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1	APPEARANCES FOR THE APPLICANT:	
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- 1 EXAMINER BROOKS: Okay. We call Case Number 14803,
- 2 application of Apache Corporation to amend Order R-13176 and
- 3 for a secondary recovery project, Lea County, New Mexico.
- 4 Call for appearances.
- 5 MR. BRUCE: Mr. Examiner, Jim Bruce of Santa Fe
- 6 representing the applicant. I have one witness.
- 7 EXAMINER BROOKS: Very good. Witness will stand and
- 8 identify yourself and be sworn.
- 9 MR. NELSON: John Nelson.
- 10 (Witness sworn.)
- MR. BRUCE: We only have one cross-section, and we
- 12 will give another copy to the court reporter.
- JOHN NELSON
- 14 (Sworn, testified as follows:)
- 15 DIRECT EXAMINATION
- 16 BY MR. BRUCE:
- 17 Q. Will you please state your full name and city of
- 18 residence?
- 19 A. John Nelson, Midland, Texas.
- Q. Who do you work for and in what capacity?
- 21 A. Apache Corporation as a petroleum engineer.
- Q. Have you previously testified before the Division as
- 23 an engineer?
- 24 A. I have.
- Q. And were your credentials as an expert accepted as a

- 1 matter of record?
- 2 A. They were.
- Q. Does your area of responsibility at Apache include
- 4 this area of southeast New Mexico?
- 5 A. Yes, it does.
- 6 Q. Are you familiar with the engineering matters
- 7 involved in this case?
- 8 A. Yes.
- 9 MR. BRUCE: Mr. Examiner, I tender Mr. Nelson as an
- 10 expert petroleum engineer.
- 11 EXAMINER BROOKS: He is so qualified.
- 12 Q. Mr. Nelson, could you summarize what Apache seeks in
- 13 this case?
- 14 A. We were -- we were approved doing a pilot secondary
- 15 recovery project in the Blankenship Well Number 2 back in
- 16 2009, and that would inject water into the Blinebry, Tubb and
- 17 Drinkard Formations, and now we are seeking to add the
- 18 Paddock Formation, which is just above the Blinebry, to the
- 19 injection permit.
- 20 MR. BRUCE: Mr. Examiner, just for making your file
- 21 complete, this is a copy of the original order.
- 22 EXAMINER BROOKS: Okay. That was Order Number
- 23 R-13176?
- MR. BRUCE: That's correct.
- 25 EXAMINER BROOKS: Okay. Go ahead.

- 1 Q. Now, this order was granted a while ago. Did --
- 2 take a step back -- did Apache commence injection into this
- 3 well?
- 4 A. We did. We did.
- 5 Q. Okay. What is Exhibit 1?
- 6 A. Exhibit 1 is a land plat showing the well. It's
- 7 highlighted on my exhibit. Should be highlighted on yours.
- 8 EXAMINER BROOKS: It doesn't appear to be.
- 9 THE WITNESS: Okay. It's in Section 12, Township 20
- 10 Range 38.
- 11 EXAMINER BROOKS: Okay. You've got -- Will has a
- 12 copy, so --
- 13 THE WITNESS: Okay.
- 14 A. It is in the northwest quarter of southwest quarter
- of Section 12, about 21 hundred feet from the south line,
- 16 about 550 feet from the west line, and that's the Blankenship
- 17 Number 2.
- 18 Q. Let's present a few exhibits to set up why Apache
- 19 needs to amend the order. As you said, this is -- this is an
- 20 older well, is it not?
- 21 A. It is.
- Q. And you did, after the last order, you did convert
- 23 the well to injection?
- 24 A. Yes.
- 25 Q. Could you identify Exhibit 2 and discuss the work

- 1 that was done on the well?
- A. Exhibit 2 is a wellbore diagram going all the way
- 3 back to when the well was spud in 1957, and it goes all the
- 4 way up to and includes the work we did to convert the well to
- 5 injection. The well was originally producing from the
- 6 Drinkard Formation. They came uphole and tried the Tubb in
- 7 1979 and squeezed it off. It doesn't look like they produced
- 8 much from the Tubb then. And in 2005 the previous operator,
- 9 Capataz Engineering, they came in and they perfed the Paddock
- and produced from the Paddock, and that's from depths 5946 to
- 11 6055.
- And then in 2007 the Tubb formation was opened and
- 13 produced, and the Drinkard was plugged off. So when we went
- into this well to convert it, we only wanted to inject into
- 15 the Blinebry, Tubb and Drinkard formations, but the Paddock
- 16 was open and the Drinkard was plugged off. So we fixed those
- 17 two, we squeezed off the Paddock perforations and we drilled
- 18 out the plug over the Drinkard.
- 19 And our original intention for this flood is to test
- 20 the feasibility of the Blinebry, Tubb, Drinkard flood and
- 21 House Field. We have several analogous Blinebry, Tubb
- 22 Drinkard plugs just to the south, and we think the House
- 23 Field might be a good candidate for waterflood as well.
- 24 However, after we converted the well to injection,
- 25 we never actually opened up the Blinebry perfs. The

- 1 Blinebry, up until this point, had never been produced from.
- 2 So we never went in and opened up the perfs. We were only
- 3 injecting into the Tubb and Drinkard.
- 4 Q. So the original order approved Blinebry, Tubb, and
- 5 Drinkard injections, but you did not open it up in the
- 6 Blinebry?
- 7 A. Yes, that's correct.
- Q. Let's turn to Exhibit 3 and discuss what happened
- 9 more recently in this well.
- 10 A. Exhibit 3 kind of details the events when we went in
- 11 to open up the Blinebry and to start injecting into that, and
- 12 along with the Tubb and the Drinkard. This was just a few
- 13 months ago in December -- and do you all have the right one?
- 14 I think -- yeah, that's it.
- 15 Q. Exhibit 3?
- 16 A. Yeah. We initially went in and we perfed and
- 17 acidized the Blinebry and selected intervals, and we
- 18 realized, when we did the acid job in the Blinebry, it
- 19 communicated up into the squeezed perfs in the Paddock, and
- 20 those sightly broke down; we lost pressure on the back side.
- 21 So it indicated that we have some kind of communication on
- 22 the back side, either behind the wellbore or out in the
- 23 reservoir between the Blinebry and Paddock Formations. And
- 24 we think a big reason for that is, when they perfed and
- opened up the Paddock in 2005, they fracked it.

- 1 And if I can just point you really quickly to -- I
- 2 believe it's Exhibit 7 or 8, and it shows the C-105 form in
- 3 which they --
- 4 O. The C-105 is Exhibit 7.
- 5 A. Exhibit 7, yeah. And it just shows on here that
- 6 they indeed fracked the Paddock. It was from 5946 to 6055
- 7 using 52,000 pounds of 20-40 sand, and we think this is the
- 8 primary cause for the communication between the Blinebry and
- 9 Paddock. So when we tried acidizing the Blinebry, it
- 10 communicated up to the Paddock, broke down the perfs. So we
- 11 went in and we sought to squeeze off the Paddock, again. We
- 12 had done this in 2009 when we converted this to injection,
- 13 but it broke down, so we did this again.
- And before doing that, we isolated the Blinebry
- 15 formation by placing a plug at the top of the Blinebry and
- 16 one below to isolate the Blinebry from the Paddock above and
- 17 the Tubb below. We went in and we squeezed off the
- 18 Blinebry -- sorry -- the Paddock perfs, and the squeeze was
- 19 successful. We tested it and went back in. We drilled out
- 20 the plug over the Blinebry, and the cement had gone into the
- 21 wellbore down into the Blinebry and the Tubb. So it had
- 22 communicated again back down to the Blinebry, and then the
- 23 Blinebry had communicated down to the Tubb. The Tubb was
- 24 fracked in 2007, so that was probably a big reason why.
- So we drilled out the plug over the Blinebry and

- 1 drilled out all the cement and realized the entire Blinebry
- 2 that we had just perfed and opened had been squeezed off. So
- 3 we went back in, re-perfed the Blinebry, re-acidized doing
- 4 the pinpoint injection job, and the Paddock perfs held that
- 5 time.
- 6 So we went back in, drilled out the plug over the
- 7 Tubb, realized the entire Tubb had been squeezed off, so we
- 8 drilled out all the cement in the Tubb, realized that the
- 9 Drinkard was still fine. None of the cement made it down to
- 10 the Drinkard, thank god. So currently, if I could point you
- 11 all to Exhibit 4 --
- 12 Q. And before you move on to that exhibit, the last two
- 13 pages of Exhibit 3 are simply the sundry notices that Apache
- 14 filed describing in more detail it's work.
- 15 A. Right.
- Q. And go ahead to Exhibit 4.
- 17 A. Exhibit 4 details the work that we did, and the
- 18 wellbore diagram on the left shows the current state of the
- 19 wellbore. So the Paddock is squeezed off, but the -- the
- 20 squeeze job is not holding, and the Tubb is squeezed off, so
- 21 currently we've got perfs in the Blinebry, and we've got
- 22 perfs in the Drinkard. And we went in -- we figured at that
- 23 point, okay, that's fine, let's just get the Blinebry and get
- 24 the Drinkard injecting. The Tubb, we'll come back to later
- 25 and re-perf it. So we had to test the back side, and, again,

- 1 the Paddock would not hold.
- 2 So at this point we spent up to about \$175,000, and
- 3 we have no assurance that in the future a squeeze job in the
- 4 Paddock is going to hold in the Paddock and that we wouldn't
- 5 get communication down to the Blinebry.
- Q. So, in short, you are requesting to be allowed to
- 7 inject into the Paddock in order to be able to inject
- 8 properly into the previously-approved zones?
- 9 A. Right. Yes.
- 10 Q. Let's move on to your next exhibit. In your
- 11 opinion, will the Paddock zone be harmed if you are allowed
- 12 to inject into it?
- 13 A. No, it shouldn't be. The Paddock in this area is
- 14 not productive; it's generally wet. There are no producing
- wells in this area, and Exhibit 5 shows a base map of the
- 16 area. If we even zoomed out from here, you would see there
- 17 is no Paddock production for a few miles in any direction.
- 18 But Exhibit 5 shows the base map, and the colored circles on
- 19 top of each well indicate which formations are present in
- 20 those wells, and it might have been present at some point in
- 21 the past or currently producing. Only -- as you can see,
- 22 only the Blinebry, Tubb, Drinkard, Abo, and San Andres
- 23 Formations are productive in this area. There is no
- 24 Paddock.
- 25 Q. Okay. And then Exhibit 6 is the cross-section,

- 1 correct?
- A. Exhibit 6 is the cross-section, and I think
- 3 something that -- the big point that we want to make is that
- 4 we don't intend to -- to sweep or do any kind of injection
- 5 into the Paddock. Again, it's mostly wet in that area.
- 6 There is no hydrocarbons to be produced or recovered in the
- 7 Paddock in this area. So it's only the Blinebry, Tubb,
- 8 Drinkard that are target formations to inject into, but
- 9 because the Paddock perfs aren't holding up, we need to put
- 10 the injection packer just above the Paddock perfs, and we
- 11 need a way to inject into the Blinebry, and the only way we
- 12 can do that is to include those Paddock perfs which are just
- 13 above it. But regardless, we are not going to be assured
- 14 that any of the water we are injecting into the Blinebry is
- 15 going to stay in the Blinebry because we have these fractures
- 16 between the two formations that were created back in 2005
- 17 when we fracked the Paddock.
- 18 So the cross-section, getting to that, shows on
- 19 here, I think we have the bottom of the San Andres near the
- 20 top, and then the Paddock, the Glorieta and Paddock are kind
- 21 a third of the way down from the top. That's -- the pink
- 22 line would be the Glorieta top, and the Paddock would be just
- 23 beneath that, and --
- Q. Mr. Nelson, we were discussing, what I would like to
- 25 emphasize is, will the water be contained from the top of the

- 1 Paddock in the well?
- A. We believe it will. As you can see, the depth scale
- 3 is on the left-hand side here. The Paddock in this area is
- 4 about 400 feet thick. We will be injecting our northern-most
- 5 point in the Blinebry. I believe it's 6178. So we have
- 6 hundreds of feet before we get up even to the top of the
- 7 Paddock. And from what you can make out in the cross-section
- 8 here is the Paddock in this area generally has some pretty
- 9 tight sections where there is some silt and clay areas where
- 10 it will probably prevent any water moving all the way through
- 11 the Paddock potentially up into the San Andres. We don't
- 12 think that will happen. Even if it did -- going back to the
- 13 base map -- there are a handful of San Andres producers in
- 14 this immediate area, we operate all of them. None of them
- 15 are big producers at all, but, again, we don't think any of
- 16 the water will get out of the Paddock at all.
- 17 Q. And again, Exhibit 7 is just the C-105 for the well,
- 18 when it was completed for a shorter period of time in the
- 19 Paddock, correct?
- 20 A. Yes.
- Q. Now, up in the upper, right-hand corner, it says,
- 22 "House, Blinebry," but these depths are definitely Paddock
- 23 depths.
- A. They are definitely Paddock. We went back through
- 25 and I believe Paul Koutz verified these are part of the

- 1 Paddock. They were incorrectly identified as Blinebry when I
- 2 did this.
- Q. Again, even though you are adding the Paddock to
- 4 this zone, the water will be -- the water will be confined
- 5 into the injection?
- 6 A. That's right.
- 7 Q. What is Exhibit 8?
- A. Exhibit 8 here is the C-108 form. This is the new
- 9 C-108 that asked to include the Paddock as a formation to
- 10 inject into.
- 11 Q. And obviously a C-108 was also presented to the
- 12 Division when the original application was presented?
- 13 A. Correct.
- Q. Does this application change any material aspect of
- 15 the injection program?
- 16 A. It shouldn't. I know that currently we're
- 17 injecting -- or before we had the issues with the Blinebry, I
- 18 believe we were injecting at around 2000 PSI, and we had done
- 19 a step rate test after we converted the well to injection,
- 20 and we got the maximum injection pressure increased. So now
- 21 that we have the Blinebry, if we are -- if we are able to
- 22 eventually inject back into all three zones, the BTD, at the
- 23 same time, I imagine we'll be doing another step rate test to
- 24 see what kind of max pressures we can get before we fracture
- 25 the rock.

- Q. But the injection volume will remain the same as
- 2 previously?
- 3 A. They should.
- Q. And does the C-108 contain the usual data on fresh
- 5 water in the area and water analyses?
- 6 A. Yes.
- 7 Q. And just again as a reminder, what is the overall
- 8 focus of this pilot project?
- 9 A. Really, it's to test the injectivity and the
- 10 feasibility of the waterflood in the Blinebry, Tubb, and
- 11 Drinkard Formations in House Field. Like I said, we have a
- 12 few analogous BTD waterfloods just to the south here in the
- 13 Blinebry Drinkard units, it's the Web -- and just to north of
- 14 that is the Warren Unit, which is an existing Blinebry,
- 15 Drinkard floodwater as well. The rock in the House Field,
- 16 the quality of the rock kind of diminishes as you move
- 17 northeast from the Blinebry Drinkard Units, so this is a
- 18 pilot to see if it's going to be feasible or not.
- 19 O. Were all the offset interest owners and surface
- 20 owners where the well is located notified of this
- 21 application?
- 22 A. They were.
- Q. And is that reflected in Exhibit 9?
- 24 A. Yes.
- Q. Now, when you turn to the third page of Exhibit 9,

- 1 there is interest ownership set up by tract. Where did this
- 2 data come from?
- A. This came from our land department.
- Q. And have you discussed the info on this exhibit with
- 5 the land department?
- 6 A. I have.
- 7 Q. And a lot of these data -- a lot of this data comes
- 8 from leases operated by Apache, does it not?
- 9 A. Yes.
- 10 Q. So you have Division order files on these interest
- 11 owners?
- 12 A. Yes, we do.
- Q. On the non-operated Apache tracts, did you send --
- 14 did Apache send out a landman to check the pertinent county
- 15 records?
- 16 A. We did.
- 17 MR. BRUCE: Mr. Examiner, considering how many
- 18 notices I sent out, I didn't get any back. There are -- the
- 19 last three pages of the exhibit show that notice was left at
- 20 certain of these people, which they are the correct
- 21 addresses, they just weren't picked up. But none of the
- 22 notices came back as undeliverable.
- Q. In your opinion, Mr. Nelson, will the granting of
- 24 this application be in the interest of conservation and
- 25 prevention of waste?

- 1 A. Yes.
- Q. Now, looking at the exhibits, Exhibit 6, the -- the
- 3 cross-section, who prepared that?
- A. This was prepared by our geologist that's on my team
- 5 who resides over in Lea County, New Mexico.
- 6 Q. Who is that?
- 7 A. Bob Johnson.
- 8 Q. And did you review that exhibit with him so that you
- 9 were confident of the results of that?
- 10 A. I did.
- 11 Q. And Exhibit 8 was prepared by somebody in your
- 12 regulatory department?
- 13 A. Yes.
- Q. Beverly Hatfield?
- 15 A. That was Beverly Hatfield.
- 16 Q. Did you review the exhibit and do you agree with the
- 17 contents set forth in Exhibit 8?
- 18 A. I did, and I do.
- 19 Q. Were the remaining exhibits either prepared by you
- 20 or under your supervision or compiled from company business
- 21 records?
- 22 A. Yes, they were.
- MR. BRUCE: Mr. Examiner, I move the admission of
- 24 Apache Exhibits 1 through 9.
- 25 EXAMINER BROOKS: 1 through 9 are admitted.

- 1 (Exhibits 1 through 9 admitted.)
- 2 MR. BRUCE: And I have no further questions of the
- 3 witness.
- 4 EXAMINER BROOKS: Very good. Mr. Jones?
- 5 EXAMINER JONES: Okay, Mr. Nelson, have you had any
- 6 results to date from the injection?
- 7 THE WITNESS: No, we haven't. We really haven't.
- 8 I've looked at the pattern plots from the surrounding wells,
- 9 and we haven't seen much of a response yet. I think a big
- 10 reason for that is because we haven't been injecting into the
- 11 Blinebry, which is one of the target formations, as much a
- 12 target formation as the Drinkard would be. The Tubb in this
- 13 area isn't as big of a play as far as the recovery goes, but
- 14 we think a big part is the fact that we have not been able to
- 15 inject into the Blinebry.
- 16 EXAMINER JONES: Okay. But basically do -- were you
- the one presenting this in 2009?
- 18 THE WITNESS: I wasn't.
- 19 EXAMINER JONES: Do you agree with the feasibility
- 20 of the water play in these reservoirs?
- THE WITNESS: I do, absolutely do.
- 22 EXAMINER JONES: But why?
- 23 THE WITNESS: There is sufficient amount of oil in
- 24 place, unrecovered oil --
- 25 EXAMINER JONES: Okay.

- 1 THE WITNESS: -- that would definitely be
- 2 recoverable by secondary, and I think, with all the different
- 3 leases that we have in the area, that this is -- this entire
- 4 area is just prime for unitization should the waterflood
- 5 work, but we have no reason to believe that it wouldn't work
- 6 given the success of the waterflood to the southwest.
- 7 I said the rock quality isn't as good, and,
- 8 relatively speaking, it's not as good as the Blinebry
- 9 Drinkard Units, but it's still very well sufficient for a
- 10 waterflood.
- 11 EXAMINER JONES: Wouldn't it be better to use a
- 12 regular pattern instead of inverted?
- 13 THE WITNESS: It would.
- 14 EXAMINER JONES: You would see results faster.
- 15 THE WITNESS: I agree, and we actually intend to
- 16 expand the pilot here.
- 17 EXAMINER JONES: In this case you might tell
- 18 directional permeability, though.
- 19 THE WITNESS: We could, and I haven't noticed any
- 20 myself, but I think we would notice that. In general, in
- 21 this area, I think we see, as far as the fracture, the
- 22 natural fracture point goes, it's northwest to southeast, but
- 23 I agree with you that we should expand the waterflood a
- 24 little bit and that a normal five spout would be better than
- 25 inverted.

- 1 EXAMINER JONES: Another way to recover more is to
- 2 drill more wells, though. Do you think that's -- competing
- 3 with that method, with waterflooding method, what do you
- 4 think?
- 5 THE WITNESS: Last year in 2011 we drilled probably
- 6 eight wells in the House Field, and they are all on varying
- 7 density, well density anywhere from 10 to 40 acres, and the
- 8 results that we have seen going down to 10, 20 acres in this
- 9 area might be a little difficult. We think it's possible
- 10 further south in the Blinebry Drinkard units. In fact, we
- 11 are doing a pilot waterflood right now, but I think -- I
- 12 think waterflood here with our -- the oil in place that we
- 13 have is a good opportunity.
- 14 EXAMINER JONES: So ultimate primary, what do you
- think is out here as a percent of the original oil in place?
- 16 THE WITNESS: Anywhere from 8 to 14. That's kind of
- 17 like the typical gas for the Permian.
- 18 EXAMINER JONES: Okay.
- 19 THE WITNESS: Yeah.
- 20 EXAMINER JONES: And I didn't see what you might
- 21 expect from the secondary. A little less than that, maybe?
- 22 THE WITNESS: I think so. Probably, I think an
- 23 ratio may be five to one, so anywhere from maybe five, so if
- 24 we get lucky, maybe 10 percent extra.
- 25 EXAMINER JONES: Did you look at the cement that was

- 1 pumped from this well and try to figure out why?
- THE WITNESS: We could not find any cement bond logs
- 3 for this well, for whatever reason, but we looked around,
- 4 there was a group of us, and we could not come across a
- 5 cement bond log.
- 6 EXAMINER JONES: But the actual cement that was
- 7 pumped at this depth and temperature and for a while there
- 8 you couldn't get oil field cement, so was that a factor, you
- 9 think?
- 10 THE WITNESS: I would say probably not just because
- 11 we use the same kind of cement everywhere we do squeeze jobs.
- 12 We probably do a handful each week just around the Permian
- 13 Basin just for Apache, and we haven't had this kind of issue
- in any of our other wells that I know of. And then, even if
- 15 the cement was the issue, we would still have the issue of
- 16 the fracture that we created out in the formation.
- 17 EXAMINER JONES: Speaking of that, each one of these
- 18 has to be fractured, probably, and do you have any idea of --
- 19 is there any results from your melting pot of whether it
- 20 fracked up or fracked -- or screened out, or -- I mean
- 21 what --
- THE WITNESS: No. We -- we really have no idea.
- 23 This was in 2005. It was a different operator that did that,
- 24 and, as far as I know, they didn't do any kind of injection
- or analysis to see what kind of spread or length they got.

25