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1	АРРЕ	A R A N C E	S	
2	For the Applicant			:
3	SETH McMILLAN, ESQ. Montgomery & Andrews	Law Firm		
4	325 Paseo de Peralta			
5	Santa Fe, New Mexico (505) 982-3873 smcmillan@montand.cor			
6				
7	I N	DEX		
8	CASE NUMBER 15398 CALLED BC OPERATING, INC.			
9	CASE-IN-CHIEF:			
10	WITNESS DEANE DURHAM			,
11		Direct	Redirect	Further
12	By Mr. McMillan	5	REGIFECE	raremer
13	EXAMINATION			
14	Examiner Goetze	12		
15				
16	WITNESS BILLY MOORE			
17	By Mr. McMillan	Direct 12	Redirect	Further
18	EXAMINATION			
19	Examiner Goetze Examiner Jones	20 20		
20				
21	WITNESS ART CARRASO			
			Redirect	Further
22	By Mr. McMillan	22		
23	Examiner Goetze	EXAMINAT: 30	ION	
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- 1 (Time noted 3:00 p.m.)
- 2 EXAMINER JONES: We have one more case on
- 3 the docket. Let's call case 15398, the Application of
- 4 BC Operating, Inc., for Authorization to Inject, Lea
- 5 County, New Mexico.
- 6 Call for appearances.
- 7 MR. McMILLAN: Mr. Examiner, Seth McMillan,
- 8 Montgomery and Andrews, on behalf of BC Operating, Inc.
- 9 I have some exhibits, if I may approach.
- 10 EXAMINER JONES: Any other appearances? Did
- 11 the other parties dissolve in this case?
- 12 EXAMINER GOETZE: No. We will make note
- 13 that this was a protested well application, that the
- 14 protestant dropped it, but we continued on with
- 15 hearing -- well, Amtex made an appearance, but we wanted
- 16 to hear this case since there were issues concerning
- 17 what was submitted in application.
- 18 EXAMINER JONES: Okay.
- MR. McMILLAN: In brief, we are here to
- 20 address the concerns of Mr. Goetze two weeks ago. And
- 21 we have three witnesses today. On first blush, that may
- 22 sound like a bit of overkill. I promise to keep my
- 23 examinations short and sweet, and then turn the
- 24 witnesses over to you for questions. And,
- 25 importantly, BC Operating wanted to make sure that there

- 1 were no questions unanswered or concerns unaddressed
- 2 today, so we brought along the three principals
- 3 involved in developing the revised plan for the subject
- 4 well.
- 5 EXAMINER JONES: All right. Will the
- 6 witnesses please stand and the court reporter swear the
- 7 witnesses.
- 8 (WHEREUPON, the presenting witnesses
- 9 were administered the oath.)
- 10 MR. McMILLAN: I would call our first
- 11 witness, Deane Durham.
- 12 DEANE DURHAM
- 13 having been first duly sworn, was examined and testified
- 14 as follows:
- 15 DIRECT EXAMINATION
- 16 BY MR. McMILLAN:
- Q. Would you please state your full name and place
- 18 of residence.
- 19 A. My name is Deane Durham, Midland, Texas.
- Q. And by whom are you employed and in what
- 21 capacity?
- 22 A. I am a petroleum engineer employed by BC
- 23 Operating in the capacity of the drilling engineer of
- 24 the company.
- 25 Q. Are you authorized to testify today on behalf of

- 1 BC Operating?
- 2 A. I am.
- 3 Q. Have you previously testified before the Division
- 4 or one of its examiners and had your credentials
- 5 accepted and made a matter of record?
- 6 A. Yes. Several years ago, I testified in this room
- 7 for a Palo Petroleum as a petroleum engineer.
- Q. Are you familiar with the application filed in
- 9 this case?
- 10 A. Yes.
- 11 Q. Are you familiar with the lands that are the
- 12 subject of this application?
- 13 A. Yes, I am.
- MR. McMILLAN: Mr. Examiner, I would tender
- 15 Mr. Durham as an expert petroleum engineer.
- 16 EXAMINER JONES: He is so qualified.
- Q. Mr. Durham, is it your understanding that at the
- 18 October 29th hearing in this matter the Hearing Examiner
- 19 had some concerns about the cementing and casing program
- 20 for this well?
- 21 A. That is my understanding, yes.
- Q. And has BC Operating had the opportunity to take
- 23 those concerns into consideration and revise the plan
- 24 for this well?
- 25 A. We have.

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- 1 Q. And have you been involved directly in this
- 2 process?
- 3 A. Yes, I have.
- 4 Q. And what has been -- just briefly, what has been
- 5 your role?
- A. My main focus was to examine the existing P and A
- 7 wellbore and study it for pressure integrity and for
- 8 concerns between the Capitan Reef and our zone of
- 9 interest for saltwater disposal.
- 10 Q. Let's take a look at your Exhibit 21.
- MR. McMILLAN: And, Mr. Hearing Examiner, we
- 12 are numbering our exhibits today beginning with Exhibit
- 13 21, as the last exhibit of the October 29th hearing was
- 14 Exhibit 20. And we may be referring back to exhibits
- 15 tendered and accepted at the October 29th hearing.
- I have a couple of copies in front of me, if
- 17 need be.
- 18 EXAMINER JONES: I am sure Mr. Goetze has
- 19 one.
- 20 EXAMINER GOETZE: Probably it's going to end
- 21 up with me, so proceed and we will share if we need.
- MR. McMILLAN: Okay. Thank you.
- Q. Looking at Exhibit 21, can you begin by
- 24 identifying for us the proposed injection zone?
- 25 A. Yes. So the illustration, Exhibit 21, is a

- 1 wellbore diagram I drew. And it shows the wellbore
- 2 where it will be after BC Operating cleans out to 8299
- 3 minus.
- 4 And the saltwater zone picked by our geologist
- 5 who was here two weeks ago is from 5,790 feet at the top
- 6 and 6,970 feet at the bottom. Again, this depicts where
- 7 we clean out and prior to running a full suite of cement
- 8 bond logs and examination logs.
- 9 Q. Can you point out on this diagram where the
- 10 Capitan Reef has been identified by geologist Mike
- 11 Moylett?
- 12 A. Yes. The geologist also identified the top and
- 13 bottom of the Capitan Reef, the top being at 4,105 feet,
- 14 the bottom being at 5,030 feet.
- 15 Q. Can you briefly summarize for us what you -- what
- 16 BC Operating understood the Examiner's concerns to be on
- 17 October 29th?
- 18 A. The Examiner was concerned about a hole in the 9
- 19 and 5/6ths casing, the intermediate casing.
- 20 And as noted on Exhibit 4, page 5 and a sundry
- 21 notice, it did say they were running the scab liner to
- 22 repair a hole in the 9 and 5/8ths casing. And they did
- 23 so to repair that.
- Q. Have you identified on this diagram where you
- 25 believe the most likely spot for this hole could be

- 1 located?
- 2 A. I have. I used the original well surveys, which
- 3 is Exhibit 122, from the well. And by examining that I
- 4 saw a trend of increasing angle in the hole up to four
- 5 and three quarter degrees at 4378.
- And then by them drilling ahead with that angle
- 7 in the hole -- and shortly after that, within the next
- 8 150 feet or so, it dropped of pretty drastically back to
- 9 almost a vertical well.
- 10 So we feel like subsequent drilling in the area
- 11 and the rubbing of the drill pipe on the casing, the
- 12 most likely spot for that hole would be at or near 4378,
- 13 probably within that depth or slightly -- maybe 100 or
- 14 150 feet below that. In general, that's where the hole
- 15 is we feel.
- Q. And is that identified in red on Exhibit 21?
- 17 A. It is. It is identified in red at 4378, and it
- 18 is within the Capitan Reef.
- 19 Q. Is this generally the area of concern that BC
- 20 Operating focused on in developing a revised plan for
- 21 the cementing and casing of this well?
- 22 A. It is. Because of those concerns we were --
- 23 well, No. 1, wanted to isolate the zonal integrity, the
- 24 pressure integrity of the existing wellbore. And then
- 25 we have a plan going forward -- that will be addressed

- 1 to the other two witnesses -- of how to remedy this and
- 2 remediate it.
- 3 Q. Is it your understanding that there was also a
- 4 concern about a possible 6-foot gap and can you explain
- 5 -- can you address that concern?
- 6 A. Yes.
- Also on Exhibit 4, page 5, there is a mention of
- 8 setting the scab liner, the 7 and 5/8ths scab liner at
- 9 at 4939 feet, cementing it in place. And then it went
- 10 on. The last line of that sundry notice says, Tested
- 11 the casing and seal on top of casing to 2,500 pounds and
- 12 held okay.
- We have also included Exhibit 23, which is a
- 14 boeing seal assembly, a packer and seal assembly. They
- 15 were common to run back then in these cases, they would
- 16 have, on that same sundry, page 5 of Exhibit 4, the
- 17 first line says ream to 9 and 5/8ths casing.
- 18 They run probably a mil or a billion there and
- 19 dress the top of that existing liner off and then run
- 20 the seal assembly. And they would offset, set above the
- 21 existing top of the liner and pump their cement job,
- 22 which it says they did.
- And at that point, they would have set down in
- 24 it, set the packer and the seal assembly, the lead seal
- 25 on that. And it did mention they tested that lead seal

- 1 after that 2,500 pounds.
- 2 So we feel that 4,939 foot, it appeared there
- 3 might be a six-foot gap between the top of the liner and
- 4 the bottom of that scab liner. We feel like that's not
- 5 the case. So we feel like it's a seal and a pressure
- 6 integrity there.
- 7 Q. Whether or not this six-foot gap does indeed
- 8 exist, is it your understanding that the revised plan
- 9 for this well would address that problem if it is, in
- 10 fact, a real problem?
- 11 A. Yes. We are concerned about those same things,
- 12 the hole in the casing mentioned and the age of the
- 13 casing. So we feel like our plan going forward does
- 14 address that and does provide integrity for the wellbore
- 15 going forward.
- 16 Q. And our subsequent witness is going to speak with
- 17 specificity to the BC Operating plan for this wellbore?
- 18 A. They will.
- 19 O. Were Exhibits 21 through 23 prepared by you or at
- 20 your direction and were they found in the well file for
- 21 this well in the OCD records?
- 22 A. They were.
- MR. McMILLAN: Mr. Hearing Examiner, I would
- 24 tender at this time exhibits -- move for the admission,
- 25 rather, of Exhibits 21 through 23.

- 1 EXAMINER JONES: Exhibits 21 through 23 are
- 2 admitted.
- 3 (BC OPERATING INC. EXHIBITS 21 through 23
- 4 were offered and admitted.)
- 5 MR. McMILLAN: And that's all I have on
- 6 direct for Mr. Durham.
- 7 EXAMINATION BY EXAMINER GOETZE
- 8 EXAMINER GOETZE: Since it's my case, I will
- 9 say that I have no more questions or any questions for
- 10 you. With the evidence provided in the exhibits you've
- 11 addressed a lot of my questions. And we will see what
- 12 the subsequent witnesses present, so no further
- 13 questions for you as a witness.
- 14 THE WITNESS: Thank you.
- 15 EXAMINER GOETZE: Thank you.
- MR. McMILLAN: I call our next witness,
- 17 Billy Moore.
- 18 BILLY MOORE
- 19 having been first duly sworn, was examined and testified
- 20 as follows:
- 21 DIRECT EXAMINATION
- 22 BY MR. McMILLAN:
- Q. Mr. Moore, would you please state for the record
- 24 your full name and place of residence.
- 25 A. Billy Steven Moore, Odessa, Texas.

- 1 Q. By whom are you employed and in what capacity?
- 2 A. I am employed by BC Operating as a petroleum
- 3 engineer.
- 4 Q. Are you authorized to testify today on behalf of
- 5 BC Operating?
- 6 A. Yes.
- 7 Q. And have you previously testified before the
- 8 Division or one of its examiners and had your
- 9 credentials accepted and made a matter of record?
- 10 A. Yes. At the beginning of this case.
- 11 Q. And that, in fact, took place on October 29th?
- 12 A. Yes.
- Q. Are you familiar with the application filed in
- 14 this case?
- 15 A. Yes.
- 16 Q. And are you familiar with the lands that are the
- 17 subject of this application?
- 18 A. Yes.
- MR. McMILLAN: Mr. Hearing Examiner, I
- 20 tender Mr. Moore as an expert petroleum engineer.
- 21 EXAMINER JONES: He is so qualified.
- Q. Mr. Moore, let's first look at your Exhibit 24.
- 23 Is this a revised area of review diagram showing your
- 24 half mile area of review and neighboring wells?
- 25 A. Yes. Last time it was a larger graph. And I

- 1 knew the examiners would like a more accurate and
- 2 focused picture, so we zoomed in and made this half-mile
- 3 radius AOR. Nothing has changed on it in what wells are
- 4 inside of the half mile, because it's the same half
- 5 mile.
- 6 Q. So this exhibit was developed, essentially, at
- 7 the request of the Examiner at the October 29th hearing
- 8 for a less cluttered AOR diagram?
- 9 A. Yes.
- 10 Q. And is this intended to replace or to supplement
- 11 BC Operating's Exhibit 1?
- 12 A. Yes.
- Q. Now, you'll recall that at the October 29th
- 14 hearing, the examiners had some concerns about the
- 15 cementing and casing program for this well, correct?
- 16 A. Yes.
- 17 Q. You have taken the opportunity to examine these
- 18 concerns and revise the plan for the cementing and
- 19 casing of this well?
- 20 A. Yes.
- 21 Q. Let's look at your Exhibit 25. Is Exhibit 25 a
- 22 revised version of what was previously pages 15 to 17 of
- 23 BC Operating's C-108?
- 24 A. Yes, it is.
- 25 Q. And to be clear, the C-108 was Exhibit 3 at the

- 1 earlier hearing, correct?
- 2 A. Yes.
- Q. Let's go ahead and explain to the Examiners the
- 4 changes that BC Operating is proposing to its original
- 5 cementing and casing plan for the Pearson well; are
- 6 there a total of five changes; is that correct?
- 7 A. A total of five, yes.
- 8 Q. Are those five changes listed with specificity on
- 9 the fourth page of your Exhibit 25?
- 10 A. It is, yes, the fourth page.
- 11 Q. And are those changes incorporated into the plan
- 12 shown on the first three pages of Exhibit 25?
- 13 A. Yes.
- Q. Let's take them a step at a time. Could you
- 15 please explain the first change and the purpose for the
- 16 change and what you expect it to accomplish?
- 17 A. Yes. So the change number 1 occurs in step 15.
- 18 We're now going to install a five-and-a-half casing from
- 19 7,200 feet all the way to surface. And then also cement
- 20 it to surface.
- 21 And this should give adequate isolation of the
- 22 Capitan Reef that is located from 4,105 feet to 5,030
- 23 feet. And it will also give -- it will also take place
- 24 in isolating in case that six-foot zone was there. It
- 25 will go over that and also go over any hole that was in

- 1 the 9 and 5/8ths area, because this cement will be going
- 2 to surface.
- Q. Let's turn now to the second proposed change.
- 4 Can you explain to us what that change is and
- 5 what it's intended to accomplish.
- 6 A. Step No. 2 is also for step 15 in the C-108. And
- 7 it is changed to show the cement job that will ran to go
- 8 behind the 5 and 1/2 casing all the way to surface.
- 9 The cement job will be 175 sacks of Class C at
- 10 the tail and 200 sacks of Halliburton Lite to lead.
- 11 Q. And generally the purpose of that change?
- 12 A. That's where we are really trying to make sure we
- 13 give you all, the Examiners, a feeling of we are going
- 14 to have everything isolated because we plan on showing
- 15 that cement to surface. We are going to make sure it
- 16 gets to surface.
- 17 Q. Let's take a look at the third proposed change.
- 18 Explain to us what that is and what it is intended to
- 19 accomplish.
- 20 A. The third change comes in Step 17. And it is the
- 21 change from 20,000 barrels per day maximum water to
- 22 7,500 barrels a day max, due to the fact of this is to
- 23 stay under the erosional velocity of steel inside of a
- 24 3 and 1/2 fiberglass line tubing.
- Last time, the Examiner, I could tell, he was a

- 1 little bothered when I said 20,000, which was in a 7 and
- 2 5/8ths. So I went back -- and the big point here is we
- 3 are going from -- we were going to have a 5 and 1/2
- 4 tubing, and now we are going into a 3, 3 and 1/2 tubing.
- 5 That's going to really restrict in that it does
- 6 not (incomprehensible) go down; it substantially goes
- 7 down with the maximum volume. And 7,500 barrels per day
- 8 is the max without eroding that.
- 9 Q. Very good.
- 10 Let's take a look at your fourth proposed change.
- 11 Can you explain it to us and the purpose.
- 12 A. So that goes into the next future job, Procedure
- 13 No. 3, and that's Step 3. It's changed to the new 5 and
- 14 1/2 casing. All that's there is to show that I was
- 15 taking care of my business, that we are changing from
- 16 being in the 7 and 5/8ths; now we are going into this
- 17 new 5 and 1/2 casing.
- 18 Q. And, finally, the fifth proposed change, please
- 19 explain it to us and the purpose.
- 20 A. It is Step 11, which is running the injection
- 21 equipment. It shows the new dimensions of the tubing to
- 22 be used and also the new size of the Arrowset
- 23 nickel-plated injection packer.
- Also included is the new setting depth of
- 25 5,740 feet, which is being changed so that BC Operating

- 1 is just 50 feet above the top perf. And that is to
- 2 leave room for if BC has to go in and do remedial work,
- 3 we can work uphole a little bit and still stay within
- 4 the guidelines of 100 foot but above your top perf.
- 5 The new tubing is a fiberglass line tubing, NOV,
- 6 which is 3 and 1/2 J55.
- 7 And then the new packer was going to be a 7 and
- 8 5/8ths, which would have been in that 7 and 5/8ths
- 9 casing. It is now going to be a 5 and 1/2 Arrowset
- 10 nickel plated packer.
- 11 Q. I am going to jump ahead just a bit here.
- Mr. Moore, generally, in your opinion, will this
- 13 new program maintain the injection fluids within the
- 14 injection zone?
- 15 A. Yes.
- Q. Now, is it possible in looking at Step 13 of the
- 17 revised plan -- this is on the first page of
- 18 Exhibit 25 -- is it possible that the cement bond \log
- 19 that will be run pursuant to Step 13 could show cement
- 20 up and above the Capitan Reef?
- 21 A. Yes, it could.
- Q. Would this finding have any effect on BC
- Operating's revised plan for this well?
- 24 A. No. To satisfy the Commission and also BC
- Operating, even if the bond log shows cement up above

- 1 the Capitan Reef, we're still going to run a brand new 5
- 2 and 1/2 casing and cement to surface. That would be
- 3 because we want -- we understand that that's 1970s
- 4 casing. We want a new casing and we want to make sure
- 5 that we're taking the best precautions we can to not
- 6 neglect anything that could possibly happen.
- 7 Q. And, likewise, could the cement bond log run in
- 8 Step 13 also potentially show that the hole discussed in
- 9 Mr. Durham's testimony has, in fact, been covered?
- 10 A. Yes. By the assumption that Mr. Durham was able
- 11 to have given, if the cement is anywhere close to the
- 12 cements that are -- the last testimony will be given
- 13 says that should show that that hole was covered for
- 14 sure as well anyhow.
- Q. But if that finding is made in Step 13, would
- 16 that alter BC Operating's plan for -- revised plan for
- 17 the cementing --
- 18 A. It still would not. We would still say with the
- 19 5 and 1/2 casing all the way to surface with the cement.
- Q. Mr. Moore, were Exhibits 24 and 25 prepared by
- 21 you or at your direction?
- 22 A. Yes, they were.
- MR. McMILLAN: Mr. Examiner, I would move
- 24 for the admission of Exhibits 24 and 25 at this time.
- 25 EXAMINER JONES: 24 and 25 are admitted.

- 1 (BC OPERATING INC. EXHIBITS 24 and 25 were
- 2 offered and admitted.)
- MR. McMILLAN: Okay. That's all I have for
- 4 Mr. Moore.
- 5 EXAMINATION BY EXAMINER JONES
- 6 EXAMINER JONES: So you are starting out,
- 7 from the bottom of the hole, you're going to have a
- 8 5-inch liner up to 500 feet or so. And then what
- 9 happens from there up?
- 10 UNIDENTIFIED VOICE: That's the old one.
- 11 EXAMINER JONES: Okay.
- 12 EXAMINER GOETZE: I'll go ahead and take
- 13 some questions.
- 14 EXAMINATION BY EXAMINER GOETZE
- 15 EXAMINER GOETZE: So are you satisfied with
- 16 the reduction in tubing size, that it will still
- 17 adequately meet your requirements for your intent in
- 18 this --
- 19 THE WITNESS: Yes, it will.
- 20 EXAMINER GOETZE: Thank you very much for
- 21 including this change in design.
- The only other thing I would ask of you is
- 23 if this is approved, that when your folks run your
- 24 cement bond logs, do make them aware that you are
- 25 running a light cement -- and many a heartburn is a

- 1 result of people running some bond logs showing cement
- 2 not being there when it actually is.
- 3 So you are putting this much effort, make
- 4 sure you carry on with any after cementing work to make
- 5 sure that your logs are representative of anything that
- 6 is placed.
- 7 At this point, you have answered all my
- 8 questions, and I have no further.
- 9 EXAMINER GOETZE: Off the record.
- 10 (Discussion off the record.)
- 11 EXAMINER JONES: So it's all LE, all the way
- 12 to the top?
- MR. WADE: We're back on the record.
- 14 EXAMINER JONES: The 5 and 1/2 casing?
- THE WITNESS: Yes.
- 16 EXAMINER JONES: Okay.
- 17 (Discussion off the record.)
- 18 EXAMINER GOETZE: We're back on the record.
- 19 EXAMINER JONES: I don't have any more
- 20 questions, either.
- 21 EXAMINER GOETZE: Thank you very much.
- THE WITNESS: Okay.
- MR. McMILLAN: Mr. Hearing Examiner, we have
- 24 one more witness who pulled together some really neat
- 25 exhibits showing us a little bit of the history here.

- I don't know if his testimony is absolutely
- 2 necessary, but he came a long way.
- Would you like to hear Mr. Carrasco testify
- 4 briefly and see if you have any questions for him?
- 5 EXAMINER JONES: Sure.
- 6 ART CARRASCO
- 7 having been first duly sworn, was examined and testified
- 8 as follows:
- 9 DIRECT EXAMINATION
- 10 BY MR. McMILLAN:
- 11 Q. For the record, sir, please state your full name
- 12 and place of residence.
- 13 A. My name is Art Carrasco, Midland, Texas.
- Q. By whom are you employed and in what capacity?
- 15 A. By BC Operating. I am the senior completion
- 16 engineer.
- Q. Are you authorized to testify on behalf of BC
- 18 Operating?
- 19 A. Yes, I am.
- Q. Have you previously testified before the Division
- 21 or one of its examiners?
- 22 A. Yes, I have.
- 23 Q. And were your credentials accepted and made a
- 24 matter of record?
- 25 A. Yes, they were.

- 1 Q. Are you familiar with the application filed in
- 2 this case?
- 3 A. Yes, I am.
- 4 Q. And with the lands that are the subject of this
- 5 application?
- 6 A. Yes, I am.
- 7 MR. McMILLAN: Mr. Hearing Examiner, I
- 8 tender Mr. Carrasco as an expert petroleum engineer.
- 9 EXAMINER JONES: He is so qualified.
- 10 THE WITNESS: Thank you.
- 11 Q. Mr. Carrasco, what has been your involvement in
- 12 the development of the revised plan for this well?
- A. After the last hearing, I picked up, went through
- 14 all the available information from the OCD website and
- 15 rebuilt a history of the well using that information.
- 16 Q. Let's look at your Exhibit 26.
- 17 A. Okay.
- 18 Q. Exhibit 26 has a number of pages to it. Let's
- 19 see. It looks like 7 pages. Can you tell us what
- 20 Exhibit 26 shows and lead us, in fairly summary fashion,
- 21 through what your diagrams show.
- 22 A. Yes. The first page shows my interpretation of
- 23 the plugged and abandoned wellbore -- the state of the
- 24 plugged and abandoned wellbore before it was plugged.
- 25 And it shows all the casing strings, the scab liner, and

- 1 the production string that was run at the time.
- When you go to the second page -- I mean, I went
- 3 back to square one. That's the surface pipe. It showed
- 4 the depth it was set at, about how much cement was run,
- 5 I assume some yields and weights, because that was not
- 6 in the OCD information. But Halliburton Lite is usually
- 7 mixed about that weight and Class C is about that
- 8 weight.
- 9 And you'll also -- and so -- what went through
- 10 the surface part came back and went to the intermediate
- 11 part. They actually ran a three-stage intermediate.
- The first stage, they cemented, using only about
- 13 60-something percent excess on it. And the second stage
- 14 was cemented shortly thereafter, using almost
- 15 300 percent excess -- 285 is what I figured out. And
- 16 then they went back and they cement the third stage.
- 17 After that they -- they tested the shoe. They
- 18 tested the shoe and then they went ahead and started to
- 19 drill out.
- They subsequently drilled out just 5 feet or so
- 21 and lost circulation. At that time, I assume they went
- 22 ahead and ran a retainer at the bottom of that 9 and
- 23 5/8ths and squeezed the shoe and the lost circulation
- 24 interval with 350 sacks of cement.
- 25 They drilled out the squeeze and everything held,

- 1 so I assume they went ahead and they drilled on.
- 2 They drilled on down to 11,098 feet, set a 7 and
- 3 5/8ths liner, with the top of the liner about 4,945, and
- 4 went ahead and cemented that, using a tack and squeeze
- 5 method.
- 6 They went ahead and tacked the bottom of the
- 7 liner with -- I am trying to figure out how much cement
- 8 they used -- with almost 1,400, 1,500 cubic feet of
- 9 cement. And then they came back and squeezed the liner
- 10 top with an additional 150 sacks of cement. And if you
- 11 figure that excess of cement that they ran over the
- 12 two-hole volume, it came out to about 200 percent excess
- 13 cement over the whole two-hole volume.
- 14 They went ahead and tested that liner top after
- 15 they drilled it out and it held. And then they
- 16 continued on to drill the production hole part of the
- 17 well.
- And, subsequently, somewhere along the process,
- 19 they rubbed a hole in the 9 and 5/8ths due to the
- 20 crooked hole that Deane alluded to earlier in that area.
- 21 And they went ahead and they ran a scab liner. They ran
- 22 a really heavy weight scab liner, I guess to be able to
- 23 take some of the abuse of drilling on forward and still
- 24 maintain pressure.
- When they ran that liner, the record shows that

- 1 they -- they set the bottom of the casing 6 feet above
- 2 the liner top. And then they went ahead and cemented
- 3 it. And then they went ahead and pressure tested the
- 4 liner top to make sure of pressure integrity.
- 5 And my past experience in kind of listening and
- 6 reading what the sundry notices say, the particular
- 7 procedure at that time was to go in the hole with a
- 8 boeing type casing seal, lead seal. And you go down and
- 9 you tag the liner top, you pick up five to ten feet, and
- 10 do your cement job.
- Once you get your cement displaced, you go ahead
- 12 and set back down on the liner top, engage the grapples
- on the lead seal. That attaches the upper liner to the
- 14 lower liner. And then you expand the lead seals and
- 15 create your pressure seal there.
- They went ahead and they drilled out all the
- 17 cement from inside the liner. And they tested it to
- 18 2,500 pounds -- I believe it was 2,500 pounds, and it
- 19 held fine.
- I am assuming they tested that with fresh water.
- 21 So that probably put about 4,000-something psi across
- 22 that perceived lake.
- So in my opinion, I don't think there's a gap
- 24 there at all. But, anyway, it was tested, the
- 25 2,500-pound surface pressure.

- 1 And they came back -- when they got finished with
- 2 all that, they went ahead and they finished drilling
- 3 their hole. And when they tested the 7 and 5/8ths shoe
- 4 again, they went ahead and put more pressure on it, so
- 5 that tested that liner top again.
- I am sorry. I was wrong. They tested the liner
- 7 top previously. When they first set the original liner,
- 8 they tested it. And then, after they drilled everything
- 9 out, they tested it again. So that liner top
- 10 has withstood the pressure.
- And then the last diagram that is in there is my
- 12 interpretation of what the wellbore looks like after it
- 13 was plugged and abandoned, showing the cement plugs
- inside the wellbore with the cement cap on the plug on
- 15 top of the five-inch liner, a subsequent 50-sack cement
- 16 plug with 8,300 feet.
- And the other cement plugs across the liner top
- and liner bottom of 7 and 5/8ths. And then above that,
- 19 two more plugs covering the DV tools, to make sure the
- 20 cement crosses the DV tools.
- 21 And then it shows where they went ahead and
- 22 circulated to make sure of that cement between the 9 and
- 23 5/8ths and 7 and 5/8ths liner and pumped down the 7 and
- 24 5/8ths liner to ensure they had cement in there.
- 25 And then it also shows the cement plug that was

- 1 set at the surface inside the 7 and 5/8ths.
- 2 O. So, essentially, the last page of Exhibit 26
- 3 shows what the well looks like today?
- 4 A. Correct. That's what the wellbore should look
- 5 like today.
- 6 Q. Let's take a look at your Exhibit 27. Is this
- 7 your wellbore diagram for the repaired well?
- 8 A. Yes, it is. And what this exhibit shows is we
- 9 would rig up and drill and clean out the 7 and 5/8ths
- 10 all the way to that top plug at 8,300 feet. And then we
- 11 would come and set the 5-and-1/2-inch casing string at
- 12 7,200 feet and circulate that cement to surface using a
- 13 single stage.
- 14 Q. In your opinion, will the revised cementing
- 15 program ensure that the injection fluids are maintained
- 16 within the injection zone?
- 17 A. Yes, they will.
- 18 Q. And were Exhibits 26 and 27 prepared by you or at
- 19 your direction?
- 20 A. Yes, they were.
- MR. McMILLAN: Mr. Examiner, I would move
- 22 for the admission of Exhibits 26 and 27 at this time.
- 23 EXAMINER JONES: 26 and 27 are admitted.
- 24 (BC OPERATING INC. EXHIBIT 26 and 27 were
- 25 offered and admitted.)

- 1 MR. McMILLAN: And that is all I have for
- 2 Mr. Carrasco.
- 3 EXAMINER JONES: I am really glad you
- 4 presented this because it was a very logical way to
- 5 graphically show what the well file showed --
- 6 THE WITNESS: Thank you.
- 7 EXAMINER JONES: -- and your interpretation
- 8 of what the well file showed also.
- 9 EXAMINATION BY EXAMINER JONES
- 10 EXAMINER JONES: But that 5,000 foot, there
- 11 was a lost circulation zone there also, then, right?
- 12 THE WITNESS: Yes. When they drilled out
- 13 from the first immediate, they drilled about five feet
- 14 and they lost circulation. And they went ahead and
- 15 squeezed that off and went ahead and drilled it out and
- 16 tested it. And then they continued drilling on down.
- 17 EXAMINER JONES: So does that show that they
- 18 didn't set their casing low enough?
- 19 THE WITNESS: Either they didn't set the
- 20 casing low enough -- that is probably my
- 21 interpretation.
- 22 EXAMINER JONES: But it looks like the
- 23 surface water is protected here?
- 24 THE WITNESS: I would say it is, yes.
- 25 EXAMINER JONES: Okay. Thank you.

	Page 31			
1	STATE OF NEW MEXICO)			
2) ss.			
3	COUNTY OF BERNALILLO)			
4				
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7	REPORTER'S CERTIFICATE			
8	T FILEN H ALLANIC Now Movice Penarter CCP			
9	I, ELLEN H. ALLANIC, New Mexico Reporter CCR No. 100, DO HEREBY CERTIFY that on Thursday, November 12, 2015, the proceedings in the above-captioned matter			
10	were taken before me, that I did report in stenographic shorthand the proceedings set forth herein, and the			
11	foregoing pages are a true and correct transcription to the best of my ability and control.			
12	the best of my ability and control.			
13				
14	I FURTHER CERTIFY that I am neither employed by nor related to nor contracted with (unless excepted by the rules) any of the parties or attorneys in this case,			
15	and that I have no interest whatsoever in the final disposition of this case in any court.			
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20	ELLEN H. ALLANIC, CSR			
21	NM Certified Court Reporter No. 100 License Expires: 12/31/15			
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