

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. 14608

APPLICATION OF MEWBOURNE OIL COMPANY TO
AMEND THE SPECIAL RULES FOR THE SANTO NINO-BONE
SPRING POOL,
EDDY COUNTY, NEW MEXICO,

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

DOCKET NO. 6-11

BEFORE: DAVID K. BROOKS, Hearing Examiner
WILLIAM V. JONES, Technical Examiner

MARCH 3, 2011

10:55 AM

Santa Fe, New Mexico

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This matter came on for hearing before the
New Mexico Oil Conservation Division, DAVID K. BROOKS,
Hearing Examiner, and WILLIAM V. JONES, Technical
Examiner, on THURSDAY, MARCH 3, 2011, at the New Mexico
Energy, Minerals and Natural Resources Department, 1220
South Street Francis Drive, Room 102, Santa Fe,
New Mexico.

REPORTED BY: Lisa Reinicke
PAUL BACA PROFESSIONAL COURT REPORTERS
500 Fourth Street, NW, Suite 105
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For the Applicant Mewbourne Oil Company:

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1 EXAMINER BROOKS: Okay. At this time we
2 call Case Number 14608, the application of Mewbourne Oil
3 Company to amend the special rules for the Santo
4 Nino-Bone Spring Pool, Eddy County, New Mexico.

5 Call for appearances.

6 MR. BRUCE: Mr. Examiner, Jim Bruce of
7 Santa Fe representing the applicant. I have three
8 witnesses all of whom have been previously sworn and
9 qualified.

10 EXAMINER BROOKS: You say all have been
11 previously sworn?

12 MR. BRUCE: Yes, sir.

13 EXAMINER BROOKS: Okay. Any other
14 appearances? You may proceed.

15 PAUL HADEN

16 after having been first duly sworn under oath,
17 was questioned and testified as follows:

18 DIRECT EXAMINATION

19 BY MR. BRUCE:

20 Q. Will you please state your name for the record?

21 A. Paul Haden.

22 Q. And you are a landman for Mewbourne?

23 A. That's correct.

24 Q. And you are familiar with the land matters
25 involved in this case?

1 A. Yes, sir, I am.

2 MR. BRUCE: Mr. Examiner, we have a package
3 of exhibits I put in front of you. Exhibit 1 is simply
4 the pool rules for the Santo Nino Bone Spring Pool,
5 which established 80-acre spacing. And also in Rule 4
6 it required each well to be located within 150 feet of
7 the center of a governmental quarter quarter section or
8 lot. It's that rule that we seek to change to make it
9 like the statewide rules, 330 feet from a quarter
10 quarter section of a lot.

11 Q. (By Mr. Bruce) Mr. Haden, what is Exhibit 2?

12 A. Exhibit Number 2 is a plat. It shows the
13 boundaries of the Santo Nino pool. That's indicated in
14 blue. In red is the outline of the area in which we had
15 made or notified the offset owners who had production in
16 the Bone Spring in this area.

17 Q. And how now looking at the blue, the acreage to
18 the north in Section 19, 29, and 30, that is currently
19 within the defined limits of the Santo Nino Bone Spring
20 Pool?

21 A. Yes, that is absolutely correct.

22 Q. And why did you include the acreage in
23 Sections 31 and 32?

24 A. The acreage in 31 and 32 shaded in blue is to be
25 in a projected pool boundary.

1 Q. And you were informed by the division's district
2 office that they were going to include that acreage; is
3 that correct?

4 A. That's correct.

5 Q. And is page 2 simply a Midland Map Company plat
6 showing the area?

7 A. Yes, it is.

8 Q. And for purposes of this case, we needed to
9 notify offset operators of existing bone spring wells
10 within a mile. Does Exhibit 3 accurately list all of
11 those operators?

12 A. It does.

13 Q. And was notice given to all of those operators?

14 A. Notice was given.

15 Q. And was that reflected in my affidavit of notice
16 marked as Exhibit 4?

17 A. That's correct.

18 MR. BRUCE: And, Mr. Examiner, all of the
19 offset operators or operators within the pool did
20 receive actual notice.

21 Q. (By Mr. Bruce) Were Exhibits 1 through 4
22 prepared by you or compiled by company business records?

23 A. Yes, they were.

24 MR. BRUCE: Mr. Examiner, I move the
25 admission of Exhibits 1 through 4.

1 EXAMINER BROOKS: 1 through 4 are admitted.

2 [Exhibits 1 through 4 admitted.]

3 MR. BRUCE: I have no further questions of
4 the witness.

5 EXAMINER BROOKS: I guess I don't have any
6 either.

7 EXAMINER JONES: Did you determine the
8 reason for this 150 setback that was the previous -- or
9 the existing rule right now?

10 MR. HADEN: Originally, Manzano Oil
11 Corporation instigated that rule. And temporary pool
12 rules were established for the Santo Nino for 80-acre
13 spacing in this 150-foot rule. We later went to hearing
14 and testified to the fact that we thought it would in
15 fact drain 80 acres. As far as the 150 feet, I'll have
16 to defer that onto our engineering witness.

17 MR. BRUCE: Mr. Examiner, probably until
18 15 years ago that was just the standard for 80-acre
19 spacing to require it to be within 150 feet.

20 EXAMINER JONES: So 180-acre spacing but one
21 well per 40?

22 MR. BRUCE: One well per 40, yes.

23 EXAMINER JONES: And in this case you're
24 asking for --

25 MR. BRUCE: Just to change the footage

1 requirements, the footage setbacks. We're not asking to
2 change the number of wells or the spacing itself.

3 EXAMINER BROOKS: And what you're proposing
4 would be not less than 330 feet from the quarter quarter
5 section boundary.

6 MR. BRUCE: That is correct.

7 EXAMINER BROOKS: If you do a horizontal it
8 would be not less than 330 from the outer boundary
9 spacing.

10 MR. BRUCE: That is correct.

11 EXAMINER JONES: Thank you.

12 NATE CLESS

13 after having been first duly sworn under oath,
14 was questioned and testified as follows:

15 DIRECT EXAMINATION

16 BY MR. BRUCE:

17 Q. Mr. Cless, you are a geologist from Mewbourne?

18 A. Yes, sir.

19 Q. And this is the same area that you just testified
20 about in the previous case?

21 A. Yes, sir.

22 Q. What are Exhibits 5 and 6?

23 A. Exhibits 5 and 6 are type logs of the first bone
24 spring sand and the second bone spring sand in this
25 area. They come from the same well, which if you look

1 at Exhibit 7, is 29E, well 29E. In the first bone
2 spring sand -- I guess the reason we were originally
3 asking for 80-acre spacing was the first bone spring
4 sand was the primary vertical target or vertical
5 objective in this area. And we believed that it had a
6 high porosity and high permeability and it would drain a
7 larger area.

8 So if you look at Exhibit Number 5, the average
9 porosity throughout the first bone spring sand. And in
10 the upper part is 16 to 18 percent porosity and in the
11 lower part you're looking at 16 to 14 percent porosity.

12 Also if you look at the resistivity in the upper
13 part of the first bone spring sand you can see some
14 separation between the deep and the shallow resistivity
15 curves. This is caused by mud invasion into the
16 formation, which is a good indicator of increased
17 permeability within that formation.

18 Now if you'll look down at Exhibit 6, this is the
19 type log of the second bone spring sand. And looking at
20 the porosity, you're averaging about 12 to 14 percent
21 porosity throughout that interval. So you're at a
22 little lower porosity and also you do not have the
23 separation and the resistivity curve indicating a little
24 bit lower or a decreased permeability.

25 Q. And what is Exhibit 7?

1 A. Exhibit 7 is a structure map on top of the lower
2 second bone spring sand. Again, it has a dipping
3 slightly to the southeast.

4 Q. And looking at the wells in this map, there's a
5 well over to the east of Section 33. Is that in a
6 separate pool?

7 A. Yes, sir, it is.

8 Q. And what is that pool?

9 A. I believe it's the South Leo Pool.

10 Q. And is that pool statewide 40 acres?

11 A. Yes, sir, it is.

12 Q. With 330-foot setbacks?

13 A. Yes, sir, it is.

14 Q. Is there also another pool to the north?

15 A. Yes. The Santo Nino Pool is to the north.

16 Q. Or the sand tank?

17 A. The sand tank. I apologize. The Sand Tank Pool
18 is to the north in Section 20. And there's a well
19 that's not on this map, but it's in the north half of
20 the north half of Section 20 that is a horizontal second
21 bone springs sand well. And it is also spaced on 330
22 setbacks.

23 Q. Okay. Statewide rules?

24 A. Yes, sir.

25 Q. And what is Exhibit 8?

1 A. Exhibit 8 is a gross isopach of the lower second
2 bone spring sand.

3 Q. And looking at this, there's really no reason to
4 differentiate geology between the three bone spring
5 pools you just mentioned, is there?

6 A. No, sir.

7 Q. And in looking at this from a geologic
8 standpoint, if this is granted, Mewbourne won't have
9 to -- or other operators won't have to ask for specific
10 unorthodox locations depending on what pool they're in?

11 A. Yes, sir, that is correct.

12 Q. Were Exhibits 5 through 8 prepared by you or
13 under your supervision or compiled from company business
14 records?

15 A. Yes, sir, they were.

16 Q. And in your opinion, is the granting of this
17 application in the best interest of conservation and the
18 prevention of waste?

19 A. Yes, sir.

20 MR. BRUCE: Mr. Examiner, I move the
21 admission of Exhibits 5 through 8.

22 EXAMINER BROOKS: 5 through 8 are admitted.

23 [Exhibits 5 through 8 admitted.]

24 MR. BRUCE: I have no further questions of
25 the witness.

1 EXAMINER BROOKS: I have no questions.

2 Mr. Jones?

3 EXAMINER JONES: So this upper bone spring
4 was the original vertical target?

5 MR. CLESS: Yeah. For the most part, they
6 would drill throughout both the first and second sand.
7 The first sand was just more prolific of the vertical
8 completion. And our engineer will get more into the
9 production side of that.

10 EXAMINER JONES: And it's reactive or
11 something? I mean, it's a real high gamma ray.

12 MR. CLESS: Yeah. For the most part the
13 gamma ray reads roughly 90 units. And that's fairly
14 similar to other parts of the area.

15 EXAMINER JONES: I guess it's a scale I was
16 just looking at.

17 MR. CLESS: Yeah. It's a 0 to 100 gamma ray
18 scale.

19 EXAMINER JONES: Okay. So in your geologic
20 opinion, there's no reason to change the rule to allow
21 more than one well per 40?

22 MR. CLESS: No, sir.

23 EXAMINER JONES: You just didn't want to do
24 that in this case?

25 MR. CLESS: Yes, sir.

1 EXAMINER JONES: Okay. Sounds good.

2 EXAMINER BROOKS: You may step down.

3 Call your next witness.

4 BRYAN MONTGOMERY

5 after having been first duly sworn under oath,

6 was questioned and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. BRUCE:

9 Q. Mr. Montgomery, you're a petroleum geologist for
10 Mewbourne?

11 A. A petroleum engineer.

12 Q. A petroleum engineer. And you are familiar with
13 the engineering related to this pool?

14 A. Yes.

15 Q. What does Exhibit 9 reflect?

16 A. Exhibit 9 is a production map that is centered
17 around the Santo Nino Pool. And if we go through that
18 for clarification, you'll see two different colors
19 represented in the bubbles. As is previously testified,
20 the first sand and the second sand both produce in the
21 Santo Nino Pool. The yellow bubble would show a well
22 that is produced in the second sand. And closer to the
23 orange color would be a first sand.

24 Many of the wells -- in fact all of the Mewbourne
25 vertical wells that were producers were commingled in

1 both sands. And there are some horizontal first sand
2 wells and some horizontal second sand wells that have
3 been drilled in the last few years.

4 Q. And what is Exhibit 10?

5 A. Exhibit 10 is a table that goes with this map.

6 Q. Now, is this the same exhibit that was prepared
7 by Mr. Cless and submitted in the prior hearing?

8 A. Yes. Yes, with the pooling of Section 30. This
9 table is the same and it shows which wells are vertical
10 and which wells are horizontal, which zone they're in
11 and the cumulative recoveries for oil, gas, and water
12 for each well as long as the operator.

13 Q. And why don't you go through this and discuss the
14 production characteristics and the length of some of
15 these horizontals.

16 A. Okay. The production characteristics, as we
17 heard from the geologist, show that the first sand will
18 produce a much higher rate in a vertical well. The
19 vertical wells will be drilled down through both sands.
20 And we would stimulate the second sand first, the lower
21 zone. And in some instances -- and I have an exhibit to
22 show this in a minute -- we would produce just that sand
23 to see how that sand would produce for rates and ratios
24 and fluids.

25 Then we'd set a plug and come up to the first

1 sand and let that produce by itself a while. And then
2 we would commingle the two. We didn't do that on every
3 well. But on two or three wells we did that to try to
4 ascertain where the oil was coming from. We were making
5 good wells. As you see from the cumulative production
6 on some of this from the table, some of these are very
7 good wells.

8 And so what happened was we also began to see
9 other companies, including ourselves, drill horizontally
10 into the bone spring into these sands. At the time it
11 was Marbob to the south in Section 32 trying to develop
12 on first sand as it went down dip. Those wells are
13 decent horizontal wells but they make a lot of water.

14 And then to the north, EOG in the sand tank
15 field, began to drill horizontal second sand wells where
16 the water was much less and yet the oil results were
17 very good. And we've had a few years of production on
18 those wells. So we felt confident that we had similar
19 geology. Even though we had completed the second sand
20 vertically, we wanted to maybe drill through those sand
21 40s with horizontals in the second sand and also into
22 the new 40s that had no vertical production at all where
23 we mapped the second sand to go. And I suppose the
24 first sand may come at some point. But right now we're
25 really focused on the second sand.

1 And that may take me to next exhibit.

2 Q. Yeah. Move ahead to 11 and 12 and discuss the
3 productivity of some of these sands.

4 A. Okay. 11 is the one that has the highlights in
5 yellow. And what this is, is to show an example of one
6 of our vertical wells that were tested in both sands
7 individually. And if you'll note, in March of 1995 for
8 the Santo Nino 29, Number 3, we had fracked the second
9 bone spring sand. And after our first partial month we
10 began to produce this sand by itself fully everyday of
11 the month pretty much to where by June of 1995 the well
12 had gone from around 1500 barrels of oil per month down
13 to 800 barrels of oil per month.

14 We then set a plug, came up the hole, and stopped
15 production on this zone and stimulated the first sand.
16 And in the same three month time frame, we noticed a
17 much higher initial rate, 2500 barrels of oil per month.
18 And after three months we were at 2200 barrels of oil
19 per month. So almost threefold better producing
20 characteristics.

21 Then we did commingle the wells you see down in
22 January of 1996 with a slight increase. And as I look
23 at the decline curves on these I see that this well and
24 others would give me almost an 80/20 or a 25/75 split
25 between first sand and second sand where the first sand

1 would dominate the production. And with draining a
2 larger area, these are sort of a similar thickness.
3 Although as was testified, the porosities are much
4 better in the first sand.

5 So the question is, what is left to do as we
6 drill through here to get all the production. And that
7 takes us to our next exhibit. Since these sands are not
8 perfectly homogeneous and continuous, but in general
9 they're very continuous, horizontal technology has
10 helped us to go back in and drill and recover reserves.

11 This Exhibit 12 is for the Bradley 29, 1H. And
12 it's an interesting well for a few reasons. It's a
13 second sand horizontal well. And you see it on the map
14 on Exhibit 9. In the south half of 29 is actually the
15 south half of the southwest quarter. It's an 80-acre
16 horizontal that was actually drilled and fracked and
17 produced in an area where we already had vertical
18 production that had taken out some oil in the second
19 sand.

20 And we also, on Exhibit 12, have another well,
21 the Aries 20, 1H, which is a full 160-acre lateral that
22 is drilled in Section 20, the north half of the north
23 half that just recently has been on for a few months
24 now. And I have four months here to talk about. And if
25 we look and compare the two we see some interesting

1 things. The first well, the 29, Number 1H, didn't have
2 as high rates probably because it's only half a mile
3 long instead of a full mile long and partly because it's
4 going through an area where the 40-acre units had some
5 recovery from the second sand already.

6 I've studied those original vertical wells and I
7 see no detriment. There's no reduction in their oil
8 rates even after these few months. So we just don't
9 believe that they were draining large areas around their
10 single frac that they put out there. We certainly
11 believe there is some drains because we would have hoped
12 our 29 well would have been a little better, maybe half
13 as good as the area well that I'm going to talk about
14 next. But instead, it may be slightly less than half as
15 good. It's only half as long so we knew it would only
16 be half as good.

17 Q. And, Mr. Montgomery, this Bradley 29 was
18 originally drilled as a Morrow well, was it not?

19 A. Thank you. That's correct. We drilled it down
20 to the Morrow with the intention of completing in the
21 Morrow but found it to be a dry hole in the Morrow. And
22 at the time we're already interested in horizontal
23 technology and drilling horizontal in this sand and so
24 we made the necessary arrangements to turn and complete
25 it as a horizontal bone spring well.

1 Q. And that is the reason why it's only an 80-acre
2 lateral as opposed to a Morrow?

3 A. That's correct, yes. Yeah, we plan them all to
4 try to make them all one full mile.

5 Q. And then the areas 20?

6 A. And then the areas 20 to finish out that
7 Exhibit 12. It was in the sand tank pool so we did not
8 have to ask for the exception to the setback. We were
9 able to perforate our foot ports at 330 from the line,
10 both at the toe and the heel, and drill that just how we
11 wanted to. We actually surfaced the well such that we
12 didn't quite get it on the heel side, the initial part.
13 But we certainly went to the toe at 330.

14 And what we found was after fracking that with
15 several frac jobs, I think maybe 20 is how many
16 different ports we had in there, and spaced 250 to
17 220 feet apart, we made a nice well. You see the peak
18 rate at 13,000 barrels of oil a month. Well, none of
19 the vertical wells ever did that. Of course, none of
20 the horizontal wells that we talked about here have
21 either. There have been others that have been that
22 good.

23 And what happens is you're able to drain, at the
24 same time, four 40s at one time, which really multiplies
25 what that well can produce and really frac each 40 four

1 times at 250 feet apart so you have a better recovery
2 factor. It would be almost like drilling multiple
3 vertical wells in those 40s. And it's just the best way
4 to prevent waste really. And we worry that if we don't
5 get to go to the 330 line we really won't get reserves
6 from there to the section line recovered as easily if we
7 can go to 330. Right now we stop at about 10 unless we
8 get an exception.

9 Q. And eventually, in your opinion, Mr. Montgomery,
10 won't these existing pools, the south Leo and the Sand
11 Tank and the Santo Nino, they will all merge sooner or
12 later, will they not? I mean, in so far as they will
13 abut each other?

14 A. Yes, that's correct. We think the sand is
15 throughout this whole region. Other operators are
16 permitting wells and so they will all come up
17 continuous. And we feel that having everybody at 330 is
18 the right way to go.

19 Q. Were Exhibits 9 through 12 prepared by you or
20 compiled from company business records?

21 A. Yes, they were.

22 Q. And in your opinion, is the granting of this
23 application in the interest of conservation and the
24 prevention of waste?

25 A. Yes, it is.

1 MR. BRUCE: Mr. Examiner, I move the
2 admission of Exhibits 9 through 12.

3 EXAMINER BROOKS: 9 through 12 are admitted.
4 [Exhibits 9 through 12 admitted.]

5 EXAMINER BROOKS: A number of these wells
6 have been drilled pursuant to the exceptions of
7 inspecting spacing, have they not?

8 MR. MONTGOMERY: All the horizontal wells in
9 the Santo Nino Pool have been.

10 EXAMINER BROOKS: Okay. That's what I
11 thought. So the recent development has been essentially
12 de facto going to the rules that you propose to adopt.

13 MR. MONTGOMERY: That's correct.

14 EXAMINER BROOKS: Mr. Jones?

15 EXAMINER JONES: Yeah, this is amazing. It
16 seems that, you know, if there's other look-alikes like
17 this up and down the hole it would be great. And it
18 does seem like along the section lines there's an
19 undrained area, you know, maybe that somebody could work
20 partners out or something and just drill right along the
21 section line.

22 MR. MONTGOMERY: Right.

23 EXAMINER JONES: But I guess that's a land
24 issue or something. But, yeah, I think this is -- I was
25 going to ask you real quickly, this bone spring, I saw

1 the water production here, but it looks like the
2 water -- does it increase per barrel of water, per
3 barrel of oil? Or is it pretty much just the water
4 that's there that's movable is coming out and you drain
5 it just like you do the oil?

6 MR. MONTGOMERY: That's more the case,
7 right. It will be a depletion-type of drive. So you'll
8 have good, high water and sometimes it's the first month
9 we'll mask because of frac water. But eventually when
10 you get into the future months you'll see the water
11 productions start high and go low from depletion. And
12 sometimes you have a water cut with the oil that is high
13 or low. There's variability there. But the water has
14 not been a significant issue here as far as cost or
15 disposal.

16 EXAMINER JONES: Do you have trouble washing
17 that four and a half down to the place of your hole?

18 MR. MONTGOMERY: No. Many times we drill a
19 seven through the curve, you know, and then cement back
20 up through all the legal setbacks we have to cement back
21 up through. So we have pipe all the way to 90 degrees.
22 And then, yeah, we run the four and a half with packers,
23 which is tricky. But they'll go through and condition
24 the hole once with the drill first and then run in. And
25 every once in a while we have to wash down.

1 But the formation usually hangs in there just
2 fine and we're able to get to the bottom with no problem
3 and then set the packers. And then one by one frac
4 those ports from the very toe back to the heel. And
5 it's an all-day job, but we can usually do it in a day.

6 EXAMINER JONES: Well, do you tie your frac
7 simulators in with your reservoir simulators nowadays?

8 MR. MONTGOMERY: We try a little of that.
9 And getting back to your question about how do you get
10 all the oil out of the toe in the end, since we're
11 fracking every 250 feet, if you go from 330 off each
12 line there's a 660-foot gap there. And you'll drain
13 some of that, of course, from that very last port. And
14 the simulators just aren't good enough to be absolutely
15 confident on how to get that out.

16 But what we found is ports closer together will
17 do a better job. Let's say you want to get a recovery
18 factor out of a 40-acre unit and you drill a vertical
19 well with one frac. And you do enough of them where you
20 say I have a 10 percent recovery factor, you're likely
21 going to have high recovery factor even though it's the
22 same the fluid, the same sand with multiple ports. It
23 would be like drilling multiple wells. It may be
24 slightly more. There's some limits you can't get past.
25 You'll never get it all.

1 So that's another great thing about the
2 horizontal and multi-frac technology as we go through
3 these 40s.

4 EXAMINER JONES: This horizontal that you
5 drilled next to some of the verticals, you didn't see
6 any adverse effects on the vertical wells. But did you
7 see pressure differences?

8 MR. MONTGOMERY: I don't recall. We didn't
9 see any frac water in the producing tank batteries.
10 Sometimes we do see things like that. You know, and
11 then those wells usually recover quite quickly. But
12 these didn't see that to my recollection. And they
13 certainly have -- if you just look at the trend that
14 they were on, they're still on that same trend.

15 EXAMINER JONES: I don't have any other
16 questions. Thank you very much.

17 EXAMINER BROOKS: Very good. If there's
18 nothing further then Case Number 14608 will be taken
19 under advisement. And I believe we established 14609 is
20 continued to March 17th, correct? That's the Devon
21 case.

22 MR. BRUCE: That is correct. It is
23 continued.

24 EXAMINER BROOKS: Okay. I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 14608.
heard by me on 3-3-11
25 [The case was taken under advisement.]

David L. Brooks, Examiner
Oil Conservation Division

REPORTER'S CERTIFICATE

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2
3 I, Lisa Reinicke, New Mexico Provisional
4 Reporter, License #P-405, working under the direction
5 and direct supervision of Paul Baca, New Mexico CCR
6 License #112, Official Court Reporter for the US
7 District Court, District of New Mexico, do hereby
8 certify that I reported the foregoing proceedings in
9 stenographic shorthand and that the foregoing pages are
10 a true and correct transcript of those proceedings and
11 was reduced to printed form under my direct supervision.

12 I FURTHER CERTIFY that I am neither employed by
13 nor related to any of the parties or attorneys in this
14 case and that I have no interest whatsoever in the final
15 disposition of this case in any court.

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Lisa R. Reinicke,
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22 Ex count:

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