

INDEX January 11th, 1996 Examiner Hearing CASE NOS. 11,280 (Reopened) and 11,447 (Consolidated) PAGE EXHIBITS 3 APPEARANCES 4 APPLICANT'S WITNESSES: JERRY R. ANDERSON (Landman) Direct Examination by Mr. Carr 6 Examination by Examiner Stogner 12 RALPH NELSON (Geologist) Direct Examination by Mr. Hall 12 Examination by Examiner Stogner 19 <u>GREG STRICKLAND</u> (Engineer) Direct Examination by Mr. Hall 20 Examination by Examiner Stogner 36 STATEMENT ON BEHALF OF CHEVRON USA PRODUCTION COMPANY: By Mr. Carr 43 **REPORTER'S CERTIFICATE** 45 * * *

2

EXHIBITS

Applicant's		Identified	Admitted
Exhibit		8	11
Exhibit	2	13	19
Exhibit	3	14	19
Exhibit	4	16	19
Exhibit	5	21	35
Exhibit	6	24	35
Exhibit	7	29	35
Exhibit	8	29	35
Exhibit	9	-	-
Exhibit	10	-	-
Exhibit	11	-	-
Exhibit	12	42	-

* * *

APPEARANCES

FOR THE DIVISION:

RAND L. CARROLL Attorney at Law Legal Counsel to the Division 2040 South Pacheco Santa Fe, New Mexico 87505

FOR THE APPLICANT:

MILLER, STRATVERT, TORGERSON & SCHLENKER, P.A. 125 Lincoln Avenue Suite 303 Santa Fe, New Mexico 87501 By: J. SCOTT HALL

FOR CHEVRON USA PRODUCTION COMPANY:

CAMPBELL, CARR & BERGE, P.A. Suite 1 - 110 N. Guadalupe P.O. Box 2208 Santa Fe, New Mexico 87504-2208 By: WILLIAM F. CARR

* * *

WHEREUPON, the following proceedings were had at 1 2 9:05 a.m.: EXAMINER STOGNER: At this time I will call 3 4 Reopened Case 11,280. MR. CARROLL: In the matter of Case Number 11,280 5 6 being reopened pursuant to the provisions of Division Order 7 Number R-10,389, which order created the South Black River-8 Delaware Pool in Eddy County, New Mexico, and promulgated 9 temporary special pool rules therefor. EXAMINER STOGNER: At this time I'll call for 10 11 appearances. 12 MR. HALL: Mr. Examiner, Scott Hall of the Santa Fe office of the Miller, Stratvert, Torgerson and 13 14 Schlenker law firm. I have three witnesses this morning. 15 We would also ask that this matter be 16 17 consolidated with Case Number 11,447 for purposes of 18 testimony. 19 EXAMINER STOGNER: Are there any other 20 appearances in Case 11,280? MR. CARR: May it please the Examiner, my name is 21 William F. Carr with the Santa Fe law firm Campbell, Carr 22 23 and Berge. I would like to enter our appearance in this 24 case and in the subsequent case for Chevron USA Production 25 Company.

We do not intend to call a witness. I have a 1 statement to read on behalf of Chevron at the conclusion of 2 the case in support of the Application of Enserch. 3 EXAMINER STOGNER: If there's no objection, then 4 5 at this time Case Number 11,447. 6 MR. CARROLL: Application of Enserch Exploration, 7 Inc., to amend special pool rules for the South Black 8 River-Delaware Pool, Eddy County, New Mexico. 9 EXAMINER STOGNER: Other than Mr. Hall or Mr. 10 Carr, are there any appearances in this matter? 11 Mr. Hall, I assume the three witnesses are also going to appear in this matter? 12 MR. HALL: Yes, sir. 13 14 EXAMINER STOGNER: Okay. Would the witnesses please stand to be sworn? 15 (Thereupon, the witnesses were sworn.) 16 17 MR. HALL: We would call Jerry Anderson. JERRY R. ANDERSON, 18 the witness herein, after having been first duly sworn upon 19 his oath, was examined and testified as follows: 20 DIRECT EXAMINATION 21 BY MR. HALL: 22 For the record, please state your name and your 23 Q. place of residence. 24 My name is Jerry R. Anderson. I reside at 4325 25 Α.

Las Robles in Plano, Texas. 1 And by whom are you employed and in what 2 Q. capacity? 3 Α. I'm employed with Enserch Exploration as a 4 5 regional landman. And Mr. Anderson, have you previously testified 6 Ο. before the Division and one of its Examiners and had your 7 8 credentials accepted and made a matter of record? 9 Α. Yes, I have. 10 Q. And are you familiar with the Applications in 11 these matters and the subject lands? Yes, I am. 12 Α. MR. HALL: Mr. Examiner, are the witnesses 13 14 credentials acceptable? EXAMINER STOGNER: They are. 15 (By Mr. Hall) Mr. Anderson, if you would, 16 Q. 17 briefly state what it is Enserch is asking by its Application. 18 We're seeking an order to provide for a 19 Α. 20,000-to-1 GOR, gas-oil ratio, in preparation for the 20 recompletion of the Murchison State "2" Number 1 well, to 21 be completed in the upper level of the Brushy Canyon 22 Delaware, and that's located at approximately 4800 feet. 23 And we also propose to present evidence relative to the 24 establishment of permanent pool rules for the South Black 25

River-Delaware Pool. 1 Is Enserch recommending further development on 2 ο. 3 40-acre spacing for the pool? Α. Yes. 4 If you would, please, sir, refer to Exhibit 1 and 5 Q. identify that and review it for the Examiner. 6 7 Exhibit 1 is a map showing the offset operators Α. within two-mile radius. It also shows the -- has the well 8 spotted and the Delaware pools that are inside that area. 9 Is the Enserch acreage highlighted in red? 10 Q. Yes, it is. 11 Α. Are you the individual who's responsible for 12 Q. identifying the operators of all wells and owners of 13 unleased mineral interests within a mile of the subject 14 lands? 15 16 Yes, I am. Α. In conjunction with that, did you direct a search 17 Q. be conducted of public records in Eddy County and at the 18 BLM to determine that ownership? 19 20 Yes, we checked federal, state and county records Α. 21 to determine the ownership. And Exhibit 1, was it prepared at your direction 22 Q. 23 and control? 24 Α. Yes, it was. 25 MR. HALL: Nothing further of this witness, Mr.

1	Examiner.
2	We would move the admission of Exhibit 1.
3	And by way of explanation, you'll note that the
4	title block shows reference to the P-J Delaware field.
5	Apparently the District Office had recently issued a letter
6	indicating that the nomenclature of this pool now is the
7	P-J Delaware, so that's made it onto the exhibits here
8	today.
9	I don't know if the District Office letter is
10	correct or not. Make sure we're singing from the same hymn
11	book.
12	EXAMINER STOGNER: You threw me for a loop on
13	that one. Okay now, you said that's the P-J Delaware, and
14	that's what the nomenclature is known?
15	MR. HALL: The Order establishes this as the
16	South Black River-Delaware, and that's the nomenclature on
17	the Order.
18	Apparently the District Office recently issued a
19	letter saying this is the nomenclature for this pool. Now,
20	I have not seen that letter, but it went out to industry,
21	and that's why the exhibits refer to P-J Delaware. I just
22	wanted to point that out for the record. We're talking
23	about the same acreage described in the Order as the South
24	Black River-Delaware.
25	EXAMINER STOGNER: You wouldn't happen to have a

1	copy of that letter, would you?
2	MR. HALL: I have not seen it.
3	THE WITNESS: No, we don't, not with us.
4	RALPH NELSON: We do not have it.
5	EXAMINER STOGNER: Okay. Subsequent to that
6	hearing, I'll have to see what's going on on that.
7	However, I am going to refer at this time to
8	Order Number R-10,389, which declaratory paragraph number 2
9	essentially contracted and deleted certain acreage in the
10	P-J Delaware Pool for the creation of this particular pool.
11	Now, that was done under an application brought
12	on by Dalen Resources Oil and Gas Company in May of 1995
13	It's possible that the District Office wasn't
14	aware of this, because it went outside of the regular
15	nomenclature proceedings. I'm just speculating at this
16	point, of course, but I know we do have a new personnel
17	down there, a geologic, that may not be aware of it.
18	However, that should not change the scope of
19	today's case, because we are talking about the South Black
20	River-Delaware Pool, which had special pool rules and a
21	special allowable; is that correct? Under authority of
22	this order?
23	MR. HALL: That's correct, and you should know
24	that Enserch acquired Dalen Resources Oil and Gas effective
25	January of this year, and they are the successor operator

to the subject well in this particular acreage. 1 That earlier application was for the 2 3 establishment of rules for new discovery pool, and those lands were contracted out of the P-J Delaware Pool, that is 4 5 right. Note also that the Byram Service describes the 6 7 South Black River-Delaware Pool incorrectly. I think they picked up the description for the contracted-out acreage. 8 9 So we're all wrong. 10 EXAMINER STOGNER: All righty. So Byram's has it described wrong. Thank you for bringing that to my 11 attention. I'll try to get everybody's nomenclature 12 13 brought into line. MR. HALL: Thank you. That concludes our direct 14 of Mr. Anderson. 15 16 We would move the admission of Exhibit 1. 17 EXAMINER STOGNER: Exhibit Number 1 will be admitted into evidence at this time. 18 19 I assume, Mr. Hall, that your affidavit of 20 mailing will be presented at a later time? 21 MR. HALL: We'll present that today. 22 EXAMINER STOGNER: But at a later time in today's case? 23 MR. HALL: Yes, sir. 24 EXAMINER STOGNER: Okay, let's discuss that at 25

this point. I'm assuming that the people that you have 1 2 shown in your one-mile radius of this pool boundary is also 3 represented with these affidavits. MR. HALL: That's correct. 4 EXAMINATION 5 BY EXAMINER STOGNER: 6 7 Mr. Anderson, what does the red mark indicate on 0. your Exhibit Number 1? 8 9 Α. That outlines the acreage that Enserch has an interest in. 10 Okay. Now, what is your understanding of the 11 Q. 12 pool boundary of the South Black River-Delaware Pool at this time? 13 The 40 acres surrounding the Murchison State "2" 14 Α. 15 Number 1 well, the southeast quarter of the northeast 16 quarter. 17 EXAMINER STOGNER: I have no other questions of 18 this witness. You may be excused. 19 MR. HALL: Call Ralph Nelson at this time. 20 RALPH NELSON, 21 the witness herein, after having been first duly sworn upon 22 his oath, was examined and testified as follows: 23 DIRECT EXAMINATION BY MR. HALL: 24 25 Q. Mr. Nelson, for the record, state your name and

	13
1	place of residence.
2	A. I'm Ralph Nelson. I'm at 5501 Oak Hills Drive,
3	Colleyville, Texas.
4	Q. And for whom do you work and in what capacity?
5	A. Enserch Exploration as a staff geologist.
6	Q. And have you previously testified before the
7	Division, one of its Examiners, and had your credentials
8	made a matter of record?
9	A. Yes, sir, I have.
10	Q. And are you familiar with the lands that are the
11	subject of these combined Applications and the subject
12	well?
13	A. Yes.
14	MR. HALL: Mr. Examiner, are the witness's
15	credentials acceptable?
16	EXAMINER STOGNER: They are.
17	Q. (By Mr. Hall) Mr. Nelson, if you would, provide
18	Mr. Stogner with an overview of the geology of this
19	particular reservoir.
20	A. Well, on Exhibit 2, this map will show the a
21	Brushy Canyon sand at the 4800-foot level. This sand is
22	representative of the Brushy Canyon sands in this area.
23	The general trends are from the northwest to the
24	southeast. These are deep-water fan channel sands whose
25	source is to the northwest, approximately 15 miles.

Generally in this area, these sands will tend to 1 stack, these channels will tend to stack, and I believe 2 we'll show that in a later exhibit. 3 All right. If you'd like to refer to Exhibit 3, ο. 4 5 that's your cross-section. Exhibit 3 is a cross-section that runs between Α. 6 7 the Enserch Murchison State "2" and the Chevron Number 7 Marguardt Federal. Half of this cross-section was 8 9 previously submitted in the earlier hearing, that being the 10 Murchison State 2, both the density neutron log and the mud 11 gas log sections that you see. The pay in the Murchison State Number 1 is in the 12 basal Brushy Canyon interval. We have identified sands A, 13 B and C. 14 Also colored there in A and B is green on the 15 porosity side. We believe those sands to be oil 16 productive. We are not sure, we believe there's a 17 possibility that the C sand is gas-bearing because of the 18 three to three and a half times increase in the mud gas log 19 and the density neutron separation. 20 Also on these wells, this cross-section, you'll 21 see the 4800-foot sand. Chevron attempted a completion in 22 23 the basal Brushy Canyon sand and was unsuccessful and has moved up to the 4800-foot sand. They have frac'd it and 24 had a flow test of 60 to 100 barrels a day and 800 to 900 25

14

MCF and 800 barrels of water. It's not officially been 1 potentialed, but it is currently shut in, waiting on a 2 disposal well. 3 We have a similar interval in the 4800-foot sand 4 in the Murchison State Number 2 [sic]. Perhaps -- It is a 5 little thicker, and it has better porosity development. 6 It also has a good mud gas show. 7 All right. With respect to the other well, the ο. 8 Chevron Marquardt well, does it appear that the C sand you 9 described is also present in the Marquardt well? 10 It appears that there is perhaps an equivalent 11 Α. interval in the C sand. However, the C sand in that well 12 is very much lower porosity, with the exception of one 13 little two-foot stringer at the base, and that two-foot 14 15 stringer corresponds and correlates to a high gas kick on 16 the mud gas log in the Chevron well also. All right. The fact that the C is not as 17 Q. 18 prevalent in the Marquardt well, does that indicate to you that that particular sand is more of a discontinuous 19 20 nature? Very much so. We see that in other wells that 21 Α. have been drilled in this immediate area. C sand is not 22 present in these other wells in a similar way as it is 23 24 here. All right. These C sands, are they lenticular in 25 Q.

1	nature?
2	A. Very much so.
3	Q. All right.
4	A. Very discontinuous.
5	Q. With respect to the 4800-foot sand in the
6	Murchison State well and then over on the Marquardt 7 well
7	for Chevron, what does that tell you? The fact that it
8	shows up in both logs prevalently, does it indicate that
9	there is homogeneity in the reservoir for that section?
10	A. It appears that this is a much more continuous
11	sand. It's a much more massive sand, it's more widespread
12	across the area. It is potentially the better pay in the
13	area.
14	Q. All right. Anything further with respect to
15	Exhibit 3?
16	A. No.
17	Q. Let's refer to Exhibit 4, if you would explain
18	that to the Hearing Examiner.
19	A. Exhibit 4 is a structure map from the top of the
20	base of the Brushy Canyon sand with an isopach overlay, net
21	porosity isopach greater than 12 percent overlay, and the
22	Murchison State Number 2 shown there is the thickest net
23	porosity well in the area, as we have seen.
24	The Chevron Marquardt well is approximately a
25	third as thick, and note there are no other wells nearly as

1	thick, perhaps, except for one down in the southeast of the
2	southwest of 1.
3	Q. All right. Do Exhibits 2 and 4 show the known
4	extent of the limits of both the upper and lower sands?
5	A. Yes, they do. And they also both show how these
6	sands tend to stack as the isopach for both sands appears
7	to be in approximately the same positions.
8	Q. Would you explain why Enserch is seeking an
9	increase in the GOR limitation to 20,000 to 1?
10	A. Well, in the production of the Number 1 Murchison
11	State "2", which Mr. Strickland will discuss in detail
12	later, the GOR has increased in producing in the range of
13	13,000 to 19,000 GOR.
14	The Marquardt well also tested in a range that
15	was in the 9000 to 15,000 range. We feel like that is the
16	nature of these reservoirs.
17	Q. All right. With respect to the 4800-foot sand,
18	is there any likelihood of drainage across Enserch's lease
19	line from the Chevron well?
20	A. The Chevron well is drilled 330 feet off the line
21	from our leases. Our side wall core porosities in the
22	4800-foot sand, as well as their side wall core porosities,
23	indicate that is the most permeable sand between the two
24	sand intervals.
25	Since we have not perforated the well and

production-tested the well, we don't have, really, any 1 information to say that it is or it isn't. 2 You cannot preclude that there will be drainage, 3 Ο. then? 4 5 Α. That's correct. It is a porous and permeable 6 sand. 7 Does your data continue to confirm that reserves Q. can be most efficiently and economically drained on 40-acre 8 9 spacing? Yes, especially in the basal Brushy Canyon sand, 10 Α. because of the discontinuous nature of these sands. 11 And also producing these two sands together would be more 12 economical, rather than separate completions. 13 14 Q. All right. And separate allowables -- Would it make sense to be producing these through separate 15 allowables, separate wells, separate tubings? 16 No. No, it would make more sense to produce them 17 Α. economically, as in one completion. 18 19 All right. In your opinion, will the Q. establishment of permanent pool rules with an allowable set 20 21 at 250 barrels of oil per day and at 20,000-to-1 GOR 22 limitation be in the interest of conservation, the prevention of waste and the protection of correlative 23 24 rights? 25 Yes, it would. Α.

18

1	Q. And were Exhibits 2 through 4 prepared by you or
2	at your direction?
3	A. Yes, they were.
4	MR. HALL: That concludes our direct of Mr.
5	Nelson.
6	We would move the admission of Exhibits 2 through
7	4.
8	EXAMINER STOGNER: Exhibits 2 through 4 will be
9	admitted into evidence.
10	Mr. Carr, your witness.
11	MR. CARR: I have no questions, Mr. Examiner.
12	EXAMINATION
13	BY EXAMINER STOGNER:
14	Q. Mr. Nelson, as far as the production off that
15	Chevron well, adjacent that's the Number 7 Marquardt
16	Federal well are those perforations blocked off at
17	present, as shown on your Exhibit Number 3, or are they
18	producing simultaneously, that upper and lower interval?
19	A. No, there's a cast iron bridge plug set at 4900
20	feet, so they have shut off those perforations, the lower
21	perforations.
22	Q. Lower perforations. And the Only the upper
23	perforations
24	A. Yes.
25	EXAMINER STOGNER: Mr. Hall, I have no other

1	questions of Mr. Nelson at this time.
2	MR. HALL: All right. At this time we would call
3	Greg Strickland.
4	<u>GREG_STRICKLAND</u> ,
5	the witness herein, after having been first duly sworn upon
6	his oath, was examined and testified as follows:
7	DIRECT EXAMINATION
8	BY MR. HALL:
9	Q. Mr. Strickland, for the record would you state
10	your name and place of residence, please, sir?
11	A. Greg Strickland. I live in Dallas, Texas.
12	Q. And by whom are you employed and in what
13	capacity?
14	A. I'm employed by Enserch Exploration in the
15	capacity of petroleum engineer.
16	Q. All right. Have you previously testified before
17	the New Mexico Oil Conservation Division?
18	A. No, I have not.
19	Q. If you would, please, sir, give the Hearing
20	Examiner a brief summary of your educational background and
21	work experience.
22	A. I graduated from Texas A&M University with a
23	bachelor of science in petroleum engineering in 1980. I
24	became employed for Enserch Exploration in 1981 as a
25	petroleum engineer and have worked there continuously for

1 the past 15 years. And I'm also a registered professional engineer 2 in the State of Texas, in the specialty of petroleum 3 4 engineering. 5 Have you testified before the Texas Railroad Q. Commission? 6 7 Α. Yes, sir, I have. 8 Q. Are you familiar with the Application Enserch has 9 filed in this case and the subject pool in the Murchison 10 State 2? 11 Α. Yes, I am. 12 MR. HALL: Mr. Examiner, we would offer Mr. 13 Strickland as an expert petroleum engineer. EXAMINER STOGNER: Mr. Strickland is so 14 qualified. 15 16 Q. (By Mr. Hall) Mr. Strickland, if you would, 17 please, refer to Exhibit 5 and explain what this is intended to reflect to the Hearing Examiner. 18 Exhibit Number 5 is an exhibit initially 19 Α. 20 submitted in the past proceeding. It is a PVT analysis 21 performed by Core Laboratories. The sample was taken from our discovery well, the Murchison State "2" Number 1, after 22 23 about ten days of stabilized flow. 24 The significant things to note on that exhibit 25 are the relative oil volume or formation volume factor of

1.5, the solution gas-oil ratio of 1051 toward the bottom 1 of the page, and the API gravity of the oil of 45.5 degrees 2 API. This is indicative of a black oil reservoir. 3 Does it also tell you whether or not this is a 4 0. solution gas drive reservoir? 5 Yes, this would be a typical oil sample for a 6 Α. solution gas drive mechanism. 7 All right. And what was the GOR at discovery? ο. 8 The GOR at discovery was 1051. From the sample, Α. 9 we initially began producing at a GOR of around 8000 to 1. 10 Is the producing GOR higher now? 11 Q. Yes, the producing GOR has been much higher. In 12 Α. fact, the producing GOR has ranged over the last several 13 months from 4700 as the low, up to a high of 19,200. 14 All right. And does this tend to confirm the 15 Q. 16 existence of a solution gas drive? 17 Α. Well, it confirms the existence of a combination 18 drive, a solution gas drive, depletion gas drive, and water 19 encroachment. All right. If you would refer to page 2 of 20 0. Exhibit 5. And I'll note to the Examiner, the bottom of 21 page 2 is marked page 5; I'll ask you to ignore that. 22 But the second page of Exhibit 5 is the 23 "Composition of Primary Stage Separator Gas". What is that 24 25 intended to reflect?

What we're trying to identify here, this is the 1 Α. sample of the separator gas taken at the same time the oil 2 sample was taken under the same conditions, and this is the 3 sample of separator gas showing a plant product yield of 4 5.432 gallons per MCF. We're showing a gross heating value 5 6 of 1208 and a specific gravity of .73. This would appear 7 to be a gas-reservoir gas sample. 8 Q. And what is the primary source for this gas? 9 Which interval? 10 We believe that this gas sample is dominated by Α. 11 the presence of the gas seen in the C sand, which was 12 described by Mr. Nelson to be the primary gas-bearing sand in the completed interval. 13 14 0. All right. If you would refer to page 3 of Exhibit 5 and explain what this is intended to demonstrate. 15 Page 3 is a comparison of gas samples taken from 16 Α. 17 four wells in southern Eddy County, in Brushy Canyon completions, similar to our discovery Murchison State "2" 18 Number 1, and the White City field. 19 20 The two columns on the right are from the La Huerta and East Loving fields, and they show heating values 21 ranging from 1400 to 1500 BTUs, and they show plant product 22 23 yields ranging from 11 to 13 gallons per MCF. Those are more typical of black oil systems, solution gas drive 24 mechanisms dominating the oil production. 25

Contrast that with the two columns to the left, 1 which are taken from the East Herradura Bend field and the 2 White City field, or what we're calling White City on the 3 exhibit. The heating values there are from 1170 to 1200 4 The plant product yield, respectively, is 5.4 and BTUs. 5 5.0. That's showing a leaner mixture with the dominance 6 that we mentioned earlier of the gas presence. 7 And in fact, we realize that in the Santa Fe 8

9 Federal lease of East Herradura, a situation similar to 10 ours occurred wherein Ray Westall completed two zones of 11 porosity by perforating directly, which he thought to be 12 oil zones, did not perforate a presumed gas zone, and 13 fractured into a gas zone. Hence, the presence of the high 14 gas composition, similar to our situation.

Q. All right. Let's refer to Exhibit -- now, if you
would, please, sir, and explain what this exhibit is
intended to demonstrate.

18 A. Okay.

19 Q. Exhibit 6.

A. Okay, Exhibit 6? On Exhibit 6 we're showing the production from our particular well, the Murchison State 2 Number 1, since it began producing in April through November of 1995. We have a graphical presentation on the first page, followed by a tabular description of the production on the second page.

On the graphical presentation, the top line, the 1 black line, is the gas-oil ratio. The red line is the gas 2 produced, green is oil and blue is water. 3 As you notice, on the black line we started out 4 producing at a GOR of around 8000 to 1 and rapidly 5 6 increased up to a GOR from 17,000, 19,000 to 1, and then decreased down to 10,000 and 4000 to 1, respectively. 7 8 You can also see, similarly, that the gas production reached a peak and then began a decline. 9 10 So we have a range of GOR production exhibited on 11 the graph. All right. Is the current gas producing rate an 12 Ο. accurate indication of the actual gas-oil ratio of the 13 14 hydrocarbons at reservoir conditions? Yes, we believe that it is. 15 Α. Do you have any plans for putting the Murchison 16 Q. 17 State 2 on pump? Yes, as you can see, that the rapid decline in 18 Α. production, we believe, is due to fluid loading. And in 19 20 fact, if you look at the June-through-August period, it was producing on a daily basis -- in June it only produced 23 21 days, but during June it was producing about 148 barrels of 22 oil, 1.4 million cubic feet of gas, and about 257 barrels 23 24 of water per day. 25 In August it was producing on a daily basis at

868 MCF and about 50 barrels of oil per day and 220 barrels 1 of water. 2 3 After that time, September, October and November, the oil production fell off dramatically. The gas 4 5 production also demonstrated a sharp decline as the water 6 production fluctuated. 7 We believe that the sharp decline in the gas rate 8 is not providing enough velocity to continuously unload the high volume of fluids present in the well from both water 9 10 and oil. We hope that when we put the well on pump --11 which we are in progress of placing the well on pump, and 12 13 today is probably the first full day of pumping activity on 14 the well -- we hope to get the production rate back up to 50 to 100 barrels of oil per day. 15 16 All right. What would you anticipate the Q. 17 production to be at the 20,000-to-1 GOR limitation? We think that the production rate will be between 18 Α. 19 50 and 100 barrels a day. 20 Q. All right. Do you believe the production at the 21 20,000-to-1 limitation to be the ultimate appropriate GOR at which this well should be produced? 22 23 Α. Yes, I do. 24 And why do you need that higher limitation? Q. 25 Α. We need that high limitation in order to

efficiently and economically extract the hydrocarbons from 1 the well. 2 All right. Will production at the higher rate 3 Ο. deplete reservoir energy excessively or prematurely? 4 No, we do not believe that it will. 5 Α. Mr. Strickland, is there any way to complete 6 0. these wells in the lower section to avoid frac'ing through 7 8 to the C sand so you can avoid a high-GOR situation to 9 begin with? No, there are not. The Brushy Canyon, as has 10 Α. 11 been demonstrated numerous times in this agency as well as through the literature, has minimal barriers that would 12 impede frac growth. You have seven-, eight-foot shale 13 stringers isolating these sands. And in fact, looking at 14 the cross-section Mr. Nelson showed, there was excessive 15 frac growth in the Chevron well. 16 We feel that you cannot isolate the perforation 17 placement and stay out of adjacent sands that might contain 18 different hydrocarbon constituents, as was demonstrated in 19 the Herradura case, and as we have in fact experienced in 20 the Murchison State "2" Number 1. 21 All right. If you would refer back to Exhibit 5, 22 Q. beginning with page 4 of Exhibit 5, it's labeled "Santa Fe 23 Federal Lease - 8 Wells"? 24 25 Α. Yes.

	20
1	Q. If you would review that for the Hearing Examiner
2	and explain what that evidence demonstrates.
3	A. We feel that the Herradura Bend-East Brushy
4	Canyon field is the analog for our situation, and this is a
5	plot of gas-oil ratio versus cumulative oil production for
6	an eight-well lease, the Santa Fe Federal lease.
7	You can see that the GOR reached a peak of 25,000
8	to 1, which is atypical of a solution-gas-drive-dominated
9	production scenario. It began a decline down to a 5000-to-
10	1 level after production of about 153,000 barrels of oil.
11	We feel that the gas sand depleted rapidly, but
12	however, as the gas zone was present, it did dominate the
13	GOR, opposed to a typical solution GOR where the gas-oil
14	ratio increases over the life of production.
15	Q. All right, let's refer to the next page, page 5
16	of Exhibit 5. If you would explain that page?
17	A. On this page, in Exhibit 5, this is a production
18	plot of the same eight wells on the Santa Fe Federal lease.
19	The top curve is the gas curve, the solid line is the oil
20	curve, the light dashed curve is the water curve.
21	And it just goes on to show that as the gas
22	production reached a high of 250 million cubic feet per
23	month in late 1992, oil production was at 10,000 per month,
24	the oil production and gas production were both declining
25	somewhat, you experienced a slight flattening through

1	midway of 1993 as the oil also began to decline. It just
2	goes ahead and confirms the GOR presentation on the
3	previous page.
4	Q. By the way, these plots are for the entire field,
5	are they not? They are not limited to a single well?
6	A. They're limited This plot is limited to eight
7	wells on the Santa Fe Federal lease.
8	Q. All right. And you have some updated plots now?
9	A. Yes, I do, I have some updated plots.
10	Q. All right. Let's refer to Exhibit 7, please.
11	A. Exhibit 7 is a continuation of the Herradura
12	Bend-East Delaware field, and it encompasses all wells in
13	the field which were completed, presumably in similar
14	manners. There again, we're going with the same color
15	scheme, red being gas, black being GOR, oil being the green
16	curve and blue being the water curve.
17	And this goes on to show the gas domination of a
18	nontypical solution gas drive system where the GOR on the
19	field basis reached a maximum of 17,000 to 1 and then began
20	to decline over time, and has is presently at about 4000
21	to 1. And that's through August of 1995.
22	Q. All right, let's refer to Exhibit 8, if you would
23	explain that exhibit.
24	A. Exhibit 8 is a contrasting exhibit.
25	As you recall from our gas analysis comparison,

we said that the Loving, Loving East fields were more 1 typical black oil systems, solution gas oil systems. 2 And there you see, on this decline curve, using the same color 3 scheme, an increasing GOR over the life of the field. You 4 5 see it beginning at a low point of 2000 to 1, increasing up to 10,000 to 1 over the life of the production. 6 7 We do not think this is the system we had in place, but we think this is the model of a typical solution 8 9 gas oil drive system. All right. Now, with respect to the Murchison 10 Q. State "2" well, do you anticipate it will be necessary to 11 fracture-stimulate the 4800-foot oil sand? 12 13 Α. Yes, we do believe we'll have to fracturestimulate the 4800 sand, as we did the basal Brushy Canyon, 14 in order to achieve commercial production rates. 15 And when you include production from the 4800-16 Q. 17 foot oil sand, what do you expect the maximum reasonable oil rate to be? 18 We expect that based on the greater porosity 19 Α. present in our well, where we had 47 feet of net pay 20 21 compared to the Chevron well having 32 feet, and with the better permeability present in our well, that we could have 22 rates approaching 150 to 200 barrels of oil per day. 23 And is that porosity demonstrated in Exhibit 3? 24 0. It's demonstrated on both the 25 Yes, it was. Α.

cross-section and on the isopach map presented by Mr. 1 2 Nelson previously. Is there any new evidence that you've seen to 3 Q. suggest that a single gas cap is present in this reservoir? 4 5 Α. No, there is not. All right, if you would refer back once again to 6 Q. 7 Exhibit 5 and page 11 of that. It's the initial production data information. What is this intended to demonstrate? 8 This is a spreadsheet of the first month and a Α. 9 half of production from the Murchison "2" Number 1. In the 10 left column you have oil, water, gas, GOR and flowing 11 12 pressure. We produced the well initially at a -- several 13 different flow rates and a few choke configurations. 14 One thing that's interesting to note, though, is, 15 production at the state-regulated oil system -- or the 16 state-regulated GOR of 2000 to 1 is shown on April 26th and 17 April 27th. 18 There we choked back the well to a 2000 to 1 at a 19 depth bracket allowable of 107 barrels of oil per day, 20 21 would give us a gas production of roughly 200 MCF per day. 22 When we put the well on an 8/64 choke and 23 produced 203 MCF, we produced six barrels of water and six 24 barrels of oil. 25 The next day we increased the choke slightly to a

1	9/64. We experienced 213 MCF. However, we produced no
2	fluid whatsoever.
3	The point here is that the well will not lift any
4	fluid at the 200-MCF-per-day rate and the state GOR
5	limitations of 2000 to 1.
6	Q. All right. Let's refer to the next page of
7	Exhibit 5, and explain that, please, sir.
8	A. In Exhibit 5, the last page of this package is a
9	summation of the economic analysis that was previously
10	performed for the Murchison State "2" Number 1. There, we
11	compared the impact of producing the well at 107 barrels of
12	oil per day, a 2000-to-1 GOR, we compared it to producing
13	case 2, 107 barrels a day at 10,000 to 1, and case 3 is 250
14	barrels a day from both the basal Brushy Canyon and the
15	4800 sand at a 10,000 to 1.
16	The important thing to note is, cases 1 and 2
17	are just the basal Brushy Canyon. If we produced at the
18	2000-to-1 GOR we would have a well payout of 64 months, to
19	recover 80,000 barrels, which is a poor economic venture.
20	Conversely, if we produced the well at the 117
21	barrels of oil per day at the 10,000-to-1 GOR, we had a
22	payout of nine months.
23	And at 250 barrels a day, as you would expect,
24	the payout decreased down to six months.
25	And the reserve values were obtained by using

1	volumetric calculations for a 40-acre area of reservoir
2	rock at the prescribed porosities, water saturations and
3	thicknesses.
4	Q. All right. Are you able to project the economic
5	scenario using the 20,000-to-1 GOR limitation?
6	A. No, that work has not been done.
7	Q. All right. Again, for purposes of explanation,
8	the exhibit refers to the White City Brushy Canyon field.
9	In fact, we're referring to the South Black River-Delaware
10	field. Is this the same ?
11	A. Yes, this exhibit refers to the same area and
12	refers more specifically to the Murchison State "2" Number
13	1 well in that field, whatever the name might be.
14	Q. Mr. Strickland, in your opinion, are the 250
15	barrels of oil per day allowable and the 20,000-to-1 GOR
16	limitation reasonable and necessary to efficiently and
17	economically develop this field?
18	A. Yes, they are.
19	Q. In your opinion, if the wells in this pool are
20	produced under the 10,000-to-1 GOR limitation, is there a
21	likelihood that the liquids cannot be economically produced
22	and ultimate recoverability of liquids will be impeded?
23	A. Yes.
24	Q. Likewise, if the wells are produced under the
25	statewide rules, 2000 to 1, with the standard depth bracket

allowable, the 107 barrels of oil, will recoverability be 1 2 substantially reduced? Yes, we believe this to be the case. 3 Α. Will the continued operation at the lower GOR 4 Q. 5 limitation result in any cross-communication in the oil 6 zone? 7 No, we do not believe that any cross-Α. communication in the oil zone will occur by producing in 8 the manner that we are prescribing. 9 10 That's at the higher GOR? Q. At the higher GOR limitation. 11 Α. All right. Do you expect that there will be gas 12 0. 13 migration among the zones in any event? The only event that there might be gas migration 14 Α. 15 would be in the shut-in state. But as long as we continuously produce the well 16 17 at the higher GORs and at the expected allowables, we do 18 not anticipate any cross-feeding of gas or oil. 19 Is development on 40 acres appropriate for this Q. 20 pool? Yes, the 40-acres development is appropriate 21 Α. 22 primarily because of the heterogeneity of the sands, the sand absence in the Chevron well and the sand presence in 23 our well. 24 All right. 25 Q. In your opinion, will granting

1	Enserch Exploration's Application be in the best interests
2	of conservation, the prevention of waste and the protection
3	of correlative rights?
4	A. Yes, I believe it is.
5	Q. And are you recommending that the temporary pool
6	rules for the pool with a 20,000-to-1 GOR limitation be
7	made permanent?
8	A. Yes, I am.
9	Q. Were Exhibits 6 through 8 prepared by you or at
10	your direction?
11	A. Yes, they were.
12	Q. And you've reviewed Exhibit 5 for the Examiner,
13	and we understand this was an exhibit presented in the
14	earlier case.
15	Have you reviewed the information in that exhibit
16	and believe it to be accurate?
17	A. Yes, I have.
18	MR. HALL: All right. We would tender Exhibits 5
19	through 8.
20	And that concludes our direct examination of Mr.
21	Strickland.
22	EXAMINER STOGNER: Exhibits 5 through 8 will be
23	admitted into evidence at this time.
24	Mr. Carr?
25	MR. CARR: No questions of Mr. Strickland.

	36
1	EXAMINATION
2	BY EXAMINER STOGNER:
3	Q. Mr. Strickland, in referring to your Exhibit
4	Number 6
5	A. Yes, sir.
6	Q this is a historical backdrop of the Murchison
7	"2" State Well Number 1 production. Was that production
8	curtailed any during the past what? year and half of
9	production, because of overproduction of gas allowable?
10	A. No, sir, it was not curtailed, and it's about
11	nine months of production. There was no curtailment. The
12	well was flowing at choked rates through October, at which
13	point we removed any chokes. But we're just basically
14	flowing the well in a prudent manner.
15	After the Commission granted the allowables and
16	the provisions for the temporary field rules, there was no
17	restricted flow that I'm aware of.
18	Q. Would this well, if it had continued with the
19	statewide 2000-to-1 gas-oil-ratio, would it have been
20	curtailed with that GOR?
21	A. At 2000, the well would lift it would be
22	curtailed significantly, and we would be able to lift
23	minimal fluid. And in fact, that the 2000 to 1 If you
24	go back to the exhibit, the tabular sheet that has the
25	daily production rates

36

	37
1	Q. That's your Exhibit Number 5?
2	A. Yes, page It's the second to the last page.
3	Q. Second to the last page.
4	A. The 2000-to-1 rate would be 2000 times 107 depth
5	bracket. But as you notice, we were producing 200 MCF
6	per day and six barrels of oil, which calculated to a
7	34,000-to-1 GOR.
8	So we were unable to lift We were highly gas
9	dominated at the 2000-to-1 GOR rate, and we needed to
10	increase the gas flow to reduce the GOR, if that addresses
11	your question.
12	Q. Yes, it does. But still, at the same time, if
13	your production wasn't curtailed, why are you still seeking
14	the 20,000-to-1 GOR?
15	A. Well, as you can see from July to October on the
16	exhibit showing the tabular production of the "2"-1 and the
17	graph, we were producing at 17,500 and at 19,200 in
18	September. At that point in time which is higher than
19	the 10,000 to 1 that we were asking for earlier.
20	And what we're seeking is no curtailment or no
21	reduction in the productive capacity of the well. As was
22	mentioned, in Herradura it reached a 25,000 to 1 and then
23	began to decline.
24	We don't expect it to stay at 25,000 to 1,
25	although we're not sure. We feel like that the gas will

	38
1	decline as we deplete that gas sand, and that gas and oil
2	rates will decline over a period of time.
3	But if we produce it at 10,000 to 1, where it was
4	in October, we feel that that GOR was impacted by fluid
5	loading. And as you can see by the production of over 100
6	barrels per day of water, we are experiencing a significant
7	amount of fluid loading.
8	And as we put the well on pump and continue to
9	pump the well, we hope that we'll obtain the 50 to 100
10	barrels a day. If we pump it slowly, perhaps the gas rate
11	could reach the 1.2 million or higher gas rates. It will
12	be a semi-flowing pumping situation.
13	In order to continuously remove fluids, though,
14	we need to have a pump or some form of artificial lift on
15	the well.
16	And we don't want to restrict the productive
17	capability by enforcing the 10,000-to-1 temporary GOR or
18	reverting back to the 2000 to 1, which we think will be
19	detrimental to recoveries and detrimental to the economic
20	recovery of the hydrocarbons.
21	And we feel that in the near term, after we get
22	stabilized performance from the basal Brushy Canyon zone,
23	it may be appropriate at that time to perforate and
24	stimulate the 4800 zone, which we think will have a lower
25	GOR but could have substantial oil production, based on the

1 good porosity development and permeability in the 4800
2 zone.

So we're seeking a cushion up to the 250 3 allowable, and we're seeking removal of any barriers to 4 full production capacity from the well, from the 4800 zone 5 6 at some point in time in the future, and the existing basal 7 Brushy Canyon zone that we currently have open to 8 production, however it's impeded by fluid loading. ο. Is it also your contention on Exhibit Number 6 --9 10 well, okay, I'm referring to Exhibit Number 6 and Exhibit 11 Number 8 in this question -- that continued production of this well could see a flattening out and also an increase 12 13 of the GOR like you have in Exhibit Number 8, which 14 represents the Loving and Loving East Pool production? It could. It's possible that as the gas sand is 15 Α. depleted, we might see a rise in the GOR at that point in 16 17 time. And it could reach the 10,000 level or higher. And there again, the 20,000-to-1 GOR, we do not 18 19 think, causes any waste. It damages no one, it's the --20 It's not causing any reservoir energy premature dissipation. 21 22 It's primarily allowing the gas zone to produce unimpeded, and the GOR could increase to 10,000 to 1, or it 23 may increase to a higher level. We're trying to remove any 24 25 roadblocks to production.

1	Q. As far as the Exhibit Number 8, that represents
2	Is that a solution gas drive, or a depletion gas drive,
3	or is it a combination of all three?
4	A. Well, Exhibit Number 8, we think, is dominated by
5	a solution gas drive. It's got the increasing GOR as you
6	produce the well, the oil production is declining. You can
7	see a fairly flat decline on the green line, following
8	1990, late 1990, early 1991, it's declining at an
9	exponential decline rate of about 15 percent, and the gas
10	is relatively flat.
11	And that decreasing oil and flat gas production
12	causes that increased GOR, and that is typical of most
13	solution gas drive systems.
14	Q. And that's your contention, that this pool
15	mirrors that particular production type or production
16	reservoir as you are exhibiting in Exhibit 8?
17	A. Well we actually feel that Exhibit 7 is more
18	analogous to our situation in the Murchison State, and
19	Exhibit 7 was the Herradura Bend East field, which I
20	believe in 1990, Case 10,541, was 10,541, I think, was
21	the case number.
22	But there they testified that they had two oil
23	zones sandwiching a gas sand. They perforated directly the
24	oil sands, frac'd into the gas zone. They had a higher GOR
25	initially, and it was It was a departure or deviation

from the norm. 1 And we feel like that's probably what we have 2 3 here. We had the C gas zone that we frac'd into, we have a higher GOR quite early in the well life. 4 In the Loving East, they were down to 2000 to 1 5 6 and gradually increased up to 10,000 to 1. 7 Here we started off at 8000 to 1 and jumped up to 8 19,000 to 1 quite rapidly. So we feel like -- we may have -- We may have a 9 gradual jump up to this 17,000, 19,000 level, and we may 10 decline back downward. However, we also have the change 11 that as we complete the 4800 sand, which we expect to have 12 13 a lower GOR, we could have a combination effect. 14 What's the status of the other three wells down Q. 15 in the southeast quarter of Section 2? I mean, you have 16 the State Number 2 drilled; is that correct? Are you 17 drilling it at this time? We have a State Number 4 drilled and we have a 18 Α. State Number 3 drilled. The State Number 2 --19 20 MR. NELSON: State Number 2 drilled. 21 THE WITNESS: State Number 2 drilled? Okay, not 22 the Number 3. Yeah, that's right, we have the State "2"-2 23 and the State "2"-4 drilled. The State "2"-4 is shut in, and we are 24 25 presently -- we tested the basal Brushy Canyon in the State

	42
1	Number "2"-4; it was marginally productive. We are in
2	present operations of attempting to examine the well for
3	conversion to a saltwater disposal well to handle the water
4	produced from the State "2" Number 1.
5	And then we would also take the production from
6	the State "2" Number 2. The State "2" Number 2 is a basal
7	Brushy Canyon completion. It's producing about 20 barrels
8	a day on pump and about 100 MCF of gas and about 150
9	barrels of water. They are poorer producing wells than the
10	Murchison State "2" Number 1.
11	Q. In those areas where the Brushy Canyon is not
12	present, but should the 20,000 to 1 be approved, in those
13	areas, where the 4800-foot sand is produced and somebody
14	comes in and is capable of an increased gas-oil ratio
15	because that would also follow through in those areas,
16	would there be any detriment or potential detriment to that
17	production, higher GOR?
18	A. No, we do not feel that that would be the case.
19	EXAMINER STOGNER: Any other questions of this
20	witness?
21	MR. HALL: No, sir.
22	EXAMINER STOGNER: You may be excused.
23	Mr. Hall, do you have anything else further?
24	MR. HALL: Mr. Examiner, we'd also offer our
25	Exhibit 12, which is our affidavit showing notice of this

1 hearing to interest owners and operators. And we'd also ask the Examiner to take 2 administrative notice of the previous testimony offered in 3 4 Case 11,280. 5 And also, I would note that Unit Production 6 Company is an interest owner in Section 36. They have 7 authorized me to state that they support Enserch's 8 Application here today. 9 And that concludes our case. 10 EXAMINER STOGNER: Okay, with -- I'll take 11 administrative notice of the previous case in this matter. 12 And also in reviewing the docket, I see that Case 11,401, which was a nomenclature case, extended the P-J 13 Delaware pool in Eddy County, New Mexico, to include the 14 15 southeast quarter section too. I'll also take administrative notice on that and make any necessary -- or 16 17 propose any necessary changes in this order, should it be approved, to straighten up the nomenclature. 18 Mr. Carr? 19 MR. CARR: Mr. Stogner, I have a statement I've 20 been asked to present to the Division for Chevron USA 21 22 Production Company. It reads: 23 24 As an offset leasehold owner, Chevron USA, Inc., 25

supports the Application of Enserch Exploration to 1 amend the special pool rules for the South Black 2 River-Delaware Pool to increase the GOR to 20,000 to 3 4 1. A 20,000-to-1 GOR more accurately represents the current producing GOR of the field and allows for 5 6 economic development of the Delaware formation. 7 Establishment of a 20,000-to-1 GOR will support the 8 economic viability of Chevron's workover program in the South Black River field planned for 1996. 9 10 The statement is signed by Dave Rittersbacher, 11 senior geologist for the New Mexico area. 12 EXAMINER STOGNER: Thank you, Mr. Carr. 13 Anything further? 14 15 Mr. Hall, I'm going to ask that you submit me a 16 rough draft. 17 MR. HALL: Will do. EXAMINER STOGNER: With that, if there's nothing 18 further in either Case 11,447 or the reopened portion of 19 20 11,280, this case will be taken under advisement. (Thereupon, these proceedings were concluded at 21 I do hereby certify that the foregoing a 22 10:06 a.m.) a complete record of the proceedings in the Examiner hearing of Case Nos 11280 (Red 23 heard by me on 16/ 6 19 4 24 , Examiner Oil Conservation Division 25

CERTIFICATE OF REPORTER

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

I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I transcribed my notes; and that the foregoing is a true and accurate record of the proceedings.

I FURTHER CERTIFY that I am not a relative or employee of any of the parties or attorneys involved in this matter and that I have no personal interest in the final disposition of this matter.

WITNESS MY HAND AND SEAL January 13th, 1996.

STEVEN T. BRENNER CCR No. 7

My commission expires: October 14, 1998