

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

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

**CASE NO. 24123**

**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. 24018-24020, 24025**

**EMPIRE NEW MEXICO LLC'S RESPONSE TO THE OIL CONSERVATION  
DIVISION'S MOTION TO VACATE AND CONTINUE THE JUNE 11, 2026 STATUS  
CONFERENCE BEFORE THE OIL CONSERVATION COMMISSION AND  
GOODNIGHT MIDSTREAM PERMIAN LLC'S NOTICE OF SUPPORT**

Empire New Mexico, LLC ("Empire") submits this response to the Oil Conservation Division's ("OCD") Motion to Vacate and Continue the June 11, 2026 Status Conference before the Oil Conservation Commission ("OCC" or "Commission") and Goodnight Midstream LLC's ("Goodnight") Notice of Support for OCD's Motion to Vacate and Continue June 11, 2026 Status Conference ("Notice of Support" or "Notice"). While Empire does not oppose OCD's request for a continuance, Empire submits this response to raise several issues of concern and respond to Goodnight's improper Notice.

1. On April 27, 2026, Empire filed a motion requesting that the Commission require the OCD to modify its implementation of OCC Orders 24004 and 24004-A (“Implementation Decision”) in accordance with the requirements of OCC Order Nos. 24004 and 24004-A (collectively “Orders”).

2. On April 29, 2026, Empire filed a Form C-103X to obtain approval of a CO<sub>2</sub> Huff-n-Puff pilot project in the San Andres formation within the Eunice Monument South Unit, in accordance with Commission Orders. OCD rejected the Form C-103X and requested that Empire submit a Form C-101 instead. Empire submitted the C-101 on May 1, 2026. **See Exhibit A.**

3. On May 13, 2026, the Commission discussed Empire’s motion at a Commission meeting but did not issue a decision. The motion was taken under advisement, and a status conference was set for the next regular Commission meeting on June 11, 2026.

4. The current status of Empire’s C-101, as reflected in Comments on the OCD website, is “HOLD PENDING APPROVAL OF OCC MOTION.” **See Exhibit B.** Empire presumes this is a reference to Empire’s pending motion. Such a hold is contrary to OCD’s statements at the Commission’s May 13, 2026 meeting that Empire’s C-101 was a “top priority” and would be expedited. The C-101 now appears to be in a holding pattern, with the Commission’s consideration of Empire’s pending motion being pushed out another month and the Division delaying a decision on the C-101 pending the Commission’s decision on Empire’s motion.

5. Empire does not oppose continuing the matter until July given the scheduling issues identified by OCD. However, Empire has serious concerns regarding its ability to develop its CO<sub>2</sub> pilot project in a timely manner, particularly given that the Commission’s Order requires Empire to demonstrate recoverability of the San Andres Residual Oil Zone within three years. In addition, delaying a decision on Empire’s motion allows Goodnight to continue its unfettered

injection into the Unitized Interval, which further injures the correlative rights of the interest owners.

6. Lastly, Empire addresses the improper “Notice of Support” filed by Goodnight on June 3, 2026. As an initial matter, it is unclear why Goodnight submitted the Notice as no party opposes OCD’s request for a continuance. Rather, Goodnight’s Notice appears to be a substantive attack on the merits of Empire’s motion, which is improper and should be disregarded by the Commission. Again, this smacks of gamesmanship—OCD will not act on Empire’s pending C-101 until the Commission issues a decision on Empire’s motion, and Goodnight asserts that the Commission cannot hear Empire’s motion because the C-101 is pending before the OCD. These antics are putting Empire in an impossible position and are prolonging the ongoing destruction of significant hydrocarbon reserves within the EMSU.

7. For the foregoing reasons, Empire writes separately to address the delays on pending matters but does not otherwise oppose OCD’s request for continuance.

Respectfully submitted,

By: /s/ Dana S. Hardy

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon the following counsel of record by electronic mail on June 10, 2026.

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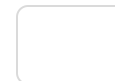
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/s/ Dana S. Hardy  
Dana S. Hardy

# OCD Permitting



Home / Operator Data / Action Status / Action Search Results / Action Status Item Details

## [C-101] Drilling Non-Federal/Indian (APD) Application

### Submission Information

Submission ID: 581181

Districts:

ID:

Operator: [\[330679\]](#) Empire New Mexico LLC

Counties:

Description:

Status: Submitted

Status Date: 05/01/2026

References

(0):

### Forms

Attachments:

[APD](#)

[C-102 \(Plat\)](#)

[NGMP](#)

[Casing, Closed Loop, Other\\*](#)

[Formation Tops](#)

[BOP](#)

\* Attachments contained one or more undefined "Other" tags that must be reviewed before they can be

displayed.

# OCD Permitting

## Acknowledgments

I hereby certify that no additives containing PFAS chemicals will be added to the completion or recompletion of this well.

## Comments

No comments found for this submission.

## Conditions

No conditions found for this submission.

## Reasons

No reasons found for this submission.

## OCD Permitting

Q2DHW-260501- APD000	Fee	5/1/2026 SB553 A.(1) [DRILL]	\$500.00	Paid [PAID]	5/1/2026
	Payment	5/1/2026 Credit Card [CC]	\$500.00	Paid [PAID]	5/1/2026

[Go Back](#)

Santa Fe Main Office  
 Phone: (505) 476-3441  
 General Information  
 Phone: (505) 629-6116

State of New Mexico  
 Energy Minerals and Natural Resources

Form C-101  
 Revised July 18, 2013

Oil Conservation Division

AMENDED REPORT

Online Phone Directory Visit:  
<https://www.emnrd.nm.gov/ocd/contact-us/>

1220 South St. Francis Dr.  
 Santa Fe, NM 87505

**APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE**

<sup>1</sup> Operator Name and Address		<sup>2</sup> OGRID Number	
Empire New Mexico LLC 2200 S. Utica Place Tulsa, OK 74114		330679	
<sup>4</sup> Property Code		<sup>3</sup> API Number	
331251		30-025-20166	
<sup>5</sup> Property Name		<sup>6</sup> Well No.	
JOHN D KNOX		#009	

**7. Surface Location**

UL - Lot	Section	Township	Range	Lot Idn	Feet from	N/S Line	Feet From	E/W Line	County
A	10	21S	36E		330	N	990	E	Lea

**8. Proposed Bottom Hole Location**

UL - Lot	Section	Township	Range	Lot Idn	Feet from	N/S Line	Feet From	E/W Line	County
A	10	21S	36E		330	N	990	E	Lea

**9. Pool Information**

<sup>1</sup> Pool Name	<sup>2</sup> Pool Code
EUNICE MONUMENT; GRAYBURG-SAN ANDRES	23000

**Additional Well Information**

<sup>11</sup> Work Type	<sup>12</sup> Well Type	<sup>13</sup> Cable/Rotary	<sup>14</sup> Lease Type	<sup>15</sup> Ground Level Elevation
Plugdown Recompletion	OIL	Rotary	Private	3561
<sup>16</sup> Multiple	<sup>17</sup> Proposed Depth	<sup>18</sup> Formation	<sup>19</sup> Contractor	<sup>20</sup> Spud Date
N	5155 (PBSD)	San Andres	Mesa Rig #217	07/01/2026 (workover)
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

We will be using a closed-loop system in lieu of lined pits

**21. Proposed Casing and Cement Program**

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surface	9 7/8	7 5/8	24 #/ft	1331	450 sx	Surface
Production	6 3/4	4 1/2	9.5, 11.6 #/ft	6220	500 sx	2500

**Casing/Cement Program: Additional Comments**

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**22. Proposed Blowout Prevention Program**

Type	Working Pressure	Test Pressure	Manufacturer
Type U	3000 psi	2100 psi	SHAFFER

<sup>23</sup> I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify that I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> , if applicable. Signature: <i>Debbie Ghani</i> Printed name: Debbie Ghani Title: Regulatory Manager E-mail Address: dghani@empirepetrocorp.com Date: 05/01/2026	OIL CONSERVATION DIVISION	
	Approved By:	
	Title:	
	Approved Date:	Expiration Date:
	E-mail Address: dghani@empirepetrocorp.com	
	Date: 05/01/2026	Phone: 303-947-2726

Conditions of Approval Attached

Santa Fe Main Office Phone: (505) 476-3441 General Information Phone: (505) 629-6116  Online Phone Directory Visit: <a href="https://www.emnrd.nm.gov/ocd/contact-us/">https://www.emnrd.nm.gov/ocd/contact-us/</a>	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>	C-102 Revised July 9, 2024 Submit Electronically via OCD Permitting
		Submittal Type: <input type="checkbox"/> Initial Submittal <input checked="" type="checkbox"/> Amended Report <small>CHANGE POOL &amp; WELL NAME &amp; #</small> <input type="checkbox"/> As Drilled

**WELL LOCATION INFORMATION**

API Number 30-025-20166	Pool Code 23000 (WAS 76480)	Pool Name EUNICE MONUMENT; GRAYBURG-SAN ANDRES
Property Code 330840	Property Name EUNICE MONUMENT SOUTH UNIT	Well Number 803
OGRID No. 330679	Operator Name EMPIRE NEW MEXICO LLC	Ground Level Elevation 3551'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

**Surface Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	10	21 S	36 E		330 FNL	990 FEL	32.49975°	-103.24779°	LEA

**Bottom Hole Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	10	21 S	36 E		330 FNL	990 FEL	32.49975°	-103.24779°	LEA

Dedicated Acres 40.00	Infill or Defining Well N/A	Defining Well API N/A	Overlapping Spacing Unit (Y/N) Y	Consolidation Code U
Order Numbers. R-7765			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

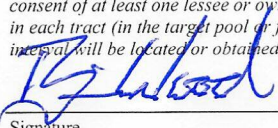
**First Take Point (FTP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Last Take Point (LTP)**

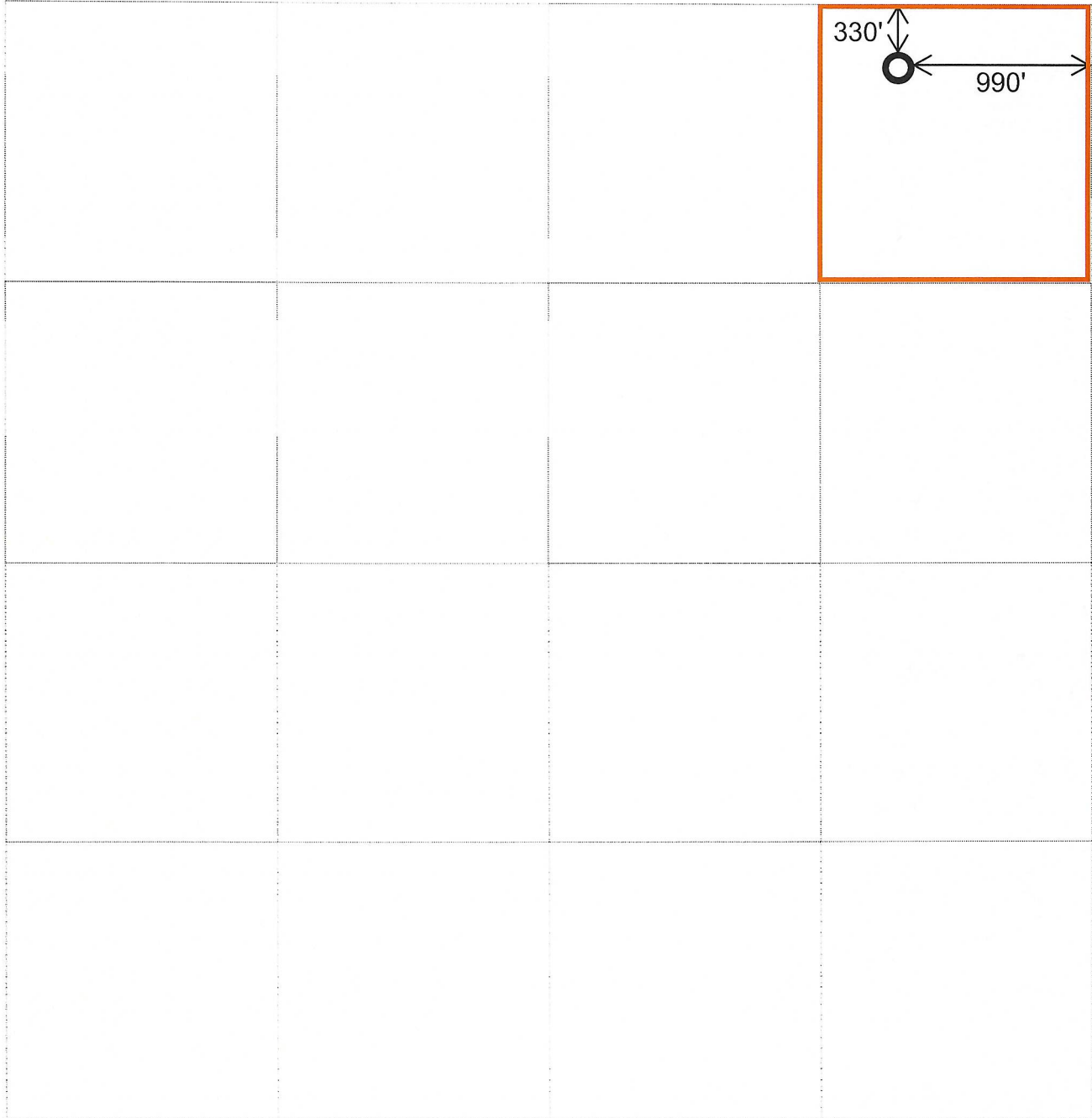
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Unitized Area or Area of Uniform Interest 14,189.84 ACRES	Spacing Unit Type <input type="checkbox"/> Horizontal <input checked="" type="checkbox"/> Vertical	Ground Floor Elevation:
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<p><b>OPERATOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p><i>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</i></p> <p> 4-23-26                  Signature Date</p> <p>BRIAN WOOD (505) 466-8120                  Printed Name</p> <p>brian@permitswest.com                  Email Address</p>	<p><b>SURVEYOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i></p> <p style="text-align: center;"><b>ORIGINAL SURVEY BY R. W. ESTES ON FILE WITH NMOCD</b></p> <p>_____                  Signature and Seal of Professional Surveyor</p> <table style="width:100%;"> <tr> <td style="width:50%;">Certificate Number 554</td> <td style="width:50%;">Date of Survey 9-9-63</td> </tr> </table>	Certificate Number 554	Date of Survey 9-9-63
Certificate Number 554	Date of Survey 9-9-63		

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

1. MI & RU WOR. Load well with FSW.
2. ND tree. NU BOP's. Set BPV. Test BOP's.
3. POH with 2-3/8" tubing and retrievable packer.
4. PU 3-3/4" bit, 4 drill collars, and 2-3/8" workstring and GIH to PBTD at +/-5155' and circulate hole clean. POH.
5. Set cement retainer (EZSV or equivalent) at +/- 2650' in middle of casing joint. Squeeze perforations 2713'-2883' (Yates), 2949'-3209' (Seven Rivers) and 3334'-3507' (Queen). Pump 80% of cement and then hesitate squeeze last 20%. Leave 2 barrels of cement above retainer and reverse out remaining. Drill out retainer and cement and test to 500 psi. If squeeze does not hold pressure, re-squeeze. GIH with bit and collars to PBTD at +/-5155' to make sure hole is clean. POOH.
6. RU wireline and run CBL/GR from PBTD to 2000'.
7. If cement isolation around San Andres interval 4150'-4200' is poor, perforate below the interval and perform cement squeeze. Drill out and test to 500 psi.
8. Perforate 4150'-4200' (San Andres) with 3-1/8" casing gun 6 SPF, 60 degree phase for production test. RD wireline.
9. GIH with 2-3/8" workstring and POOH laying down workstring in preparation to run completion tubing.
10. GIH with 4-1/2" Lok-set type packer and new 2-3/8" internally coated tubing. Set packer at 4100' and pull tension to make sure it is set. Test annulus to 500 psi. ND BOP's and NU tree. Test tree to 5000 psi.
11. Acidize interval with 10,000 gallons 15% NE (non-emulsifying) HCL acid where wellhead pressure does not exceed 830 psi (0.2 psi/ft to top perforation).
12. Displace acid into perforations with FSW. Allow to set overnight so acid spends.
13. RU swab and swab well until all acid is recovered (238 barrels) and formation fluid production stabilizes. Collect samples and determine oil percentage. Shut well in overnight.
14. Run BHP survey to 4300' and then record pressure every 500' while pulling out of hole, making 15 minute stops if required.
15. Have CO<sub>2</sub> provider truck 1000 tons (approximately 5410 barrels) CO<sub>2</sub> to location and fill portable tanks.
16. RU pump truck and pump CO<sub>2</sub> into the well at a rate where wellhead pressure stays below 830 psi (0.2 psi/ft to top perforation). Since CO<sub>2</sub> is lighter density than acid and field saltwater (0.4396 psi/ft versus 0.465 psi/ft for 10 ppg saltwater), wellhead pressure can actually be higher and stay at the same treating BHP. We will get OCD approval if necessary to go to a higher pressure.

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

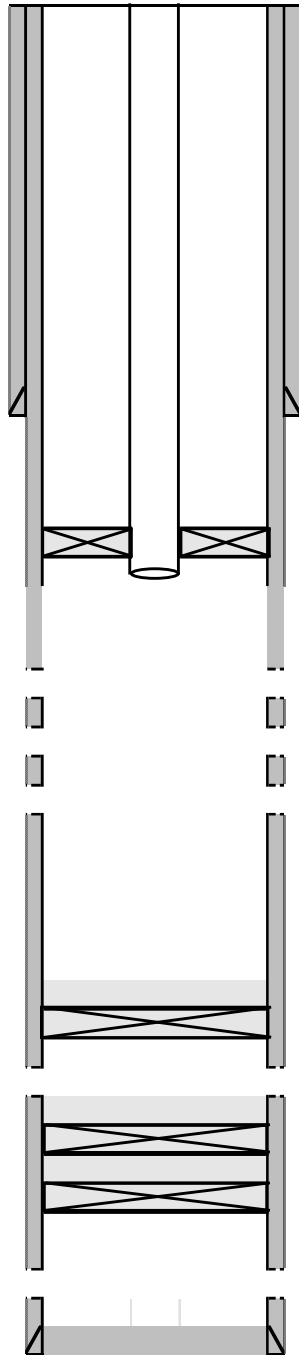
17. Displace CO<sub>2</sub> into perforations using approximately 20 barrels field saltwater. RD pump truck and CO<sub>2</sub> provider equipment. Shut well in for 20 days to allow CO<sub>2</sub> to soak and absorb the residual oil in the San Andres formation across the 50' interval and approximately 200' radius around the wellbore.
18. Install 2500' flowline to Adkins / Knox battery and tie-in to production header so the well can be flowed through test separator. Test line to 1000 psi.
19. Install gas lit flare tied to gas outlet on test separator. Hook natural gas line or propane to flare and test.
20. After 20-day soak period, open well and establish flowrate of approximately 1 MMCFPD of CO<sub>2</sub> and hydrocarbon gas with associated fluids (oil and water).
21. Burn the CO<sub>2</sub> and hydrocarbon gas vent using a gas lit flare. Measure oil, water, and gas (CO<sub>2</sub>) using existing test facilities.
22. After well begins producing oil, RU 3rd party test facility with separator and flow measurement equipment. Test well over a 3-day period recording production on 30 minute intervals.
23. Collect oil, water, and gas (CO<sub>2</sub>) samples and send to laboratory for PVT properties.
24. After well ceases to flow within 30-day period, determine if artificial lift (beam pumping unit, ESP, etc.) should be installed.
25. Send all test results pre and post CO<sub>2</sub> injection to OCD and OCC.

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

### CURRENT WELLBORE DIAGRAM



**Knox #9**

**API # 30-025-20166**

Ground Level Elevation 3551'

7-5/8" 24# CSG @ 1311'  
Cemented with 450 sx in 9-7/8" hole size

2-3/8" tubing with packer set at 2670'

Yates, Seven Rivers, Queen Completion  
Perfs 2713'-2883', 2949'-3209', 3334'-3507' (total 219 shots)  
Fracced with 454,000 # 12/20 sand with 114,400 gallons gel

CIBP set at 5190' with 35' cement on top

Perfs: 5225'-5308' Glorietta Perforations (36 holes)

CIBP set at 5741' with 10' cement on top  
Leaking section of casing below 5741'  
CIBP set at 5810' with 10' cement on top

Perfs: 5834'-6059' Blinebry Perforations

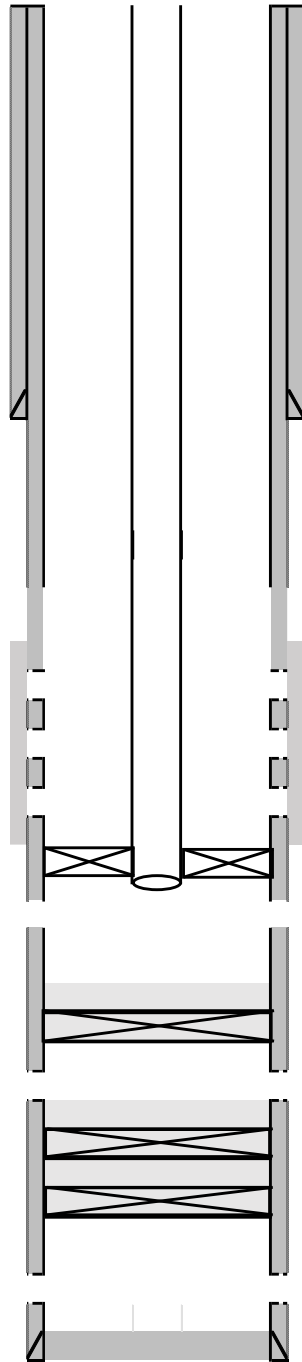
4-1/2" 9.5# & 11.6# CSG @ 6220'  
Cemented with 500 sx in 6-3/4" hole size  
Top of cement at 2500' based on temperature log

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

### PROPOSED WELLBORE DIAGRAM



**EMSU #803**  
**API # 30-025-20166**

Ground Level Elevation 3551'

7-5/8" 24# CSG @ 1311'  
Cemented with 450 sx in 9-7/8" hole size

2-3/8" tubing with packer set at 2670'

Yates, Seven Rivers, Queen Completion  
Perfs 2713'-2883', 2949'-3209', 3334'-3507' (total 219 shots)  
Fracced with 454,000 # 12/20 sand with 114,400 gallons gel  
**SQUEEZED AND PRESSURE TESTED TO 500 PSI**

**4-1/2" Lok-set Type Packer set at 4100'**

San Andres Perforations 4150'-4200'  
**OPEN FOR PRODUCTION**

CIBP set at 5190' with 35' cement on top

Perfs: 5225'-5308' Glorietta Perforations (36 holes)

CIBP set at 5741' with 10' cement on top  
Leaking section of casing below 5741'  
CIBP set at 5810' with 10' cement on top

Perfs: 5834'-6059' Blinebry Perforations

4-1/2" 9.5# & 11.6# CSG @ 6220'  
Cemented with 500 sx in 6-3/4" hole size  
Top of cement at 2500' based on temperature log

EMSU #803 (formerly John D Knox #9)  
30-025-20166  
BOP



EMSU #803 (formerly John D Knox #9)  
30-025-20166  
Formation Tops

<b>Knox #9 Tops</b>	<b>INSTRUCTIONS</b>	<b>30-025-20166</b>					
<p>This form is to be filed with the appropriate District Office of the Division not later than 20 days after the completion of any newly-drilled or deepened well. It shall be accompanied by one copy of all electrical and radio-activity logs run on the well and a summary of all special tests conducted, including drill stem tests. All depths reported shall be measured depths. In the case of directionally drilled wells, true vertical depths shall also be reported. For multiple completions, Items 25 through 29 shall be reported for each zone. The form is to be filed in quintuplicate except on state land, where six copies are required. See Rule 1105.</p>							
<p>INDICATE FORMATION TOPS IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE</p>							
<b>Southeastern New Mexico</b>		<b>Northwestern New Mexico</b>					
T. Anhy _____	T. Canyon _____	T. Ojo Alamo _____					
T. Salt _____	T. Strawn _____	T. Kirtland-Fruitland _____					
B. Salt _____	T. Atoka _____	T. Pictured Cliffs _____					
T. Yates _____	T. Miss _____	T. Cliff House _____					
T. 7 Rivers _____	T. Devonian _____	T. Menefee _____					
T. Queen _____	T. Silurian _____	T. Point Lookout _____					
T. Grayburg _____	T. Montoya _____	T. Mancos _____					
T. San Andres _____	T. Simpson _____	T. Gallup _____					
T. Glorieta _____	T. McKee _____	Base Greenhorn _____					
T. Paddock _____	T. Ellenburger _____	T. Dakota _____					
T. Blinberry _____	T. Gr. Wash _____	T. Morrison _____					
T. Tubb _____	T. Delaware Sand _____	T. Todilto _____					
T. Drinkard _____	T. Bone Springs _____	T. Entrada _____					
T. Abo _____	T. _____	T. Wingate _____					
T. Wolfcamp _____	T. _____	T. Chinle _____					
T. Penn _____	T. _____	T. Permian _____					
I. Cisco (Bough C) _____	T. _____	T. Penn "A" _____					
<b>OIL OR GAS SANDS OR ZONES</b>							
No. 1. from _____ to _____	No. 3. from _____ to _____						
No. 2. from _____ to _____	No. 4. from _____ to _____						
<b>IMPORTANT WATER SANDS</b>							
Include data on rate of water inflow and elevation to which water rose in hole.							
No. 1. from _____ to _____	feet _____						
No. 2. from _____ to _____	feet _____						
No. 3. from _____ to _____	feet _____						
<b>LITHOLOGY RECORD (Attach additional sheet if necessary)</b>							
From	To	Thickness in Feet	Lithology	From	To	Thickness in Feet	Lithology

State of New Mexico  
 Energy, Minerals and Natural Resources Department

Submit Electronically  
 Via E-permitting

Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

## NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

### Section 1 – Plan Description Effective May 25, 2021

**I. Operator:** EMPIRE NEW MEXICO LLC **OGRID:** 330679 **Date:** 04 / 29/ 2026

**II. Type:**  Original  Amendment due to  19.15.27.9.D(6)(a) NMAC  19.15.27.9.D(6)(b) NMAC  Other.

If Other, please describe: This well will be recompleted to the Eunice Monument; Grayburg-San Andres formation and renamed EUNICE MONUMENT SOUTH UNIT #803 after completion.

**III. Well(s):** Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D
JOHN D KNOX #009	30-025-20166	A-10-21S-36E	330' FNL & 990' FEL	35	1000	200

**IV. Central Delivery Point Name:** A. J. Adkins & J. D. Knox Commingled Facility [See 19.15.27.9(D)(1) NMAC]

**V. Anticipated Schedule:** Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow Back Date	First Production Date
JOHN D KNOX #009	30-025-20166	07/01/2026	N/A	07/15/2026	09/01/2026	09/01/2026

**VI. Separation Equipment:**  Attach a complete description of how Operator will size separation equipment to optimize gas capture.

**VII. Operational Practices:**  Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.

**VIII. Best Management Practices:**  Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

**Section 2 – Enhanced Plan**  
**EFFECTIVE APRIL 1, 2022**

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

**IX. Anticipated Natural Gas Production:**

Well	API	Anticipated Average Natural Gas Rate MCF/D	Anticipated Volume of Natural Gas for the First Year MCF

**X. Natural Gas Gathering System (NGGS):**

Operator	System	ULSTR of Tie-in	Anticipated Gathering Start Date	Available Maximum Daily Capacity of System Segment Tie-in

**XI. Map.**  Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

**XII. Line Capacity.** The natural gas gathering system  will  will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

**XIII. Line Pressure.** Operator  does  does not anticipate that its existing well(s) connected to the same segment, or portion, of the natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by the new well(s).

Attach Operator’s plan to manage production in response to the increased line pressure.

**XIV. Confidentiality:**  Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information provided in Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of the specific information for which confidentiality is asserted and the basis for such assertion.

### Section 3 - Certifications

Effective May 25, 2021

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or

Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.

***If Operator checks this box, Operator will select one of the following:***

**Well Shut-In.**  Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

**Venting and Flaring Plan.**  Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- (b) power generation for grid;
- (c) compression on lease;
- (d) liquids removal on lease;
- (e) reinjection for underground storage;
- (f) reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- (h) fuel cell production; and
- (i) other alternative beneficial uses approved by the division.

### Section 4 - Notices

1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

(a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or

(b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.

2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

Signature: <i>Debbie Ghani</i>
Printed Name: Debbie Ghani
Title: Regulatory Manager
E-mail Address: dghani@empirepetrocorp.com
Date: 04-29-2026
Phone: 303-947-2726
<b>OIL CONSERVATION DIVISION</b> <b>(Only applicable when submitted as a standalone form)</b>
Approved By:
Title:
Approval Date:
Conditions of Approval:

## VI. Separation Equipment

Empire New Mexico LLC (Empire) is planning to recomplete its existing John D. Knox 9 Eumont; Yates – 7 RVRS – Queen (Gas) well to a Eunice Monument; Grayburg – San Andres oil well. The well will be renamed the Eunice Monument South Unit 803. Empire will use a CO<sub>2</sub> huff-n-puff.

Empire will lay a 2,500' flowline to a test separator at its existing A. J. Adkins / J. D. Knox central tank battery. The flowline will be tested to 1,000 psi. A gas lit flare will then be tied into the test separator's gas outlet. Empire will hook a natural gas line or propane to flare and test. After a 20-day soak period, Empire will open the well and establish a flow rate of approximately 1MMCFPD of CO<sub>2</sub> and hydrocarbon gas with associated fluid (oil and water). Empire will burn the CO<sub>2</sub> and hydrocarbon gas using a gas lit flare. Empire will measure oil, water, and gas (CO<sub>2</sub>) using its existing test facilities. After the well begins producing oil, Empire will rig up a 3rd party test facility with separator and flow measurement equipment. Empire will test the well over 3-days while recording production at 30-minute intervals. Oil, water, and gas (CO<sub>2</sub>) will be collected and sent to a laboratory for PVT properties. Separated pipeline quality gas will then be piped into an existing sales line on the same pad.

## VII. Operational Practices

### NMAC 19.15.27.8 (A) Venting & Flaring of Natural Gas

1. Empire New Mexico LLC will comply with NMAC 19.15.27.8 – venting and flaring of gas during drilling, completion, or production that constitutes waste as defined in 19.15.2 is banned.

### NMAC 19.15.27.8 (B) Venting & Flaring During Drilling

1. Empire New Mexico LLC will capture or combust gas if technically feasible during drilling operations using best industry practices.
2. A flare stack with a 100% capacity for expected volume will be set on the pad  $\geq$ 100 feet from the nearest well head and storage tank.
3. In an emergency, Empire New Mexico LLC will vent gas in order to avoid substantial impact. Empire New Mexico LLC will report vented or flared gas to the NMOCD.

### NMAC 19.15.27.8 (C) Venting & Flaring During Completion or Recompletion

1. Facilities will be built and ready from the first day of flowback

2. Test separator will be properly separate gas and liquids. Temporary test separator will be used initially to process volumes. In addition, separator will be tied into flowback tanks which will be tied into the gas processing equipment for sale down a pipeline.
3. Should the facility not be ready to process gas, or the gas does not meet quality standards, then storage tanks will be set that are tied into gas busters or a temporary flare to manage all gas. This flare would meet the following requirements:
  - a) An appropriately sized flare stack with an automatic igniter
  - b) Empire New Mexico LLC analyzes gas samples twice a week
  - c) Empire New Mexico LLC flows the gas into a gathering line as soon as the line specifications are met
  - d) Empire New Mexico LLC provides the NMOCD with pipeline specifications and natural gas data.

#### NMAC 19.15.27.8 (D) Venting & Flaring During Production

Empire New Mexico LLC will not vent or flare natural gas except:

1. During an emergency or malfunction
2. To unload or clean-up liquid holdup in a well to atmospheric pressure, provided
  - a) Empire New Mexico LLC does not vent after the well achieves a stabilized rate and pressure
  - b) Empire New Mexico LLC will be on-site while unloading liquids by manual purging and take all reasonable actions to achieve a stabilized rate and pressure as soon as possible
  - c) Empire New Mexico LLC will optimize the system to minimize gas venting if the well is equipped with a plunger lift or auto control system
  - d) Best management practices will be used during downhole well maintenance.
3. During the first year of production from an exploratory well provided
  - a) Empire New Mexico LLC receives approval from the NMOCD
  - b) Empire New Mexico LLC stays in compliance with NMOCD gas capture requirements
  - c) Empire New Mexico LLC submits an updated C-129 form to the NMOCD
4. During the following activities unless prohibited
  - a) Gauging or sampling a storage tank or low-pressure production vessel
  - b) Loading out liquids from a storage tank
  - c) Repair and maintenance
  - d) Normal operation of a gas-activated pneumatic controller or pump
  - e) Normal operation of a storage tank but not including venting from a thief hatch
  - f) Normal operation of dehydration units
  - g) Normal operations of compressors, engines, turbines, valves, flanges, & connectors
  - h) During a bradenhead, packer leakage test, or production test lasting <24 hours
  - i) When natural gas does not meet the gathering line specifications

- j) Commissioning of pipes, equipment, or facilities only for as long as necessary to purge introduced impurities.

NMAC 19.15.27.8 (E) Performance Standards

1. Empire New Mexico LLC will use a safety factor to design the separation and storage equipment. The equipment will be routed to a vapor recovery system and use a flare as back up for startup, shutdown, maintenance, or malfunction of the VRU system.
2. Empire New Mexico LLC will install a flare that will handle the full volume of vapors from the facility in case of VRU failure. It will have an auto-ignition system.
3. Flare stacks will be appropriately sized and designed to ensure proper combustion efficiency
  - a) Flare stacks installed or replaced will be equipped with an automatic ignitor or continuous pilot.
  - b) Previously installed flare stacks will be retrofitted within 18 months of May 25, 2021, with an automatic ignitor, continuous pilot, or technology that alerts Empire New Mexico LLC to flare malfunction.
  - c) Flare stacks replaced after May 25, 2021, will be equipped with an automatic ignitor or continuous pilot if at a well or facility with an average production of  $\leq 60$  Mcfd of natural gas.
  - d) Flare stacks will be located  $>100$  feet from well head and tanks and securely anchored.
4. Empire New Mexico LLC will conduct an AVO inspection on all components for leaks and defects every week.
5. Empire New Mexico LLC will make and keep records of AVO inspections available to the NMOCD for at least 5 years.
6. Empire New Mexico LLC may use a remote or automated monitoring technology to detect leaks and releases in lieu of AVO inspections with prior NMOCD approval.
7. Facilities will be designed to minimize waste.
8. Empire New Mexico LLC will resolve emergencies as promptly as possible.

NMAC 19.15.27.8 (F) Measuring or Estimating Vented & Flared Natural Gas

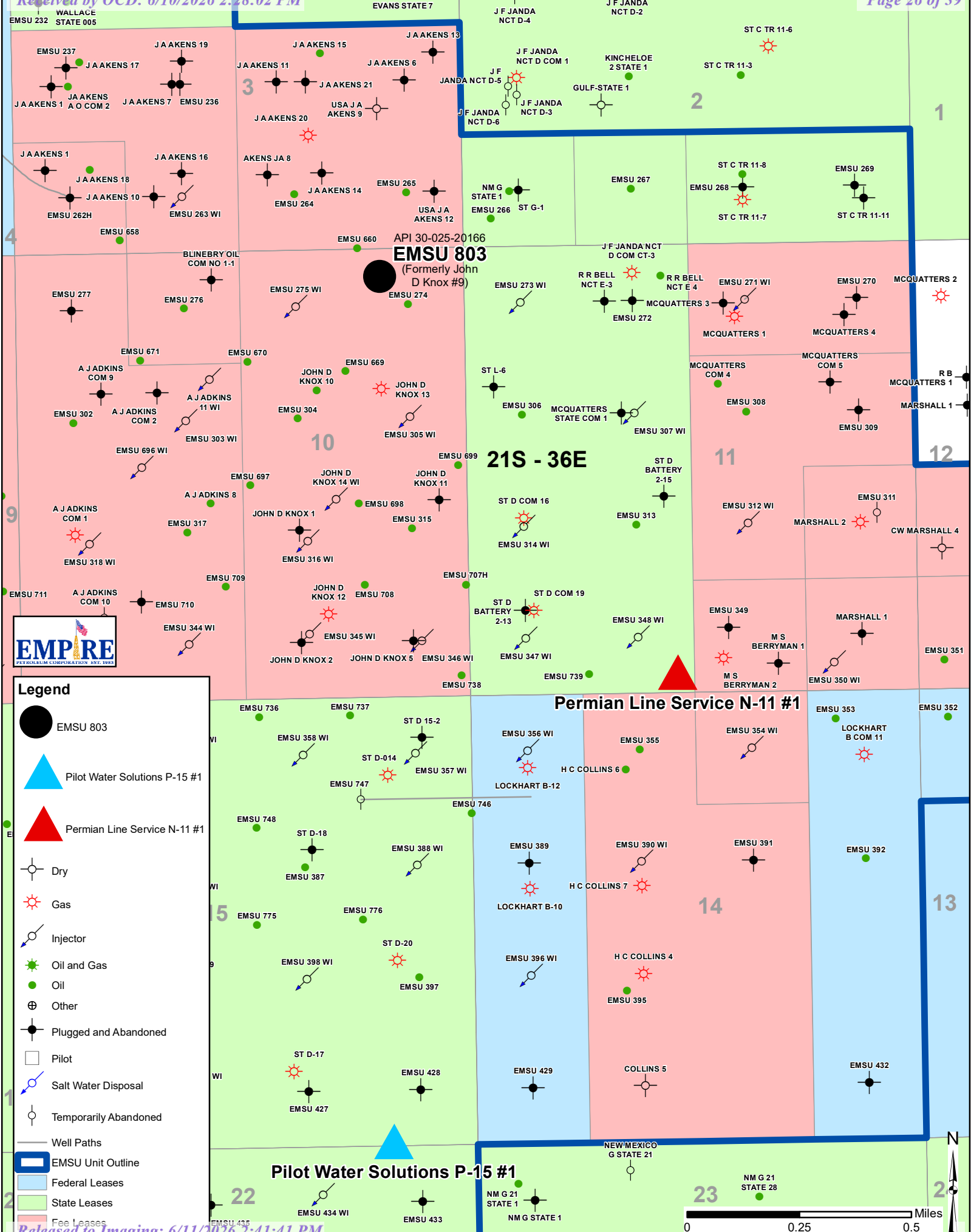
1. Empire New Mexico LLC will have meters on both the low and high-pressure sides of the flares. Volumes will be recorded in the SCADA system.
2. Empire New Mexico LLC will install equipment to measure the volume of flared natural gas that has an average production of  $\geq 60$  Mcfd.
3. Empire New Mexico LLC's measuring equipment will conform to industry standards.
4. Measurement system will be designed such that it cannot be bypassed except for inspections and servicing the meters.
5. Empire New Mexico LLC will estimate the volume of vented or flared gas using a methodology that can be independently verified if metering is not practicable due to low flow rate or pressure.

6. Empire New Mexico LLC will estimate the volume of vented and flared gas based on the results of an annual GOR test for wells that do not require measuring equipment reported on form C-116.
7. Empire New Mexico LLC will install measuring equipment whenever the NMOCD determines that metering is necessary.

### **VIII. Best Management Practices**

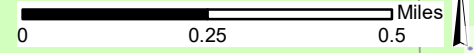
Empire New Mexico LLC will minimize venting during maintenance by:

1. System will be designed and operated to route storage tank and process equipment emissions to the VRU. If the VRU is not operable, then vapors will be routed to the flare.
2. Scheduling maintenance for multiple tasks to minimize the need for blowdowns.
3. After completion of maintenance, gas will be flared until it meets pipeline specifications.

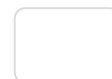


**Legend**

- EMSU 803
- Pilot Water Solutions P-15 #1
- Permian Line Service N-11 #1
- Dry
- Gas
- Injector
- Oil and Gas
- Oil
- Other
- Plugged and Abandoned
- Pilot
- Salt Water Disposal
- Temporarily Abandoned
- Well Paths
- EMSU Unit Outline
- Federal Leases
- State Leases
- Fee Leases



# OCD Permitting



Home / Operator Data / Action Status / Action Search Results / Action Status Item Details

## [C-103X] NOI General Sundry (C-103X) Application

### Submission Information

<b>Submission ID:</b> 580325	<b>Districts:</b> Hobbs
<b>Operator:</b> <a href="#">[330679]</a> Empire New Mexico LLC	<b>Counties:</b> Lea
<b>Description:</b> Empire New Mexico LLC [330679] , JOHN D KNOX #009 , 30-025-20166	
<b>Status:</b> Submitted	
<b>Status Date:</b> 04/29/2026	
<b>References (0):</b>	

### Forms

**Attachments:**

- [C-103X](#)
- [Other](#)
- [Other](#)
- [Other](#)

### Questions

This submission type does not have questions at this time.

## OCD Permitting

### Comments

No comments found for this submission.

### Conditions

No conditions found for this submission.

### Reasons

No reasons found for this submission.

### Fees

No fees found for this submission.

[Go Back](#)

Santa Fe Main Office  
Phone: (505) 476-3441  
General Information  
Phone: (505) 629-6116

State of New Mexico  
Energy, Minerals and Natural Resources

Form C-103  
Revised July 18, 2013

Online Phone Directory Visit:  
<https://www.emnr.nm.gov/ocd/contact-us/>

OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

WELL API NO. 30-025-20166
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name Eunice Monument South Unit
8. Well Number #803
9. OGRID Number 330679
10. Pool name or Wildcat Eunice Monument; Grayburg-San Andres

**SUNDRY NOTICES AND REPORTS ON WELLS**  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: Oil Well  Gas Well  Other

2. Name of Operator  
Empire New Mexico LLC

3. Address of Operator  
2200 S. Utica Place Suite 150, Tulsa OK 74114

4. Well Location  
Unit Letter A : 330 feet from the North line and 990 feet from the East line  
Section 10 Township 21S Range 36E NMPM County Lea

11. Elevation (Show whether DR, RKB, RT, GR, etc.)  
3561' GR, 3572' KB

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

<b>NOTICE OF INTENTION TO:</b>		<b>SUBSEQUENT REPORT OF:</b>	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
DOWNHOLE COMMINGLE <input type="checkbox"/>			
CLOSED-LOOP SYSTEM <input type="checkbox"/>			
OTHER: <input checked="" type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

The above referenced well is currently the John D. Knox #9 gas well in the Yates / 7 Rivers / Queen intervals. These intervals will be squeezed off and the well will be recompleted in the Eunice Monument; Grayburg-San Andres pool from 4150'-4200' (-578' to -628' subsea).

Procedure, wellbore diagrams, Form C-102, and well location map are attached.

Estimated dates of work:

Spud Date: **July 1, 2026**

Rig Release Date: **October 1, 2026**

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Debbie Ghani TITLE Regulatory Manager DATE 04/28/2026  
Type or print name Debbie Ghani E-mail address: dghani@empirepetrocorp.com PHONE: 303-947-2726

**For State Use Only**

APPROVED BY: \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_  
Conditions of Approval (if any): \_\_\_\_\_

Santa Fe Main Office Phone: (505) 476-3441 General Information Phone: (505) 629-6116  Online Phone Directory Visit: <a href="https://www.emmrd.nm.gov/ocd/contact-us/">https://www.emmrd.nm.gov/ocd/contact-us/</a>	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>	C-102 Revised July 9, 2024 Submit Electronically via OCD Permitting
		Submittal Type: <input type="checkbox"/> Initial Submittal <input checked="" type="checkbox"/> Amended Report <small>CHANGE POOL &amp; WELL NAME &amp; #</small> <input type="checkbox"/> As Drilled

**WELL LOCATION INFORMATION**

API Number 30-025-20166	Pool Code 23000 (WAS 76480)	Pool Name EUNICE MONUMENT; GRAYBURG-SAN ANDRES
Property Code 330840	Property Name EUNICE MONUMENT SOUTH UNIT	Well Number 803
OGRID No. 330679	Operator Name EMPIRE NEW MEXICO LLC	Ground Level Elevation 3551'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

**Surface Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	10	21 S	36 E		330 FNL	990 FEL	32.49975°	-103.24779°	LEA

**Bottom Hole Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	10	21 S	36 E		330 FNL	990 FEL	32.49975°	-103.24779°	LEA

Dedicated Acres 40.00	Infill or Defining Well N/A	Defining Well API N/A	Overlapping Spacing Unit (Y/N) Y	Consolidation Code U
Order Numbers. R-7765			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

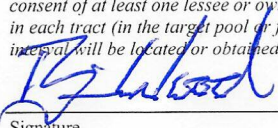
**First Take Point (FTP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Last Take Point (LTP)**

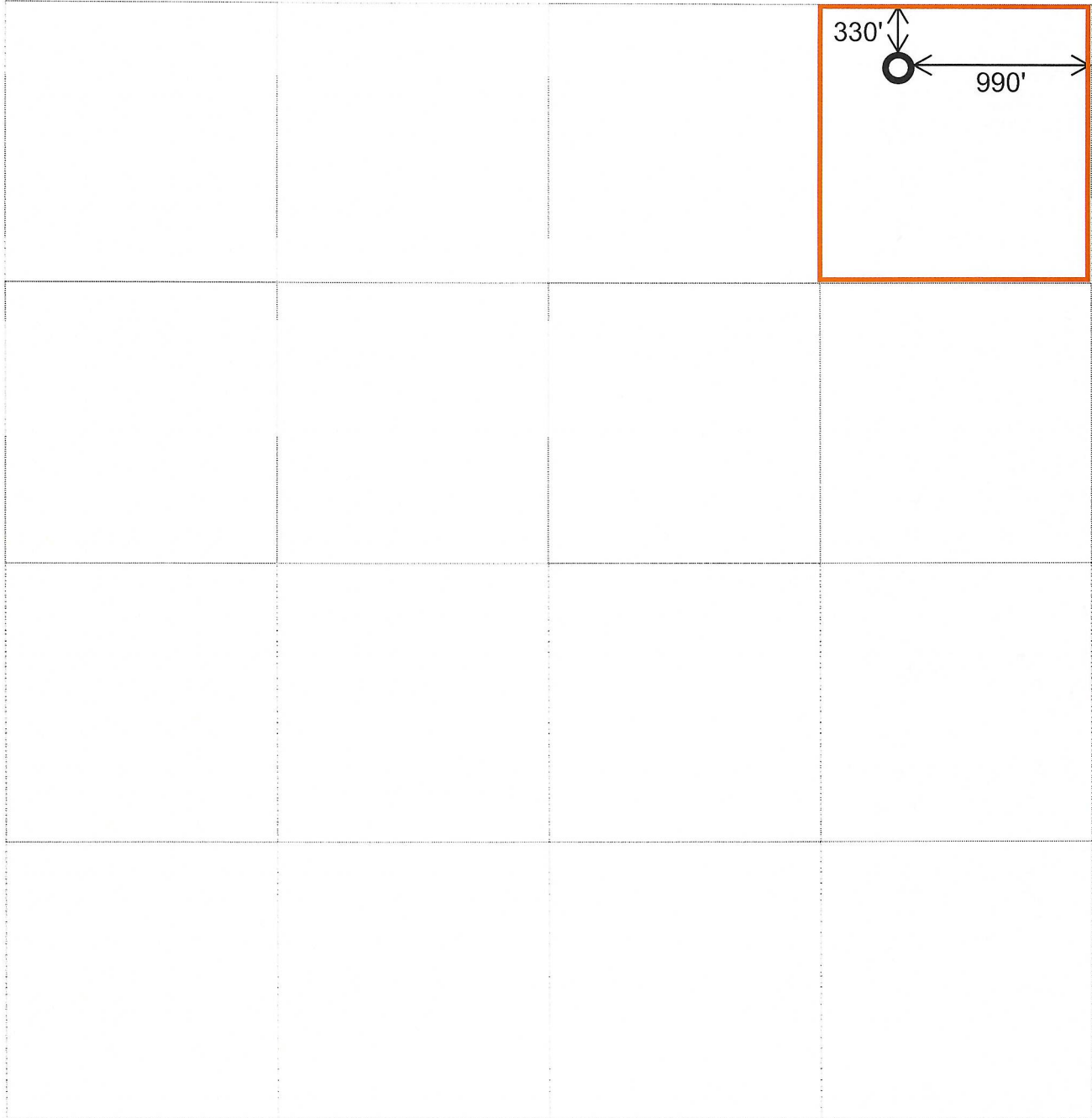
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Unitized Area or Area of Uniform Interest 14,189.84 ACRES	Spacing Unit Type <input type="checkbox"/> Horizontal <input checked="" type="checkbox"/> Vertical	Ground Floor Elevation:
--	--	-------------------------

<p><b>OPERATOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p><i>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</i></p> <p style="text-align: center;">                   Signature <span style="margin-left: 150px;">Date</span>                  4-23-26                  BRIAN WOOD (505) 466-8120                  Printed Name                  brian@permitswest.com                  Email Address             </p>	<p><b>SURVEYOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i></p> <p style="text-align: center; font-weight: bold; font-size: 1.2em;">                 ORIGINAL SURVEY BY                  R. W. ESTES                  ON FILE WITH NMOCD             </p> <p style="text-align: center;">                 Signature and Seal of Professional Surveyor  <hr/>                 Certificate Number <span style="margin-left: 100px;">Date of Survey</span>                  554 <span style="margin-left: 100px;">9-9-63</span> </p>
--	---

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



## EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

1. MI & RU WOR. Load well with FSW.
2. ND tree. NU BOP's. Set BPV. Test BOP's.
3. POH with 2-3/8" tubing and retrievable packer.
4. PU 3-3/4" bit, 4 drill collars, and 2-3/8" workstring and GIH to PBTD at +/-5155' and circulate hole clean. POH.
5. Set cement retainer (EZSV or equivalent) at +/- 2650' in middle of casing joint. Squeeze perforations 2713'-2883' (Yates), 2949'-3209' (Seven Rivers) and 3334'-3507' (Queen). Pump 80% of cement and then hesitate squeeze last 20%. Leave 2 barrels of cement above retainer and reverse out remaining. Drill out retainer and cement and test to 500 psi. If squeeze does not hold pressure, re-squeeze. GIH with bit and collars to PBTD at +/-5155' to make sure hole is clean. POOH.
6. RU wireline and run CBL/GR from PBTD to 2000'.
7. If cement isolation around San Andres interval 4150'-4200' is poor, perforate below the interval and perform cement squeeze. Drill out and test to 500 psi.
8. Perforate 4150'-4200' (San Andres) with 3-1/8" casing gun 6 SPF, 60 degree phase for production test. RD wireline.
9. GIH with 2-3/8" workstring and POOH laying down workstring in preparation to run completion tubing.
10. GIH with 4-1/2" Lok-set type packer and new 2-3/8" internally coated tubing. Set packer at 4100' and pull tension to make sure it is set. Test annulus to 500 psi. ND BOP's and NU tree. Test tree to 5000 psi.
11. Acidize interval with 10,000 gallons 15% NE (non-emulsifying) HCL acid where wellhead pressure does not exceed 830 psi (0.2 psi/ft to top perforation).
12. Displace acid into perforations with FSW. Allow to set overnight so acid spends.
13. RU swab and swab well until all acid is recovered (238 barrels) and formation fluid production stabilizes. Collect samples and determine oil percentage. Shut well in overnight.
14. Run BHP survey to 4300' and then record pressure every 500' while pulling out of hole, making 15 minute stops if required.
15. Have CO<sub>2</sub> provider truck 1000 tons (approximately 5410 barrels) CO<sub>2</sub> to location and fill portable tanks.
16. RU pump truck and pump CO<sub>2</sub> into the well at a rate where wellhead pressure stays below 830 psi (0.2 psi/ft to top perforation). Since CO<sub>2</sub> is lighter density than acid and field saltwater (0.4396 psi/ft versus 0.465 psi/ft for 10 ppg saltwater), wellhead pressure can actually be higher and stay at the same treating BHP. We will get OCD approval if necessary to go to a higher pressure.

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

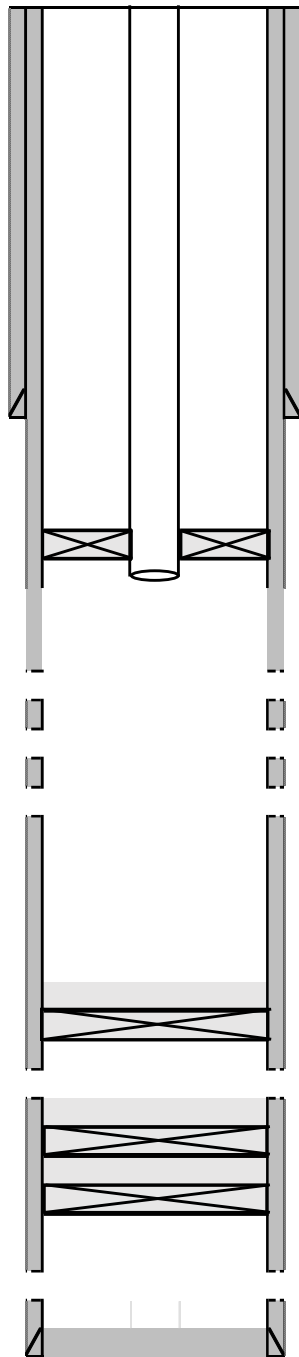
17. Displace CO<sub>2</sub> into perforations using approximately 20 barrels field saltwater. RD pump truck and CO<sub>2</sub> provider equipment. Shut well in for 20 days to allow CO<sub>2</sub> to soak and absorb the residual oil in the San Andres formation across the 50' interval and approximately 200' radius around the wellbore.
18. Install 2500' flowline to Adkins / Knox battery and tie-in to production header so the well can be flowed through test separator. Test line to 1000 psi.
19. Install gas lit flare tied to gas outlet on test separator. Hook natural gas line or propane to flare and test.
20. After 20-day soak period, open well and establish flowrate of approximately 1 MMCFPD of CO<sub>2</sub> and hydrocarbon gas with associated fluids (oil and water).
21. Burn the CO<sub>2</sub> and hydrocarbon gas vent using a gas lit flare. Measure oil, water, and gas (CO<sub>2</sub>) using existing test facilities.
22. After well begins producing oil, RU 3rd party test facility with separator and flow measurement equipment. Test well over a 3-day period recording production on 30 minute intervals.
23. Collect oil, water, and gas (CO<sub>2</sub>) samples and send to laboratory for PVT properties.
24. After well ceases to flow within 30-day period, determine if artificial lift (beam pumping unit, ESP, etc.) should be installed.
25. Send all test results pre and post CO<sub>2</sub> injection to OCD and OCC.

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

### CURRENT WELLBORE DIAGRAM



**Knox #9**

**API # 30-025-20166**

Ground Level Elevation 3551'

7-5/8" 24# CSG @ 1311'  
Cemented with 450 sx in 9-7/8" hole size

2-3/8" tubing with packer set at 2670'

Yates, Seven Rivers, Queen Completion  
Perfs 2713'-2883', 2949'-3209', 3334'-3507' (total 219 shots)  
Fracced with 454,000 # 12/20 sand with 114,400 gallons gel

CIBP set at 5190' with 35' cement on top

Perfs: 5225'-5308' Glorietta Perforations (36 holes)

CIBP set at 5741' with 10' cement on top  
Leaking section of casing below 5741'  
CIBP set at 5810' with 10' cement on top

Perfs: 5834'-6059' Blinebry Perforations

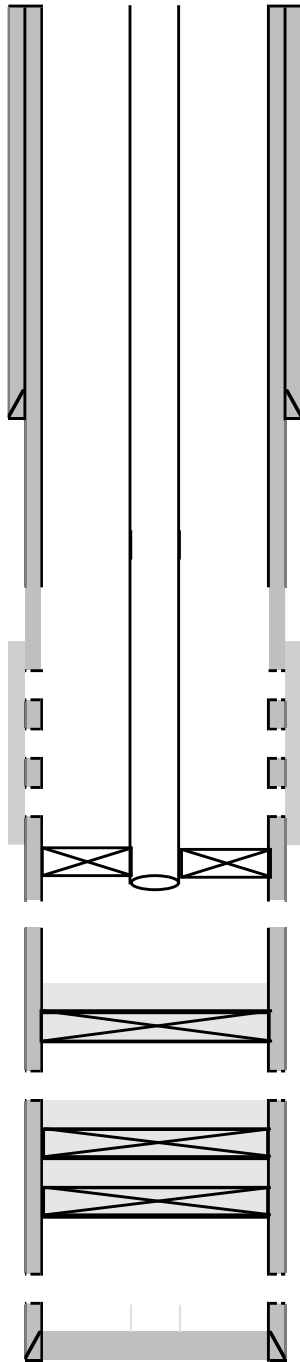
4-1/2" 9.5# & 11.6# CSG @ 6220'  
Cemented with 500 sx in 6-3/4" hole size  
Top of cement at 2500' based on temperature log

EMSU #803 (formerly John D Knox #9)

30-025-20166

Workover Procedure to Perform CO<sub>2</sub> Huff-n-Puff in San Andres

### PROPOSED WELLBORE DIAGRAM



**EMSU #803**  
**API # 30-025-20166**

Ground Level Elevation 3551'

7-5/8" 24# CSG @ 1311'  
Cemented with 450 sx in 9-7/8" hole size

2-3/8" tubing with packer set at 2670'

Yates, Seven Rivers, Queen Completion  
Perfs 2713'-2883', 2949'-3209', 3334'-3507' (total 219 shots)  
Fracced with 454,000 # 12/20 sand with 114,400 gallons gel  
**SQUEEZED AND PRESSURE TESTED TO 500 PSI**

**4-1/2" Lok-set Type Packer set at 4100'**

San Andres Perforations 4150'-4200'  
**OPEN FOR PRODUCTION**

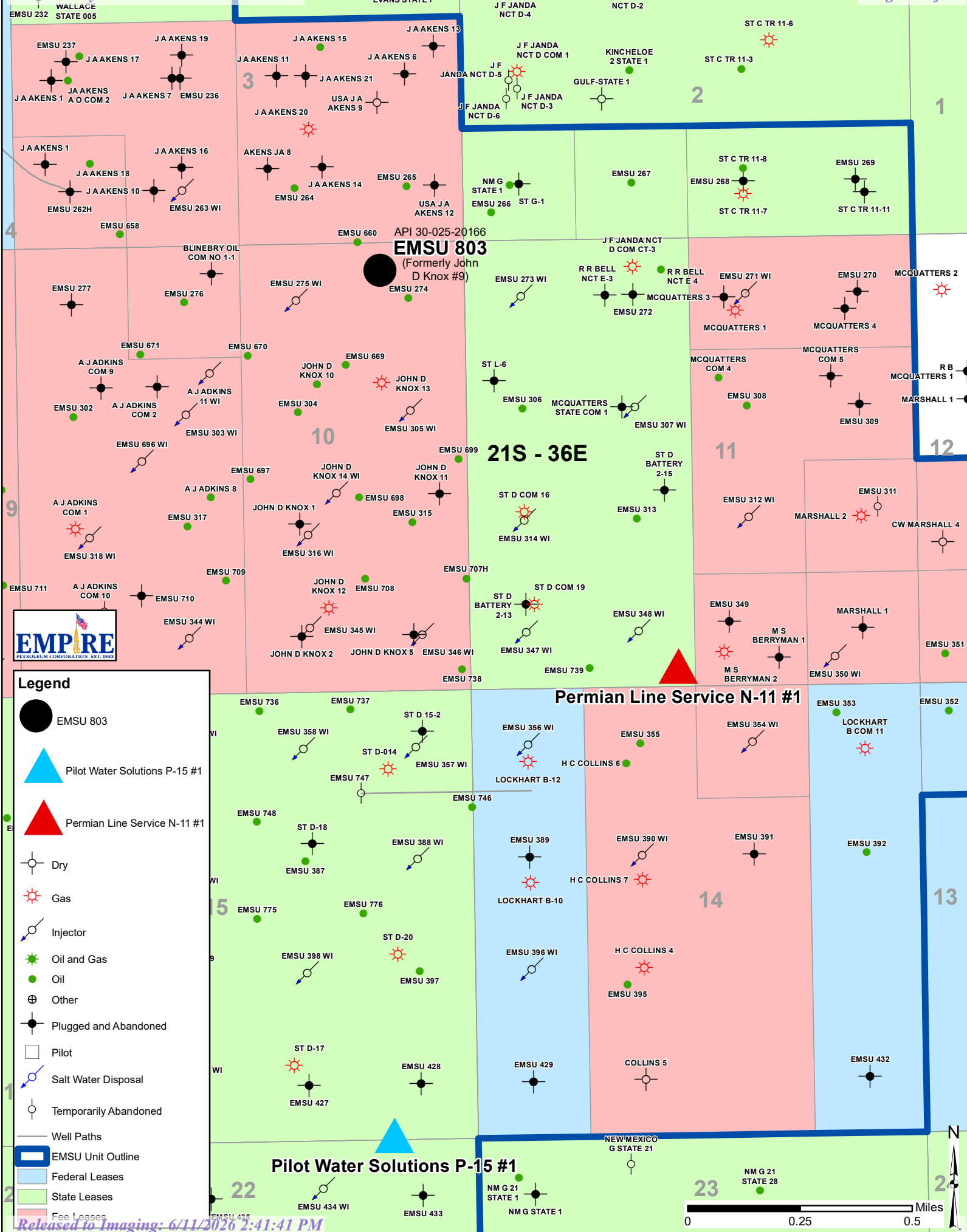
CIBP set at 5190' with 35' cement on top

Perfs: 5225'-5308' Glorietta Perforations (36 holes)

CIBP set at 5741' with 10' cement on top  
Leaking section of casing below 5741'  
CIBP set at 5810' with 10' cement on top

Perfs: 5834'-6059' Blinbry Perforations

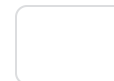
4-1/2" 9.5# & 11.6# CSG @ 6220'  
Cemented with 500 sx in 6-3/4" hole size  
Top of cement at 2500' based on temperature log



**Legend**

- EMSU 803
- Pilot Water Solutions P-15 #1
- Permian Line Service N-11 #1
- Dry
- Gas
- Injector
- Oil and Gas
- Oil
- Other
- Plugged and Abandoned
- Pilot
- Salt Water Disposal
- Temporarily Abandoned
- Well Paths
- EMSU Unit Outline
- Federal Leases
- State Leases
- Fee Leases

# OCD Permitting



Home / Operator Data / Action Status / Action Search Results / Action Status Item Details

## [C-101] Drilling Non-Federal/Indian (APD) Application

### Submission Information

Submission ID: 581181

Districts: Hobbs

ID:

Operator: [\[330679\]](#) Empire New Mexico LLC

Counties: Lea

Description: Empire New Mexico LLC [330679]  
, JOHN D KNOX #009  
, 30-025-20166

Status: Submitted

Status Date: 05/01/2026

#### References

(0):

### Forms

Attachments:

[APD](#)

[C-102 \(Plat\)](#)

[NGMP](#)

[Casing, Closed Loop, Other\\*](#)

[Formation Tops](#)

[BOP](#)

# OCD Permitting



## BOP

\* Attachments contained one or more undefined "Other" tags that must be reviewed before they can be displayed.

## Questions

This submission type does not have questions, at this time.

## Acknowledgments

I hereby certify that no additives containing PFAS chemicals will be added to the completion or recompletion of this well.

## Comments

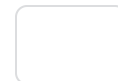
**Summary:** *pgoetze (5/13/2026)*, HOLD PENDING APPROVAL OF OCC MOTION

## Conditions

No conditions found for this submission.

## Reasons

# OCD Permitting



## Comments

**Summary:** pgoetze (5/13/2026), HOLD PENDING APPROVAL OF OCC MOTION

## Conditions

No conditions found for this submission.

## Reasons

No reasons found for this submission.

## Fees

**Summary:**

	Created	Type	Amount	Status	Saved
Q2DHW-260501- APD000	5/1/2026	SB553 A.(1) [DRILL]	\$500.00	Paid [PAID]	5/1/2026
	Payment 5/1/2026	Credit Card [CC]	\$500.00	Paid [PAID]	5/28/2026

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