

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY)
THE OIL CONSERVATION DIVISION FOR THE)
PURPOSE OF CONSIDERING:) CASE NO. 12,223
)
APPLICATION OF POGO PRODUCING COMPANY)
FOR APPROVAL OF A PILOT PRESSURE)
MAINTENANCE PROJECT AND TO QUALIFY THE)
PROJECT FOR THE RECOVERED OIL TAX RATE) ORIGINAL
PURSUANT TO THE ENHANCED OIL RECOVERY)
ACT, EDDY COUNTY, NEW MEXICO)
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

August 5th, 1999

Santa Fe, New Mexico

OIL CONSERVATION DIVISION
99 AUG 30 AM 8:52

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, August 5th, 1999, 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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August 5th, 1999
 Examiner Hearing
 CASE NO. 12,223

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* * *

A P P E A R A N C E S

FOR THE DIVISION:

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FOR THE APPLICANT:

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* * *

1 WHEREUPON, the following proceedings were had at
2 9:45 a.m.:

3 EXAMINER CATANACH: We'll call the hearing back
4 to order at this time and call Case 12,223, which is the
5 Application of Pogo Producing Company for approval of a
6 pilot pressure maintenance project and to qualify the
7 project for the recovered oil tax rate pursuant to the
8 Enhanced Oil Recovery Act, Eddy County, New Mexico.

9 Call for appearances in this case?

10 MR. BRUCE: Mr. Examiner, Jim Bruce of Santa Fe,
11 representing the Applicant. I have three witnesses.

12 EXAMINER CATANACH: Call for additional
13 appearances.

14 Okay, will the three witnesses please stand to be
15 sworn in?

16 (Thereupon, the witnesses were sworn.)

17 SCOTT MCDANIEL,

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?

24 A. My name is Scott McDaniel, and I live in the City
25 of Midland, Texas.

1 Q. Who do you work for and in what capacity?

2 A. I work for Pogo Producing Company, and I'm a
3 landman for Pogo.

4 Q. Have you previously testified before the Division
5 as a landman?

6 A. Yes, I have.

7 Q. And were your credentials as an expert accepted
8 as a matter of record?

9 A. Yes, they were.

10 Q. And are you familiar with the land matters
11 involved in this Application?

12 A. Yes, I am.

13 MR. BRUCE: Mr. Examiner, I'd tender Mr. McDaniel
14 as an expert petroleum landman.

15 EXAMINER CATANACH: He is so qualified.

16 Q. (By Mr. Bruce) Mr. McDaniel, what does Pogo seek
17 in this case?

18 A. Pogo seeks an order approving a pilot pressure
19 maintenance project in the Delaware formation involving
20 four federal leases.

21 Q. Would you identify Exhibit 1 for the Examiner and
22 describe the lands and leases involved?

23 A. Yes, Exhibit 1 is a land plat covering a portion
24 of Township 23 South, Range 31 East, with four federal
25 leases highlighted there on the plat. The leases involved

1 are NM-38463 covering Section 20, lease NM-38464 which
2 covers Section 21, NM-40859 covering Section 28, and then
3 lease NM-0281482-A, covering the east half of Section 29.

4 The plat also outlines the proposed pilot project
5 area, which covers 320 acres, and identifies the initial
6 injection well, the first eight producing wells within the
7 project area, and the freshwater wells on record with the
8 New Mexico State Engineer's Office.

9 Q. Okay.

10 A. Also identified there on the plat are the working
11 interest owners that are involved with these leases.

12 Q. Okay.

13 A. And as far as lease royalties is concerned, all
14 these leases are federal leases.

15 Q. With respect to three of the leases, the working
16 interest ownership is split up in one half-section, is it
17 not, Mr. McDaniel?

18 A. That's correct.

19 Q. Okay. Now, all of these leases are operated by
20 Pogo?

21 A. Yes, as to Delaware rights, they are.

22 Q. Now, which well is the initial injection well?

23 A. The initial injection well is located in the
24 southeast of the southeast of Section 20. It's known as
25 the Pure Gold "B" Federal Well Number 20.

1 Q. And it's marked with that red arrow?

2 A. That's correct, it is.

3 Q. What is the current status of the proposed
4 injection well?

5 A. This particular well was drilled and completed
6 during April and May of this year. Pogo had originally
7 planned to produce this well for some period of time,
8 however the well has not been produced to date, and our
9 engineers up here later will discuss that.

10 Q. And how many producing wells are there in the
11 project?

12 A. There are eight producers in this initial phase
13 of the project.

14 Q. And they are all identified within that green
15 block, are they not?

16 A. That's correct.

17 Q. Before we leave this map, the water wells, you
18 obtained this data from the State Engineer Office in
19 Roswell, I believe?

20 A. Yes.

21 Q. They did not know the status of these wells, did
22 they?

23 A. They did not. Those were just the freshwater
24 wells that they show of record there, in their shop.

25 Q. Which pool are we dealing with, with respect to

1 the producing wells?

2 A. This is the West Sand Dunes-Delaware Pool. This
3 particular pool includes the Bell Canyon, the Cherry
4 Canyon, the Brushy Canyon zones and is developed on
5 statewide rules.

6 Q. Is the Bureau of Land Management the surface
7 owner of the injection well site?

8 A. Yes.

9 Q. Who was notified of the Application?

10 A. The BLM as the surface owner was notified, as
11 well as Kaiser-Francis Oil Company, who operates a couple
12 of deeper gas wells there in this immediate area.

13 Q. Okay.

14 A. And they are the only operator within a half mile
15 of the injection well.

16 Q. Now, does Exhibit 2 simply list the eight
17 producing wells in the project?

18 A. Yes, it produces the -- or it lists the eight
19 producing wells, as well as the location and API number for
20 each.

21 Q. And is Exhibit 3 my affidavit of notice regarding
22 the notice given to the BLM and Kaiser-Francis Oil Company?

23 A. Yes, it is.

24 Q. Are you seeking unitization of this area?

25 A. No, we are not.

1 Q. And why is that?

2 A. As you can see from looking at Exhibits 1 and 2,
3 Pogo operates all of these leases as to the Delaware
4 formation in the project, so we have effective control of
5 the area.

6 Furthermore, this pool is not fully developed in
7 this area at this point in time, so we really think
8 unitization may be premature.

9 Q. Were Exhibits 1 through 3 prepared by you or
10 under your supervision or compiled from company business
11 records?

12 A. Yes, they were.

13 Q. And is the granting of this Application in the
14 interests of conservation and the prevention of waste?

15 A. Yes, it is.

16 MR. BRUCE: Mr. Examiner, I tender the admission
17 of Exhibits 1 through 3.

18 EXAMINER CATANACH: Exhibits 1 through 3 will be
19 admitted as evidence.

20 EXAMINATION

21 BY EXAMINER CATANACH:

22 Q. Mr. McDaniel, I notice on your map that within
23 three of the leases Pogo operates and is the 100-percent
24 working interest owner.

25 A. That's correct.

1 Q. The fourth lease, however, there's some split
2 ownership on that lease?

3 A. Yes, there is.

4 Q. What type of agreement or what type of
5 negotiations or anything have you had with these other
6 working interest owners in that lease?

7 A. In connection with this pilot --

8 Q. Yes, sir.

9 A. -- pressure maintenance?

10 We have not had any discussions with them at this
11 point. As you indicated, we are the operator of that
12 particular lease, and we feel like that each of these
13 working interest owners will be benefited by what we do.

14 Q. So production from each of the wells will be just
15 based on where they're at, their acreage and their -- I
16 mean, there's no kind of allocation formulas or anything
17 like that?

18 A. That's correct.

19 Q. How about the cost of the injection well? Is
20 that going to be borne 100-percent by Pogo?

21 A. Yes, it will be. In fact, it has been.

22 Q. And none of the other interest owners in that
23 other lease have had to contribute at all?

24 A. That's correct.

25 Q. Is this -- This pilot area is just this area in

1 green. Is there a chance this may be expanded to go
2 further south in the future?

3 A. I may let one of our other witnesses address
4 that.

5 Q. Have you guys contacted and been -- Have you
6 consulted with the Bureau of Land Management with regards
7 to this proposal?

8 A. We have notified the Bureau of Land Management as
9 -- since they are the surface owner here, of all the
10 acreage involved.

11 Q. As far as you know, are the royalty rates on all
12 these leases the same?

13 A. Three of them are the same. The south half of --
14 Or the southeast quarter of Section 20 there is a step-
15 scale royalty, as is the west half, southwest quarter of 21
16 and the northwest northwest of Section 28. The portion
17 there in Section 29 is a one-eighth lease.

18 Q. Mr. McDaniel, do you feel like your initial
19 project, initial pilot project, will have any adverse
20 effects on any of the interest owners within this area?

21 A. No, we do not.

22 EXAMINER CATANACH: I have no further questions.

23 This witness may be excused.

24 MR. BRUCE: I have nothing further of Mr.

25 McDaniel.

1 Call Mr. Dillman to the stand.

2 GEORGE J. DILLMAN,

3 the witness herein, after having been first duly sworn upon
4 his oath, was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. BRUCE:

7 Q. Would you please state your name for the record?

8 A. George Dillman.

9 Q. Who do you work for and in what capacity?

10 A. I'm employed by Pogo Producing Company as the
11 division geologist.

12 Q. Have you previously testified before the
13 Division?

14 A. Yes, I have.

15 Q. And were your credentials as an expert geologist
16 accepted as a matter of record?

17 A. Yes, they were.

18 Q. And are you familiar with geologic matters
19 involved in this Application?

20 A. Yes, I am.

21 MR. BRUCE: Mr. Examiner, I'd tender Mr. Dillman
22 as an expert petroleum geologist.

23 EXAMINER CATANACH: He is so qualified.

24 Q. (By Mr. Bruce) Mr. Dillman, would you identify
25 Exhibit 4 and discuss the injection zone and the Delaware

1 geology in this area?

2 A. The proposed injection interval is the BC 4 sand
3 in the basal section of the Brushy Canyon formation of the
4 Delaware Mountain group.

5 In the Sand Dunes field area, the Delaware
6 Mountain group is a 3800-foot-thick sequence of very fine-
7 grained sandstones, siltstones, and to a lesser extent
8 limestone. Cumulative Delaware production in the project
9 area is approximately 800,000 barrels of oil and 3.7
10 billion cubic feet of gas, the bulk of which can be
11 attributed to this Basal Brushy Canyon A section.

12 Exhibit Number 4 is an annotated log of the B 20
13 well, utilizing Pogo Producing Company's nomenclature.

14 If you look at this log, you'll see that a
15 regional marker at the upper portion is known as the A
16 marker. Then we subdivide the major sandbodies from top to
17 bottom as the BC 5, the BC 4, the injection interval for
18 this project, a silty BC 3 interval, a BC 2, and in this
19 particular project area no designation of a BC 1 has been
20 made. Then you'll see the Bone Springs limestone marker
21 indicated at the lower portion of the log.

22 It is these intervals referenced throughout the
23 rest of this hearing that I will describe, and the
24 appropriate interval, again, is the BC 4 interval.

25 You will also notice in future exhibits that the

1 wells are essentially all perforated in the BC 2 and the BC
2 4 interval. All of those completions have been fracture-
3 stimulated.

4 Q. Would you please refer to your Exhibits 5 and 6
5 together and discuss a little bit more the productive zone
6 in this area?

7 A. Most continuous reservoir in the Sand Dunes field
8 is the BC 4 sand, and Exhibit 5 is an isopach map of the BC
9 4 sand net porosity.

10 Two posted values are adjacent to each well
11 symbol. Those on the left represent gross sand thickness,
12 while those on the right are net porosity utilizing a
13 minimum porosity cutoff of 14-percent density.

14 This exhibit is an enlargement of a similar map
15 shown as Exhibit 6 that was submitted by Pogo Producing
16 Company and published in the 1995 Roswell Geological
17 Society supplement to, in quotes, "A Symposium of the Oil
18 and Gas Fields of Southeast New Mexico".

19 The porosity trend in this map is almost north-
20 south, with an axial thick passing through the southeast
21 corner of Section 20, Township 23 South, Range 31 East,
22 Eddy County. This coincides with the location of the B 20
23 well. That's the borehole used for this pressure
24 maintenance pilot project.

25 Q. Would you move on to Exhibits 7 and 8 together

1 and identify them for the Examiner?

2 A. Exhibit 7 and Exhibit 8 are structure maps made
3 on the BC 4 marker. These maps cover the same area
4 discussed earlier in the isopach exhibits.

5 Regionally, the Sand Dunes field is a north-south
6 trending, east-plunging structural nose with local four-way
7 closures. The BC 4 marker in the B 20 well is at 7721 feet
8 measured depth, which corresponds to a subsea value of
9 minus 4368.

10 The general outline of the productive area is
11 between a minus 4300 and a minus 4500 subsea. The basal
12 Brushy Canyon is productive farther downdip, but
13 development drilling is incomplete in both the updip and
14 downdip directions.

15 Q. Finally, Mr. Dillman, would you identify Exhibit
16 9 and discuss its contents for the Examiner?

17 A. Exhibit 9 is a stratigraphic cross-section that
18 shows correlation of the Basal Brushy Canyon section in the
19 six wells that surround the B 20. These wells produce from
20 the Delaware.

21 A locator plat is in the lower left corner and
22 provides the layout for the A-A' sequence, with the B 20
23 well positioned in the center on the cross-section, the BC
24 4 marker, and the sand is highlighted in yellow, and the
25 net porosity is highlighted in red.

1 Q. Mr. Dillman, based on your exhibits and this
2 cross-section, is the proposed injection zone continuous
3 across the project area?

4 A. Yes, clear continuity exists in the proposed
5 injection interval.

6 Q. And you said that all of these wells in the
7 project area are completed in the BC 4?

8 A. Yes, either directly through perforations and
9 frac, or through perforations and fracture-stimulating the
10 BC 2, in which case we believe that the fracture has grown
11 high enough to intersect the BC 4 sand and be in pressure
12 communication and drainage of the BC 4 interval.

13 Q. Are there any freshwater-bearing zones in this
14 area?

15 A. Yes, there are. Fresh water generally exists in
16 either the shallow Santa Rosa formation when present, or in
17 the Dewey Lake Red Bed sequence, with lesser quality water
18 in the magenta or Culebra dolomites in the Rustler
19 formation.

20 Usually water wells are not drilled deeper than
21 800 feet or below the Rustler. The shallow groundwater
22 interval is always protected in this area with a surface
23 casing string that is cemented back to surface.

24 Q. Are there any faults in this area which connect
25 the freshwater zone with the injection zone?

1 Section 28, if you to -- I believe it's Exhibit 1,
2 initially presented, that well has had perforations added
3 in several intervals.

4 The shallowmost set of perforations is 6629-6634.
5 Below that there are perforations from 6816 to 6850. Below
6 that there are perforations from 7066 to 7072. Below that
7 there are perforations from 7275 to 7280. Below that there
8 are perforations 7564 to 7588. And then below that are the
9 two sets of perfs in the BC 4 and the BC 2.

10 Several sets of those perforations were only
11 treated with an acid stimulation and were never fracture-
12 stimulated. One interval was fracture stimulated.

13 All those producing zones are much shallower than
14 the proposed injection interval and are all currently
15 combined in that wellbore and producing. Future production
16 from that wellbore will not be affected by an increase in
17 production rate from a pressure project in the BC 4 in a
18 negative sense. We expect all production to continue on
19 normal decline and show an increase as a result of the
20 pressure maintenance project moving additional oil through
21 the BC 4 interval.

22 Q. With the exception of that Number 2 well, all of
23 the rest of the wells in the pilot area are either BC 2 or
24 BC 4?

25 A. That is correct. There is, as mentioned earlier,

1 a deeper Atoka gas-producing well which has no shallow
2 perforations in the Delaware.

3 Q. Okay. So within the West Sand Dunes-Delaware
4 Pool, there is production outside of the Brushy Canyon?

5 A. No, sir.

6 Q. It's all in the Brushy Canyon?

7 A. Well, excuse me. Yes, there is. Some of it
8 would be the very lowest Cherry Canyon interval out here.

9 Q. Okay. Why just the BC 4 and not the BC 2, as far
10 as injecting water?

11 A. At this point, the only perforations that were
12 established in the B 20 well were made in the BC 4, because
13 we believe that is the primary producing reservoir. All
14 the surrounding wells, whether perforated and fractured in
15 both the BC 2 and the BC 4 or in just one of the intervals,
16 are probably in pressure communication. We think by
17 injecting water in the BC 4, limited entry in the B 20
18 well, that we will also have partial influence on the BC 2
19 at this time.

20 Limiting the perfs to the BC 4 at this time also
21 gives us more control on fluid injection.

22 Q. You gave me some cumulative numbers. Is that
23 cumulative within just the pilot area?

24 A. That's just the pilot area. This --

25 Q. Actually -- I'm sorry, go ahead.

1 A. I was going to add that in this area there's a
2 substantially higher amount of cumulative production from
3 all the Delaware wells in this trend. If you refer back to
4 one of the exhibits that show the regional structure maps,
5 all those wells are producing in the area. And if I can
6 pull out one of my reference notes, I'll give you an exact
7 number as to what the current cumulative production is.

8 Q. Okay.

9 A. According to published data from *Dwight's*
10 production, there have been 8,161,000 barrels of oil and
11 30.16 billion cubic feet of gas produced from the Sand
12 Dunes Delaware, and also known as the Los Medanos-Delaware
13 Pool. Essentially, they are the same reservoir continuous
14 north-south through this project area.

15 There are approximately 70 -- 70 wells producing
16 from this interval? Let me double-check that. No, it's
17 closer -- That interval is about 110 wells, have
18 contributed to this cumulative production through this
19 area. By far, this is one of the most significant
20 producing Delaware fields in southeast New Mexico. And
21 future recovery in secondary projects, perhaps influenced
22 by this initial pilot pressure maintenance project, will
23 contribute substantially large volumes of oil in the future
24 to be recovered from this field.

25 Q. The injection well structurally is in what

1 position in relation to the other wells?

2 A. Essentially, it's right in the center of this
3 producing structural trend. The overall structure dips
4 from west to east, and this is in a mid-structural
5 position.

6 Where the sand is developed, the thickest, there
7 also tends to be some local four-way closures, and this is
8 not one of the local four-way closures but approximately
9 mid-structure in this producing property.

10 Q. Is this a good permeable zone or --

11 A. Yes, it is, and that will be evidenced by the
12 engineer's presentation of pressure drainage at this point.

13 Q. Do you know if any of these wells in the pilot
14 area are producing from Bone Spring formation?

15 A. No, sir, there are no Bone Springs producers in
16 this pilot area.

17 Q. None of these wells, as far as you know, are
18 downhole commingled with the Bone Spring?

19 A. No, sir, there are no Bone Spring perforations in
20 most of them, and most of these wells were only drilled
21 into the uppermost part of the Bone Spring. The upper Bone
22 Spring sand is not developed in this area, and essentially
23 none of these wells have been drilled to the first Bone
24 Spring interval.

25 Q. Mr. Dillman, this is in a potash area?

1 A. That is correct.

2 Q. Is that to the west here, as far as you know?

3 A. The potash area is to the west and also the east,
4 if I can confer with my landman to confirm that.

5 MR. McDANIEL: Yes, actually, the potash area is
6 primarily to the west. There are some leases, I believe,
7 that may cover Section 8 as well on the area. There are
8 several leases in that area.

9 THE WITNESS: But in general, this falls within
10 the potash outline for the greater Eddy County area.

11 Q. (By Examiner Catanach) Where is this, do you
12 know, in relation to the Waste Isolation Pilot Project?

13 A. This part of the field is approximately four
14 miles due south from the southern boundary of the Waste
15 Isolation Pilot Project. The Waste Isolation Pilot Project
16 is located in Township 21 South, Range 31 East of Eddy
17 County -- or excuse me, Township 22 South, Range 31 East of
18 Eddy County. And this is 23 South.

19 Q. Do you guys have a similar pressure maintenance
20 project north of here?

21 A. Yes, we do, Pogo Producing operates two projects.
22 The first one that you refer to north of here is in the
23 Livingston Ridge field, and it is essentially adjacent to
24 the Waste Isolation Pilot Project area, located in Section
25 25 of Township 22 South, Range 31 East.

1 Q. And where do you reside?

2 A. I reside in Midland, Texas.

3 Q. Who do you work for and in what capacity?

4 A. I'm employed by Pogo Producing Company as the
5 division petroleum engineering manager.

6 Q. Have you previously testified before the
7 Division?

8 A. No.

9 Q. Would you outline your educational and employment
10 background for the Examiner?

11 A. I received my bachelor of science in petroleum
12 engineering from Texas Tech University in 1983, at which
13 time I went to work for Enserch Exploration, Incorporated,
14 in various engineering positions, until 1997, when I went
15 to work for Spirit Energy 76 as an advising reservoir
16 engineer.

17 I moved to Pogo in January of 1999 as a division
18 petroleum engineer and manager, which is the position I'm
19 currently employed.

20 Q. Does your area of responsibility include
21 southeast New Mexico?

22 A. Yes.

23 Q. And are you familiar with the engineering matters
24 related to this Application?

25 A. Yes, I am.

1 MR. BRUCE: Mr. Examiner, I tender Mr. Gasser as
2 an expert petroleum engineer.

3 EXAMINER CATANACH: He is so qualified.

4 Q. (By Mr. Bruce) Mr. Gasser, referring to your
5 Exhibit 10, could you identify that and describe briefly
6 its contents for the Examiner?

7 A. Exhibit 10 highlights the proposed pilot pressure
8 maintenance project area, and it has the current producing
9 rates and cumulative production from the wells within this
10 area.

11 Q. And the initial injection is the -- marked with
12 the red arrow?

13 A. Yes, the Pure Gold B 20.

14 Q. Okay. Let's discuss your proposed injection
15 operations. Would you identify Exhibit 11 for the
16 Examiner?

17 A. Exhibit 11 is a copy of the Form C-108 for the
18 project. For ease of reference, the pages are numbered at
19 the bottom right-hand corner.

20 The proposed injection well is an existing well
21 that was drilled in April of this year with the intent of
22 producing it. However, during completion operations the
23 well swab-tested 14 barrels of load water per day with a
24 five-percent oil cut and a weak gas blow.

25 At that time we obtained a bottomhole shut-in

1 pressure of 903 p.s.i.g., at which time we decided to
2 attempt a pilot pressure maintenance project at this
3 location.

4 Q. Is Exhibit 2 [sic] a schematic of the proposed
5 injection well?

6 A. Yeah, page 2 of Exhibit 11 has a schematic of the
7 proposed injection well.

8 Q. Will the well be properly cased, or has it been
9 properly cased and cemented?

10 A. Yes, the well has been properly cased and
11 cemented, and no injection water can escape to other zones.

12 Q. Referring to Exhibits 4 -- excuse me, Exhibit 11,
13 pages 4 through 8, how many wells are there in the area of
14 review?

15 A. Page 4 is a land plat of the area, identifying
16 one-and-a-half-mile -- a one-half-mile radius of review,
17 and there are twelve wells within a half mile of the
18 injector which penetrate the Delaware. A listing of those
19 wells with their completion data is given on pages 5
20 through 8.

21 Q. Are any of the wells in the area of review
22 plugged and abandoned?

23 A. No, they're not.

24 Q. And are these producing wells in the area of
25 review properly completed, and will they prevent the

1 movement of fluids to other zones?

2 A. Yes, these wells were completed in the early
3 1980s or early 1990s.

4 Page 5 is a typical completion in which you have
5 surface casing of 13 3/8 to 730 feet, intermediate casing
6 of 8 5/8 to 4100 feet. Both sections have cement
7 circulated back to surface.

8 Production casing of 5 1/2 inch was set to a
9 total depth of 8100 feet and cemented with a DV tool at
10 6281 with the top of cement being about 2800 feet, well
11 within the intermediate casing string.

12 Q. Now, the Delaware wells were all completed in the
13 early 1990s. The older wells are the deeper Atoka wells --

14 A. That's correct.

15 Q. -- and gas wells?

16 A. That's correct.

17 Q. Okay. Moving on to page 9, would you summarize
18 the injection operation for the Examiner?

19 A. We anticipate an average injection rate of
20 approximately 4000 barrels per day with a maximum of 6000
21 barrels per day.

22 Q. What will be the injection pressures?

23 A. The top of the perforations in the injection well
24 is approximately 7740 feet subsurface, so under Division
25 rules the maximum injection pressure is 1535 p.s.i. And we

1 expect to be injecting at about 1000 p.s.i., but no higher
2 than the maximum.

3 Q. Is there a proposed stimulation program for the
4 injection well?

5 A. No.

6 Q. Now, Mr. Dillman testified about fresh water in
7 the area. Do you have a freshwater analysis?

8 A. Yes, the closest freshwater analysis in which we
9 have -- the freshwater well in which we have an analysis,
10 is in Section 14 of 22 South, 31 East, about six miles from
11 this proposed injection well. An analysis of the fresh
12 water is attached as page 15.

13 Q. What will be the source of the injection water
14 for this project?

15 A. The injection water will be produced water from
16 the Delaware formation.

17 Q. And as a result, since it's just the same water,
18 you would expect no compatibility problems, would you?

19 A. None whatsoever.

20 Q. Now, referring back to your Exhibit 10, what are
21 the current producing rates of the proposed producing wells
22 in the project area?

23 A. The average daily rate from these wells is 18
24 barrels of oil per day, 138 MCF of gas per day and 22
25 barrels of water per day.

1 Q. Are these stripper wells?

2 A. No.

3 Q. What is Exhibit 12?

4 A. Exhibit 12 is a production plot showing the
5 expected primary recovery and anticipated response from the
6 pilot pressure maintenance project within this 320-acre
7 boundary.

8 Q. And what did you base this on?

9 A. Basically off of area knowledge from the two
10 pilot pressure maintenance projects that we currently have,
11 and I risked the adjusted figure down so that we wouldn't
12 be too awful optimistic.

13 Q. Based on your analysis, will the pressure
14 maintenance project result in the increase in the amount of
15 crude oil ultimately recovered from this reservoir?

16 A. Yes, it will.

17 Q. What are the costs of the project?

18 A. Exhibit Number 13 is a cost estimate for the
19 project. We expect to invest another \$50,000 within the
20 Pure Gold B Federal Number 20 to convert it to water
21 injection, and then additional flow lines would cost
22 another \$100,000.

23 We expect to recover 127,000 barrels of oil and
24 177 million cubic foot of gas as a result of this project.
25 At \$15 per barrel for the oil and \$2 per MCF for the gas,

1 less severance taxes, *ad valorem* taxes and \$5 per barrel
2 operating costs, we've calculated a value of \$1.5 million
3 for the incremental reserves.

4 Q. Now, your Exhibit 10 already outlines the
5 proposed project area, but what project allowable does Pogo
6 request?

7 A. The depth bracket allowable is 187 barrels of oil
8 per day. And there are eight quarter-quarter sections in
9 the project area, so we are requesting an allowable of 187
10 time eight, which is 1496 barrels of oil per day for the
11 project.

12 Q. In your opinion, is it prudent to apply enhanced
13 recovery techniques to maximize ultimate recovery of oil
14 from this pool?

15 A. Yes, it is.

16 Q. Is the pressure maintenance project economically
17 and technically feasible at this time?

18 A. Yes, it is.

19 Q. And in your opinion, is the granting of this
20 Application in the interests of conservation and the
21 prevention of waste?

22 A. Yes, it is.

23 Q. Were Exhibits 10 through 13 prepared by you or
24 under your direction?

25 A. Yes, they were.

1 MR. BRUCE: Mr. Examiner, at this time I'd move
2 the admission of Pogo's Exhibits 10 through 13.

3 EXAMINER CATANACH: Exhibits 10 through 13 will
4 be admitted as evidence.

5 EXAMINATION

6 BY EXAMINER CATANACH:

7 Q. Mr. Gasser, the area-of-review wells, are they
8 all cemented across the proposed injection well?

9 A. Yes, they are.

10 Q. Do you know why it's necessary to use a DV tool
11 in this area for that long string?

12 A. I can only -- No, not necessarily, I'm not
13 totally familiar with the operational characteristics, but
14 I can speculate that the hydrostatic of the cement on the
15 back side might break down the lowest formation which it
16 TD'd in, so it's better to just keep the hydrostatic off of
17 the lower part of the formation.

18 Q. How quickly would you guys anticipate a response
19 to waterflood operations?

20 A. Well, as you can see on Exhibit Number 12, I've
21 shown response to be approximately a year and a half out in
22 the future. It could be as quick as six months. You know,
23 it almost depends on the permeability streaks that may be
24 encountered within the producing formation.

25 Q. And in your other two pressure maintenance

1 projects, is that kind of what you've seen up there?

2 A. Yes, we saw response within about a year in the
3 Livingston Ridge Pilot Project, and we've yet to see
4 response in the Red Tank.

5 Q. So the response that you've on 12, is that kind
6 of the same thing you've show in Livingston Ridge?

7 A. Yes, it is.

8 Q. What's the -- Is there any plan to expand this
9 project?

10 A. Well, if this was successful, we would definitely
11 evaluate an expansion. And at this moment there is not --
12 for us, the jury is still out as to the benefits of the
13 pressure maintenance projects. We've seen promising
14 results in the Livingston Ridge area, and we're hoping that
15 we see promising results in Red Tank. And if we see them
16 here, certainly we would plan to expand at a later date.

17 Q. Are you guys bringing in any makeup water, or is
18 it all produced water?

19 A. It's all produced water.

20 Q. In the field?

21 A. Yes.

22 EXAMINER CATANACH: Mr. Bruce, you guys are also
23 seeking to qualify this as an EOR project?

24 MR. BRUCE: Yes.

25 EXAMINER CATANACH: Okay. I don't think I have

1 any other questions, Mr. Bruce.

2 MR. BRUCE: That's all I have in this case, Mr.
3 Examiner.

4 EXAMINER CATANACH: Okay, there being nothing
5 further in this case, Case 12,223 will be taken under
6 advisement.

7 (Thereupon, these proceedings were concluded at
8 10:26 a.m.)

9 * * *

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14 I do hereby certify that the foregoing is
15 a complete record of the proceedings in
the Examiner hearing of Case No. 12223.
16 heard by me on August 5 1999.
17 David M. Catanach, Examiner
Off Conservation Division

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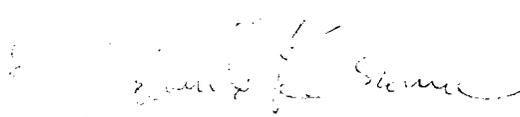
CERTIFICATE OF REPORTER

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 10th, 1999.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 2002