### 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:

APPLICATION OF POGO PRODUCING COMPANY FOR A PRESSURE MAINTENANCE PROJECT, LEA COUNTY, NEW MEXICO

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CASE NO. 11,579

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#### REPORTER'S TRANSCRIPT OF PROCEEDINGS

## EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

July 25th, 1996

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, July 25th, 1996, 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	
July 25th, 1996 Examiner Hearing	
CASE NO. 11,579	
	PAGE
EXHIBITS	3
APPEARANCES	3
APPLICANT'S WITNESSES:	
<u>TERRY GANT</u> (Landman) Direct Examination by Mr. Bruce	4
Examination by Examiner Catanach <u>GEORGE J. DILLMAN</u> (Geologist)	10
Direct Examination by Mr. Bruce Examination by Examiner Catanach	12 16
VANCE USHER (Engineer)	
Direct Examination by Mr. Bruce Examination by Examiner Catanach	20 26
REPORTER'S CERTIFICATE	31
* * *	

	EXHIBITS	
Applicant's	Identified	Admitted
Exhibit 1 Exhibit 2 Exhibit 3	5 9 13	10 10 16
Exhibit 4 Exhibit 5 Exhibit 6	13 13 21	16 16
Exhibit 6	21	26
А	PPEARANCES	
FOR THE DIVISION:		
RAND L. CARROLL Attorney at Law Legal Counsel to the 2040 South Pacheco Santa Fe, New Mexico		
FOR THE APPLICANT:		
HINKLE, COX, EATON, 218 Montezuma P.O. Box 2068	COFFIELD & HENSLEY	
Santa Fe, New Mexico By: JAMES G. BRUCE	87504-2068	
	* * *	

1	WHEREUPON, the following proceedings were had at
2	11:04 a.m.:
3	EXAMINER CATANACH: At this time we'll call Case
4	Number 11,579.
5	MR. CARROLL: Application of Pogo Producing
6	Company for a pressure maintenance project, Lea County, New
7	Mexico.
8	EXAMINER CATANACH: Are there appearances in this
9	case?
10	MR. BRUCE: Mr. Examiner, Jim Bruce from the
11	Hinkle law firm in Santa Fe, representing the Applicant. I
12	have three witnesses to be sworn.
13	EXAMINER CATANACH: Additional appearances in
14	this case?
1.5	Will the witnesses please stand to be sworn in?
16	(Thereupon, the witnesses were sworn.)
1.7	TERRY GANT,
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. BRUCE:
22	Q. Would you please state your name and city of
23	residence for the record?
24	A. Terry Gant, Midland, Texas.
25	Q. Who do you work for and in what capacity?
•	

1	A. Pogo Producing Company as a senior landman.
2	Q. Have you previously testified before the Division
3	as a landman?
4	A. Yes, I have.
5	Q. And were your credentials as an expert accepted
6	as a matter of record?
7	A. Yes, they were.
8	Q. And are you familiar with the land matters
9	involved in this Application?
10	A. Yes, I am.
11	MR. BRUCE: Mr. Examiner, I would tender Mr. Gant
12	as an expert petroleum landman.
13	EXAMINER CATANACH: Mr. Gant is so qualified.
1.4	Q. (By Mr. Bruce) Mr. Gant, briefly what is it Pogo
15	seeks in this case?
16	A. Pogo seeks approval of a pressure maintenance
17	project for a portion of its Red Tank 26 Federal lease.
18	Q. And what formation does the project involve?
19	A. The lower Brushy Canyon portion of the Delaware
20	Mountain Group.
21	Q. Okay. Let's move on to your Exhibit 1 and have
22	you identify that for the Examiner.
23	A. Exhibit 1 is a land plat of a portion of Township
24	22 South, Range 32 East. All Delaware wells in the area
25	are identified.

1	Q. What lease is involved in this particular
2	project?
3	A. That will be Federal Lease NM-86,149, which
4	covers the west half of Section 26. Pogo owns 100 percent
5	of the working interest in this lease.
6	Q. And the red dot identifies the proposed injection
7	well?
8	A. That is correct.
9	Q. Who is the mineral interest owner in all of this
1.0	area we're looking at?
11	A. The US owns the mineral interest under all of
1.2	Sections 26, 27 and 35 in the north half of Section 34.
13	The United States also owns the surface at the proposed
14	injection well site.
15	Q. So really the project in any offsetting leasehold
16	or any offsetting acreage, the mineral interest is owned
17	by the BLM?
18	A. That's correct.
19	Q. Now, turning to working interests, who owns the
20	leases within a half mile of the proposed injection well
21	from the surface to the base of the Bone Spring?
22	A. Pogo is the sole working interest owner in the
23	west half of Section 26, east half of Section 27, north
24	half of Section 34 and all of Section 35.
25	Q. And what about the east half of Section 26?
L	

1	A. Pogo is the operator and owns approximately 88.5
2	percent. Meridian, which I believe is now known as
3	Burlington Resources, is the owner of approximately 10.5
4	percent. And then Yates Petroleum is the owner of a little
5	under one percent.
6	Q. So only Meridian and Yates, or Burlington
7	Resources and Yates, are the potentially affected
8	offsetting working interest owners?
9	A. Yes, they are.
10	Q. And you do operate their acreage, though; is that
11	correct?
12	A. Yes, that's correct.
13	Q. What is the location of the proposed injection
14	well?
15	A. The injection well is the Red Tank 26 Federal
16	Number 1 well, located in the northeast quarter of the
17	southwest quarter of Section 26, and it's marked as a red
18	dot on Exhibit 1.
19	Q. What is the injection interval?
20	A. 8399 feet to 8471 feet subsurface, which is in
21	the Brushy Canyon.
22	Q. What is the current status of this well?
23	A. That well is shut in.
24	Q. What project area does Pogo propose?
25	A. The south half of the northwest quarter and

1	southwest quarter of Section 26, covering 240 acres.
2	Q. And could you identify the producing wells which
3	will be within the project area?
4	A. That would be the Red Tank 26 Federal Numbers 3,
5	4, 5 and 7, which again are marked on Exhibit 1. We
6	believe that gas injection will provide pressure support
7	for these wells.
8	Q. And what is the current status of those
9	particular four wells?
1.0	A. They all produce out of the Brushy Canyon at
11	rates of 37 barrels of oil a day, 35 barrels of oil a day,
12	67 barrels of oil a day, and 25 barrels of oil per day,
1.3	respectively.
1.4	Q. Where will the gas for the project come from?
15	A. That will come from the Red Tank 26 Federal
16	Number 8 well, which is located in the southeast quarter of
17	the southwest quarter of Section 26.
18	Q. And that is in the project area, the proposed
19	project area?
20	A. That's correct.
21	Q. And what zone does that well produce from?
22	A. The Ramsey sand of the Bell Canyon.
23	Q. In this particular area, are the Bell Canyon and
24	the Brushy Canyon in the same pool?
25	A. Yes, the West Red Tank-Delaware.

1	Q. Now, who was notified of this hearing?
2	A. We notified Meridian again, or Burlington
3	Resources, and Yates as the only other working interest
4	owners in the area. We also notified the BLM as surface
5	and royalty owner and the Hobbs Division Office.
6	Submitted as Exhibit 2 is an affidavit of notice,
7	along with a copy of the notice letter, with receipts
8	attached.
9	MR. BRUCE: Mr. Examiner, if you look at the
10	notice letter, although it was mailed certified mail, for
11	some reason every single green card has disappeared from
12	the face of the earth. They are somewhere in the post
13	office, and we've made request for duplicate green cards.
1.4	If we can't get those, we will renotify the parties.
15	We think they've all received notice of this. If
16	necessary, I'd like to keep the record open until we make
17	that determination, and we will submit the substitute cards
18	or, if necessary, renotify all the parties of a subsequent
19	hearing date.
20	EXAMINER CATANACH: Okay.
21	Q. (By Mr. Bruce) Mr. Gant, were Exhibits 1 and 2
22	prepared by you or compiled from company records?
23	A. Yes, they were.
24	Q. And in your opinion, is the granting of this
25	Application in the interests of conservation and the

1	prevention of waste?
2	A. Yes.
3	MR. BRUCE: At this time, Mr. Examiner, I would
4	move the admission of Pogo's Exhibits 1 and 2.
5	EXAMINER CATANACH: Exhibits 1 and 2 will be
6	admitted as evidence.
7	EXAMINATION
8	BY EXAMINER CATANACH:
9	Q. Okay, Mr. Gant, you want to have the whole west
10	half as the you're proposing to have the whole west half
11	as the project as the pressure maintenance project?
12	A. No, sir, just the southwest quarter and the south
13	half of the northwest quarter of Section 26.
14	Q. South half of the northwest quarter and the what?
15	A. The southwest quarter and the south half of the
16	northwest quarter.
17	Q. South half of the northwest quarter. Again,
18	the Pogo operates east half of Section 27?
19	A. Yes.
20	Q. The
21	A. Yes.
22	Q. Okay, north half of 34?
23	A. Yes.
24	Q. All of 35?
25	A. Yes.

1	Q. And obviously the west half of 26?
2	A. Yes.
3	Q. And in Section 23, is that Meridian Does
4	Meridian operate that?
5	A. Meridian operates the all of the Section 23
6	I say that I have to backtrack. I know that the
7	southern portion except for the east half of the southeast
8	quarter, they operate.
9	Q. Okay. The project area producing wells will be
10	the 3, 4, 5 and 7, which produce at rates of 37, 35, 67 and
11	25?
12	A. That's correct, respectively.
13	Q. Okay. Injection would occur into the lower
14	Brushy Canyon member, which is being produced in the 3, 4,
15	5 and 7?
16	A. That's correct.
17	Q. And the Number 8 well, that is producing from the
18	Ramsey sand only?
19	A. Correct.
20	Q. Not producing from the interval that you're going
21	to inject into?
22	A. I'd have to I was looking back at my
23	geologist, and he's shaking his head, so that's correct.
2:4	Q. Okay. As far as the vertical limits of the
25	project, they would not just be the lower Brushy Canyon

<ol> <li>member; they would be the entire Del</li> <li>A. Actually, I'm going to hav</li> <li>defer that to our engineer or to our</li> </ol>	
	ve to I'll probably
3 defer that to our engineer or to our	
	geologist.
4 EXAMINER CATANACH: Okay.	That's all I have of
5 the witness.	
6 MR. BRUCE: Call Mr. Dillm	nan to the stand.
7 <u>GEORGE J. DILLM</u>	AN,
8 the witness herein, after having bee	en first duly sworn upon
9 his oath, was examined and testified	l as follows:
10 DIRECT EXAMINAT	ION
11 BY MR. BRUCE:	
12 Q. Will you please state your	name and city of
13 residence?	
14 A. George Dillman, Midland, T	'exas.
15 Q. And what is your occupation	on and who are you
16 employed by?	
17 A. I am senior geologist with	Pogo Producing
18 Company.	
19 Q. Have you previously testif	ied before the Division
20 as a geologist?	
21 A. Yes, I have.	
22 Q. And were your credentials	as an expert petroleum
23 geologist accepted as a matter of re	cord?
A. They were.	
25 Q. Are you familiar with the	geology pertaining to

12

1	this Application?
2	A. Yes, I am.
3	MR. BRUCE: Mr. Examiner, I would tender Mr.
4	Dillman as an expert petroleum geologist.
5	EXAMINER CATANACH: He is so qualified.
6	Q. (By Mr. Bruce) Mr. Dillman, would you identify
7	your Exhibits 3 and 4 and describe the Delaware geology in
8	this area?
9	A. Exhibit 3 is a structure map of the proposed
10	Brushy Canyon injection interval, and Exhibit 4 is a net
11	porosity isopach of the same injection interval.
12	The injection well identified by a green circle
13	is located on the east flank and structurally downdip of
14	the primary Brushy Canyon BC4 reservoir, which we are
15	requesting to inject gas into.
16	Q. Would you refer, then, to your Exhibit 5,
17	identify that for the Examiner, and discuss the precise
1.8	injection interval?
19	A. Exhibit 5 is a cross-section of all the wells
20	associated with this project. It shows all the potential
21	producing wells, the injection well, and the gas-source
22	well is also included on the edge of the cross-section.
23	At the base of each log is the initial potential,
24	the cumulative production as of 5-1-96, and the current
25	rate of production in each of these wells.

1	The location of this cross-section is identified
2	on Exhibits 3 and 4 as the highlighted outline.
3	The primary injection interval is denoted by Pogo
4	as the BC4 in the lower part of the Brushy Canyon section.
5	A datum marker is on the cross-section that aligns this
6	injection interval in the wells affected by this project
7	area. Perforations are also indicated on each of the wells
8	that demonstrate where the wells were initially perforated
9	and the initial potential rates were recorded from.
10	The injection well is the Red Tank 26 Number 1,
11	and to the left of it is the gas-source well, the Red Tank
12	26 Number 8. The perforations of the Ramsey sand in the
13	Bell Canyon where the gas is being sourced from are
14	indicated on that log.
15	Q. Mr. Dillman, the Examiner asked Mr. Gant a
16	question as far as what zone would be within this pressure
17	maintenance project. You don't need the entire Delaware
18	interval, Bell Canyon to Brushy Canyon, for the project
19	area, do you?
20	A. No, sir, the affected injection area will be
21	confined to the basal Brushy Canyon section. The
2.2	perforations as indicated on each of the wells are
23	demonstrating production from this unique injection
24	interval.
25	We expect that the gas will be confined and

1	injected entirely into the BC4 reservoir and any adjacent
2	rocks affected by the initial fracture stimulation, which
3	should be limited from 50 to 200 feet vertical growth in
4	either direction of the existing perforations in each of
5	the wellbores. This would essentially retain all the
6	injected gas in the very basal Brushy Canyon and
7	essentially below what is indicated on the cross-section as
8	the A marker.
9	Q. So geologically, the injected gas will remain in
10	that lower Brushy Canyon?
11	A. That is correct.
12	Q. Do you expect the injection of gas into this zone
13	will provide pressure support for the four producing wells
14	on this lease or project area, excuse me?
1.5	A. That is correct. Each of those wells are
1.6	slightly higher on structure than the proposed injection
1.7	well. We expect that the gas will move upstructure and
1.8	enhance recovery from those four wells.
19	Q. Now, the gas-source well, the Number 8, what is
20	that capable of producing?
21	A. Approximately 500 MCF of gas per day.
22	Q. Let's move on to a slightly different topic. Are
23	there any sources of fresh water within one mile of the
24	proposed injection well?
25	A. No, the nearest water well is more than two miles
-	

1	to the north, in the northeast quarter of the southeast
2	quarter. I'm sorry, the northeast quarter of the southwest
3	quarter of Section 14. Pogo attempted to find fresh water
4	in this immediate area, but drilled two dry holes.
5	Q. Are there any open faults or other connections
6	between the injection zone and any drinking water sources
7	in this area?
8	A. None that we are aware of.
9	Q. Were Exhibits 3 through 5 prepared by you or
10	under your direction and control?
11	A. They were.
12	Q. And in your opinion, will the granting of this
13	Application be in the interests of conservation and the
14	prevention of waste?
15	A. It will.
16	MR. BRUCE: Mr. Examiner, I would move the
17	admission of Pogo's Exhibits 3 through 5.
18	EXAMINER CATANACH: Exhibits 3 through 5 will be
19	admitted as evidence.
20	EXAMINATION
21	BY EXAMINER CATANACH:
22	Q. Mr. Dillman, what is the extent of the whole
23	Delaware Pool in this area? At approximately what depths
24	do you find the Delaware?
25	A. The Delaware produces, as indicated on this

<ul> <li>12 the base of the Delaware formation.</li> <li>13 Q. Okay. Now, in the Within the west half of</li> </ul>		
<ul> <li>Brushy Canyon section.</li> <li>Q. Right, at approximately what depths do you find</li> <li>the top and bottom of the Delaware in this area?</li> <li>A. The top of the Delaware is essentially at 4900</li> <li>feet, measured depth drilling, and the bottom of the</li> <li>Delaware is approximately 8650 feet measured depth.</li> <li>Q. Okay.</li> <li>A. The cross-section has indicated a Bone Springs</li> <li>marker at the bottom of each log. That would correspond to</li> <li>the base of the Delaware formation.</li> <li>Q. Okay. Now, in the Within the west half of</li> <li>Section 26 or the project area, is the that the lower</li> <li>Brushy Canyon is the predominant producing interval?</li> <li>A. That's correct.</li> <li>Q. But you do have some production from the Ramsey</li> <li>Bell Canyon?</li> <li>A. The gas-source well is Ramsey producer in the</li> <li>project area.</li> <li>Q. Okay. Are any of the other producing wells</li> <li>producing from any other zone except the basal Brushy</li> <li>Canyon?</li> <li>A. In the project area or in the immediate area?</li> </ul>	1	cross-section, from the extremes, from the very upper
<ul> <li>Q. Right, at approximately what depths do you find</li> <li>the top and bottom of the Delaware in this area?</li> <li>A. The top of the Delaware is essentially at 4900</li> <li>feet, measured depth drilling, and the bottom of the</li> <li>Delaware is approximately 8650 feet measured depth.</li> <li>Q. Okay.</li> <li>A. The cross-section has indicated a Bone Springs</li> <li>marker at the bottom of each log. That would correspond to</li> <li>the base of the Delaware formation.</li> <li>Q. Okay. Now, in the Within the west half of</li> <li>Section 26 or the project area, is the that the lower</li> <li>Brushy Canyon is the predominant producing interval?</li> <li>A. The gas-source well is Ramsey producer in the</li> <li>project area.</li> <li>Q. Okay. Are any of the other producing wells</li> <li>producing from any other zone except the basal Brushy</li> <li>Canyon?</li> <li>A. In the project area or in the immediate area?</li> </ul>	2	Delaware Bell Canyon Ramsey sand, down to the lowermost
5       the top and bottom of the Delaware in this area?         6       A. The top of the Delaware is essentially at 4900         7       feet, measured depth drilling, and the bottom of the         8       Delaware is approximately 8650 feet measured depth.         9       Q. Okay.         10       A. The cross-section has indicated a Bone Springs         11       marker at the bottom of each log. That would correspond to         12       the base of the Delaware formation.         13       Q. Okay. Now, in the Within the west half of         14       Section 26 or the project area, is the that the lower         15       Brushy Canyon is the predominant producing interval?         16       A. The gas-source well is Ramsey producer in the         17       Q. But you do have some production from the Ramsey         18       Bell Canyon?         19       A. The gas-source well is Ramsey producer in the         20       Okay. Are any of the other producing wells         21       Q. Okay. Are any of the other producing wells         22       producing from any other zone except the basal Brushy         23       Canyon?         24       A. In the project area or in the immediate area?	3	Brushy Canyon section.
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feet, measured depth drilling, and the bottom of the Delaware is approximately 8650 feet measured depth. Q. Okay. A. The cross-section has indicated a Bone Springs marker at the bottom of each log. That would correspond to the base of the Delaware formation. Q. Okay. Now, in the Within the west half of Section 26 or the project area, is the that the lower Brushy Canyon is the predominant producing interval? A. That's correct. Q. But you do have some production from the Ramsey Bell Canyon? A. The gas-source well is Ramsey producer in the project area. Q. Okay. Are any of the other producing wells producing from any other zone except the basal Brushy Canyon? A. In the project area or in the immediate area?	5	the top and bottom of the Delaware in this area?
<ul> <li>Belaware is approximately 8650 feet measured depth.</li> <li>Q. Okay.</li> <li>A. The cross-section has indicated a Bone Springs</li> <li>marker at the bottom of each log. That would correspond to</li> <li>the base of the Delaware formation.</li> <li>Q. Okay. Now, in the Within the west half of</li> <li>Section 26 or the project area, is the that the lower</li> <li>Brushy Canyon is the predominant producing interval?</li> <li>A. That's correct.</li> <li>Q. But you do have some production from the Ramsey</li> <li>Bell Canyon?</li> <li>A. The gas-source well is Ramsey producer in the</li> <li>project area.</li> <li>Q. Okay. Are any of the other producing wells</li> <li>producing from any other zone except the basal Brushy</li> <li>Canyon?</li> <li>A. In the project area or in the immediate area?</li> </ul>	6	A. The top of the Delaware is essentially at 4900
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20 project area. 21 Q. Okay. Are any of the other producing wells 22 producing from any other zone except the basal Brushy 23 Canyon? 24 A. In the project area or in the immediate area?	18	Bell Canyon?
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<ul> <li>23 Canyon?</li> <li>24 A. In the project area or in the immediate area?</li> </ul>	21	Q. Okay. Are any of the other producing wells
A. In the project area or in the immediate area?	22	producing from any other zone except the basal Brushy
	23	Canyon?
25 Q. In the project area?	24	A. In the project area or in the immediate area?
	25	Q. In the project area?

The proposed injection well was stimulated at one 1 Α. point in the Cherry Canyon, and production has been 2 recovered from the Cherry Canyon in that well, but it will 3 be isolated by a packer and will not be affected by the 4 5 injection process. None of the other wells in the project area have 6 7 had any additional completion attempts made outside of this basal Brushy Canyon section. 8 Is there some potential in those wells? 9 ο. Yes, there is. There is uphole potential in most 10 Α. of these wells. 11 Will that be deferred -- Any recompletion of 12 0. those, will that be deferred until these wells are depleted 13 14 in the Brushy Canyon? 15 It would probably be deferred until the injection Α. of the gas is completed. 16 17 We anticipate depletion of the gas-source well before moving up and performing any additional workovers in 18 19 the wells in the project area. 20 0. The project will last until the source well is 21 depleted? That's correct. 22 Α. 23 Now, the interval that you're going to be Q. injecting into, is that -- that's correlatable across all 24 25 these producing wells in this project area?

	19
1	A. That's correct. As indicated on Exhibits 3 and
2	4, each well with a data point or value has this basal
3	Brushy Canyon sand associated with that wellbore.
4	Q. Mr. Dillman, what are the barriers to for the
5	gas to or what's going to keep the gas in the injection
6	interval? Are there some barriers in the top and bottom
7	that would keep it in the injection interval?
8	A. The natural boundaries of the Delaware rock that
9	have not been fracture-stimulated will retain the gas below
10	those rocks.
1.1	The Delaware rocks themselves have very poor
1.2	vertical permeability, which restricts the flow of any
1.3	fluid, water or gas, up the wellbore.
1.4	Q. What's the lithology of that?
1.5	A. The Delaware rocks in this area are primarily a
16	very fine-grain sublitharenite.
17	The sands are generally low porosity and a low
18	permeability, with the exception being a higher porosity,
19	higher permeability interval.
20	Q. Do you know what the drive mechanism is in this
21	reservoir?
22	A. The drive mechanism is interpreted to be solution
23	gas.
24	EXAMINER CATANACH: I believe that's all I have,
25	Mr. Bruce.
-	

	20
1	VANCE USHER,
2	the witness herein, after having been first duly sworn upon
3	his oath, was examined and testified as follows:
4	DIRECT EXAMINATION
5	BY MR. BRUCE:
6	Q. Would you please state your name?
7	A. Vance Usher.
8	Q. And where do you reside?
9	A. Houston, Texas.
10	Q. What is your occupation and who is your employer?
11	A. Petroleum engineer, Pogo Producing.
12	Q. Have you previously testified before the
13	Division?
14	A. Yes.
15	Q. And were your credentials as an expert petroleum
16	engineer accepted as a matter of record?
17	A. Yes.
1.8	Q. And are you familiar with the engineering matters
19	applicable to this case?
20	A. Yes.
21	MR. BRUCE: Mr. Examiner, I tender Mr. Usher as
22	an expert petroleum engineer.
23	EXAMINER CATANACH: He is so qualified.
24	Q. (By Mr. Bruce) Mr. Usher, would you just
25	identify Exhibit 6 for the Examiner?

Exhibit 6 is a copy of the Form C-108 filed with 1 Α. 2 the Division. 3 For ease of reference, the pages of the C-108 are 4 numbered in the bottom right-hand corner. What is the status of the proposed injection 5 Q. well? 6 The Red Tank 26 Federal Well Number 1 was 7 Α. completed in the Bone Springs from perforations 9551 to 8 9570 in May, 1993, recompleted to the Brushy Canyon in 9 10 perforations 8399 to 8471 in June, 1993, and recompleted to the Cherry Canyon, perforations 6788 to 6796 and 11 perforations 6846 to 6860 in May, 1995. 12 The Cherry Canyon last tested in June 18, 1996, 13 1.4 at 10 barrels per day, 15 barrels of water per day, 27 MCF 15 of gas per day, and the well is on pump. 16 The wellbore has no additional zones behind pipe. 17 A schematic of the well is given on page 3. Is it properly 18 cased and cemented and no injected fluids can escape from 19 other formations -- or excuse me, to other formations, from this well. 20 21 Okay, let's discuss the proposed injection Q. 22 operations. Could you first discuss the injection volumes? Referring to page 7, I anticipate a maximum 23 Α. injection rate of 600 MCF of gas per day. This is the 24 25 producing capacity of the well supplying the gas.

1	Q. And what will be the injection pressure?
2	A. The top perforation in the injection well is 8399
3	feet subsurface, so under Division rules the maximum
4	injection pressure will be 1680 p.s.i.
5	Q. Is there a stimulation program proposed for the
6	injection well?
7	A. The well was frac'd and acid-stimulated when it
8	was completed. I do not plan any additional stimulation.
9	Q. How many wells are there in the area of review?
10	A. There are seven wells, six in Section 26 and one
11	in the east half of Section 27. Data on those wells is
12	given on pages 5 and 6.
13	As you can see, the Culbertson and Irwin Well
14	Number 1, which did not penetrate the Brushy Canyon, is
15	plugged and abandoned. The other wells are Delaware
16	producers operated by Pogo.
17	Q. Was the Culbertson and Irwin Well Number 1
18	properly plugged?
19	A. The data on plugging, which is on page 10,
20	indicates that it was properly plugged.
21	Q. Are the other producing wells properly completed,
22	and will they prevent the movement of fluids to other
23	formations or zones?
24	A. Yes, they were all drilled during the past few
25	years.

Q. What type of production response do you
anticipate from the injection program?
A. I expect the reservoir pressure decline will be
stabilized.
As a result, producing GORs will stop increasing
and the reservoir's solution gas drive energy will be
conserved. This will yield a higher recovery factor for
wells in the affected area and yield a higher gross
ultimate reserve.
I do not expect an increase in oil production
rates on wells in the production area, but rather a longer
sustained productive life through conservation of reservoir
energy.
Q. If this project performs favorably, is it your
opinion that it will recover additional oil which otherwise
would not be recovered?
A. Yes.
Q. Are the Numbers 3, 4, 5 and 7 wells in this
particular lease, the Brushy Canyon producers which are in
this project area, the only wells you anticipate will be
affected by the gas injection?
A. Yes.
Q. Could this project also beneficially affect
offsetting leases?
A. The injection well is on the eastern edge of the

23

1	project area, and there are offsetting producing wells in
2	adjoining acreage. If there is any effect, I think it will
3	be beneficial.
4	Q. If the project is approved and operations are
5	commenced in line with Pogo's expectations, will there be
6	any significant movement of oil across lease lines?
7	A. No, I don't think this single well pressure
8	maintenance gas injection program will cause significant
9	movement of oil.
10	Oil banking and significant movement of oil only
11	occurs in closely spaced multiple-injection well projects
12	where interference occurs to force banking and displacement
13	of oil. A single gas injection well will not create a gas
14	bank.
1.5	Q. What project allowable do you request?
16	A. The depth bracket allowable is 230 barrels of oil
17	per day in this pool, so I request an allowable of 230
18	barrels per day times six wells, or the equivalent if 1380
1.9	barrels of oil per day.
20	Q. And again, what is the source of the injection
21	gas?
22	A. The injection gas will be from Pogo's Red Tank 26
23	Federal Well Number 8, located in the southeast quarter of
24	the southwest quarter of Section 26. It's a producer in
25	the Ramsey sand of the Bell Canyon.

1Q. What is the status of that well?2A. It has been shut in since May 7th, 1996, because3Pogo cannot sell the gas.4Q. Why is that?5A. If you'll refer to page 11, a gas sample from the6Number 8 well shows that it has a 47-percent nitrogen7content, with a BTU content of only about 700.8As a result, the pipeline company was unwilling9to take the gas.10Q. Is the injection gas compatible with gas in the11injection zone?12A. I anticipate no compatibility problems.13Referring to page 12, the Brushy Contains 19 sorry, 1714percent nitrogen, which is also a high percentage, but it15has a BTU content of 1100.16The only effect of injection will be to dilute17somewhat the BTU content of the Brushy Canyon gas.18However, it should also upgrade the injected gas,19eventually making it saleable. This is a side benefit to20the pressure-maintenance project. All potentially saleable21gas should potentially be recovered through production from22offset wells, or when the injector gets converted back to a23producing well.24Q. In your opinion, is the granting of this25Application in the interest of conservation and the		
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	23	producing well.
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	25	Application in the interest of conservation and the

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prevention of waste? 1 2 Α. Yes. 3 0. And was Exhibit 6 compiled from company business records? 4 Α. 5 Yes. 6 MR. BRUCE: Mr. Examiner, I would move the 7 admission of Pogo's Exhibit 6. 8 EXAMINER CATANACH: Exhibit Number 6 will be 9 admitted as evidence. 10 EXAMINATION 11 BY EXAMINER CATANACH: 12 Mr. Usher, have you made any calculations on what Q. kind of ultimate increase you might recover from these 13 wells? 14 15 Α. No. You testified that you believed that you would 16 Q. see an increase in ultimate recovery. What is that based 17 on? 18 Based on my experience in the area and 19 Α. recognizing the pressure decline that these wells are 20 21 subjected to, unless unabated by some form of pressure 22 maintenance, which would then extend the life. 23 Q. Do these wells produce at high GORs now? They produce at increasing GORs. 24 Α. And you believe that that will be stabilized by 25 Q.

gas injection? 1 That's correct. 2 Α. Without the gas injection, would you be unable to 3 0. sell this gas from the source well? 4 Α. That is correct. 5 ο. So it would -- Would you plug and abandon the 6 7 well if the project wasn't approved or --Α. The gas source well has no future utility unless 8 it's utilized as a source of gas for this injection 9 10 project. Q. What is the limit as far as nitrogen content is 11 12 concerned, for sale of this gas? Is that what it's based 13 on, or --That is correct, that's correct. No, it's not 14 Α. 15based on BTU content. It's based on nitrogen, which then requires 16 extraction by the pipeline company, and that's at the 17 discretion of each individual pipeline company. 18 What is the limit in this pipeline? 19 ο. 20 There is no limit, but the pipeline company has Α. 21 elected not to take our gas because of high nitrogen 22 content. 23 Q. And the gas that you're producing out of the 24 producing wells has how much nitrogen? 25 Α. 17 percent.

27

1	Q. 17 percent. They do accept that gas?
2	A. Yes.
3	Q. Okay. The Have the Cherry Canyon perforations
4	in the injection well been squeezed?
5	A. No, they have not. They'll be isolated behind
6	tubing with a packer.
7	Q. They will not be cement-squeezed?
8	A. That's correct.
9	Q. The One of the requirements for an injection
10	well is, it has to pass a mechanical-integrity test, which
11	means the casing pressuring up on the casing. How would
12	you propose to conduct that test?
13	A. Well, perhaps I've misspoken on that. I would
14	have to defer to our operations engineer on that aspect.
15	Q. The wells within a half mile, are they all
16	cemented across the injection interval?
17	A. Yes, they are.
18	Q. Do you believe that any of these wells will not
19	provide a conduit for the gas to escape to other
20	formations?
21	A. I believe the primary cement jobs are adequate to
22	isolate those zones from any others.
23	Q. Do you believe the P-and-A'd wells are
24	sufficiently plugged to isolate that injected gas to the
25	injection interval?

	23
1	A. Based on the information we've researched, yes.
2	Q. Based on the current rates of production from the
3	source well, what do you anticipate the remaining life of
4	that well will be?
5	A. It's difficult to tell. It has not been on
6	production long enough to establish decline yet
7	Q. Is it possible to run any kind of calculations
8	that might show what the effect of the gas injection into
9	that interval how much it would dilute the current gas?
10	I mean, is that something you can't estimate or calculate?
11	A. No, there's no rigorous technique of doing that.
12	Q. Are you fairly certain that the injected gas
13	won't dilute the gas in place such that that would render
14	that gas not sellable?
15	A. I do not believe it will.
16	EXAMINER CATANACH: I have nothing further of the
17	witness.
18	He may be excused.
19	MR. BRUCE: Mr. Examiner, the only thing I have
20	is, if you would like We do not have our operations
21	engineer here, but if you would like him to address the
22	question on isolating the zones and conducting the
23	integrity tests, we can have him submit a letter on his
24	proposed plan.
25	EXAMINER CATANACH: I would, and if you could do

that I would appreciate it. 1 Is there anything further, Mr. Bruce? 2 MR. BRUCE: Nothing. 3 EXAMINER CATANACH: There being nothing further, 4 5 Case Number 11,579 will be taken under advisement. (Thereupon, these proceedings were concluded at 6 7 11:33 a.m.) 8 \* \* \* 9 10 11 12 13 14 15 16 1718 19 20 I do hereby certify that the foregoing is 21 a complete strend of the proceedings in 22 the Examiner acority of Case No. 71579 heard by me on\_ the 25 1996 23 , Examiner OH Conservation Division 24 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 July 30th, 1996.

STEVEN T. BRENNER CCR No. 7

Country - Rowing

My commission expires: October 14, 1998