STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SAMSON RESOURCES COMPANY) FOR SPECIAL POOL RULES FOR THE SOUTHEAST) HAT MESA-DELAWARE POOL, LEA COUNTY,) NEW MEXICO) CASE NO. 13,289

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

June 24th, 2004

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, June 24th, 2004, at the New Mexico Energy, Minerals and Natural Resources Department, 1220 South Saint Francis Drive, Room 102, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

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2 INDEX June 24th, 2004 Examiner Hearing CASE NO. 13,289 PAGE **APPLICANT'S WITNESS:** <u>RAYMOND L. TAYLOR</u> (Engineer) Direct Examination by Mr. Carr 4 Examination by Examiner Catanach 16 **REPORTER'S CERTIFICATE** 22 * * * EXHIBITS Applicant's Identified Admitted Exhibit 1 6 16 Exhibit 2 8 16 Exhibit 3 9 16 Exhibit 4 12 16 Exhibit 5 15 16 * * * APPEARANCES FOR THE APPLICANT: HOLLAND & HART, L.L.P., and CAMPBELL & CARR 110 N. Guadalupe, Suite 1 P.O. Box 2208 Santa Fe, New Mexico 87504-2208 By: WILLIAM F. CARR

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3 WHEREUPON, the following proceedings were had at 1 2 10:28 a.m.: EXAMINER CATANACH: Call Case 13,289, the 3 Application of Samson Resources Company for special pool 4 5 rules for the southeast Hat Mesa-Delaware Pool, Lea County, New Mexico. 6 7 Call for appearances. 8 MR. CARR: May it please the Examiner, my name is 9 William F. Carr with the Santa Fe office of Holland and Hart, L.L.P. We represent Samson Resources Company in this 10 matter, and I have one witness. 11 EXAMINER CATANACH: Additional appearances? 12 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of 13 the Santa Fe law firm of Kellahin and Kellahin. 14 I'm 15 appearing this morning on behalf of Mr. Gene Gallegos, doing business as Pro NM Energy, Inc. 16 MR. CARR: Mr. Kellahin, this is not the Coleman 17 18 I know you're anxious, but you're going to have to case. 19 wait. 20 MR. KELLAHIN: Oops. 21 EXAMINER CATANACH: Okay. MR. KELLAHIN: I promise to do better next time. 22 23 EXAMINER CATANACH: Okay, no additional appearances. Will the witness --24 25 MR. CARR: He got the e-mail on the black coat,

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1	but he missed the rest of it.
2	EXAMINER CATANACH: Will the witness please
3	stand?
4	(Thereupon, the witness was sworn.)
5	RAYMOND L. TAYLOR,
6	the witness herein, after having been first duly sworn upon
7	his oath, was examined and testified as follows:
8	DIRECT EXAMINATION
9	BY MR. CARR:
10	Q. Would you state your name for the record, please?
11	A. Raymond L. Taylor.
12	Q. Mr. Taylor, where do you reside?
13	A. Tulsa, Oklahoma.
14	Q. By whom are you employed?
15	A. Samson Resources Company.
16	Q. And what is your position with Samson Resources
17	Company?
18	A. I'm a reservoir engineer.
19	Q. Have you previously testified before the New
20	Mexico Oil Conservation Division?
21	A. No, I have not.
22	Q. Could you summarize your educational background
23	for Mr. Catanach and then review your work experience?
24	A. Certainly. I received a bachelor of science
25	degree in petroleum engineering from the University of

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1	Missouri, Rolla, in 1974, and I have been employed in
2	production and reservoir engineering capacities by various
3	firms over the last 29 years.
4	Q. Have you previously testified in other states?
5	A. Yes, approximately 12 other states.
6	Q. And in all those cases as an expert in reservoir
7	engineering?
8	A. Or in production engineering, yes.
9	Q. Are you familiar with the Application filed in
10	this case on behalf of Samson?
11	A. Yes, I am.
12	Q. And are you familiar with the status of the lands
13	in the area of the Southeast Hat Mesa-Delaware Pool?
14	A. Yes, I am.
15	MR. CARR: We tender Mr. Taylor as an expert
16	witness in reservoir engineering.
17	EXAMINER CATANACH: Mr. Taylor is so qualified.
18	Q. (By Mr. Carr) Could you briefly summarize for
19	Mr. Catanach what it is that Samson Resources seeks with
20	this Application?
21	A. Yes, Samson is seeking the adoption of special
22	pool rules and regulations for the Southeast Hat Mesa-
23	Delaware Pool that would include 160-acre spacing on a
24	temporary basis.
25	Q. When was this pool created?

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1	A. The pool was created in January of 2003 by Order
2	Number R-11,886.
3	Q. Mr. Taylor, let's go to what has been marked as
4	Samson Resources Exhibit Number 1. I would ask you to
5	identify that and then review the information shown
6	thereon.
7	A. Certainly. Exhibit 1 is a plat that demonstrates
8	the general area. There are quite a few wells depicted on
9	the plat. Delaware producers are depicted in a pinkish
10	color, I'll call it.
11	There are three principal field areas that are
12	depicted on the plat. Up in the northwest portion, that is
13	Hat Mesa-Delaware Pool.
14	In the south central portion of the plat there is
15	a single well which is South Hat Mesa.
16	And then over toward the eastern portion of the
17	plat there is a single well, the Samson Resources Minis 2
18	Federal Number 1. That is Southeast Hat Mesa Pool.
19	Q. Could you describe for Mr. Catanach the pool
20	boundaries as defined by the Oil Conservation Division?
21	A. Yes. First of all, Section 2, like all of the
22	sections along the northern boundary of Township 21 South,
23	Range 32 East, are corrective sections. They're very much
24	oversize sections. Section 2 is approximately 956 acres in
25	size. It's a normal-size section on the south end of it,

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1	and it's composed of lots on the north end of it. The pool
2	is currently defined as Lots 9, 10, 15 and 16 of Section 2.
3	Q. Basically what we have is a pool boundary
4	comprised of approximately 160 acres surrounding the Minis
5	Federal Well Number 1?
6	A. That's correct, it would be the southeastern 160-
7	acre approximate portion of the north end of Section 2.
8	Q. Are there any other Delaware wells completed
9	within one mile of these pool boundaries?
10	A. No, there are not.
11	Q. This exhibit shows other wells in the area, and
12	in fairly close proximity to the Minis Number 1. Do these
13	wells penetrate the Delaware but do not produce from that
14	horizon? Is that what we're looking at?
15	A. Yes, most of the wells in the immediate area, and
16	in particular, in Section 2, are Morrow producers. There
17	is one well in the western portion of Section 2 that was a
18	Morrow producer, and I believe it's being produced from
19	what is now considered or called the Strawn.
20	Q. What is the current status of the Minis Federal
21	Well Number 1?
22	A. The Minis Federal the Minis 2 Federal Number 1
23	is the discovery well for the pool. It was completed in
24	the spring of 2002, and it is perforated in the Delaware
25	from 7910 feet to 7920 feet.

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1	Q. What rules currently govern this particular well?
2	A. The general Rules of the Division govern
3	operations of the well, which would be 40-acre spacing, and
4	the resultant depth bracket allowable would be 187 barrels
5	per day.
6	Q. Was a discovery allowable actually assigned to
7	this well?
8	A. Yes, it was, in January of 2003 the Division
9	assigned a discovery allowable of 35,465 barrels to be
10	produced over a two-year period.
11	Q. And what is the effective allowable that results
12	from the assignment of this discovery allowable?
13	A. That would raise the effective allowable to 241
14	barrels per day, from the 187 barrel-a-day depth bracket
15	allowable.
16	Q. Okay, let's go to Samson Resources Company
17	Exhibit Number 2. Would you identify and review this?
18	A. Exhibit Number 2 is a tabular display of the
19	production and allowable status for the Minis 2 Federal
20	Number 1. Of course the first column on the left-hand
21	portion of the exhibit, it just lists the various months
22	that the well has produced since March of 2002.
23	The next column to the right is oil production in
24	barrels per month. I would note that the production is
25	actual production through April of 2004. The May volume

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1	listed there is an estimated volume, based upon field
2	estimates of production during that month.
3	Moving onward, the next column would be
4	allowable, once again in barrels per month.
5	Moving to the right of that, we would have an oil
6	status column, which is merely the variation between oil
7	production and allowable for a given month.
8	And then there is a cum status allowable, which
9	is the accumulation of that oil status column on a totaling
10	basis as you proceed downward through time.
11	The right-hand portion of the exhibit deals with
12	gas production and of course gas allowable, based upon the
13	2000-to-1 limiting GOR. Gas production on this well was
14	such that it has not ever approached any monthly allowable.
15	From a cumulative status on an oil basis right now through
16	May of 2004, we're estimating that the well is
17	underproduced by about 11,400 barrels.
18	Q. Are you currently curtailing production from the
19	well?
20	A. Yes, there is we are currently attempting to
21	maintain the 241-barrel-a-day allowable as prescribed by
22	the Division.
23	Q. Mr. Taylor, let's go to Exhibit Number 3, the
24	rate-time plot. Would you review this for Mr. Catanach?
25	A. Certainly. Rate 3 [<i>sic</i>] is a traditional rate-

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1	time plot for oil and gas production for the Minis 2
2	Federal Number 1 well, and it also has a projection of
3	future production.
4	Oil is listed in barrels per month. Those are
5	the little crosses, if you will, listed on the right side
6	of the plot. Gas production are the little boxes connected
7	by a line, once again on the right side of the plot.
8	There's a line that goes upward vertically
9	through the plot that is the demarcation line between
10	historical production and, to the right of that line, is a
11	projection of future production.
12	If you look at the data train in the upper right-
13	hand portion of the exhibit, it lists various decline
14	parameters. In this particular case, I've attempted to
15	project production on up through the end of June of 2004,
16	and at this particular time I was looking at a potential
17	cum, about 187,000 barrels. This projection of production
18	would result in an ultimate recovery, which is listed on
19	the data train as "Ultimate (M)" of about 945,000 barrels.
20	Q. Now, what Samson seeks will result in a depth
21	bracket allowable of 427 barrels a day. In your opinion,
22	can the Minis 2 Federal Number 1 well produce at these
23	rates?
24	A. Yes, we're confident the well can produce at that
25	rate.

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1	Q. Have you recently worked on the well?
2	A. We have worked on the well during the month of
3	June, which was a little bit later than we thought perhaps
4	we would, and we've revised the lift equipment on the well
5	and we're currently attempting to return production to its
6	prior levels and then obviously increase production from
7	there.
8	Q. In addition to this decline curve analysis, have
9	you tried to simulate the well's performance?
10	A. Yes, the decline curve in and of itself is not
11	definitive, because obviously the well is currently
12	experiencing no decline.
13	So what we did was attempt to simulate the
14	reservoir, and I'll characterize this as a conceptual
15	simulation. And I'm characterizing it in that manner, that
16	although we've provided a geologic description to the
17	simulator of the reservoir itself, we have no precise
18	determinations of permeability, relative permeability, PVT
19	data that type of thing.
20	We've had to make assumptions and utilize
21	correlations in the simulation to run it, and we are
22	history-matching production data, which is not the ideal
23	condition that you would like to simulate and have
24	confidence in the results of the simulation, but I think
25	it's a reasonable approximation of what the reservoir might

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1	be able to do in the future. And that simulation is
2	indicating that a recovery from this Minis 2 Federal
3	Number 1 well approaching a million barrels is not
4	unreasonable.
5	Q. Have you calculated a drainage area for the well?
6	A. Yes, I have.
7	Q. Would you refer to Samson Exhibit Number 4, your
8	volumetric calculation, and review that for Mr. Catanach?
9	A. Certainly, Exhibit Number 4 is a traditional
10	volumetric computation of drainage area for the Minis 2
11	Federal Number 1 well. The input data that was used in the
12	computation is, of course, the EUR number of 945,000
13	barrels brought over from the rate-versus-time plot, which
14	is a simulation-based number.
15	The reservoir thickness, porosity and water
16	saturation numbers are, of course, log-based. Oil
17	formation volume factor is based on correlation, and that
18	was the same that was used in the simulation, and the
19	recovery factor of the simulator seems to indicate it's
20	approximately 28 percent of the oil in place.
21	And if you make the computation of drainage area,
22	the resultant area is approximately 216 acres.
23	Q. Samson is seeking the adoption of these special
24	pool rules on a temporary basis, establishing 160 acres as
25	the spacing pattern for this pool; is that correct?

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That is correct. Α. 1 Based on your volumetric work, is it fair to say 2 Q. that a 160-acre spacing pattern would more closely reflect 3 the acreage that's actually going to be drained by this 4 well? 5 Α. That is correct. 6 7 Now, Mr. Taylor, we have not requested special Q. 8 well-location requirements that would require wells to be located 660 feet from the outer boundary of the dedicated 9 acreage; is that right? 10 Yes, we would make that request. 11 Α. Would Samson request that the order that results 12 Q. 13 from this hearing also provide for 660-foot setbacks? 14 Α. Yes, we would. MR. CARR: Mr. Catanach, I omitted to include 15 16 that in the Application. And so, with your permission, we 17 will file an amended application and ask that you continue 18 the case to the second hearing in July and take the case 19 under advisement on the record we've made here today. 20 We're seeking a 160-acre spacing. We're also requesting 21 660 setbacks which are consistent with statewide rules for pools developed on 160-acre spacing. 22 23 EXAMINER CATANACH: Okay. 24 Q. (By Mr. Carr) Mr. Taylor, will the increased rate from this well cause any reservoir damage? 25

No, we do not anticipate any reservoir damage 1 Α. 2 whatsoever. As part of the simulation program, we looked at varying production rates for the well, principally the 3 187 barrels a day which is the current depth bracket 4 allowable, the 241 barrels a day which is the current 5 discovery allowable that -- and is imposed on the well, and 6 7 then also the 427 barrels a day. We saw no -- any significant variation in 8 ultimate recovery from those rates -- utilizing those rates 9 10 as qualifiers, if you will, on the producibility of the well. The simulator seemed to indicate that the recovery 11 would be principally the same, whatever rate you utilize to 12 produce the well. 13 Do you anticipate additional development of this 14 Q. pool? 15 There is no current plans for any additional 16 Α. drilling development. There is some possibility for a 17 recompletion of one of the Morrow wells in the area, 18 although the Morrow wells are producing commercial volumes 19 of gas at this time, so a recompletion could be somewhat 20 21 distant in time. 22 And that would depend, probably, on the Q. 23 information you're going to get from the well that's the 24 subject --That's correct, we will closely monitor of the 25 Α.

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1	data that we receive from the Minis 2 Federal Number 1 and
2	see what that leads us to.
3	Q. Could you summarize the conclusions you've
4	reached from your engineering study of this reservoir?
5	A. Yes, real brief summary, the reservoir does not
6	appear to be rate-sensitive, and that is based upon
7	simulation information. We are fully confident that the
8	withdrawal rate from the well can be increased without
9	damaging the reservoir in any way, shape or form, and that
10	the 160-acre spacing that is requested will certainly more
11	closely reflect the drainage are of the currently the
12	single well that's producing from the pool.
13	Q. Mr. Taylor, is Exhibit Number 5 an affidavit that
14	confirms that notice of this hearing was provided in
15	accordance with Division Rules?
16	A. Yes.
17	Q. And to whom was notice provided?
18	A. It was provided to the Bureau of Land Management.
19	Q. Samson is the only Division-designated operator
20	in the pool?
21	A. Yes, we are.
22	Q. And there are no other owners of mineral
23	interests in that spacing unit?
24	A. No, there are not.
25	Q. Will approval of this Application be in the best

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interest of conservation, the prevention of waste and the 1 protection of correlative rights? 2 3 Yes, it will. Α. Were Samson Exhibits 1 through 5 prepared by you 4 Q. or compiled under your direction and supervision? 5 6 Α. Yes, they were. And can you testify as to their accuracy? 7 Q. 8 Yes, I can. Α. 9 MR. CARR: May it please the Examiner, at this time we'd move the admission into evidence of Samson 10 Resources Company Exhibits 1 through 5. 11 12 EXAMINER CATANACH: Exhibits 1 through 5 will be 13 admitted. That concludes my direct examination 14 MR. CARR: 15 of Mr. Taylor. 16 EXAMINATION BY EXAMINER CATANACH: 17 18 Q. Mr. Taylor, the Minis 2 Fed Number 1, it's 19 currently producing at about what? 240? 20 Α. About -- approximately 240 barrels per day, yes, sir. 21 Have you guys tested it to see what it's capable 22 Q. 23 of producing? 24 Α. That is what we're in the process of right now. 25 The well work has been ongoing over the last two weeks, and

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1	we've just started returning the well to production after
2	we altered the lift equipment. So no, we do not have a
3	precise determination of capability at this time.
4	Q. How do you know that it's capable of producing
5	400 and some barrels a day?
6	A. The simulations the simulation indicates that
7	the well should have absolutely no difficulty in achieving
8	that level of production. In fact, it probably could
9	produce a greater volume than that.
10	Q. I'm not a simulation expert, but can you do
11	simulation work when you're artificially curtailing the
12	well like this?
13	A. Yes, you can. It is a well qualifier that's
14	placed in the simulation, and in essence what it does is,
15	the simulation is restricted by that withdrawal rate from
16	the well. So obviously the simulator will produce at a
17	constant rate until the reservoir is no longer able to
18	support that rate, and then it will start to decline from
19	that point.
20	Q. And you plugged into what number did you plug
21	into that simulator? The four hundred and
22	A. The four hundred as I testified earlier,
23	actually we looked at two or three different rates. We
24	looked at the 187-barrel-a-day rate, the 241 and also the
25	427, which is the depth bracket allowable for the 160-acre

1 spacing. There was virtually no variation in recovery of 2 3 the well, irrespective of what rate you applied to the simulator. 4 5 0. So that was essentially the same for all three rates? 6 7 Α. Right, recovery was essentially the same for all 8 three rates, that's correct. And how do you -- Does that tell you what the 9 Q. decline is going to be on the well? 10 Yes, it will. In fact, if you refer back to 11 Α. Exhibit Number 3, which is the decline-curve plot, 12 13 essentially the projection you see on that plot is what the simulator is indicating the well will do with -- in time. 14 15 As I said earlier, there is no decline on the historical data that you can work with, so obviously this 16 17 is a simulation projection of future production. 18 Q. And this particular decline is based on which 19 rate? 20 The decline -- if I may, if you'll look at Α. 21 Exhibit 3, you'll see to the right of the vertical line 22 that goes through the plot -- that, as I said, is the 23 demarcation between historic production and future 24 projection of production. 25 Right above the 10,000-barrel-per-month line on

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1	the log log log portion of the plot, you can see that
2	there's a projection for approximately a year in duration,
3	and that is representative of the 427-barrel-per-day rate,
4	and approximately a year after that projection is in place,
5	the well the simulator indicates that the well can no
6	longer sustain that production rate, and it will start to
7	decline.
8	Q. Okay. And there's not going to be any more wells
9	drilled here, or did you say there was a possibility?
10	A. We're not currently anticipating it. There is a
11	possibility There's always a possibility of drilling
12	more wells, but we there are no immediate plans to do
13	so.
14	Q. Is the reservoir essentially limited to this four
15	quarter-quarter section area?
16	A. Utilizing the geologic or subsurface control
17	available, it's more or less confined in Section 2, in this
18	northern approximately 640-acre area. But of course,
19	that's only based upon the available subsurface control.
20	Q. Is this a What type of drive? Is this
21	solution gas?
22	A. It is I'm going to characterize it as
23	primarily solution gas or depletion drive. I realize that
24	28-percent recovery of oil in place for a solution gas
25	drive reservoir is on the very high side, but this seems to

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be a very remarkable reservoir in that it's already 1 produced a hundred and -- through -- Let me see here. 2 Through the end of May it's already produced 167,000 3 4 barrels, and if we took this well over to Hat Mesa Reservoir proper it would be one of the very best wells 5 over there, even on an ultimate recovery basis. So this is 6 a very fine well. 7 8 Q. When you said you were working on the well, you're working on the lift system; is that right? 9 That's correct. It was primarily rod work and 10 Α. also changing out the prime mover on the pumping unit. 11 12 Q. Okay. The GOR is running about what, do you know? I assume gas production is not a problem, you don't 13 14 need an increase in GOR? 15 No, sir, gas production is not a problem Α. whatsoever. Let me just calculate the most recent GOR that 16 17 I have here. In may the GOR would have only been about 267 to 1. 18 Okay, and you're asking for 660 setbacks from the 19 Q. 20 outer boundary of the --21 MR. CARR: Ye, sir, of the --22 EXAMINER CATANACH: -- of the unit? 23 MR. CARR: -- 160 spacing unit. 24 EXAMINER CATANACH: 330 interior or any interior? 25 MR. CARR: We'd like to have the spacing

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requirements consistent with the statewide rule for 160-1 acre spacing, same interior setbacks. 2 3 EXAMINER CATANACH: I believe it's -- is it 130 or -- ? I'm going to have to look it up. It may be 130. 4 (By Examiner Catanach) And as far as the 5 Q. temporary rules, do you have a time frame that you're 6 7 looking at? Yes, we're requesting 18-month period --8 Α. 18 months. 9 Q. -- for the temporary nature of the rules. 10 Α. EXAMINER CATANACH: Okay, I think that's all I 11 12 have, Mr. Carr. That concludes our presentation in 13 MR. CARR: 14 this case. 15 THE WITNESS: Thank you. 16 EXAMINER CATANACH: Thank you. There being 17 nothing further, Case Number 13,289 will be continued to 18 July 22nd. 19 (Thereupon, these proceedings were concluded at 20 10:53 a.m.) * * k de hereby certify that the foregoing is 21 e complete record of the proceedings in the Examiner hearing of Case No./3209 22 heard by me on Iome 24. 2004 23 und K stand, Examiner Oll Conservation Division 24 25

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CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)) ss. COUNTY OF SANTA FE)

I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I transcribed my notes; and that the foregoing is a true and accurate record of the proceedings.

I FURTHER CERTIFY that I am not a relative or employee of any of the parties or attorneys involved in this matter and that I have no personal interest in the final disposition of this matter.

WITNESS MY HAND AND SEAL June 30th, 2004.

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STEVEN T. BRENNER CCR No. 7

My commission expires: October 16th, 2006