

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: )  
 ) CASE NO. 13,249  
APPLICATION OF THUNDERBOLT PETROLEUM TO )  
INCREASE THE MAXIMUM SURFACE INJECTION )  
PRESSURE ALLOWABLE WITHIN THE CALMON )  
STATE WATERFLOOD PROJECT, EDDY COUNTY, )  
NEW MEXICO )

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
EXAMINER HEARING

2004 JUN 24 AM 10 17

BEFORE: WILLIAM V. JONES, JR., Hearing Examiner

June 10th, 2004

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, WILLIAM V. JONES, JR., Hearing Examiner, on Thursday, June 10th, 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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## I N D E X

June 10th, 2004  
 Examiner Hearing  
 CASE NO. 13,249

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<u>ROBERT LEE</u> (Engineer)	
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## A P P E A R A N C E S

## FOR THE DIVISION:

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## FOR THE APPLICANT:

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By: W. THOMAS KELLAHIN

\* \* \*

## ALSO PRESENT:

MARK FESMIRE  
Director, Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

RICHARD EZEANYIM  
Chief Engineer  
New Mexico Oil Conservation Division  
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\* \* \*

1           WHEREUPON, the following proceedings were had at  
2 8:22 a.m.:

3           EXAMINER JONES: Okay, let's call Case 13,249,  
4 which was continued from April 15th. Application of  
5 Thunderbolt Petroleum to increase the maximum surface  
6 injection pressure allowable within the Calmon State  
7 Waterflood Project, Eddy County, New Mexico.

8           Call for appearances.

9           MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of  
10 the Santa Fe law firm of Kellahin and Kellahin, appearing  
11 on behalf of the Applicant, and I have one witness to be  
12 sworn.

13           EXAMINER JONES: Any other appearances in this  
14 case? There being none, will the witness please stand to  
15 be sworn?

16           (Thereupon, the witness was sworn.)

17           MR. KELLAHIN: Mr. Examiner, Mr. Lee on behalf of  
18 his company operates this waterflood. It's a quarter-  
19 section waterflood with two injection wells. It's been  
20 previously approved by the Division, and a number of months  
21 ago he filed an administrative application with the  
22 Division seeking an increase in the surface pressure  
23 limitation for his two injection wells. That request,  
24 filed administratively, sought to increase his approval to  
25 a pressure of 1100 pounds per injection well.

1           After reviewing that matter, you asked that the  
2 case be placed on the docket so that Mr. Lee could come  
3 forward and present additional information and discuss with  
4 you his proposal for that increase, and we're here today to  
5 do that.

6           EXAMINER JONES: Okay.

7                                 ROBERT LEE,  
8 the witness herein, after having been first duly sworn upon  
9 his oath, was examined and testified as follows:

10                                 DIRECT EXAMINATION

11           BY MR. KELLAHIN:

12           Q.    Mr. Lee, for the record, sir, would you please  
13 state your name and occupation?

14           A.    Robert Lee. I'm a petroleum engineer.

15           Q.    And in what community do you reside?

16           A.    Midland, Texas.

17           Q.    Have you previously qualified before the Division  
18 as a petroleum engineer?

19           A.    Yes, I have.

20           Q.    And you've testified before the Division in other  
21 cases, including your own application that was approved for  
22 this waterflood project?

23           A.    Yes, I have.

24           Q.    And you were the individual responsible for  
25 filing with the Division the administrative application to

1 increase the surface injection pressure on your two  
2 injection wells that are within this waterflood area?

3 A. Yes, I was.

4 Q. And pursuant to the notice of hearing, have you  
5 prepared additional exhibits and information for  
6 presentation to Examiner Jones, this morning?

7 A. Yes, I have.

8 MR. KELLAHIN: We tender Mr. Lee as an expert  
9 witness.

10 EXAMINER JONES: Mr. Lee is tendered as an expert  
11 witness.

12 Q. (By Mr. Kellahin) Mr. Lee, let's take a moment  
13 and unfold Exhibit Number 1. Let's take a moment, Mr. Lee,  
14 and look at the bottom right portion of Exhibit 1 --

15 A. Uh-huh.

16 Q. -- and have you identify what we're seeing by the  
17 outlined yellow area.

18 A. Yes, that's the 160 acres in the southwest  
19 quarter of Section 16 that comprises my Calmon waterflood.

20 Q. Describe for Mr. Jones how you have identified  
21 the location of the two approved injection wells.

22 A. They are the two westernmost wells that have  
23 triangles drawn around them. The Calmon Number 1 is the  
24 northernmost well, the Calmon Number 3 is to the south of  
25 that well. And they are on the cross-section as being the

1 two wells on the right-hand side of the cross-section. The  
2 orange line kind of shows the line of section from A-A'.

3 And the other well that's on the cross-section is  
4 the Oxy Remuda Number 1. It was a deep well that was  
5 drilled to the Morrow.

6 Q. Can you use this display, Mr. Lee, and identify  
7 for us the number and the approximate location of the  
8 producing wells in the waterflood?

9 A. Yes. To the -- starting on the west side of the  
10 yellow block in what would be Unit Letter L is the Calmon  
11 Number 2. In Unit Letter M, covered up by the little "a",  
12 is the Calmon Number 5. In Unit Letter N is the Calmon  
13 Number 6. In Unit Letter K is the Calmon Number 4, and  
14 that's a TA'd well right now.

15 Q. Let's go to the A-A' cross-section portion of the  
16 display, and let's look at the Number 1 injection well in  
17 the middle.

18 A. Uh-huh.

19 Q. What portion of the log have you displayed for  
20 this well?

21 A. What I'm showing here is from the top of the  
22 Queen down to the TD of the well, which is just right at  
23 about 3000 feet, and the top of it starts at about 1950.  
24 And I'm doing that so I can show what the top of the pool  
25 is, the Queen-Grayburg-San Andres Pool, the Loco Hills.

1           Also identified on this --

2           Q.   This production is associated with the Loco Hills  
3 Pool --

4           A.   Yes.

5           Q.   -- that's identified as the Loco Hills-Queen-  
6 Grayburg-San Andres Pool?

7           A.   Yes, sir.

8           Q.   Is the entire vertical extent of that pool shown  
9 on the log for the Number 1 injector?

10          A.   No, it is not.

11          Q.   Where would we find the top and the bottom of  
12 that pool?

13          A.   That's why I put the OXY Remuda well on it, the  
14 deep well, to show the bottom of the San Andres.  And I'm  
15 picking that at about 3975, which would be the top of the  
16 Glorieta.  And none of the other wells that I operate went  
17 that deep.  They just went down pretty much to the top of  
18 the San Andres.

19          Q.   Show us on the log for the OXY well where we  
20 would find the top of the pool.

21          A.   The top of the pool would be along the line that  
22 says Queen, and it is at a depth of about 2058.

23          Q.   When we look, then, at the cross-section and look  
24 at where your two injection wells are perforated, describe  
25 for us the characterization of the reservoir portion of the

1 pool that you're using for injection.

2 A. Okay, they're shown on the cross-section,  
3 highlighted in yellow, and what you can see are these  
4 fairly thin, somewhat tight sands spread out over several  
5 hundred feet of section there.

6 Q. Geologically, Mr. Lee, when we look at your  
7 waterflood area, can you give us a summary of the geologic  
8 sense of your flood area in comparison to the rest of the  
9 pool?

10 A. Yes, as I said, the zones that I'm injecting  
11 into, you can see the little porosity spikes here where you  
12 pick up these sands, and in between the sands it's pretty  
13 much anhydrites and dolomites, very, very tight formation,  
14 and you can see that on the porosity logs here that I've  
15 included. Both of these are compensated neutron logs, and  
16 you can just see that it's a very, very, very tight section  
17 there between my little sands there that I'm injecting  
18 into.

19 Even up to the top of the Queen, which is a sand,  
20 there it's still fairly tight; it's only got about 5-  
21 percent porosity there in the Queen, and we're typically  
22 thinking 8 to 10 percent is what we need to be productive.

23 Q. Mr. Lee, have you satisfied yourself as an expert  
24 engineer that you have adequate reservoir distance between  
25 your top and the bottom injection intervals and the top and

1 the bottom of the pool?

2 A. Yes.

3 Q. Can you characterize for us the composition of  
4 the distance from the upper perforation and an injector to  
5 the top of the pool?

6 A. Yes, the top of the injector -- top of the  
7 injection zone in Well Number 1 is at about 2260, and the  
8 top of the Queen is at about 2030, so there I have about  
9 230 feet from the top of my injection zone to the top of  
10 the Queen. And over on Well Number 3 my top injection zone  
11 is once again about 2260, and the top of the Queen is still  
12 about 2030, so once again I've got about 230 feet between  
13 my top perf to the top of the Queen.

14 Q. Within the half-mile area of review for these  
15 injectors, Mr. Lee, are there any problem wells --

16 A. No.

17 Q. -- in a half-mile radius?

18 A. No, there are not.

19 Q. So all the wells within that half-mile radius are  
20 adequately cased and cemented across the injection  
21 interval?

22 A. Yes, they are.

23 Q. Are you adequately isolated from any freshwater  
24 sands.

25 A. Yes, we are.

1 Q. Does the increased injection pressure that you're  
2 requesting, the 1100 pounds -- are you able to conclude  
3 that that's going to stay confined to the vertical limits  
4 of the pool?

5 A. Yes, based on some testing that we've done, it  
6 looks like it will be confined into this Queen-Grayburg-San  
7 Andres Pool.

8 Q. In addition to step-rate tests, have you run  
9 other tests on your injector wells to give you an  
10 engineering basis for an opinion as to the maximum extent  
11 of the pool that's being exposed to injection?

12 A. Yes, we ran some tracer surveys indicating where  
13 the injection of water may be going to within this  
14 interval.

15 Q. We'll look at those in a minute. Let's turn now  
16 to another cross-section where we can see the relationship  
17 of the injection wells to your producing wells. If you'll  
18 take a moment and unfold Exhibit Number 2, Mr. Lee, let's  
19 take Exhibit Number 2 and have you walk through an  
20 explanation of the relationship to how you're using the  
21 injection wells in relation to the zones of perforation in  
22 the producing wells.

23 A. Okay. The injection wells, Well Number 1 and  
24 Number 3 are identified by small triangles sitting above  
25 those logs. Well Number 1 is the far left-hand log, and

1 the Well Number 3 is the fourth from the left. And the  
2 perforations are marked and highlighted in yellow.

3 And this cross-section is just pretty much across  
4 the productive interval here, and so I don't have the Queen  
5 included in this cross-section. But here you can see where  
6 my wells are perforated, demonstrating the continuity of  
7 pay between my injection wells and my producing wells.

8 There's one well, the TA'd well, which is Well  
9 Number 4. It was perforated down low in the Premier  
10 section, and the previous operator before I acquired the  
11 property had set a cast-iron bridge plug and TA'd the well,  
12 and we just got through running an MIT on that a couple  
13 months ago.

14 It does have some zones in it, as well as Number  
15 6, in the Penrose that appear to be a little bit tight,  
16 about 9- to 8-percent porosity, that I do intend to go in  
17 and recomplete once we see some more response in our  
18 waterflood.

19 Q. Do you see any indication in the operation of the  
20 waterflood that you're conducting, that the injection water  
21 is moving out of the vertical limits of the pool?

22 A. No, there's nothing that would seem to indicate  
23 that.

24 Q. Let's turn, then, Mr. Lee, to Exhibit Number 3.  
25 For the record, would you identify that for us?

1           A.    This was an order for a pressure increase that  
2 was granted for these two wells back in August of 2002.  
3 They -- increasing the pressure from what we had originally  
4 been given with the initial waterflood order, which was 453  
5 pounds. And step-rate tests were ran, and the maximum  
6 pressure was granted for the Number 1 of 650 pounds and the  
7 Number 3 of 550 pounds, in August of 2002.

8           Q.    Let's turn, then, to Exhibit 4 and have you  
9 identify what Exhibit 4 is.

10          A.    This is a letter which I had sent to the OCD  
11 seeking increased injection pressure to 1100 pounds. I  
12 sent that in February of 2004, and I sent that along with  
13 some information seeking administrative approval of the  
14 increase in injection pressure there.

15          Q.    This is your request to the Division that has  
16 resulted in this morning's hearing?

17          A.    Yes, it is. Yes, it is.

18          Q.    Let's turn to Exhibit 5. Identify for us what  
19 we're looking at when we see Exhibit 5.

20          A.    Exhibit 5 is a step-rate test that was ran in  
21 February of 2004 on --

22          Q.    On which well?

23          A.    -- the Calmon State Number 1, and --

24          Q.    What does this test results show you?

25          A.    This test showed that the -- based on the graph,

1 that the parting pressure of the formation is 805 pounds.

2 Q. Let's turn to the second page of that step-rate  
3 test, Mr. Lee --

4 A. Okay.

5 Q. -- and let's go through the plot. Show us the  
6 pressures and the rates and where you have breakover.

7 A. Right, okay. The rate is plotted along the  
8 bottom, the pressures are along the side. The dots are the  
9 recorded rate and pressure at different rates, they're  
10 recording the pressures that's documented on the first  
11 page, and you start getting an established slope.

12 And then after about 670 barrels a day of rate,  
13 the slope changes. And by drawing those two lines and  
14 looking at that point that they intersect, that's used to  
15 determine the parting point, the parting pressure of the  
16 reservoir. And like I said, that point appears to be 800  
17 pounds.

18 Q. Do you have a similar step-rate test for the  
19 other injection well?

20 A. Yes, I do, Exhibit Number 6 is for the Calmon  
21 State Number 3.

22 Q. Let's look at the second page of Exhibit 6 and  
23 have you walk us through the plot.

24 A. Once again, water rate is plotted along the X  
25 axis, pressure is plotted along the Y axis. And same

1 thing, we're getting several points to establish a slope,  
2 prior to that slope changing, at a rate of about 420  
3 pounds, 420 barrels a day, and the parting pressure of the  
4 Number 3 well is 787 pounds. Both of them right around 800  
5 pounds.

6 Q. Explain this for us, Mr. Lee. If we take this  
7 step-rate test for the Number 3 well, you're injecting at a  
8 certain rate, achieving a pressure at which there is a --  
9 you called it a parting of the reservoir.

10 A. Right, where you're --

11 Q. When we're looking at the wellbore itself, what  
12 portion of the reservoir, then, is exhibiting parting?

13 A. Where the perforations are. And my perforations  
14 are, like I said, scattered over 300 or 400 feet. So  
15 there's really no way of knowing which set of perfs might  
16 be the perforations where you're seeing the frac'ing occur  
17 at. But it indicates that -- at this pressure, that you  
18 are parting some zone in the reservoir.

19 Q. Is there any way to take this information and  
20 reach a conclusion that you're parting the pool limits,  
21 that you're fracturing outside the vertical limits of the  
22 pool?

23 A. No, there's not. No, there's not. This does not  
24 tell you anything about the vertical frac-height growth or  
25 anything like that. This is just saying -- or even the

1 horizontal -- how far out your fracture wing may be. All  
2 this is telling you is at what pressure and rate that  
3 reservoir starts to crack open.

4 Q. Have you conducted additional tests on these two  
5 injection wells so that you could measure the height of the  
6 fracture --

7 A. Yes.

8 Q. -- exposed at 1100 pounds?

9 A. Yes, we did.

10 Q. And how do you do that?

11 A. We ran injection surveys, tracer surveys, and we  
12 have those listed as Exhibits 7 and 8, and --

13 Q. Let's start with Exhibit 7, which is the Number 1  
14 injector.

15 A. Yes, it is.

16 Q. Let's take a moment, unfold that. Is this a  
17 tracer test on your well, conducted by a service company?

18 A. Yes, it was, Cardinal Surveys ran this tracer  
19 survey for me.

20 Q. Are they recognized within the industry as a  
21 service company that's competent and -- to run these type  
22 of tests?

23 A. Yes, they are.

24 Q. Are their test results relied upon by you and  
25 other experts in the industry to reach conclusions about

1 your injection wells?

2 A. Yes, they are.

3 Q. Give us a summary before you talk about the  
4 specific details. Tell us a summary of what we're about to  
5 see.

6 A. Okay, the way that they run a tracer survey and  
7 temperature survey is, they will run a temperature with the  
8 well being shut in, and then they will run a temperature  
9 survey with the well injecting, looking for anomalies  
10 within the temperature gradients, indicating where fluid  
11 flow may be, fluid flow behind pipe, things of that nature.

12 And then the tracer aspect of it is, they will  
13 inject a slug of radioactive material above the  
14 perforations, and as that water travels down across the  
15 perforations, water goes into the perforations and  
16 diminishes the amount of radioactive material. And they're  
17 logging through that, counting how much radioactivity is  
18 left in that wellbore, and based on that they can estimate  
19 how much water went out of zone.

20 They're also running a velocity survey where  
21 they're measuring the change in velocity up and down the  
22 well also. And the velocity survey can be a little bit  
23 skewed because of scale or buildup inside the casing at  
24 this point here, and --

25 Q. So when we look at this display, when we see the

1 wellbore projection and look to the right side of the  
2 scale, we're seeing the temperature?

3 A. Yes.

4 Q. And that's displayed in the dashed line and the  
5 solid line?

6 A. Yes, the temperature survey that was ran when the  
7 well was injecting -- and on this well the injection  
8 pressure was 1000 pounds when they were running these  
9 surveys -- is the dashed line. The shut-in temperature is  
10 the solid dark line.

11 Q. What portion of this profile relates to the  
12 velocity information?

13 A. The first track immediately to the right of the  
14 middle of the log. If you look at the perfs at 2500, the  
15 velocity survey shows that 44.6 percent of the water enters  
16 into those perfs. And the radioactive portion of the log  
17 is on to the right of that, and it shows that there's 46  
18 percent of the water going into that set of perforations.

19 Q. When we look at the left side of this profile,  
20 what tracks are we looking at there?

21 A. What you see there are the gamma-ray, which is  
22 the line to the far left on the log, and you'll also see a  
23 casing collar log on the -- sort of the right side of the  
24 left track.

25 Q. What, then, is the measured height of the

1 indications on the tracer for the height of the frac using  
2 a pressure of 1100 pounds -- I guess it was a 1000-pound  
3 test --

4 A. Yeah.

5 Q. -- 1000-pound test, in this injection well Number  
6 1?

7 A. The temperature survey -- When we were saying  
8 that Cardinal was an expert in their field, that's  
9 generally a pretty good statement. Here they dropped the  
10 ball a little bit because I had these perforations at 2265  
11 down to about 2295, and they did not run the radioactive  
12 tracer across that set of perfs. In talking with the  
13 operator later, he just missed it.

14 But we can see on the temperature survey, the  
15 shut-in temperature shows a slight deviation across that  
16 set of perfs, and -- indicating that fluid does enter into  
17 those perfs.

18 Q. Does that lack of information, Mr. Lee, cause  
19 your conclusion about there being an adequate distance from  
20 the top of the interval affected by injection in the top of  
21 the pool?

22 A. No.

23 Q. That doesn't compromise your conclusion?

24 A. No, because even though they didn't have the  
25 tracer survey, the temperature survey indicates that

1 there's no channeling. And I specifically ran these  
2 surveys looking for channeling or frac-height growth or  
3 something like that. And even though they missed that on  
4 their radioactive tracer survey, the temperature survey  
5 shows no channeling.

6 And then looking at the bottom portion, as far as  
7 how far down we go, the injection tracer shows that there's  
8 -- from my perforations at 2600, there's a little bit of  
9 movement down below that to maybe about 2618, about maybe  
10 eight feet below the perforated interval. But the  
11 temperature survey shows a little bit more of an anomaly  
12 down to 2634, before those curves come together and join  
13 up. And both of those indicate that movement down, they're  
14 still above my bottom set of perforations, which is about  
15 2678 to -60. And in fact, this tracer survey here shows  
16 that there's no water going into my very bottom set of  
17 perforations.

18 Q. Let's look at the bottom of the pool. Your  
19 bottom perforations are going to put water in the -- sort  
20 of the middle and upper San Andres?

21 A. No, actually those perforations there, if you  
22 look back at our Exhibit 1, it's more in the middle bottom  
23 of the Grayburg interval --

24 Q. Oh, I see.

25 A. -- and still above the San Andres. There's --

1 Q. I misread this. The injection is in the  
2 Grayburg, there's nothing in the San Andres?

3 A. That's correct.

4 Q. In this immediate area, is there any Glorieta  
5 production?

6 A. No, there is not.

7 Q. So you see no potential risk to compromising  
8 further oil production below the base of your waterflood?

9 A. That's correct.

10 Q. And above the clean interval of your pool is the  
11 Seven Rivers. Is there any Seven Rivers production in this  
12 area?

13 A. No, there is not.

14 Q. Let's turn to the tracer survey for the Number 3  
15 well. If you'll look at Exhibit 8 for us.

16 A. This is, once again, another tracer survey that  
17 was ran. The perfs are shown there in the middle track.  
18 The shut-in temperature, the injection temperature -- here  
19 the injection temperature and the tracers were ran, and we  
20 had a pressure of 1120 pounds on the well at that point in  
21 time.

22 The tracers, radioactive tracer, indicates loss  
23 into all the perfs except for the very bottom set of  
24 perforations at 2600. The temperature survey on this one  
25 was pretty erratic looking, and even the Cardinal people

1 did not have a good explanation as to why this temperature  
2 survey looks like it does.

3 At the time that we were running this back in  
4 November of '03, it had been pretty cold in the days before  
5 that, and so some of this cooling that we see even on our  
6 shut-in temperature may be due to some -- you know, just  
7 cool water that had been in the pipe, kind of giving us an  
8 erroneous reading.

9 Q. Are you still able to use this log information to  
10 tell you that you have adequate separation between your  
11 injection intervals and the top and the bottom of the pool?

12 A. Yes, we do. We don't -- As I say, we don't see  
13 any tracer radioactive movement behind the pipe, and they  
14 do see a bit of an anomaly in the shut-in temperature at a  
15 depth of about 2140, and so they're making a call there of  
16 a possible channel up to about 2140. But that is still  
17 about 140 feet or so, I believe, below the top of the  
18 Queen.

19 Q. Have you satisfied yourself, Mr. Lee, that you  
20 have adequate measured information for the two injection  
21 wells to recommend to the Examiner that he improve your  
22 increased injection pressure?

23 A. I believe so. Like I say, we're not seeing any ✓  
24 of the radioactive material moving behind pipe here. The  
25 only thing that we see is a possible channel. Once again,

1 it's still well below the top of the Queen, and due to the  
2 erratic nature of the temperature survey here, you know,  
3 even the pick at 2140 might be questionable.

4 Q. Do you have available to you any information from  
5 which you conclude that you should not do this?

6 A. No, I do not.

7 Q. Let's see what the profile has been for your  
8 waterflood project. If you'll turn to the plot that you've  
9 prepared and submitted as Exhibit 9, take a moment and  
10 identify for us what we're seeing.

11 A. This is a plot of water injection, oil production  
12 and pressure from the start of the flood in October of 2000  
13 through May of 2004. And what we're showing here is the  
14 water injection rate, shown in blue; the oil production,  
15 shown in green; and our pressures, plotted in pink. And  
16 what we're --

17 Q. Are you seeing a positive response in improved  
18 oil recoveries in relationship to water injection?

19 A. Yes, yes, we are. When we first started the  
20 flood back in 2000, we were at about 100 barrels a month,  
21 and oil and p.s.i. -- our pressure is plotted, the numbers  
22 for those are on the right-hand side of the plot, and the  
23 rate is shown on the left-hand side.

24 And you see the blue line going up, we start  
25 putting water in the ground, very little pressure

1 initially. We start catching some pressure in about June  
2 of '01, and --

3 Q. Let me ask you in December of '01, we see a  
4 dramatic drop in the water rate.

5 A. Uh-huh.

6 Q. Is that a function of a reservoir problem or a  
7 problem with any of your wells?

8 A. No, it was a problem with the water supply. ✓  
9 Prior to that, in October of '01, the blue line goes up to  
10 about 15,000 barrels a month, as we were able to tie into  
11 some other water sources. And those sources went away in  
12 February of '02, and our injection dropped. Shortly after  
13 we started putting additional water in the ground, we did  
14 start seeing an increase in our oil production, going up to  
15 about 160 barrels of oil a month.

16 And the blue line is fairly erratic from about  
17 December of '01 to February of '03. Once again, just  
18 problems with water sources and getting make-up water for  
19 our flood. And during that time our oil production kind of  
20 languished and just kind of held in there at the 160-170-  
21 barrels-a-month range.

22 In February of '03 we were able to once again  
23 secure some additional water-injection sources, and our  
24 blue line goes back up to where we're putting way a rate of  
25 10,000 to 11,000 barrels a month. And at that time,

1 because we're putting more water in the ground, you can see  
2 the pink line go up to where our average injection pressure  
3 is right around 1000 pounds.

4 About three months after we secured this  
5 additional water in October of '03, we started to see an  
6 increase in our oil production and got up to almost 450  
7 barrels a month and -- tailing off a little bit. Then we  
8 had our order to shut down the injection in December of  
9 '03, and when we shut the water down you can see the blue  
10 line dropping off. You can see our oil starting to drop  
11 off at that time also, and pressures dropped down.

12 And what we did to arrest that was, we started  
13 putting in a little more water to try to stabilize our oil  
14 rate where it wouldn't continue falling, and also to do  
15 some testing here as to -- if I start putting more water in  
16 the ground, will I start seeing this oil rate come back? I  
17 was getting pretty concerned that if I, you know, just shut  
18 injection down, do I start losing my oil front? And so we  
19 started putting more water in the ground, and the oil has  
20 at least stabilized at a --

21 Q. Have you reached a reservoir fill-up on your --

22 A. No, we have not.

23 Q. -- waterflood project?

24 A. No, we have not.

25 Q. Have you prepared some voidage calculations for

1 Examiner Jones?

2 A. Yes.

3 Q. Let's turn to Exhibit 10 and have you take us  
4 through this display.

5 A. Okay. This is a calculation of the reservoir  
6 voidage, and I'm estimating the initial pressure of the  
7 reservoir to be about 1100 pounds, just based on a standard  
8 gradient to the mid-perf. And original gas in solution was  
9 about 270 standard cubic feet per barrel. My initial  
10 producing GOR was about 1000 standard cubic feet per  
11 barrel, and that increased over time as the pressure  
12 dropped.

13 The  $B_{gi}$  that I calculated for that free gas in  
14 the reservoir was 1.47 reservoir barrels per MCF, and the  
15  $B_{oi}$  is 1.14 reservoir barrels per standard barrel.

16 At 10 of 2000, when we began injecting, we'd  
17 cum'd about 106,000 barrels, 50,000 barrels of water, and  
18 the cumulative gas was 213,000 MCF. And I calculated what  
19 an average producing GOR would have been. That would be  
20 2000 standard cubic feet per stock tank barrel.

21 On my reservoir voidage calculation, I calculated  
22 the voidage created by the oil that I had produced, I  
23 calculated the voidage created by the free gas that has  
24 been produced, and the water voidage, which would just be  
25 the water production. And my oil voidage was 106,000 times

1 1.14  $B_{oi}$ , gave me 121,000 reservoir barrels.

2 The gas voidage is what has really created a lot  
3 of problem here. It's a pretty big number. I took my  
4 average producing GOR, which is 2000 to 1, minus my 270  $R_g$   
5 number, the gas-in-solution number, times my oil that's  
6 been produced, times the  $B_{gi}$ , the reservoir barrels per MCF  
7 that was associated with the free gas, and that gives me  
8 319,000 barrels.

9 So my total voidage at the time injection began  
10 was almost 490,000 barrels, and to date I've only put in ✓  
11 233,000 barrels, which is still a little less than 50  
12 percent of fill-up.

13 And that kind of fits with what I'm seeing over  
14 here on my production. You know, typically you'd think  
15 that you should start kind of really seeing some response  
16 when you get there to, you know, that 40 -- you know, maybe  
17 30 to 50 percent of fill-up, typically you should start  
18 seeing a little bit of something, but -- and we've done  
19 that. So it looks like everything's kind of working like  
20 it ought to, it's just taking a long time to get it filled  
21 up.

22 Q. Under the Division order that you received, there  
23 was a base of pressure gradient of .2 p.s.i. per foot of  
24 depth, and that was subject to modification if you  
25 presented the Division with appropriate information. Have

1 you calculated for us what the fracture gradient is, if we  
2 use 1100 pounds of pressure?

3 A. Yes, I did, and I'll recalculate it now to make  
4 sure it's a fresh number, because I forgot to write it down  
5 yesterday when we were doing that.

6 If my top perforation -- and I'm -- in  
7 calculating the surface pressure gradient, I'm picking --  
8 using my top perf versus something that would kind of be in  
9 the -- mid-perf, because that top perf is what's going to  
10 see that pressure, kind of, first --

11 Q. You're going to calculate us a surface pressure  
12 number?

13 A. Yes, I am. With 1100 pounds at the surface, with  
14 my top perf at about 2260, that's going to be a .486, say  
15 .49, surface gradient at 1100 pounds.

16 And if I take the step-rate test numbers, say at  
17 about 800 pounds, divided by the 2260, I get a gradient --  
18 surface gradient of .35. So what we're asking is about  
19 another .13 p.s.i. per foot on that surface gradient so  
20 we're able to get some -- get the water in the ground.

21 Q. If the Division approves this for you, Mr. Lee,  
22 will you recover oil that you would not otherwise produce?  
23 If you take the pressure up to 1100 pounds, is that going  
24 to give you an improved oil recovery? You get a better  
25 rate, do you not?

1           A.    It's going to increase our rate, help us get the  
2 oil out of the ground --

3           Q.    Sooner?

4           A.    -- much quicker.  And that was one of the  
5 conclusions I had drawn based on this voidage calculation,  
6 is that if I have to stay around the 700- to 800-p.s.i.  
7 surface pressure I'm only going to be able to get away --  
8 based on some of the testing we've done here, is 4000 to  
9 5000 barrels of water a month, and that takes me almost  
10 four years -- a little over four years to reach fill-up.

11                    If I can go up to the 11,000 barrels a month,  
12 10,000 to 11,000 barrels a month, which is where we were  
13 when we were seeing some pretty good increase at the  
14 pressures of 1000 to 1100 p.s.i., I can reach that fill-up  
15 in two years then.

16                    So yes, if I can have a higher pressure increase,  
17 I can get more water in the ground and I'll get greater  
18 response quicker.

19           Q.    Anything else, Mr. Lee?

20           A.    I've kind of -- You know, one of the things I've  
21 looked at here is kind of why, you know, if my reservoir is  
22 parting at 800 pounds, why am I able to get better response  
23 and increase production by being up around 1000 to 1100  
24 pounds?

25                    And I believe that the reason that it seems to be

1 working that way is because, with the system that I have  
2 we're getting a lot of iron-sulfide problems out here.  
3 We've got filters at the injection wellheads. But still,  
4 it's just -- that iron sulfide, like talcum powder, just  
5 going through everything. And it's plugging up my  
6 perforations, and I'm needing to get out past that a little  
7 bit. That seems to be kind of the -- what really kind of  
8 creates this issue of needing the additional pressure. I  
9 wish I didn't, but...

10 MR. KELLAHIN: Mr. Examiner, that concludes our  
11 presentation. We move the introduction of Mr. Lee's  
12 Exhibits 1 through 10.

13 EXAMINER JONES: Exhibits 1 through 10 will be  
14 admitted to evidence.

15 I can see Mr. Carr cringing back there about me  
16 asking all these questions, but I'll go ahead and start.

17 MR. KELLAHIN: He's being paid to suffer, Mr.  
18 Examiner.

19 EXAMINER JONES: He is.

20 THE WITNESS: He's not paying me, is he, Tom?

21 MR. KELLAHIN: No, he's not. Neither am I.

22 EXAMINATION

23 BY EXAMINER JONES:

24 Q. Okay, let's talk about the waters first.  
25 Starting with the fresh water, what depth is the fresh

1 water out here?

2 A. Surface casing is set to 400 feet in this area.  
3 In initial waterflood study I looked for any freshwater  
4 wells within the area, and there were none shown by the  
5 State Engineer's Office. But casing -- surface casing is  
6 at 400 feet.

7 Q. And there's pretty much -- What about the Yates  
8 and the --

9 A. The Yates is at about 1100 feet out here, and it  
10 is productive. I've popped the Yates in the Number 2 well,  
11 and we're producing it. It's real low BTU gas, it's like  
12 600-BTU gas. The well makes probably about 40 MCF a day.  
13 So the Yates was productive there, but then I tried it in  
14 the Number 6 and the Yates was not productive.

15 Q. So the Yates has a little nitrogen in it?

16 A. Uh-huh, a lot of nitrogen in it, yeah.

17 Q. And what about the salt zone out here? What  
18 depth is it?

19 A. I'm not sure, I don't know. I hadn't really  
20 looked at that.

21 Q. It's a long ways up the hole.

22 A. Yeah. If it's -- Yeah.

23 Q. And on your AOR wells, how many wells are within  
24 a half mile, or -- just an estimate?

25 A. Probably about 15.

1 Q. Okay.

2 A. I had that on a C-108, but I don't have it right  
3 here.

4 Q. That's good enough.

5 A. Okay.

6 Q. The water that you're producing from the Queen,  
7 what TDS is that water, what quality is that water?

8 A. The water that we're producing -- we've been  
9 having Baker Chemicals keep an eye on that for us -- it's  
10 not too bad. It's got some solids in it, but it's really  
11 not the problem.

12 The problem is the water that I'm bringing in,  
13 and I don't have a good water source here and I'm having to  
14 truck in water. So you're ending up with water that's  
15 coming out of an open-top tank into a water truck and then  
16 coming over here, picking up a lot of oxygen and iron. And  
17 Baker is treating it, mainly trying to scavenge the oxygen  
18 and slick up and dissolve any iron sulfide or slick up  
19 whatever's there to just make it move out through the  
20 reservoir. But that's the main problem.

21 Q. Okay, thanks. And what's your injection-  
22 withdrawal ratio out here? If you can inject at 1100  
23 pounds or so, what would be your injection-withdrawal  
24 ratio? Or just -- roughly.

25 A. Yeah, we're putting -- make about 20 barrels of

1 water and 10 barrels of oil, so we've got about 30. And  
2 you know, the gas is -- probably my reservoir GOR is  
3 dropping down as I've reached some fill-up here -- but it  
4 would be 10 to 1.

5 Q. So where is that water going?

6 A. Well, at this point in time it's going out into  
7 the reservoir, still filling up the reservoir voidage.

8 Q. Okay --

9 A. Yeah, a lot of --

10 Q. -- going laterally somewhere else that --  
11 outside, at least, to bother anybody else?

12 A. I have not seen or heard of any indication from  
13 any of the surrounding operators.

14 Q. Okay. Do you have an idea of the directional  
15 permeability out here?

16 A. No, I do not. There was no cores ran, cut,  
17 whenever the wells were drilled, but -- from a physical  
18 standpoint like that.

19 But I do believe that it's probably a northeast-  
20 southwest permeability trend, because the Number 5 well  
21 appears to be seeing more response than the Number 6 or the  
22 Number 2. I always figured my Number 2 would be the first  
23 to respond because it's kind of in between my two injection  
24 wells. But it's Number 5 that's seeing the response, so  
25 I'm going to say it's a northeast-southwest trend.

1 Q. Okay. Do you have any initial shut-in pressures  
2 from acid breakdowns or anything on --

3 A. No, and the files that I received after -- when I  
4 acquired the property were pretty thin. I was looking for,  
5 like I say, the breakdown pressures or the fracture-  
6 treating reports, and there was none of that in the well  
7 files whenever I bought the property.

8 Q. Okay, your casing -- how old is your oldest  
9 casing out here?

10 A. These wells were drilled in, I think, 1982,  
11 1984 --

12 Q. Okay.

13 A. -- so they're fairly new.

14 Q. And how long do these casings last out here in  
15 the Queen? What do you think? Bad corrosion problems?

16 A. There doesn't seem to be, except where -- maybe  
17 you have some of these waterfloods over here at the Ballard  
18 Unit. I know that they had some casing problems. There  
19 were some other wells that I was looking at trying to  
20 acquire up to the north that were drilled in the 1960s, and  
21 they didn't seem to have any casing problems. These were  
22 cemented to surface, which should help us on the longevity  
23 of them.

24 Q. Yeah, okay. The current reservoir pressure, what  
25 do you think, out here?

1 A. The -- I'm guessing at about 300 or 400 pounds.

2 Q. So what's your bubble point then?

3 A. Well, I think that I had free gas in the  
4 reservoir at 1100 pounds, so -- it's kind of the way you  
5 look at the terms, but that was really the bubble point for  
6 that fluid at that point in time, because once I diminish  
7 any pressure there's going to be additional free gas break  
8 out of solution of that oil.

9 Q. Yeah.

10 A. You know, and actually it was below the bubble  
11 point, if you say bubble point is a point at which there is  
12 no free gas in the reservoir, and I haven't calculated  
13 that.

14 Q. Okay. So you've got clays in this. I notice  
15 your step-rate tests over time have risen, the frac  
16 pressure has risen?

17 A. Right, and I think that's an indication of  
18 reservoir pressure increasing over the last couple years,  
19 is what I attribute that to.

20 Q. And the slope is kind of -- it's not quite such a  
21 good break as it used to be?

22 A. Right, uh-huh.

23 Q. How about your surface controllers out here? How  
24 would you limit to make sure that you keep your wells at  
25 whatever the pressure allowable is?

1           A.    We have a shutoff at the injection pump at the  
2 facility, so a Murphy switch there.

3           Q.    Murphy switch --

4           A.    Yeah.

5           Q.    -- just shuts everything down?

6           A.    Shuts it all down.

7           Q.    Okay, and you keep it at the current allowable  
8 pressure and...

9                    Now, what kind of pumps do you have out here?

10          A.    We have one little Gas-O triplex pump.

11          Q.    Gas --

12          A.    Yeah, DB pump, plunger pump.

13          Q.    And looks like part of your problem out here is  
14 your water, consistency of your water supply coming in.

15          A.    Yes, and on that -- I think it was Exhibit 9, you  
16 can see that since February it has gotten better, February  
17 of '03.

18                    Originally I had a pipeline over to an offset  
19 unit that I was going to get my water from, and kind of in  
20 the middle of 2000, whenever I was getting ready to put  
21 this in, they shut in all their high water producers. So I  
22 lost my water source.

23                    So I've had to be trucking in water, and that's  
24 created a problem because sometimes those water haulers are  
25 -- you know, they'll bring in something not very good

1 that's not where you told them to bring it from, when it's  
2 late at night.

3 Q. Yeah. Okay, I know there's been some analogous  
4 Queen floods that pressures have been allowed to go a  
5 little higher than -- or right at frac pressure or a little  
6 higher.

7 Do you have any close by that you know about?

8 A. I had looked at the Ballard Unit and over at  
9 Yates' West Loco Hills Unit, and it looks like some of  
10 their injection pressures are in the 1100- to 1500-pound  
11 range. But as far as what their allowable was, I don't  
12 know.

13 We had looked at the -- Of course it's kind of  
14 far away, but Wiser had received some increased injection  
15 pressures over frac pressures, but I mean they're north and  
16 east of Loco Hills, and I'm south and west.

17 Q. Okay.

18 A. I don't know of anything nearby, real nearby.  
19 Then there was a Peach Exploration unit over at the West  
20 High Lonesome. It was a Penrose sand unit.

21 Q. How over is that, about how...

22 A. Oh, I think it's like 12 -- 10 or 12 miles,  
23 probably.

24 Q. Now, the Penrose is a member of the --

25 A. Queen --

1 Q. -- Queen.

2 A. -- section, yes.

3 Q. So the top of this Queen that you've got  
4 perforated here, is that the Penrose?

5 A. Yes. Yes, that's the Penrose.

6 Q. Okay, and your Queen you're perforating is the  
7 highest porosity, but it's also pretty dirty stuff, it  
8 looks like?

9 A. Uh-huh.

10 Q. What kind of clays are in that?

11 A. I don't know. I don't have samples. It's  
12 looking pretty dirty. And typically what we think is that  
13 these are radioactive sands that create that hot gamma-ray  
14 look, rather than clays mixed in with the sands.

15 Q. Okay. With the prices of products pretty good  
16 out here now, what kind of spacing do you have on your --  
17 on this flood here, per well, per producer? You've got 160  
18 acres here, right?

19 A. Yes, uh-huh.

20 Q. And how many producers do you have?

21 A. I've got three producers.

22 Q. Okay.

23 A. Three producers.

24 Q. Okay. And instead of going with the higher  
25 pressure, have you thought of converting some more wells to

1 injection and getting water in the ground faster that way?

2 A. If I had it all to do over again, I would have  
3 probably -- If you look at the map, it was almost set up to  
4 be a fivespot pattern the way it was originally drilled by  
5 the original operator. I have one well in the center,  
6 surrounded by four wells, and then the Number 1 kind of on  
7 the outside of that.

8 At this point in time I would have been better  
9 off if I would have converted all four of those wells.  
10 Theoretically an inverted fivespot will recover the same  
11 amount of oil as a fivespot pattern.

12 I was trying to minimize the amount of production  
13 loss whenever I converted the wells and minimize the amount  
14 of conversion costs by converting two wells instead of  
15 four, and so my up-front decisions have kind of come back  
16 to haunt me a little bit here. I'm afraid if I was to  
17 convert any of these other wells, I may not have a point to  
18 capture them -- capture any oil that I may move, is the  
19 problem.

20 EXAMINER JONES: Okay, I think we've hammered  
21 this long enough, and I appreciate you coming today.

22 THE WITNESS: Thank you.

23 EXAMINER JONES: I have no further questions.

24 MR. KELLAHIN: That concludes our presentation,  
25 Mr. Examiner.

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EXAMINER JONES: With that, let's take Case  
13,249 under advisement.

(Thereupon, these proceedings were concluded at  
9:20 a.m.)

\* \* \*

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the examiner hearing of Case No. \_\_\_\_\_  
heard by me on \_\_\_\_\_

\_\_\_\_\_, Examiner  
Oil Conservation Division

