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2	FOR THE APPLICANT:	
3	JIM BRUCE P.O. Box 1056	
4	Santa Fe, NM 87504-1056	
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- 1 EXAMINER JONES: Now, let's start out on Page 2 of
- 2 the docket. Let's call Case 14735, application of Apache
- 3 Corporation for approval of a unit agreement in Lea County,
- 4 New Mexico. Call for appearances.
- 5 MR. BRUCE: Mr. Examiner, Jim Bruce of Santa Fe
- 6 representing the applicant. I have two witnesses.
- 7 EXAMINER JONES: Any other appearances?
- 8 (No response.)
- 9 EXAMINER JONES: Will the witnesses please stand and
- 10 state your names.
- MS. HANSON: Michelle Hanson.
- MR. McKAMEY: Keith McKamey.
- 13 EXAMINER JONES: All right. Will the court reporter
- 14 please swear the witnesses.
- 15 (Oath administered.)
- 16 MICHELLE HANSON
- 17 (Having been sworn, testified as follows:)
- 18 DIRECT EXAMINATION
- 19 BY MR. BRUCE:
- 20 Q. Would you please state your name for the record?
- 21 A. Michelle Hanson.
- Q. And where do you reside?
- 23 A. Midland, Texas.
- Q. Who do you work for and in what capacity?
- 25 A. I'm a landman for Apache Corporation.

- 1 Q. Have you previously testified before the Division?
- 2 A. Yes.
- Q. And were your credentials as an expert landman
- 4 accepted as a matter of record?
- 5 A. Yes.
- 6 Q. Are you familiar with the land matters involved in
- 7 this application?
- 8 A. Yes.
- 9 MR. BRUCE: Mr. Examiner, I would tender Ms. Hanson
- 10 as expert petroleum landman.
- 11 EXAMINER JONES: She is so qualified.
- 12 Q. Would you briefly summarize what Apache seeks in
- 13 this case?
- 14 A. Apache seeks approval of the Unit Agreement for the
- 15 West Tatum State Exploratory Unit, covering 4,440 acres of
- 16 state lands in Lea County.
- 17 Q. And what is Exhibit 1?
- 18 A. Exhibit 1 is the land plat showing the proposed unit
- 19 boundaries. If I may point out that for Exhibit 1 the tract
- 20 numbers have changed and the correct land plat is actually
- 21 attached as Exhibit A to the unit agreement.
- Q. Okay. But this does correctly show the outlines?
- 23 A. Yes, sir.
- Q. And then what is Exhibit 2?
- 25 A. Exhibit 2 is the unit agreement designating Apache

- 1 as the unit operator.
- Q. And is this on the form approved by the Commissioner
- 3 of Public Lands?
- 4 A. Yes, it is.
- Q. And in forms like this, all you do is fill in the
- 6 blanks, correct?
- 7 A. Yes.
- 8 Q. What is the unitized interval?
- 9 A. The unit agreement covers all depths.
- 10 Q. And what depth will the initial well test?
- 11 A. The initial well will test the Abo Formation.
- 12 Q. Now, looking at the unit agreement, Exhibit B to the
- 13 unit agreement, who are the working interest owners in the
- 14 unit?
- A. Apache Corporation and Perdernales Production LP,
- 16 both with a 50 percent working interest.
- 17 Q. And this agreement has been executed by Apache,
- 18 already?
- 19 A. Yes.
- 20 Q. Has Perdernales executed it or will be?
- 21 A. They have already.
- 22 Q. There are also several overriding royalty interest
- 23 owners listed in the exhibit. What is the status of their
- 24 ratification of the unit?
- 25 A. They have approved.

- Q. And has the unit agreement previously been submitted
- 2 to the land office?
- 3 A. Yes, it has.
- Q. And is the land office the only royalty owner in
- 5 this area?
- 6 A. Yes.
- 7 Q. Has the land office preliminarily approved the unit
- 8 agreement?
- 9 A. They have, and it is marked Exhibit 3.
- 10 Q. Because of the voluntary joinder of the interest
- 11 owners, does Apache control sufficient interest to give it
- 12 effective control of the unit area?
- 13 A. Yes.
- Q. And, in your opinion, will the granting of this
- 15 application be in the interest of conservation and the
- 16 prevention of waste?
- 17 A. Yes.
- 18 Q. Were Exhibits 1 through 3 prepared by you or under
- 19 your direction or compiled from company business records?
- 20 A. Yes.
- 21 Q. Does Apache request expedited approval of the unit
- 22 agreement?
- 23 A. We do.
- Q. And why is that?
- 25 A. We have a location staked and permitted, and we are

- 1 ready -- ready to drill it.
- 2 EXAMINER JONES: Ready to go.
- 3 MR. BRUCE: Mr. Examiner, if I may, I will e-mail
- 4 this to you, I have proposed a form of order based on the
- 5 prior Division orders.
- 6 EXAMINER JONES: Okay.
- 7 MR. BRUCE: As I said, I will e-mail that to you
- 8 when I get back to the office. I have no further questions
- 9 of the witness.
- 10 EXAMINER JONES: This -- say again -- Exhibit A has
- 11 been transformed into a new Exhibit A?
- 12 THE WITNESS: Exhibit -- well, the only difference
- is the tract numbers.
- 14 EXAMINER JONES: Tract, okay. So which one is
- 15 correct?
- 16 THE WITNESS: The one that is attached to the unit
- 17 agreement, which is Exhibit 2, the one attached as Exhibit B
- 18 to the unit agreement.
- 19 EXAMINER JONES: So Exhibit Number 1 is not correct?
- THE WITNESS: The outline is correct, just not the
- 21 tract number designations.
- 22 EXAMINER JONES: Okay.
- 23 THE WITNESS: And the reason I -- we did that is
- 24 when we met with the State Land Office, they requested that I
- 25 list in the Exhibit B, in order of the leases that were

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MR. BRUCE: Mr. Examiner, I tender Mr. McKamey as an

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expert petroleum geologist.

- 1 EXAMINER JONES: So qualified.
- Q. Mr. McKamey, I will basically ask you one question.
- 3 Could you identify Exhibit 4 and describe the geology and the
- 4 target zone in this area?
- 5 A. Sure. Exhibit 4 is composed of four pages, the
- 6 executive summary on the top. The second page is a double X
- 7 structure map. The third page is an Abo A Isoporosity Map,
- 8 and the fourth page is a cross section. It's a stratigraphic
- 9 cross section north to south.
- In the executive summary, I outline what the target
- 11 objective is. It's a tight, discontinuous interbedded
- 12 dolomite limestone interval within the Abo. I have listed
- 13 three wells surrounding and within the exploration unit. The
- 14 first well in Section 11 is outside the unit. There is an
- 15 old Morrow dry hole. No tests were taken in that well.
- 16 The second well listed in the executive summary is a
- 17 well within the unit in Section 26. It was completed as a
- 18 dry hole in 1956. There were five tests run. None of them
- 19 were economic.
- 20 And the third well listed in the executive summary
- 21 is a well to the southwest of the unit. It was completed in
- 22 1985. Three tests were run on that well, but no commercial
- 23 value was found in that well.
- If you will turn to the second page, which is the
- 25 structure map on the XX, it shows simple southeast dip to --

- 1 toward the basin. The XX marker is a common stratigraphical
- 2 marker we use to pick structure. It's about 150, 200 feet
- 3 below the zone of interest, but it's very near the zone of
- 4 interest.
- 5 You will see the cross section illustrated on both
- 6 this XX structure map, as well as the next map that I would
- 7 like for you to turn to. It's the Abo A Isoporosity Map.
- 8 There are only three wells, so there is not a whole lot of
- 9 control. The only thing I would like to point out is to the
- 10 east and off the map there is a limestone barrier, so we
- 11 anticipate that the dolomite zone is just updip from that
- 12 limestone barrier, and based on the control we have, we have
- 13 identified a potentially thick Abo interval that we want to
- 14 target with our first exploration well.
- The last page is a cross section of those three
- 16 wells. The well on the far left is the well on the north end
- 17 of the project. It's outside the unit in Section 11. The
- 18 well was pretty tight and non -- probably non-productive.
- 19 The well in the middle is the one within the unit. The three
- 20 yellow stringers at the very top is the Abo A we are
- 21 targeting. And the well on the far right is the well to the
- 22 south and west off the exploratory unit area, and that well
- 23 has dolomite porosity as well, so we think that that may
- 24 extend that far off the edge of the feature, but it basically
- 25 shows it's very discontinuous, and it's very tight carbonate

- 1 interval.
- Q. Looking back at the -- at the isoporosity map, does
- 3 that identify the initial well for the unit?
- A. It does. The well is in the west half west half of
- 5 26-12-35.
- 6 Q. And was it located there to keep it near the nearest
- 7 well control unit?
- 8 A. Absolutely.
- 9 Q. Is that right? In your opinion, will the granting
- 10 of this application be in the interest of conservation and
- 11 the prevention of waste?
- 12 A. Yes, it will.
- Q. And will the unit area and the drilling in the unit
- 14 area allow orderly development of this reservoir develops as
- 15 commercial --
- 16 A. Yes, it will.
- 17 Q. Was Exhibit 4 prepared by you or under your
- 18 supervision?
- 19 A. It was.
- MR. BRUCE: Mr. Examiner, I have no further
- 21 questions. And if I already didn't, I move the admission of
- 22 Exhibits 1 through 4.
- 23 EXAMINER JONES: Exhibits 1 through 4 will be
- 24 admitted.
- 25 (Exhibits 1 through 4 admitted.)

- 1 EXAMINER JONES: Where is the top of the Wolfcamp?
 2 THE WITNESS: The top of the Wolfcamp is typically
 - 3 at this top of the limestone interval, and it's marked in
 - 4 blue. It's a blue dashed line. And the well in the middle,
 - 5 it's right below those three yellow stringers, if you will
 - 6 notice.
 - 7 EXAMINER JONES: The blue dashed line on the --
 - 8 THE WITNESS: On the cross section.
- 9 EXAMINER JONES: On the cross section.
- 10 THE WITNESS: And it is identified on the side of
- 11 the log as the limestone -- Wolfcamp Limestone marker.
- 12 EXAMINER JONES: Okay. So is this Abo, or is it
- 13 Wolfcamp?
- 14 THE WITNESS: It's Abo.
- 15 EXAMINER JONES: It's definitely in the lower Abo?
- 16 THE WITNESS: Yeah. We intend to complete in that
- 17 upper zone above that Wolfcamp Limestone.
- 18 EXAMINER JONES: Okay.
- 19 THE WITNESS: Now, the Wolfcamp Limestone marker, I
- 20 might point out, is an industry term. It's not really tied
- 21 to paleo, so it's just a term that we use. In fact, the
- 22 Wolfcamp may be several hundred feet below that.
- 23 EXAMINER JONES: Okay. So all caps would agree with
- 24 this pretty much?
- 25 THE WITNESS: Certainly the Abo markers that I had

REPORTER'S CERTIFICATE

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I, IRENE DELGADO, New Mexico CCR 253, DO HEREBY

4 CERTIFY THAT ON September 29, 2011, proceedings in the

5 above-captioned case were taken before me and that I did

6 report in stenographic shorthand the proceedings set forth

7 herein, and the foregoing pages are a true and correct

8 transcription to the best of my ability.

9 I FURTHER CERTIFY that I am neither employed by nor

10 related to nor contracted with any of the parties or

11 attorneys in this case and that I have no interest whatsoever

in the final disposition of this case in any court.

13

WITNESS MY HAND this _____ day of October 2011.

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Expires: 12-31-201