

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

**APPLICATION OF EMPIRE NEW MEXICO LLC TO
REVOKE THE INJECTION AUTHORITY GRANTED
UNDER ADMINISTRATIVE ORDER SWD-1500 FOR THE
PARKER ENERGY SWD #5 WELL OPERATED BY
PARKER ENERGY SUPPORT SERVICES INC.,
LEA COUNTY, NEW MEXICO**

CASE NO. _____

APPLICATION

Empire New Mexico LLC (“Empire”) respectfully applies for an order revoking the injection authority granted under Administrative Order SWD-1500. In support, Empire states as follows:

1. Parker Energy Support Services Inc. (“Parker Energy”) is the operator of record for the Parker Energy SWD #5, API# 30-025-38789, (“Well”), a produced water disposal well located approximately 1,200 feet from the North line and 990 feet from the East line of Section 24, Township 21 South, Range 36 East, NMPM, in Lea County, NM.

2. The Well is disposing of water into the San Andres formation, at a distance of approximately 0.85 miles from the Eunice Monument South Unit (“EMSU”) and approximately 0.78 miles from the Arrowhead Grayburg Unit (“AGU”), which are each operated by Empire.

3. The unitized interval of the EMSU extends from an upper limit described as 100 feet below mean sea level or at the top of the Grayburg formation, whichever is shallower, to the lower limit at the base of the San Andres formation (“EMSU Unitized Interval”). The vertical limits of the EMSU Unitized Interval are the same as the vertical limits of the Eunice Monument Grayburg-San Andres Pool covering the Grayburg and San Andres formations.

4. The unitized interval of the AGU extends from -150 feet subsea or the top of the Grayburg formation (if shallower), down to -1500 feet subsea which includes a majority of the San Andres formation (“AGU Unitized Interval”).

5. The Well disposes into the San Andres formation through an open hole interval from approximately 4,329 to 4,675 feet below surface and is also permitted to inject into perforated interval 4,200 to 4,320 feet below surface.

6. Upon information and belief, Parker Energy injects produced water from other formations, which is not compatible with the water in the Grayburg-San Andres formations.

7. Residual oil zones are found within the San Andres, and Empire has the right to recover hydrocarbons therein.

8. Moreover, the salinity levels of water disposal are substantially greater than the salinity levels of water in the EMSU and AGU Unitized Intervals, including the San Andres formation.

9. Disposal in the Well impairs the ability of Empire to recover hydrocarbons within the EMSU and AGU Unitized Intervals and thereby adversely affects the correlative rights of Empire and other interest owners in the EMSU and AGU, resulting in waste.

10. Revocation of the disposal authority granted by Administrative Order SWD-1500 will prevent the waste of recoverable hydrocarbons and protect correlative rights.

WHEREFORE, Empire requests that this case be set for hearing on July 9, 2026, and that, after notice and hearing as required by law, the Division enter an order revoking the injection authority granted under Administrative Order SWD-1500.

Respectfully submitted,

SHAHEEN LAW NM LLC

/s/ Sharon T. Shaheen

Sharon T. Shaheen
422 Medico Lane, Suite A
Santa Fe, NM 87505
(505) 469-1521
sharon@shaheenlaw.com
ec: paralegal@shaheenlaw.com

Dana S. Hardy
Jaclyn M. McLean Timothy B. Rode
Jaime R. Fontaine
HARDY MCLEAN LLC
125 Lincoln Ave., Suite 223 Santa Fe, NM 87505
(505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
trode@hardymclean.com
jfontaine@hardymclean.com

Corey F. Wehmeyer
SANTOYO WEHMEYER, P.C.
IBC Highway 281 N. Centre Bldg. 12400 San Pedro
Avenue, Suite 300 San Antonio, Texas 78216
(210) 998-4190
cwehmeyer@swenergylaw.com

Attorneys for Empire New Mexico, LLC

Application of Empire New Mexico LLC to Revoke the Injection Authority Granted Under Administrative Order SWD-1500 for the Parker Energy SWD #5 Well Operated by Parker Energy Support Services, Inc., Lea County, New Mexico. Applicant in the above-styled cause seeks an order revoking the injection authority granted by Administrative Order SWD-1500, to dispose of produced water in the Parker Energy SWD #5 Well, API# 30-025-38789 (“Well”), a produced water disposal well located approximately 1,200 feet from the North line and 990 feet from the East line of Section 24, Township 21 South, Range 36 East, NMPM, in Lea County, NM, near the EMSU and AGU Unitized Intervals, which are operated by Applicant. The approved injection zone is within the San Andres formation, an interval that contains hydrocarbons in residual oil zones. The Well is located approximately 3.8 miles northwest of Eunice, New Mexico.