BEFORE THE OIL CONSERVATION DIVISION EXAMINER HEARING APRIL 4, 2019

CASE No. 20353

SAN JUAN 28-6 UNIT 110

SAN JUAN & RIO ARRIBA COUNTIES, NEW MEXICO



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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL. RIO ARRIBA COUNTY, NEW MEXICO.

> CASE NO. 20353

AFFIDAVIT OF CHARLES CREEKMORE IN SUPPORT OF CASE NO. 20353

I, Charles Creekmore, being of lawful age and duly sworn, declare as follows:

1. My name is Charles Creekmore. I work for Hilcorp Energy Company ("Hilcorp")

as a Landman.

2. I have previously testified before the New Mexico Oil Conservation Division as

an expert witness in petroleum land matters. My credentials as a petroleum landman have been

accepted by the Division and made a matter of record.

3. I am familiar with the application filed by Hilcorp in this case, and I am familiar

with the status of the lands in the subject areas.

4. None of the affected parties in this case has indicated opposition, and therefore I

do not expect any opposition at the hearing.

5. Hilcorp seeks an exception to the well density requirements of Rule I.B of the

Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to complete and

simultaneously produce three Mesaverde gas wells in the same quarter section for a total of five

Mesaverde gas wells within the same standard 320-acre, more or less, spacing and proration unit.

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BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Exhibit No. A

Submitted by: Hilcorp Energy Co. Hearing Date: April 4, 2019

- 6. The Blanco-Mesaverde Gas Pool is governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. The Special Rules therefore limit the number of wells in a spacing unit to four and the number of wells in a half section within a spacing unit to two. The Special Rules also provide that well density exceptions can be approved only after notice and hearing.
- 7. Hilcorp is the operator of a standard 320-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of the W/2 of Section 25, Township 27 North, Range 6 West, Rio Arriba County, New Mexico, in which the following four wells are currently completed and producing:
 - a. San Juan 28-6 Unit 70 Well (API No. 30-039-06870), Sec. 25, T27N, R6W(Unit M);
 - b. San Juan 28-6 Unit 70A Well (API No. 30-039-21860), Sec. 25, T27N,R6W (Unit D);
 - c. San Juan 28-6 Unit 110M Well (API No. 30-039-27030), Sec. 25, T27N,R6W (Unit C); and
 - d. San Juan 28-6 Unit 110N Well (API No. 30-039-30729), Sec. 25, T27N, R6W (Unit N).
- 8. Hilcorp proposes to simultaneously dedicate and produce the following well within the same standard spacing and proration unit, at the following location:
 - a. San Juan 28-6 Unit 110 Well (API No. 30-039-82369), Sec. 25, T27N,R6W (Unit L).
- 9. This will be the fifth well within the same spacing unit with three wells in the same quarter section, exceeding well density limits imposed by the Special Rules.

- 10. Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule 1.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the San Juan 28-6 Unit 110 Well (API No. 30-039-82369) within the W/2 of Section 25, Township 27 North, Range 6 West, permitting the total number of wells dedicated and producing within this spacing and proration unit to five, with three wells in the same quarter section.
- 11. The proposed simultaneous dedication of the **San Juan 28-6 Unit 110 Well**, which is currently producing in the Dakota formation, within the Blanco-Mesaverde is part of Hilcorp's strategy to use existing wells completed in other zones to economically target development of incremental Mesaverde gas reserves in areas where there is not adequate gas drainage.
- 12. The Division has pre-approved downhole commingling the Dakota formation with the Blanco-Mesaverde Gas Pool.
- 13. Pursuant to the Special Rules and Division precedent, Hilcorp provided notice to all Division-designated operators in offsetting 320-acre spacing units. Where Hilcorp is the operator, Hilcorp identified all working interest owners in offsetting spacing units as affected parties requiring notice. In some offsetting spacing units, Hilcorp owns 100% of the working interest, in which case there are no affected parties to notice.
- 14. **Exhibit A-1** is an overview map identifying the location of the subject Blanco-Mesaverde Gas Pool spacing unit, in the green outline, within the W/2 of Section 25, Township 27 North, Range 6 West, to which the well will be simultaneously dedicated.
- 15. Exhibit A-1 also identifies the locations of the existing Mesaverde wells as gray circles, as well as the San Juan 28-6 Unit 110 Well as a gray triangle.

- 16. Exhibit A-1 also depicts the notice area comprised of the offsetting spacing units, which is the area within the red dashed line surrounding the subject spacing unit outlined in green. In this case, Hilcorp is the operator of the offsetting spacing units within the notice area.
- 17. **Exhibit A-2** identifies the affected parties within the offsetting spacing units who are required to be noticed. I provided a list of all affected parties requiring notice to Holland & Hart LLP. All parties were locatable.
- 18. To the best of my knowledge, the addresses used to provide notice are valid and correct addresses which have been recently used by Hilcorp and at which mail has been received by the notice parties.
 - 19. Exhibits A-1 and A-2 were prepared by me or under my direction and supervision.
 FURTHER AFFIANT SAYETH NAUGHT.

Charles Creekmore

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STATE OF TEXAS

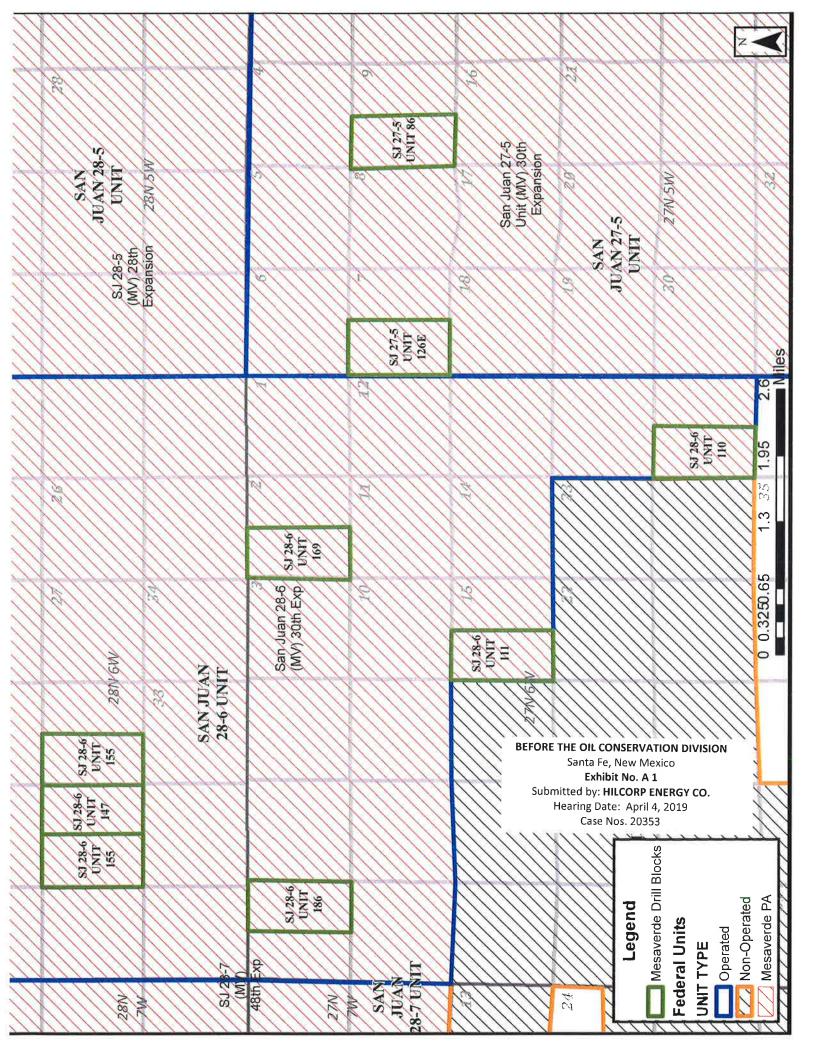
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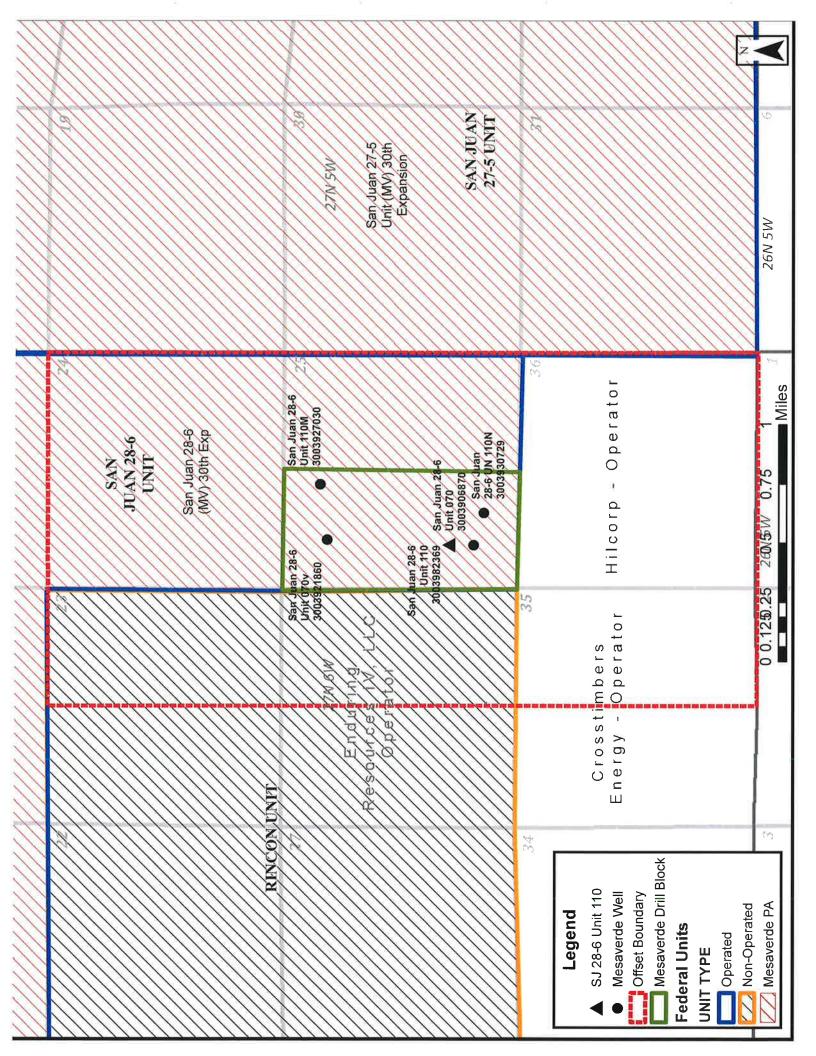
SUBSCRIBED and SWORN to before me this <u>2nd</u> day of April, 2019 by Charles Creekmore.

NOTARY PUBLIC

My Commission Expires:

CHANTELLE MESSA LABBIE
Notary ID #125987609
My Commission Expires
February 22, 2023





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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

CASE NOS. 20348 & 20349

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NOS. 20350-20363

AFFIDAVIT

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

Adam G. Rankin, attorney for **Hilcorp Energy Company** the Applicant herein, being first duly sworn, upon oath, states that the above-referenced Applications have been provided under the notice letters and proof of receipts attached hereto.

Adam G. Rankin

SUBSCRIBED AND SWORN to before me this 3rd day of April 2019 by Adam G. Rankin.

SEFORE THE OIL CONSERVATION DIVISION Santa Fe, New Mexico

Santa Fe, New Mexico
Exhibit No. B

Johnitted by: HILCORP ENERGY CO.

OFFICIAL SEAL

CLARINDA L. WETZSTEON

NOTARY PUBLIC

STATE OF NEW MEXICO

My Commission Expires: MAL 4 20 22

Submitted by: HILCORP ENERGY CO.
Hearing Date: April 4, 2019
Case Nos. 20353



Adam G. Rankin Phone (505) 988-4421 Fax (505) 983-6043 agrankin@hollandhart.com

March 15, 2019

VIA CERTIFIED MAIL CERTIFIED RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re: A

Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico.

Ladies & Gentlemen:

This letter is to advise you that Hilcorp Energy Company has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on April 4, 2019 and the status of the hearing can be monitored through the Division's website at http://www.emnrd.state.nm.us/ocd/. Division hearings will commence at 8:15 a.m. in Porter Hall at the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four business days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

If you have any questions about this matter, please contact Brad Pearson at (713) 289-2793.

Adam G. Rankin

ATTORNEY FOR HILCORP ENERGY COMPANY



Shipment Confirmation Acceptance Notice

Note to Mailer: The labels and volume associated to this form online, must match the labeled packages being presented to the USPS® employee with this form.

HEC 28-6 110 CM# 93904.0003 Notices 20190404 Docket Shipment Date: 03/14/2019 Shipped From: Name: HOLLAND & HART LLP Address: 110 N GUADALUPE ST # 1 City: SANTA FE

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State: NM

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^{*}Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

B. USPS Action

- Note to RSS Clerk:
 1. Home screen > Mailing/Shipping > More
 2. Select Shipment Confirm
- 3. Scan or enter the barcode/label number from PS Form 5630
 4. Confirm the volume count message by selecting Yes or No
 5. Select Pay and End Visit to complete transaction

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Federal Indian Minerals Office Attn: Maureen Joe 6251 College Blvd Suite B Farmington NM 87402	Delivered Signature Received
HARCO LIMITED PARTNERSHIP PO BOX 3716 ROSWELL NM 88202	Delivered Signature Received
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Jicarilla Oil & Gas Administration Attn Dir Guillermo DeHerrera Dulce Rock Road #6 Dulce NM 87528	Delivered Signature Received
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Affidavit of Publication

State of New Mexico County of Rio Arriba

I, Robert Trapp, being first duly sworn, declare and say I am the publisher of the Rio Grande SUN, a weekly newspaper published in the English language and having a general circulation in the County of Rio Arriba, State of New Mexico, and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 of the Session Laws of 1937. The publication, a copy of which is hereto attached, was published in said paper once each week for

consecutive weeks and on the same day
of each week in the regular issue of the paper
during the time of publication and the notice was
published in the newspaper proper, and not in an
supplement. The first publication being on the

al day of March, 2019

and the last publication on the ______day of

Advertisement has been duly made, or assessed as court costs. The undersigned has personal knowledge of the matters and things set forth in this affidavit.

Publisher's Bill

173	lines	one	time	at	<u>#</u>	131.10
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Affidavit \$5.00

Subtotal \$ 124.10

Tax \$ 11.27

Total \$137.37

Payment received at Rio Grande SUN

Date March 18, 2019

ву_____

Subscribed and sworn to before me this 21

day of Had A.D. 2019

OFFICIAL SEAL MARIA G CHAVEZ Notary Public

Notary Public

State of New Mexico

My Comm. Expires 19/2:120

Maria G. Chavez/Notary Public

My commission expires 21 October 2020

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

The State of New Mexico through its Oil Conservation Division hereby gives notice pursuant to law and the Rules and Regulations of the Division of the following public hearing to be held at 8:15 A.M. on April 4, 2019, in the Oil Conservation Division Hearing Room at 1220 South St. Francis, Santa Fe, New Mexico, before an examiner duly appoint for the hearing. If you are an individual with a disability who is in need of a reader, amplifier, qualified sign language interpreter, or any other form of auxiliary aid or service to attend or participate in the hearing, please contact: Florene Davidson at 505-476-3458 or through the New Mexico Relay Network, 1-

800-659-1779 by March 25, 2019. Public documents, including the agenda and minutes, can be provided in various accessible forms. Please contact Florene Davidson if a summary or other type of accessible form is needed.

STATE OF
NEW MEXICO TO:
All named parties and persons having any right, title, interest or claim in the following case and notice to the public.

(NOTE: All land descriptions herein refer to the New Mexico Principal Meridian whether or not so stated.)

TO: ALL WORKING INTEREST OWNERS IN THE SUBJECT SPACING UNIT AND OFF-SETTING OPERATORS OR LEASED MINERAL INTEREST OWNERS, INCLUDING: ROY G. & OPAL BARTON SR REV

TR; PROVIDENCE MIN-ERALS LLC; BP AMER-ICA PRODUCTION COMPANY; JABCO LLP; DUGAN PRODUC-TION CORP; OMIMEX PETROLEUM; T. H. MCELVAIN OIL & GAS LLLP; HARRINGTON **ENERGY RESOURCES** LP, HARRINGTON SAN JUAN LLC GP; HAR-RINGTON SOUTHWEST ENERGY LP, HARRING-TON SAN JUAN LLC GP; TAMACAM LLC c/o JAMES M. RAYMOND AFENT & AIF; LOR-RAYN GAY HACKER, HER HEIRS AND DE-VISEES; J&M RAY-MOND LTD, RAYMOND & SONS I LLC GEN PARTNER; RUTH ZIM-MERMAN TRUST: CHARLES W. GAY, HIS HEIRS AND DEVISEES: HARCO LIMITED PART-NERSHIP; TEMPE LIM-ITED PARTNERSHIP; TINMIL A NM LLC; THOMAS P. TINNIN, HIS HEIRS AND DEVISEES; MAR OIL & GAS COR-PORATION; NAVATEX ENERGY LP; CHAP-PELL FAMILY TR UTA JUNE 4 98; LANGDON D. HARRISON REVOC TRUST B; RIO ARIBA-GAS LTD; RIO ARRIBA LIMITED PARTNER-SHIP; TIERRA POBRE LLC: NEW MEXICO BUREAU OF LAND MANAGEMENT; NAVAJO NATION; NEW MEXICO STATE LAND OFFICE; HUERFANO CHAPTER HOUSE; JI-CARILLA OIL & GAS ADMINISTRATION; FED-ERAL INDIAN MINER-ALS OFFICE; JI-CARILLA AGENCY BIA. CASE 20353: Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, Rio Arriba County, New Mexico. Applicant in the above-styled cause seeks an order for an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (72319), Rio Arriba County, New Mexico, to permit it to complete and simultaneously produce five Mesaverde gas wells in the same standard 320acre, more or less, spacing and proration unit, with three wells in the same quarter section. Hilcorp further seeks approval for the proposed location of the San Juan 28-6 Unit 110 Well (API No. 30-039-82369) in the Mesaverde formation with a surface location in Unit L of the W/2 of Section 25, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, and authorization to simultaneously complete and produce the San Juan 28-6 Unit 110 Well from the Blanco-Mesaverde Gas Pool. Said area is located approximately 28 miles east of Bloomfield, NM. (Published March 21, 2019)

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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NO. 20353

AFFIDAVIT OF MICHELLE SIVADON IN SUPPORT OF CASE NO. 20353

Michelle Sivadon, being of lawful age and duly sworn, declare as follows:

1. My name is Michelle Sivadon. I work for Hilcorp Energy Company ("Hilcorp")

as a reservoir engineer.

2. I have previously testified before the New Mexico Oil Conservation Division as

an expert in reservoir engineering. My credentials as a reservoir engineer have been accepted by

the Division and made a matter of record.

3. I am familiar with the application filed by Hilcorp in this case and have conducted

an engineering study of the subject area and of the Blanco-Mesaverde Gas Pool.

4. As with Hilcorp's prior applications for well density exceptions in the Blanco-

Mesaverde Gas Pool, I used a decline curve analysis of existing wells to estimate ultimate

recoveries for the subject spacing unit under the existing well density. I then compared the

estimated ultimate gas recoveries against log-derived volumetric calculations for the original gas

in place with the cumulative gas production in the spacing unit. Using this approach, we

identified areas, including the subject spacing unit, that have substantial remaining recoverable

BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico **Exhibit No. C**

Submitted by: **HILCORP ENERGY CO.** Hearing Date: April 4, 2019

Case Nos. 20353

gas and lower-than-expected gas recoveries where additional well bores or well completions are necessary to adequately drain remaining gas reserves.

- 5. Exhibit C-1 contains information relating to the subject spacing unit and the San Juan 28-6 Unit 110 Well (API No. 30-039-82369) in Unit L of the W/2 of Section 25, Township 27 North, Range 6 West, which is the well Hilcorp proposes for simultaneous dedication within the Blanco-Mesaverde Gas Pool in this application. It is currently producing within the Dakota formation. It will be the third Mesaverde completion in the quarter section in the spacing unit. I anticipate that it will help drain the area to the north.
- 6. Exhibit C-2 is a basin-wide map reflecting Hilcorp's calculations for original gas in place across the Blanco-Mesaverde Gas Pool. The warmer colors represent areas where there is more original gas in place. The cooler colors indicate areas where there is less original gas in place. The red star indicates the location of the subject well in an area where we calculate moderately high volumes of original gas in place.
- 7. Exhibit C-3 is a map depicting the calculated estimated ultimate recovery (EUR) from the Blanco-Mesaverde Gas Pool and drainage radius. The larger radius circles reflect wells with higher EURs and larger drainage areas. The red star identifies the location of the subject well where there is relatively low EURs and the drainage radii are smaller.
- 8. Exhibit C-4 is a map depicting calculated remaining recoverable gas. The cooler colors indicate areas where there is relatively less remaining recoverable gas. The warmer colors reflect areas where there is relatively more remaining recoverable gas. The red star identifies the location of the subject well in an area where we calculate that there is relatively considerable remaining recoverable gas and relatively low EURs under the existing well density.

- 9. Exhibit C-5 is a table that supports this volumetric analysis. The first column titled "Volumetric OGIP" reflects the calculated volumetric original gas in place on a quarter section, section, and nine-section area basis around the subject spacing unit. The column titled "Section Equivalent OGIP" shows the estimated gas in place to show that the estimates are consistent across the area. The column titled "CTD/RF%" shows the cumulative gas production to date on a quarter section, section, and nine-section area basis and the calculated recovery factor. The column titled "Remaining GIP" shows the estimated remaining gas in place on a quarter section, section, and nine-section area basis. The last column titled "EUR/RF%" shows the estimated ultimate gas recovery and recovery factor calculated on a quarter section, section, and nine-section area basis.
- 10. I would expect recovery factors of approximately 70-80% in a gas pool of this type. The low recovery factors in Exhibit C-5 indicate that that is area is not being sufficiently drained by the existing wells in the subject spacing unit under the existing well density and that additional well bores, or completions, are necessary to adequately drain the Blanco-Mesaverde Gas Pool in this area.
- 11. Approval of Hilcorp's application is therefore necessary to drain unrecovered gas reserves that will otherwise be left in place under the existing well density.
- 12. In my opinion, granting this application will not impair the Blanco-Mesaverde Gas Pool, and will be in the interest of conservation, the prevention of waste and will protect correlative rights.
- 13. Exhibits C-1 through C-5 were prepared by me or under my direction and supervision.

FURTHER AFFIANT SAYETH NAUGHT.

Michelle Suadon

STATE OF TEXAS

COUNTY OF HARRIS

SUBSCRIBED and SWORN to before me this <u>2nd</u> day of April, 2019 by Michelle Sivadon.

Chancelle Down Fiblie NOTARY PUBLIC

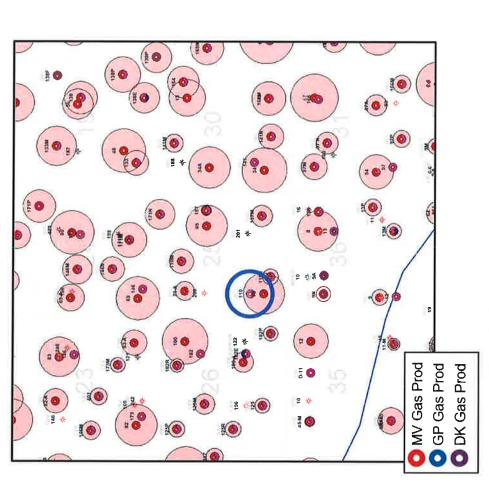
My Commission Expires:



12244209_1

San Juan 28-6 Unit 110





Well Specifics

- SW25 27-6 3003982369 1962 drill
- 3rd MV completion in 1/4 section
- 560' from nearest MV producer
- Help drain area to the north Complete MV in 1-2 stages

BEFORE THE OIL CONSERVATION DIVISION Santa Fe, New Mexico

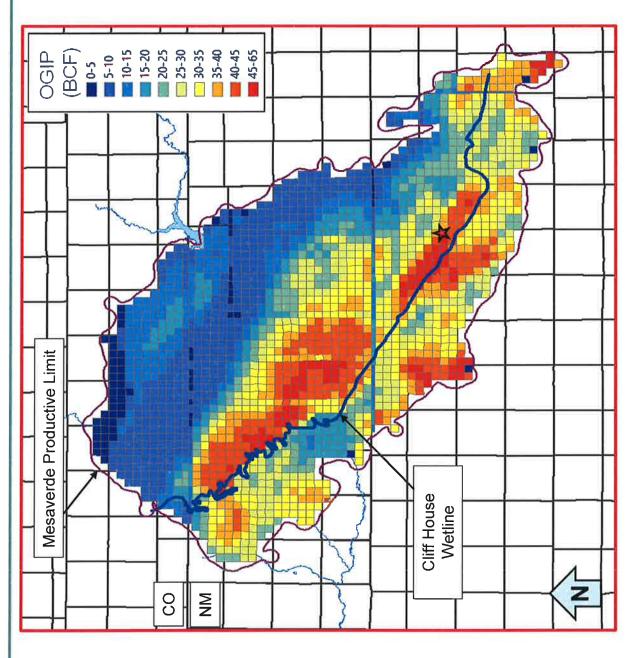
Santa Fe, INEW INIEXICO
Exhibit No. C1

Submitted by: HILCORP ENERGY CO. Hearing Date: April 4, 2019

earing Date: April 4, 2015 Case Nos. 20353

MV Original Gas In Place





BEFORE THE OIL CONSERVATION DIVISION

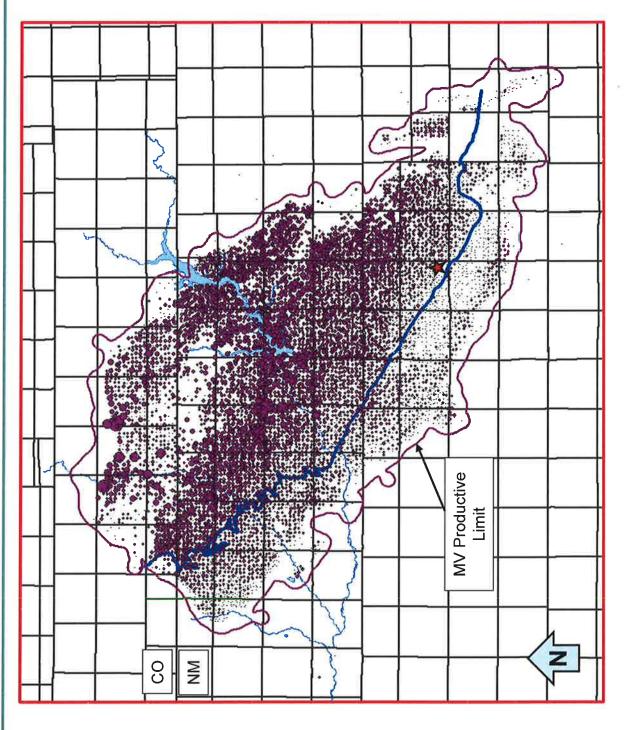
Santa Fe, New Mexico
Exhibit No. C2

Submitted by: HILCORP ENERGY CO.

Hearing Date: April 4, 2019 Case Nos. 20353

MV EUR and Drainage Radius



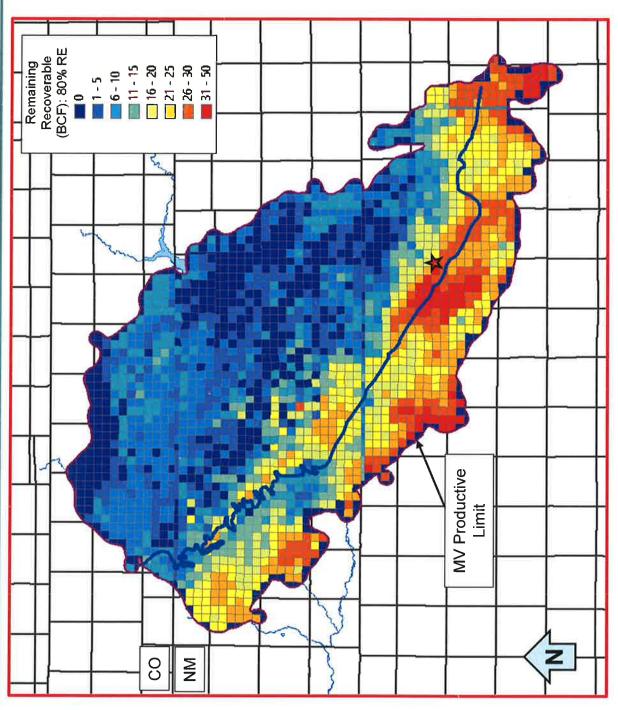


BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico
Exhibit No. C3
Submitted by: HILCORP ENERGY CO.
Hearing Date: April 4, 2019
Case Nos. 20353

MV Remaining Recoverable Gas





BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico
Exhibit No. C4
Submitted by: HILCORP ENERGY CO.
Hearing Date: April 4, 2019
Case Nos. 20353

San Juan 28-6 Unit 110



Reference Area	Volumetric OGIP	Section Equivalent OGIP	CTD/RF%	Remaining GIP	EUR/RF%
Qtr Section	12.3 Bcf	24.6 Bcf	3.1 Bcf / 25%	9.2 Bcf	3.9 Bcf / 32%
Section	45.0 Bcf	45.0 Bcf	7.6 Bcf / 17%	37.4 Bcf	9.4 Bcf / 21%
9 Section	416 Bcf	46.2 Bcf	66.0 Bcf / 16%	350.0 Bcf	85.0 Bcf / 21%

Remaining Gas in Place in Quarter Section of 9.2 Bcf

Cumulative Recovery Factor to Date 25% and 17% in the Quarter Section and Section, respectively

Considerable gas remaining in area with opportunity to recover additional volumes utilizing existing wellbore

BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Exhibit No. C5

Submitted by: HILCORP ENERGY CO.

Hearing Date: April 4, 2019

Case Nos. 20353