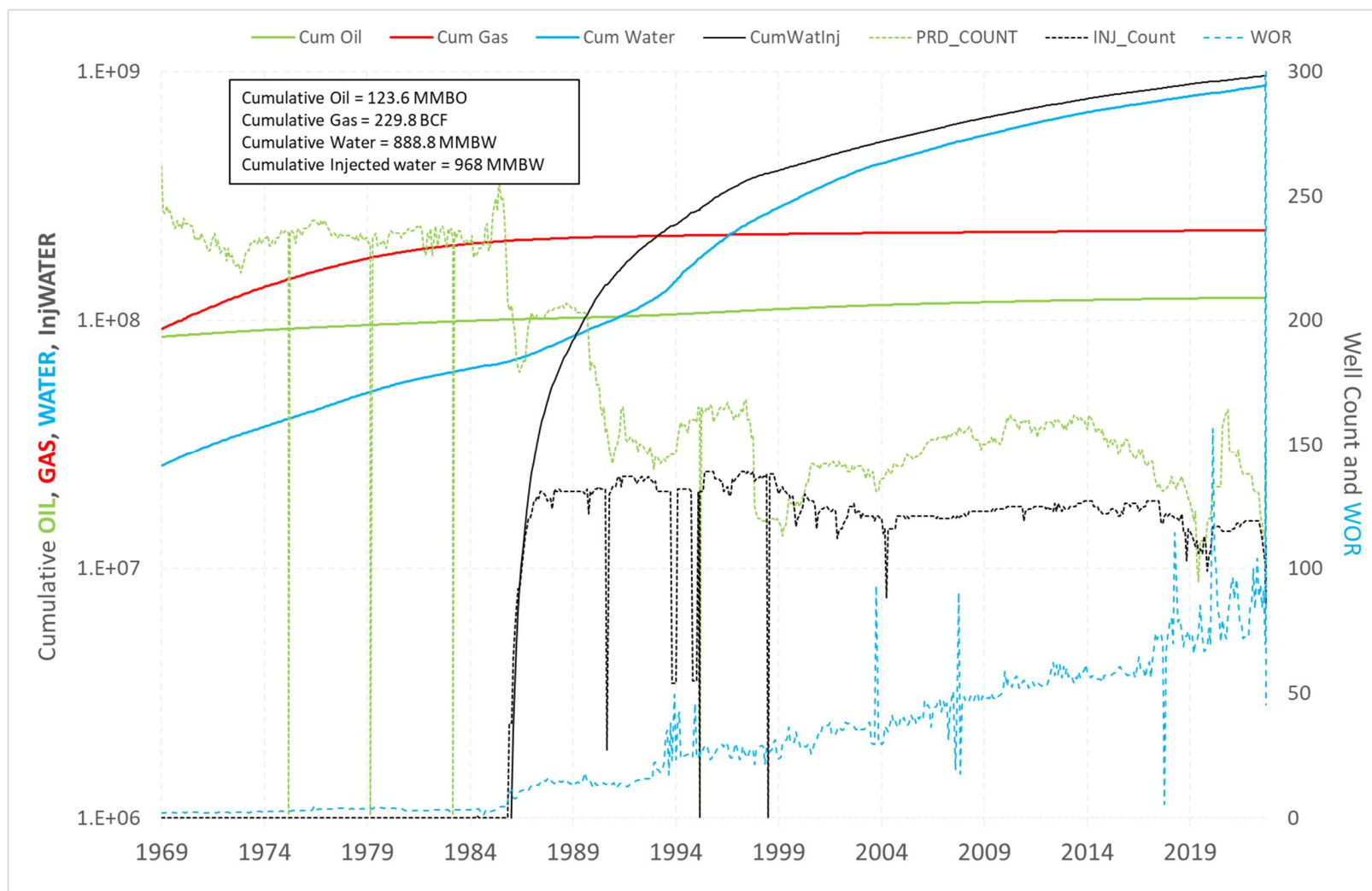


Figure 3. Cumulative Production, Injection, and Water-Oil Ratio (WOR) History for EMSU Up To The End Of The Year 2023 (YE2023).



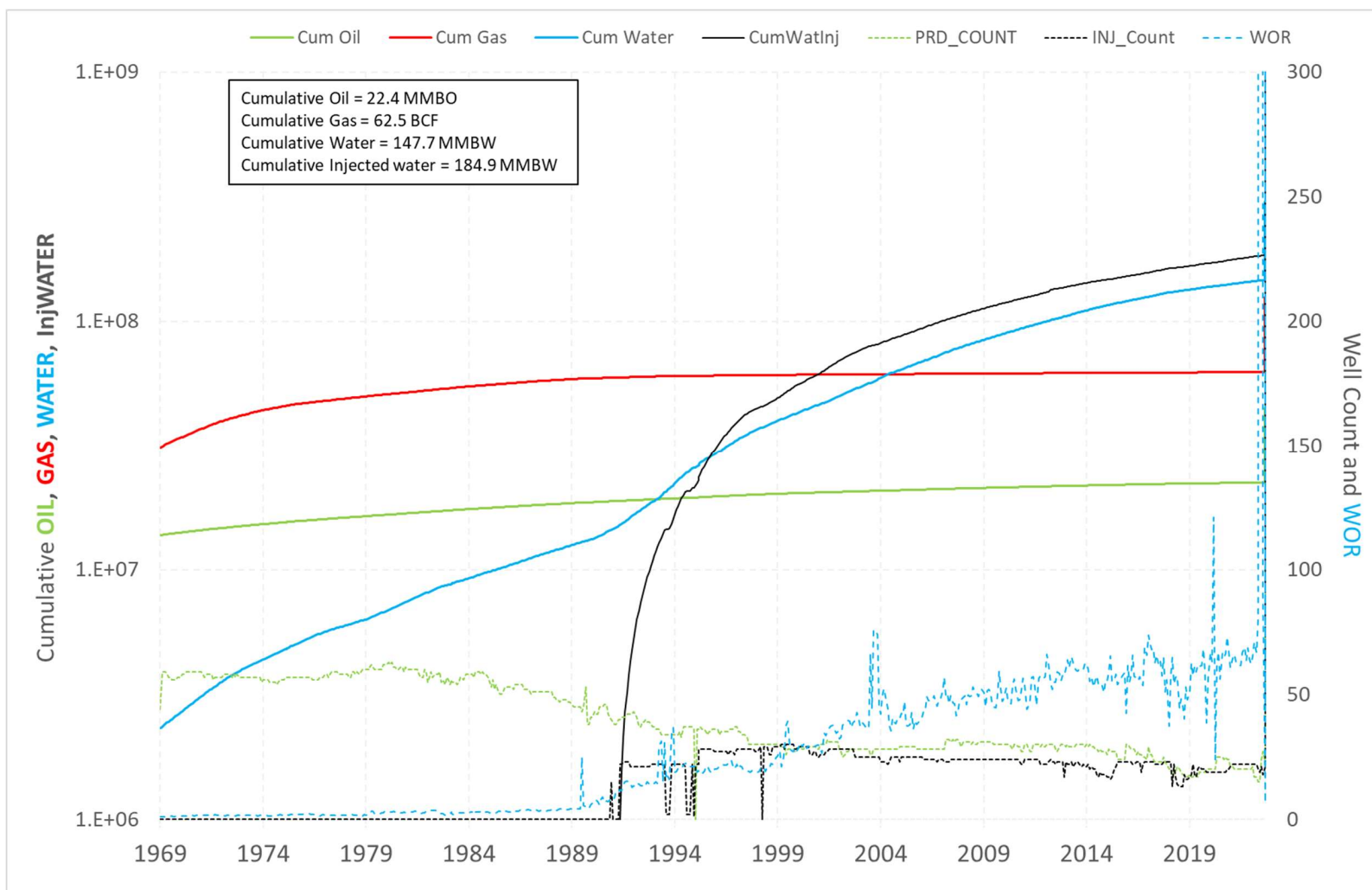


Figure 4. Cumulative Production, Injection, and Water-Oil Ratio (WOR) History for EMSU B Up To The End Of The Year 2023 (YE2023).



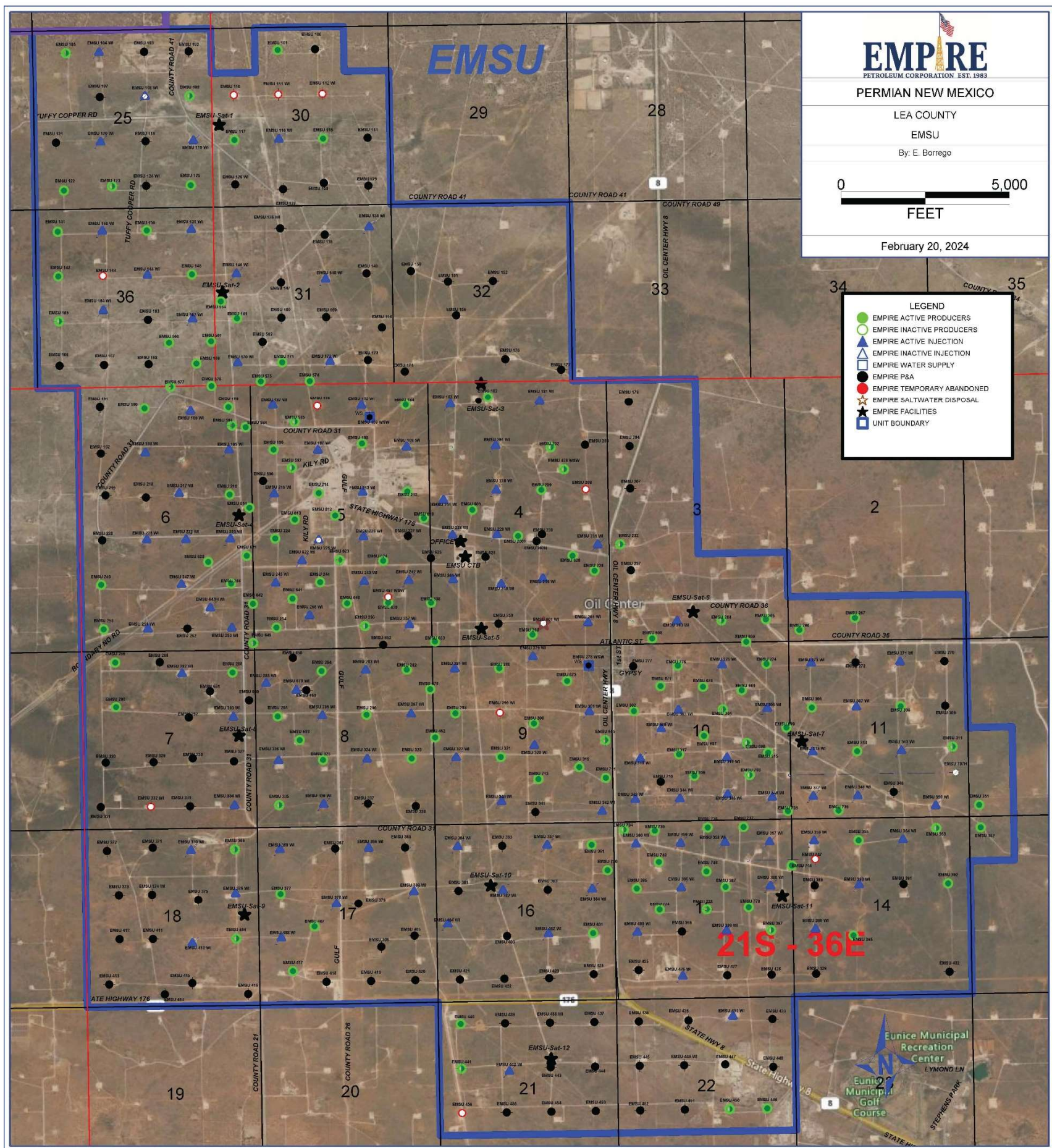


Figure 5. Satellite view showing Well Locations, Surface Facilities, and Lease Roads for the EMSU.



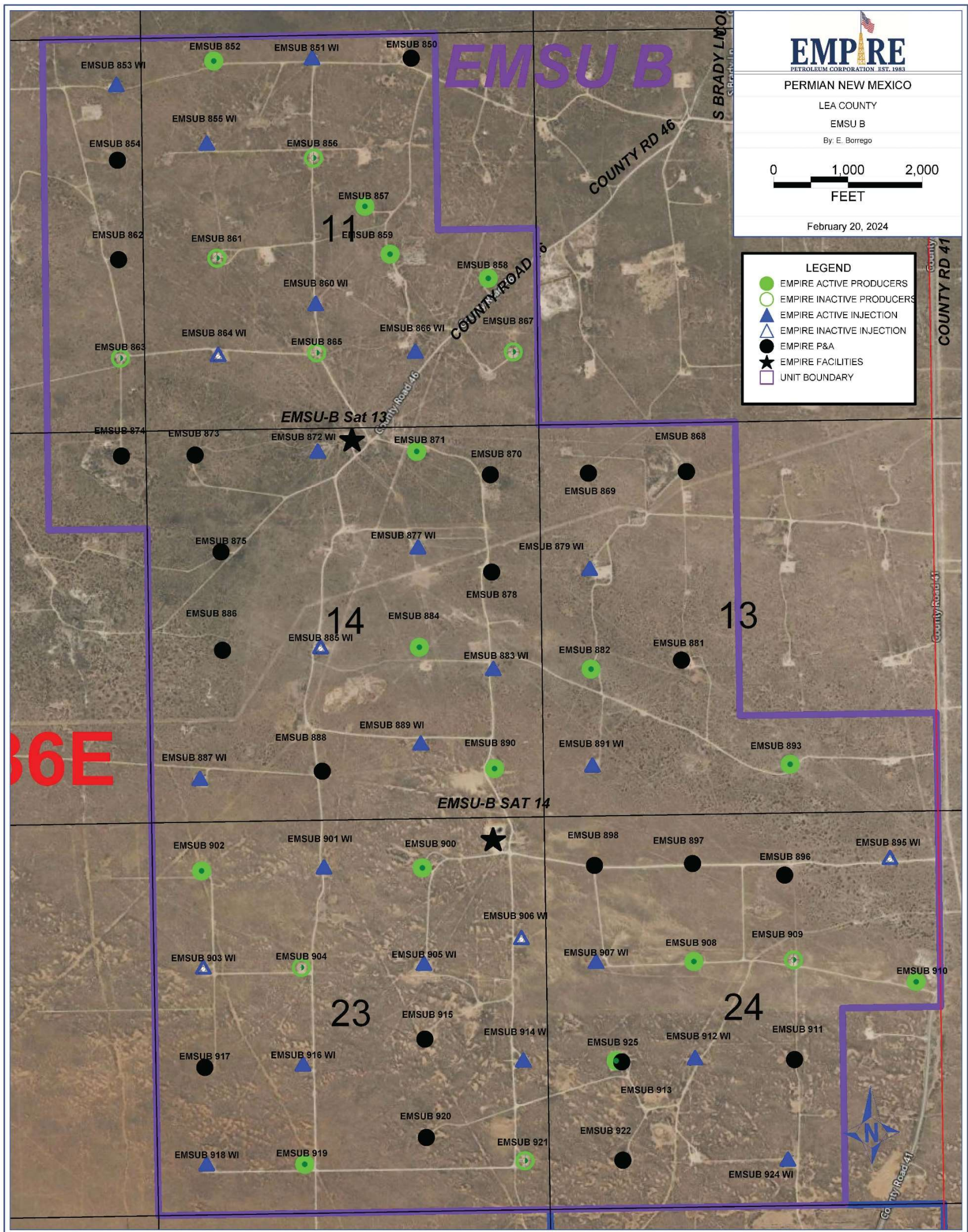


Figure 6. Satellite view showing Well Locations, Surface Facilities, and Lease Roads for the EMSU B.



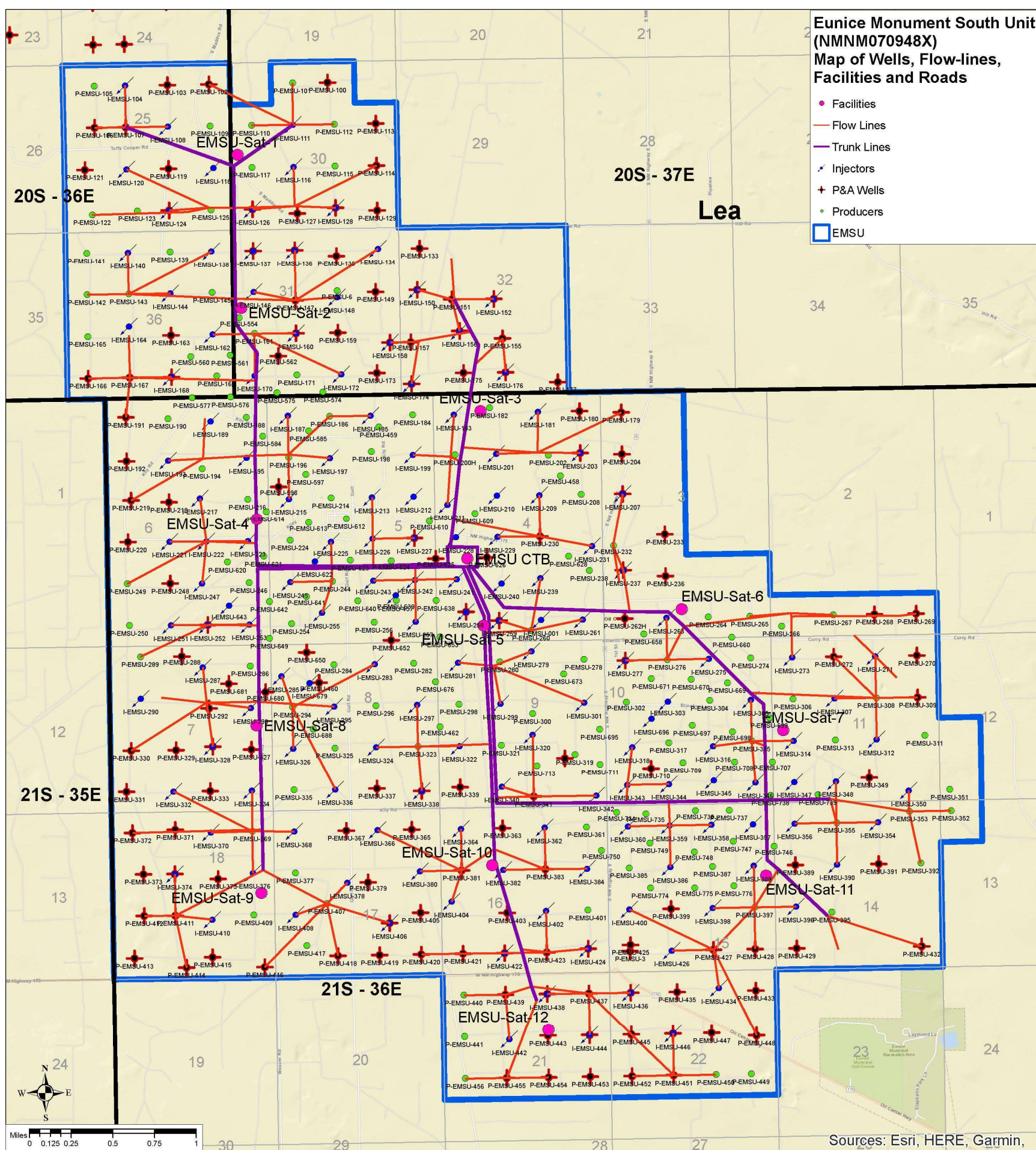


Figure 7. Map showing the Wells, Flow Lines, Surface Facilities, and Lease Roads.



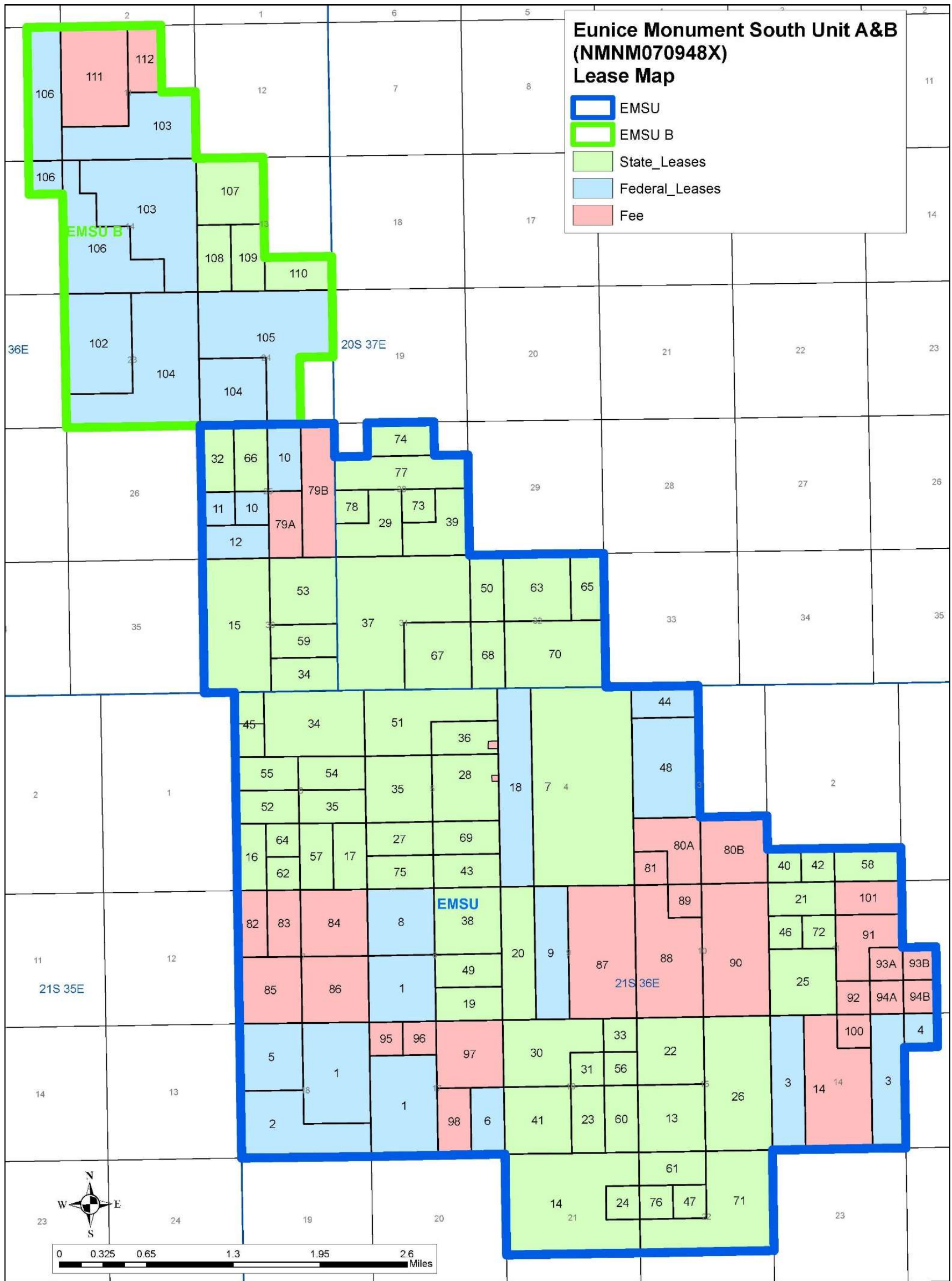


Figure 8. Map showing Lease Types and Unit Boundaries for EMSU A & B.

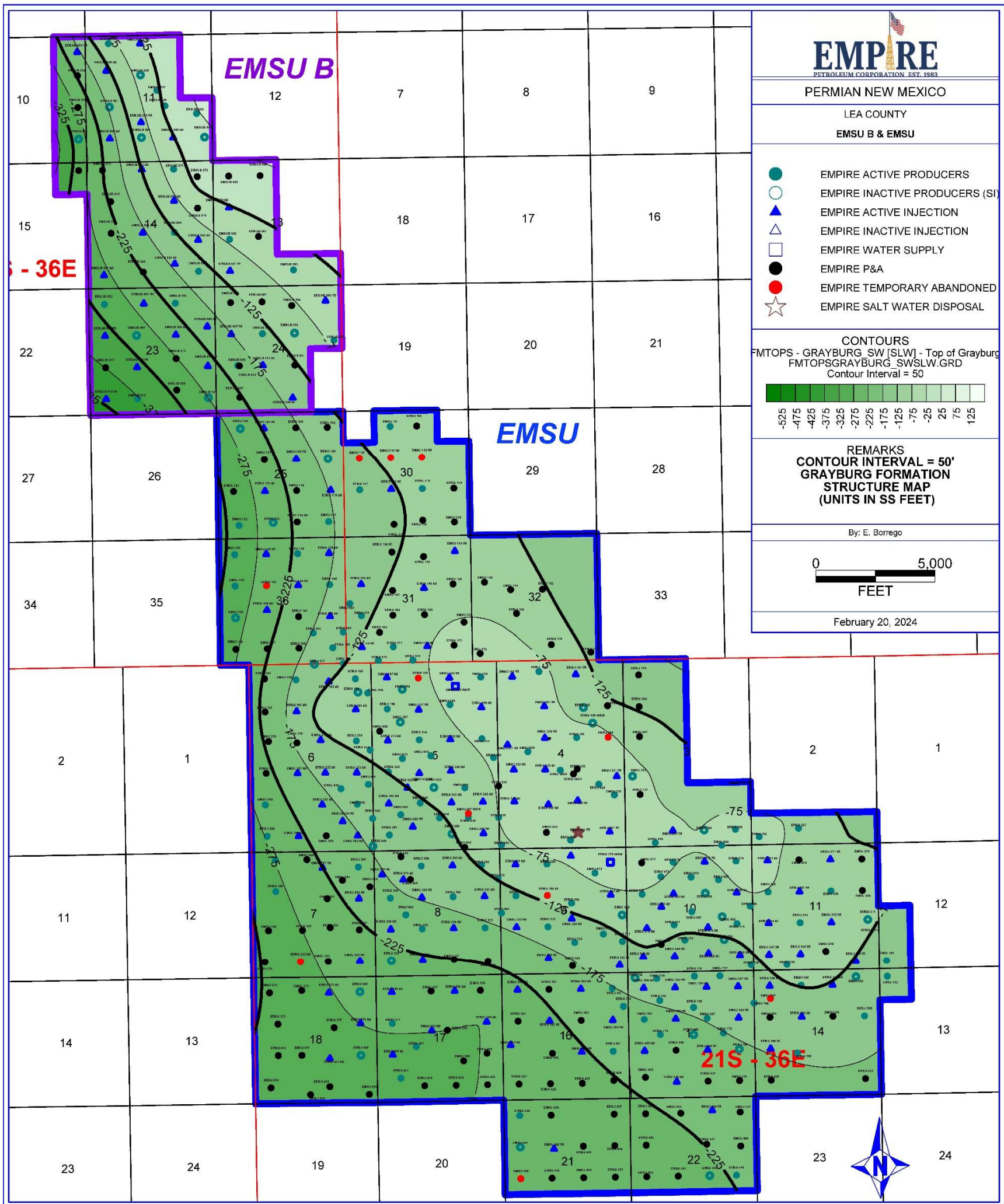


Figure 9. Structural Map. Top of Grayburg Formation.



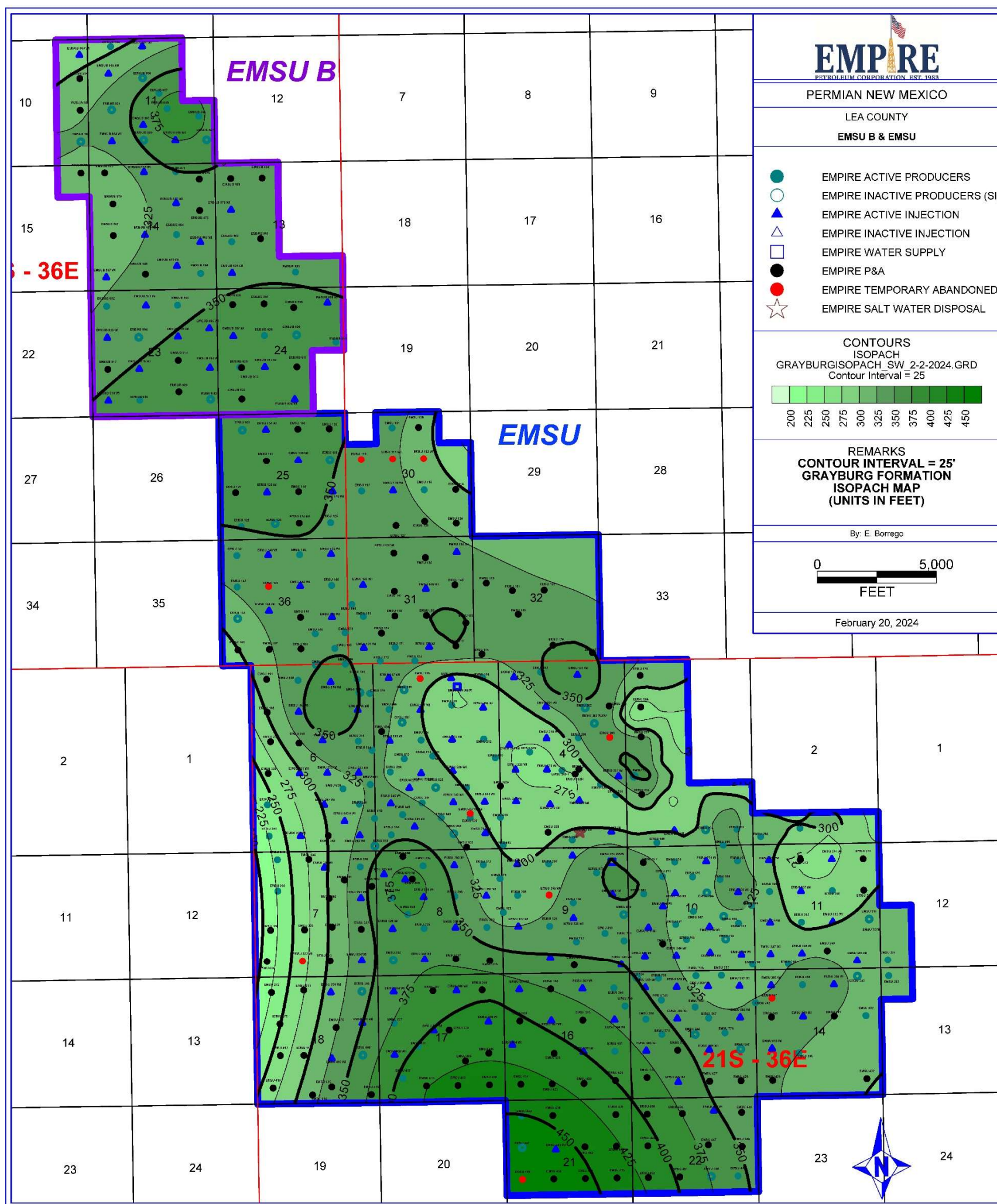


Figure 10. Isopach Map. Grayburg Formation.

**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  
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
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 / Injection Date on 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.

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Paula M. Vance  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504-2208  
Telephone: (505) 986-2678  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)  
*Attorneys for Goodnight Midstream  
Permian, LLC*



Respectfully submitted,

**HINKLE SHANOR LLP**

By: /s/ Dana S. Hardy  
Dana S. Hardy  
Jaclyn M. McLean  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

Ernest L. Padilla  
**PADILLA LAW FIRM, P.A.**  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[padillalawnm@outlook.com](mailto:padillalawnm@outlook.com)

Sharon T. Shaheen  
Daniel B. Goldberg  
**MONTGOMERY & ANDREWS, P.A.**  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[dgoldberg@montand.com](mailto:dgoldberg@montand.com)  
*Attorneys for Empire New Mexico, LLC*