### STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

#### OIL CONSERVATION DIVISION

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IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 11,367

APPLICATION OF CHEVRON U.S.A., INC.

### REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

# ORIGINAL

BEFORE: DAVID R. CATANACH, Hearing Examine RECENCE

SEP 7 1995

August 24th, 1995

Santa Fe, New Mexico

Oil Conservation Division

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, August 24th, 1995, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

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2 INDEX August 24th, 1995 Examiner Hearing CASE NO. 11,367 PAGE APPEARANCES 3 APPLICANT'S WITNESSES: <u>DAVE RITTERSBACHER</u> (Geologist) Direct Examination by Mr. Carr 4 Examination by Examiner Catanach 13 REPORTER'S CERTIFICATE 16 \* \* \* EXHIBITS Applicant's Identified Admitted Exhibit 1 7 13 Exhibit 2 8 13 Exhibit 3 9 13 Exhibit 4 10 13 Exhibit 5 10 13 Exhibit 6 11 13 Exhibit 7 12 13 \* \* \*

## A P P E A R A N C E S

FOR THE DIVISION:

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

FOR THE APPLICANT:

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

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STEVEN T. BRENNER, CCR

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WHEREUPON, the following proceedings were had at 1 9:09 a.m.: 2 EXAMINER CATANACH: At this time we'll call Case 3 4 Number 11,367. MR. CARROLL: Application of Chevron U.S.A., 5 Inc., for directional drilling, an unorthodox bottomhole 6 7 oil well location, and a nonstandard oil proration unit, Lea County, New Mexico. 8 9 EXAMINER CATANACH: Are there appearances in this 10 case? 11 MR. CARR: May it please the Examiner, my name is 12 William F. Carr with the Santa Fe law firm Campbell, Carr and Berge. 13 We represent Chevron U.S.A. in this matter, and I 14 15 have one witness. 16 EXAMINER CATANACH: Any additional appearances? Will the witness please stand to be sworn in? 17 18 (Thereupon, the witness was sworn.) 19 DAVE RITTERSBACHER, 20 the witness herein, after having been first duly sworn upon 21 his oath, was examined and testified as follows: 22 DIRECT EXAMINATION BY MR. CARR: 23 24 Q. Will you state your name for the record, please? 25 My name is Dave Rittersbacher. Α.

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1	Q. Mr. Rittersbacher, by whom are you employed?
2	A. I'm employed by Chevron U.S.A. in Midland, Texas.
3	Q. And what is your current position with Chevron?
4	A. I'm a petroleum geologist.
5	Q. Have you previously testified before this
6	Division?
7	A. Yes, I have.
8	Q. At the time of that testimony, were your
9	credentials as a petroleum geologist accepted and made a
10	matter of record?
11	A. Yes, they were.
12	Q. Are you familiar with Chevron's plans to
13	directionally drill its Lea "YL" State Well Number 2?
14	A. Iam.
15	MR. CARR: Are the witness's qualifications
16	acceptable?
17	EXAMINER CATANACH: Yes, they are.
18	Q. (By Mr. Carr) Mr. Rittersbacher, would you first
19	summarize for the Examiner what Chevron seeks in this case?
20	A. Chevron proposes to re-enter our Lea "YL" State
21	Number 2 well, which is located 2230 feet from the south
22	line, 2310 feet from the east line. This is Unit Letter J
23	in Section 2 of Township 17 South, Range 37 East.
24	Q. Now, that is an unorthodox surface location, is
25	it not?

1	A. That's right, we plan to directionally drill to
2	an unorthodox bottomhole location 2600 feet from the north
3	line, 1700 feet from the east line. We propose that our
4	bottomhole location be within 50 feet of the 2600-from-
5	north and 1700-from-east directions.
6	Q. The original unorthodox location for the Lea "YL"
7	State Well Number 2 was previously approved by the
8	Division, was it not?
9	A. Yes, it was.
10	Q. And that was Order Number R-9325?
11	A. Right.
12	Q. Are you also seeking approval of a nonstandard
13	oil proration unit for this well?
14	A. Yes, we are. We're seeking approval of an 80-
15	acre proration unit. It would be comprised of the
16	southwest of the northeast quarter of Section 2 and the
17	northwest of the southeast quarter of Section 2.
18	Q. In what pool will this well be completed?
19	A. This will be completed in the Shipp-Strawn Pool.
20	Q. And what are the well-location and acreage-
21	dedication requirements for this pool?
22	A. Standard locations for this pool require that
23	wells be within 150 feet of the center of a governmental
24	quarter-quarter section, and it requires that a standard
25	proration unit be 80 acres within a quarter section and

that 80 acres be the north half, south half, east half or 1 west half of a quarter section. 2 And so your nonstandard proration unit isn't that 3 0. you don't have the appropriate number of acres; it's that 4 you are extending it across a guarter section line? 5 That's right. 6 Α. 7 Have you prepared certain exhibits for Q. 8 presentation here today? 9 Α. Yes, we have seven exhibits to present today. 10 Ο. Could you refer to what has been marked for identification as Chevron Exhibit Number 1, identify the 11 exhibit and review the information on this exhibit for Mr. 12 Catanach? 13 14 Α. Chevron Exhibit Number 1 is a map showing the existing proration units in Section 2. It's labeled 15 "Proration Unit Map". It encompasses all of Section 2 of 16 17 South, 37 East. It shows three active proration units 17 within the section. They are outlined by the heavy black 18 line. 19 20 It shows our Lea "YL" State Number 2 well, which 21 is located in the northwest of the southeast, and it shows 22 a line showing our directional drilling plans to a location 23 2600 feet from the north, 1700 feet from the east within Section 2. 24 25 Q. Bottomhole location is actually 130 feet closer

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1	to the east line of the dedicated acreage than authorized
2	by the field rules?
3	A. That's right. The well location would encroach
4	to the east 130 feet.
5	Q. Other wells have been directionally drilled in
6	this section, have they not?
7	A. Right, we have two other wells within this
8	section that have been directionally drilled.
9	The first one that I'll reference is in the
10	northwest of the southwest. The State 2 Number 1 was
11	directionally drilled to an unorthodox location to the
12	southwest where it was drilled from a dryhole location to a
13	producer. That's an active proration unit.
14	The other well that was directionally drilled to
15	a nonstandard location is in the northeast of the southeast
16	of Section 2, and it was drilled from a dryhole location to
17	the northeast, to a well that produced from the Strawn and
18	is now plugged and abandoned.
19	Q. All right, Mr. Rittersbacher, let's go to Exhibit
20	Number 2. Can you identify and review that exhibit?
21	A. Exhibit Number 2 shows the same section 2 of 17
22	South, 37 East. It's labeled "Operator Map", and it shows
23	the operators and working interest owners in Section 2.
24	It shows the Lea "YL" State Number 2 well, which
25	is located in the northwest of the southeast, and our

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directional drilling location 2600 feet from the north and 1 1700 feet from the east. 2 It also shows the proposed proration unit as a 3 dashed line that's 80 acres in the southwest of the 4 northeast and the northwest of the southeast. 5 All of the operators shown on this map have been 6 notified of today's hearing. 7 Would you generally describe for the Examiner the 8 Q. characteristics of the Strawn formation in this area? 9 10 Α. The Strawn formation, our interpretation of its 11 reservoir characteristics is that it's an algal mound 12 buildup, it's a limestone, and reservoir is found in the 13 thickest portions of these buildups. We try to target a well location within the thickest part of the mound, 14 15 because we feel you have the best chance of reservoir development there. 16 Let's go to Exhibit 3. Will you identify that, 17 Q. 18 please? 19 Α. Exhibit 3 again shows Section 2. It's labeled 20 "Strawn Isopach Map". This isopach map is contoured on a 20-foot contour interval and the contour map was 21 22 constructed by a 3-D seismic shoot. We have a 3-D seismic 23 grid that covers all of Section 2, with data points spaced every 110 feet. 24 25 The mound that we're targeting begins with a 200-

foot contour and increases in 20-foot increments where we 1 feel the maximum thickness is 260 feet in thickness, and 2 that's where we've targeted our bottomhole location, within 3 this mound. 4 The proposed 80-acre proration unit was chosen 5 because we feel that that proration unit best represents 6 7 the majority of the mound's volume. All right, let's go to Exhibit Number 4. Can you 8 Q. explain what this is? 9 Exhibit Number 4 is titled "Target Strawn Mound 10 Α. Volumetrics", and it's a follow-up to Exhibit Number 3, 11 where we have calculated the acre-foot volume of the mound 12 that we had contoured. 13 14 The total contour volume is 537 acre-feet. Within the proposed proration unit exists 445 acre-feet. 15 16 And then the last line is a calculation, 445 acre-feet 17 divided by 537 acre-feet, shows that 83 percent of the mound as contoured would be within the proposed proration 18 unit. 19 20 Now, Mr. Rittersbacher, I'd ask you now to review Q. 21 how Chevron proposes to drill the well, and I think you 22 should refer to Chevron's Exhibit Number 5. 23 Α. Figure Number 5 was prepared for Chevron by 24 Baker-Hughes, a directional drilling company. 25 What we plan to do with the Lea "YL" State Number

2 is pull the existing 5-1/2-inch casing, then we'd like to 1 kick off in the open hole at a depth of 9500 feet and begin 2 to build angle. We'd like to build our angle out to about 3 22 degrees and continue on down to a bottomhole location of 4 11,800 feet true vertical depth. And that would put us at 5 the proposed bottomhole location of 2600 feet from the 6 7 north line, 1700 feet from the east line. We plan on taking directional surveys a minimum 8 9 of every 100 feet, and we'll take them more frequently if we feel that our directional program is not going the way 10 11 that we anticipate. 12 Q. When the well reaches total depth, you will have 13 a survey of the entire wellbore, will you not? Yes, we will. 14 Α. 15 ο. And will you provide a copy of that to the Oil Conservation Division? 16 17 Yes, we will. Α. 18 Is Exhibit Number 6 a copy of an affidavit Q. confirming that notice of this Application has been 19 20 provided to all affected offsetting operators, as required 21 by Oil Conservation Division rules? 22 Α. yes, it is, and within it are copies of the 23 certified mail green cards showing that each of the offset 24 operators has been notified. 25 Q. Have you received waivers to this proposal from

offsetting operators? 1 Yes, we have. The two non-Chevron working Α. 2 interest owners to the east upon which we are encroaching 3 have both provided waivers, and that is Exhibit Number 7 of 4 5 copies of waivers provided by Conoco and Bechtel. 6 Q. And so if we look back at Exhibit Number 2, that 7 shows that you're actually encroaching on the tract, the 8 working interest in which is owned by Conoco, Chevron and Bechtel, correct? 9 That's correct. Chevron owns a 25-percent 10 Α. working interest in the tract to the east. 11 12 Ο. And so the only interest owners who could be adversely affected by the unorthodox location have waived 13 objection to it? 14 15 Α. That's correct. In your opinion, will approval of this 16 Q. 17 Application and the directional drilling of the subject 18 well result in the production of hydrocarbons that 19 otherwise would be left in the ground? 20 Α. It will. 21 In your opinion, will approval of this Ο. 22 Application be in the best interest of conservation, the 23 prevention of waste and the protection of correlative rights? 24 Yes, it will. 25 Α.

Were Exhibits 1 through 7 either prepared by you 1 Q. or compiled at your direction? 2 Α. They were. 3 MR. CARR: At this time, Mr. Catanach, we move 4 the admission into evidence of Chevron USA Exhibits 1 5 through 7. 6 7 EXAMINER CATANACH: Exhibits 1 through 7 will be admitted as evidence. 8 9 MR. CARR: And that concludes my direct 10 examination of Mr. Rittersbacher. 11 EXAMINATION BY EXAMINER CATANACH: 12 13 Q. Mr. Rittersbacher, was this well drilled by 14 Chevron? 15 Α. Yes, the Lea "YL" State Number 2 was originally a Chevron well. 16 And was it drilled as a dryhole? 17 Ο. No, sir, it produced from the unit below the 18 Α. target mound, called the Strawn sandstone, and that's just 19 20 Chevron terminology. It produced 5000 barrels of oil and has been shut in since 1993. 21 22 Q. Did it just not encounter any of the algal mounds? 23 24 Α. It encountered -- If we move to Exhibit Number 3, 25 which is the isopach, you'll see that it encountered a

1	thickness of 179 feet of total Strawn section, but that
2	section was tight and was not capable of production.
3	What we hope for is that by moving towards the
4	thicker mound to the east, we will encounter better
5	reservoir development.
6	Q. The offset well to the east, the State MTS Number
7	1, did that produce from this same mound?
8	A. No, it again produced from what we call the
9	Strawn sandstone. It made about 25,000 barrels of oil and
10	is currently plugged and abandoned.
11	Q. Has Chevron used 3-D seismic in this area to map
12	these algal mounds before?
13	A. No, this is our first 3-D shoot in the Shipp
14	area.
15	Q. Do you know if 3-D seismic is effective in
16	mapping these mounds?
17	A. Well, we feel that it is because we can correlate
18	the producing wells that you see on this map with fixed
19	Strawn intervals.
20	Q. Is it accurate enough to tell you where that
21	thickest portion of that mound is?
22	A. Within reason, it is. We can't tell, you know,
23	within several feet. But again we're on 110-foot spacing,
24	so we have a data point every 110 feet, and there could be
25	variability in between that. But it gives us a pretty

reasonable idea, on that kind of grid, of where the 1 thickest portion is. 2 Do you know what kind of reserves you're looking 3 0. at recovering if you encounter production? 4 We're looking at -- We're generally going by 5 Α. analogy of other features of this size, and we hope that 6 we'll be in the range of 100,000 to 200,000 barrels of oil. 7 The 5-1/2-inch casing is set at TD at this point Q. 8 in time? 9 10 Α. Right, and the top of cement is about 10,500 feet. 11 12 Ο. So you're going to cut the 5-1/2 above that depth 13 and pull it --14 Α. Yes, sir, that's our plan. 15 Q. -- and kick off from the vertical at 9500 feet? 16 Α. Right. 17 EXAMINER CATANACH: I have nothing further, Mr. Carr. 18 19 MR. CARR: That concludes our presentation in 20 this case. 21 EXAMINER CATANACH: There being nothing further, 22 Case 11,367 will be taken under advisement. 23 (Thereupon, these proceedings were concluded at 24 9:23 a.m.) 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 August 27th, 1995.

STEVEN T. BRENNER CCR No. 7

My commission expires: October 14, 1998

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Çase No. 1136. 19% neard by me on - , Examiner etan Oil Conservation Division

STEVEN T. BRENNER, CCR (505) 989-9317 16