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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
CASE 10339

EXAMINER HEARING

IN THE MATTER OF:

Application of Conoco, Inc., for a High
Angle/Horizontal Directional Drilling
Pilot Project and an Unorthodox Oil Well
Location, Eddy County, New Mexico

TRANSCRIPT OF PROCEEDINGS

BEFORE: MICHAEL E. STOGNER, EXAMINER

STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO

June 27, 1991

ORIGINAL

A P P E A R A N C E S

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1 EXAMINER STOGNER: Call next case, No.
2 10399.

3 MR. STOVALL: Application of Conoco, Inc.,
4 for a high angle/horizontal directional drilling pilot
5 project and an unorthodox oil well location, Eddy
6 County, New Mexico.

7 EXAMINER STOGNER: Call for appearances.

8 MR. KELLAHIN: Mr. Examiner, I'm Tom
9 Kellahin of the Santa Fe law firm of Kellahin,
10 Kellahin and Aubrey, appearing on behalf of the
11 Applicant, and I have three witnesses to be sworn.

12 EXAMINER STOGNER: Are there any other
13 appearances?

14 MR. CROSS: Mr. Examiner, I'm Dean Cross,
15 from the law firm of Losee, Carson, Haas & Carroll.
16 I'm appearing on behalf of Yates Petroleum. We have
17 no witnesses or exhibits at this time, however we
18 would like to obtain copies of the exhibits submitted
19 today.

20 MR. KELLAHIN: Here's a set.

21 MR. CROSS: All right. Thank you.

22 EXAMINER STOGNER: Are there any other
23 appearances?

24 Okay. Will the witnesses please stand to
25 be sworn.

1 MR. KELLAHIN: Mr. Examiner, I would like
2 to call our geologic witness first, Mr. Bill Hardie.
3 We'll commence Mr. Hardie's testimony, Mr. Examiner,
4 with Exhibit No. 6 in the exhibit book.

5 WILLIAM E. HARDIE

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

8 EXAMINATION

9 BY MR. KELLAHIN:

10 Q. Mr. Hardie, would you please state your
11 name and occupation?

12 A. I'm William E. Hardie. I'm associate
13 geologist with Conoco.

14 Q. Mr. Hardie, where do you reside?

15 A. I reside in Midland, Texas.

16 Q. On prior occasions have you testified as a
17 petroleum geologist before the Division?

188 A. I have not.

19 Q. Would you summarize for us your educational
20 experience?

21 A. I have a Bachelor of Science degree in
22 geology from Baylor University.

23 Q. In what year did you graduate?

24 A. In 1986. And I have a Master of Science
25 degree in petroleum geology from Baylor University in

1 1990.

2 Q. Summarize for us your employment experience
3 as a petroleum geologist, Mr. Hardie?

4 A. I have been employed with Conoco for a
5 little over a year as a petroleum geologist assigned
6 to the Southeast New Mexico area. In the past eight
7 months I've worked almost exclusively on the Dagger
8 Draw field.

9 Q. The request today is for a high
10 angle/horizontal well in this North Dagger Draw Pool?

11 A. Yes, it is.

12 Q. Have you provided geologic work, including
13 geologic interpretations and conclusions, about this
14 proposed project by your company?

15 A. Yes, I have.

16 MR. KELLAHIN: Mr. Examiner, we tender Mr.
17 Hardie as an expert petroleum geologist.

18 EXAMINER STOGNER: Mr. Hardie is so
19 qualified.

20 Q. Mr. Hardie, let me direct your attention,
21 sir, to Exhibit No. 6. Before we talk about the
22 specific details, take a moment and identify the
23 display for us and tell us the basic information that
24 is shown on that exhibit.

25 A. Exhibit No. 6 is a map of the North Dagger

1 Draw Pool. The yellow areas are the acreage operated
2 by Conoco. The proposed horizontal well location is
3 near the top of the map, in the northwest quarter of
4 Section 17.

5 This map is actually a combination of two
6 contour maps; first of all a structural map, shown
7 with the red contours on the top of what we call the
8 Cisco C horizon. This is a geological marker near the
9 top of the pay zone. Those contours show that the
10 reservoir dips gently to the east, across the North
11 Dagger Draw Pool.

12 The blue contours are isopachs of the
13 dolomite within that same C horizon, and they show
14 that the thickest part of that dolomite occurs in the
15 northeast portion of the map, and that it thins away
16 from that on either side. The dolomite within North
17 Dagger Draw is what the reservoir is developed in.

18 Q. Can you approximate, Mr. Hardie, where the
19 North Dagger Draw southern boundary is, adjacent to
20 the area identified by the Division as the South
21 Dagger Draw Pool?

22 A. I'm sorry, could you rephrase that?

23 Q. Yeah. Do you know where the pool limits
24 are for the pool itself, when we move to the south?

25 A. I'm not positive, but I believe it's at the

1 bottom of this map, which would be the northern part
2 of Township 20 South.

3 Q. When we look, then, at your display, we're
4 looking at the area being developed under the North
5 Dagger Draw Pool Rules?

6 A. That is correct.

7 Q. Are you familiar with what the spacing
8 requirement is for development of the North Dagger
9 Draw Pool?

10 A. Yes, I am. We are allowed to produce up to
11 700 barrels a day for each 160-acre proration unit.
12 We can do that with any combination of wells as long
13 as they lie within the legal boundaries of that
14 160-acre proration unit.

15 Q. Give us a quick summary of the basic
16 geologic characteristics you find in the North Dagger
17 Draw.

18 A. The reservoir itself, since it is developed
19 within the dolomite, has a western extent which
20 coincides with the zero contour line on the map. As
21 we move to the east, the reservoir gets deeper and
22 deeper so that its eastern limit is controlled by
23 excessive water production. And that eastern limit
24 occurs somewhere between the -4200 foot contour and
25 the -4300 foot contour, shown in red.

1 Q. Are you able to identify a specific
2 oil/water contact in the North Dagger Draw at this
3 point?

4 A. The reservoir itself is highly
5 transitional, and it produces mostly oil at the upper
6 portion of the reservoir and mostly water at the lower
7 portion. There is no water-free production anywhere
8 in the field.

9 Q. Describe the reservoir and how the
10 hydrocarbons are trapped or placed in the reservoir?

11 A. The reservoir itself is a preferentially
12 dolomitized carbonate margin build-up. It is encased
13 in limestone so that it's trapped updip by a
14 transition to impermeable limestone. The downdip
15 limit of the reservoir, again is controlled by
16 excessive water production.

17 Q. Within this dolomite, do you find that the
18 hydrocarbons are uniformly placed throughout that
19 interval?

20 A. They are not. The hydrocarbons or the
21 nature of the reservoir is very heterogeneous. We
22 find areas of the field that have higher oil/water
23 transitions than other areas.

24 Q. Can you, from well to well, on wells that
25 are 40 acres apart, identify the same productive

1 interval for each of these wells?

2 A. In a general sense, we have the same
3 productive interval, although no two wells are
4 completed in the exact same stratigraphic interval.

5 Q. What tools do you utilize as a geologist to
6 help you identify the zones that may be productive?

7 A. We use a standard set of open-hole logs,
8 porosity logs, resistivity logs, but more importantly
9 we use an acoustic imaging log which shows us where
10 the gross vuggy development occurs. The production
11 in the field for each well can be directly related to
12 the number of these vuggy zones that a well
13 encounters.

14 Q. When we look at the northeast quarter of
15 Section 17, that would be the spacing unit in which
16 you desire to drill the horizontal well?

17 A. That is correct.

18 Q. What is the status of the development of
19 that 160 acres at this point, with North Dagger Draw
20 wells?

21 A. At this point there's one producing well in
22 that proration unit, the Jenny Com #1. It currently
23 produces between 40 and 50 barrels of oil per day.

24 Q. What about the other well?

25 A. The other well is abandoned. It was

1 produced and depleted and plugged.

2 Q. What is your geologic reason for selecting
3 this 160 acres to test the horizontal concept in this
4 reservoir?

5 A. There isn't any real specific geological
6 reason for this location. The concept of drilling a
7 horizontal well in Dagger Draw applies to the entire
8 field. This particular location was selected because
9 it has within it two adjacent 40-acre blocks available
10 for drilling, and that's one of the requisites for a
11 horizontal well. You have to have two adjacent blocks
12 so you can achieve the necessary lateral length.

13 The other requirement is that the proration
14 unit not be making its 700 a day allowable, in fact it
15 needs to be making much less than that, and this one
16 currently makes approximately 50 barrels a day from
17 the Jenny Com, leaving 650 barrels a day of uncaptured
18 allowable.

19 Q. Let's turn to Exhibit 7.

20 A. Exhibit 7 is a cross-section that's located
21 back on Exhibit 6. If you look back in Section 17,
22 the green-dashed line labeled A - A', is the location
23 of the cross-section in Exhibit 7.

24 The cross-section itself runs parallel to
25 the proposed horizontal well. I've placed the

1 proposed horizontal well on this cross-section, but we
2 need to keep in mind that it doesn't exactly exist in
3 this same plain. It's located a thousand feet to the
4 north of this cross-section.

5 I've included this cross-section for the
6 primary purpose of showing which part of the Cisco
7 reservoir we intend to penetrate with a horizontal
8 well. At Conoco, we've broken the Cisco down into
9 four units, and these are shown on the cross-section.

10 The Cisco A is actually just the top of the
11 Cisco formation. The primary producing horizon is the
12 Cisco C zone, which labeled on the cross-section. The
13 proposed horizontal well will penetrate the upper
14 portion of the Cisco C zone in Section 17.

15 Q. Why have you not chosen to penetrate, with
16 the horizontal portion of the well, the entire Cisco C
17 interval?

18 A. At this location, we are in the downdip
19 portion of the reservoir, and the lower portion of the
20 C and the downdip portions of the reservoir has very
21 high water cuts, and we are seeking to avoid those
22 high water cuts in order to more efficiently produce
23 from the reservoir.

24 Q. Is there any significance to this
25 particular orientation and angle of the well?

1 A. The orientation that we've chosen is to
2 drill the well in an updip direction. Our goal is to
3 traverse the upper portion of the Cisco C, and by
4 drilling in an updip direction, we can maintain the
5 borehole in the better part of the oil column.

6 If, for example, we chose to go the other
7 direction and drill downdip and our goal was to
8 traverse the upper section, then we would start high
9 in the Cisco C, but by the time we got to the bottom
10 of the target zone, we would be well within the high
11 water cut part of the reservoir.

12 Q. Let's turn now, Mr. Hardie, to Exhibit No.
13 8.

14 A. Exhibit No. 8 is an acoustic imaging log
15 from one of the wells in the North Dagger Draw Pool
16 recently drilled by Conoco. It's the Lodewick "A" Com
17 #3.

18 Q. Where is that well located?

19 A. If I could refer you back to Exhibit 6,
20 this well is located, it is the northwesternmost well
21 in Section 19.

22 Back to Exhibit No. 8. An acoustic imaging
23 log is made up of three tracts. The tract on the left
24 includes the gamma ray curve and four calipers, each
25 of those calipers 90 degrees opposed. On the right

1 are two imaging tracts, one of them derived from
2 acoustic amplitude, the other from acoustic travel
3 time. They basically just reinforce each other.

4 Each of these tracts provide us with an
5 image of the borehole. It's as if you had split the
6 borehole open and laid it flat, so that you're looking
7 at all 360 degrees of the borehole.

8 The dark areas on this log indicate gross
9 vuggy development. The reservoir itself is
10 composed of an intercrystalline porosity developed in
11 the dolomite. It's fairly tight in the matrix and
12 anywhere from zero to six percent porosity. So, in
13 order to produce from the Cisco reservoir, you have to
14 have the gross vuggy dolomite developed in order to
15 add to that porosity. It adds up to six percent to
16 the matrix porosity.

17 This log shows two vuggy zones,
18 approximately 25 feet in thickness. These zones are
19 not correlatable to adjacent wells indicating that
20 they occur randomly throughout the dolomite reservoir.

21 Q. For what purpose have you used this log?

22 A. We use this log to identify those coarse
23 vuggy zones, so that we can know where to perforate
24 each of the wells.

25 Q. How does this help you in any way in the

1 horizontal well concept?

2 A. Looking at the various acoustic imaging
3 logs that we've run, it's very apparent that these
4 vuggular zones are randomly developed. Therefore,
5 it's a matter of luck as to how many of these zones
6 you encounter with a vertical wellbore. By increasing
7 the amount of exposure to the reservoir with a
8 horizontal well, we statistically improve our chances
9 of encountering more of these vuggular zones and
10 therefore can more efficiently produce from the
11 reservoir.

12 Q. I would direct your attention to Exhibit
13 9. Would you identify and describe that display for
14 us?

15 A. Exhibit 9 is more or less a summary of the
16 concept of drilling a horizontal well in the North
17 Dagger Draw Pool. It's a conceptual cross-section,
18 and in it I show the Cisco Dolomite reservoir.

19 The upper portion of it is shaded green,
20 and then it grades downward to a blue shading. This
21 is representative of the very transitional nature of
22 the oil-to-water transition, producing mostly oil at
23 the top, mostly water at the bottom.

24 The irregularly shaped cross-hatched areas
25 conceptually illustrate the vuggular zones that are

1 randomly distributed through the reservoir.

2 The three wells I've shown on there are
3 hypothetical completions in the reservoir. The one on
4 the left would be a typical good producer from Dagger
5 Draw. It encounters two, possibly three of these vug
6 systems spread throughout the reservoir. It would
7 produce, perhaps, 300,000 barrels of oil over its
8 life, and a large amount of water.

9 The well in the middle is an example of a
10 poorer producer. It encountered one vug system in the
11 lower part of the reservoir, would have a cum of about
12 150- to 190,000 barrels of oil, and a very large
13 amount of water, perhaps a million barrels of water.

14 The horizontal well shown on the right,
15 conceptually illustrates that by extending the length
16 of the exposure of the wellbore to the reservoir, we
17 statistically increase our chances of encountering
18 more of these vug zones and therefore can more
19 effectively and efficiently produce from the
20 reservoir.

21 MR. KELLAHIN: That concludes my
22 examination of Mr. Hardie, Mr. Stogner. We move the
23 introduction of his Exhibits 6 through 9.

24 EXAMINER STOGNER: Exhibits 6 through 9
25 will be admitted into evidence.

1 I've got some general questions to ask once
2 we hear from everybody, but the questions I'm going to
3 ask of Mr. Hardie at this time are somewhat general.

4 EXAMINATION

5 BY EXAMINER STOGNER:

6 Q. Let's go with Exhibit 9. Do you see a
7 coning effect in this Cisco Dolomite producing
8 interval when I look at this Exhibit No. 9 and how
9 it's artistically put together?

10 A. We have one well that we think may have a
11 coning effect in it, although, as a general rule, we
12 don't see a coning effect. One of the ideas of this
13 project is to avoid the traditional high-water cuts,
14 that you have in Dagger Draw, by keeping the wellbore
15 in the upper part of the zone. So, if you did have a
16 coning effect, that would serve to alleviate that.

17 Q. You have more of a water encroachment as
18 opposed to--

19 A. Exactly.

20 Q. --somewhat more uniform?

21 A. Yes.

22 Q. Your well in Exhibit 8, that is not on your
23 cross-section, is it?

24 A. It is not, no. The wells on the
25 cross-section were too old, and we did not run

1 acoustic imaging logs on those wells.

2 Q. You may or may not have covered this. When
3 I look at Exhibit No. 8, can I correlate the top of
4 the Cisco A, the Cisco B and the Cisco C on this
5 cross-section?

6 A. On Exhibit 8, which is the acoustic imaging
7 log, we're looking at just a very small portion of the
8 Cisco C zone. The scale on this is such that you're
9 looking at one-foot increments. The entire exhibit
10 covers approximately 90 feet.

11 Q. Then even the top of the Cisco C is not
12 represented on here?

13 A. No, it's not.

14 Q. Would you call this Exhibit 8 the upper
15 portion of the Cisco C, the oil-bearing zone or the
16 transitional zone in the middle, or the lower zone in
17 the water?

18 A. This is from an updip well. It includes
19 the lower part of the upper Cisco C. It's right in
20 the middle.

21 EXAMINER STOGNER: Okay. I have no other
22 questions right now of Mr. Hardie, but maybe later,
23 Mr. Kellahin.

24 MR. KELLAHIN: All right.

25 MR. STOVALL: I just have one question more

1 for curiosity.

2 EXAMINATION

3 BY MR. STOVALL:

4 Q. Why did you pick the orientation, the
5 horizontal direction, this particular one as opposed
6 to another? Is there a geologic reason?

7 A. There is not. That orientation was
8 selected because it's one of the few adjacent 40-acre
9 blocks that are open that is not currently in a
10 proration unit that exceeds its allowable or at least
11 makes its allowable.

12 At a later date, when some of these other
13 proration units begin to decline, we will have more
14 open locations available. The east-west, north-south
15 orientation is--

16 Q. It's geologically insignificant, is what
17 you're saying?

18 A. Exactly.

19 MR. STOVALL: Okay. That's all I have.

20 MR. KELLAHIN: Mr. Examiner, I call Mr.
21 Gary Faul. He spells his last name F-A-U-L.

22 Mr. Faul is a drilling engineer with
23 Conoco.

24

25 GARY FAUL

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

3 EXAMINATION

4 BY MR. KELLAHIN:

5 Q. Mr. Faul, for the record, would you please
6 state your name and occupation?

7 A. Gary Faul. I'm a senior drilling engineer
8 for Conoco in its Midland Division.

9 Q. That's where you reside now, sir?

10 A. Yes, sir.

11 Q. Have you, on prior occasions, testified as
12 a drilling engineer before the Division?

13 A. No, I have not.

14 Q. Summarize for us your educational
15 background, please?

16 A. I obtained a B.S. degree in mechanical
17 engineering from McNeese State University in Lake
18 Charles, Louisiana, and graduated in 1978.

19 Q. Do you hold any other degrees in
20 engineering?

21 A. No, I do not. I am a registered
22 professional engineer.

23 Q. In what state, sir?

24 A. In the states of Louisiana and Texas.

25 Q. Summarize for us your employment

1 experience, and place particular emphasis on your
2 experience as a drilling engineer.

3 A. First two and a half years of working for
4 Conoco in Lake Charles I worked as a production
5 engineer, and since that time, since 1980, I've worked
6 as a drilling engineer, both onshore and offshore,
7 last two years being spent in Midland, Texas.

8 Q. Do you have personal experience in drilling
9 high-angle or deviated wells?

10 A. Yes, sir. When I worked in the offshore
11 division, we directionally drilled wells from
12 platforms and obtained angles up to 70 degrees.

13 Q. Are you familiar with the drilling and
14 completion program proposed for this well?

15 A. Yes, sir, I am.

16 MR. KELLAHIN: We tender Mr. Faul as an
17 expert drilling engineer.

18 EXAMINER STOGNER: Mr. Faul is so
19 qualified.

20 Q. Mr. Faul, let me take you through some of
21 these preliminary exhibits, starting with Exhibit No.
22 1, and then we'll get down to the more specific
23 questions with regards to the drilling program for the
24 well.

25 If you'll simply take a moment, though,

1 let's go through these earlier exhibits and have you
2 identify, first of all, Exhibit No. 1?

3 A. Okay. Exhibit No. 1 is a location and
4 acreage dedication plat for the Barbara Federal #13.
5 What it shows is the surface location for our proposed
6 well to be directionally drilled, with that surface
7 location being at 760 feet from the north line and
8 2,630 feet from the west line of Section 13, Township
9 19 South, Range 25 East, Eddy County, New Mexico.

10 Q. Do you have an opinion as to why it is
11 necessary to move to the southern side of the 160-acre
12 spacing unit at which to commence the drilling of this
13 well?

14 A. We are trying to stay within a block area,
15 keeping 660 feet from lease line boundaries.

16 Q. With the lateral portion of the wellbore,
17 then, in the reservoir?

18 A. Yes, sir. The actual part of the lateral
19 that's going to be in the reservoir is going to
20 maintain a spacing of 660 feet from that.

21 Q. In order to maximize the opportunity to
22 expose in the formation the maximum lateral distance,
23 is it necessary, in your opinion, then, to start at
24 this unorthodox surface location?

25 A. The reasoning behind the unorthodox surface

1 location being 10 foot offset from the lease line, is
2 that the vertical and angle built section of our hole
3 will take us to a point that's 660 feet from the east
4 side. So we need this area to build up around.

5 Q. Can you yet determine the specific angle
6 and azimuth at which you will drill the lateral for
7 this well?

8 A. At this point we have plans to head due
9 west, of course, and the angle build that we're
10 planning is 10 degrees per hundred foot, and we're
11 planning on building up to an angle of between 85 and
12 88 degrees. This is not cast in stone, but it's our
13 current best estimate of what we'll have to do to
14 encounter the formation.

15 Q. That plan is subject to change based upon
16 what you find when you drill the first portion of this
17 well, is it not?

18 A. Yes, sir.

19 Q. Do you desire that the Examiner provide you
20 the flexibility to make those operational decisions in
21 the field at the time that you're drilling the well?

22 A. Yes, sir. At the time we drill the well,
23 we plan on drilling a vertical pilot hole into the
24 formation and logging it at that time. And we'll
25 identify the exact top of the formation then, and

1 we'll need some flexibility at this time to adjust the
2 directional program.

3 Q. Would it satisfy your desires for
4 flexibility if the Examiner provides you a drilling
5 window in the reservoir that is no closer than 660
6 feet from the outer boundaries of this 160-acre
7 spacing unit?

8 A. Yes, it would.

9 Q. And that would conform to the setback
10 requirements for a vertical well under these pool
11 rules, would it not?

12 A. Yes, it would.

13 Q. Let's turn now to Exhibit No. 2. What's
14 shown here, Mr. Faul?

15 A. Okay. This is a location map showing the
16 trajectory of the Barbara Federal #13, in the
17 northwest quarter of Section 17. The surface location
18 is shown as a square dot. The angle build section is
19 shown as the dotted section. The actual horizontal in
20 the target formation is shown as the solid portion
21 between the two surfaces.

22 Q. All right, sir. Let's go on to Exhibit No.
23 3 and have you identify and describe that for us,
24 please.

25 A. Okay. Exhibit No. 3 is the plat of the

1 160-acre proration unit, and what it shows is the
2 surface location as the large solid dot being at
3 10-foot offset from the east line, the angle build
4 section at 10 degrees per hundred foot as the dashed
5 line, and then our lateral section commencing at a
6 point no further than 1,980 feet from the west line
7 and continuing to a point no closer than 660 feet from
8 the west line.

9 The solid portion is the actual, what we're
10 calling the horizontal, which would be in the target
11 producing formation.

12 Q. Let me have you turn to Exhibit No. 4.
13 Let's use Exhibit No. 4, Mr. Faul, to have you go
14 through and give us the details, then, of the drilling
15 program. You're going to start with a surface
16 location and you're going to do what?

17 A. Okay. Exhibit No. 4 is a vertical section,
18 a little bit more detail of what our drilling plan
19 would be. We would start at the surface and drill
20 vertically to set surface casing at 1,200 feet. From
21 this point we would drill vertically through the
22 target formation, being the Cisco, at approximately
23 7,775, and at that point we would log--excuse me,
24 7,875.

25 Q. You have a straight hole, then, from

1 surface to what would be close to the bottom or the
2 base of the Cisco target?

3 A. Base of the Cisco target, yes.

4 Q. Why are you doing that?

5 A. Okay. We do this mainly for two reasons.
6 Number one, we would want to log this section and
7 identify the reservoir at this point. Number two, and
8 most related to the directional drilling part of it,
9 would be to more accurately identify the top of this
10 formation. We have it estimated right now, but it's
11 real important to get the top of that formation, in
12 that once we build angle and we're at an angle of 88
13 degrees, every little bit of error in vertical
14 distance will make a large difference in horizontal
15 distance. So we want to pin down the top of that
16 formation as close as we can.

17 Q. Once you've done that, what then do you do?

18 A. Once we've done that, we plan to plug the
19 well back to approximately 7,100 feet. That's what
20 we're using for all of our planning right now, 7,100
21 feet to plug back to that depth and kick the well off,
22 build angle at 10 degrees per hundred foot, until we
23 reach our terminal angle at approximately 85 to 88
24 degrees, and that would put us into the top of the
25 target formation, the Cisco, at approximately 7,775.

1 Q. Once you get to that point, then, what do
2 you do?

3 A. At this point, we would plan on setting our
4 string of 9-5/8" casing into the top of the target
5 formation that would isolate our build section and our
6 vertical hole section, and set us up to be able to
7 drill the horizontal section without any effects from
8 this section as a whole.

9 Q. When we look at the vertical portion of the
10 wellbore, that initial stage, when this well is
11 completed for production, is that portion isolated?

12 A. Completely.

13 Q. What's the drilling fluids used during the
14 various stages of drilling?

15 A. Okay. We plan on using fresh water in the
16 surface hole section, a brine starch system in the
17 vertical and angle-build section, and once we set this
18 string of 9-5/8 intermediate casing and isolate the
19 build section and the vertical section, then we would
20 go to our fresh water type as simple a system as we
21 could.

22 Q. When you have drilled the lateral portion
23 of the wellbore, how do you prepare that for a
24 completion and production?

25 A. At this point we're planning to do an

1 open-hole completion. We feel like the confidence of
2 the formation is there and, as a completion technique,
3 we do a light acid treatment to the formation. That
4 would be our initial completion plans.

5 As a contingency, we've allowed ourselves,
6 by going with the 9-5/8 intermediate string, to set
7 7-inch as a contingency string to be able to set a
8 liner and selectively complete the formation, if we
9 need to.

10 Q. Describe the basic equipment for us that
11 you'll use to control where you are in the reservoir
12 and how you'll complete that drilling.

13 A. Okay. Of course, from the vertical hole
14 we're going to get control in that way. While we're
15 drilling the kick-off section and the lateral itself,
16 in the horizontal, we'll be using directional MWD and
17 a down-hole mud motor. The directional MWD will give
18 us instantaneous readings at the surface of what our
19 angle and direction heading are, so that we can
20 control where we're at physically as we're drilling
21 the lateral.

22 Q. Are there any other high angle/horizontal
23 wells in North Dagger Draw at this point?

24 A. Not that I'm aware of.

25 Q. This is the first pilot project of this

1 type for this pool?

2 A. Yes.

3 Q. Turn now to Exhibit No. 5. Would you
4 identify that for us?

5 A. Okay. Exhibit No. 5 is a calculation, you
6 might say, based on our 7,100 foot kick-off point, of
7 the angle and direction that we're going to be
8 encountering as we drill the build-up section and our
9 horizontal section. It's based on inclination,
10 direction, true vertical depth. At this point it all
11 hinges around that 7,100 foot kick-off point and it
12 hinges around what our estimated top of the target
13 formation is going to be.

14 This is where we would really need the
15 flexibility. When we identify the top of that
16 formation, we may have to make some minor adjustments,
17 you know, plus or minus feet, to nail down this
18 program.

19 MR. KELLAHIN: That concludes my
20 examination of Mr. Faul. We move the introduction of
21 Exhibits 1 through 5.

22 EXAMINER STOGNER: Exhibits 1 through 5
23 will be admitted into evidence.

24

25

EXAMINATION

1 BY EXAMINER STOGNER:

2 Q. Mr. Faul, let's refer to Exhibit 4.

3 A. Yes, sir.

4 Q. Starting at the top of the hole you use
5 13-3/8" casing down to 1,200. Is this in an area
6 that's in a water basin as declared by the State
7 Engineer, that you know of?

8 A. I know for a fact that in the development
9 we've done out in this area, it's customary for us to
10 set the surface casing at approximately 1,200 feet.
11 We don't always use 13-3/8" casing. Generally it's
12 something smaller, but we do generally set the casing
13 at 1,200 feet.

14 Q. Is that cemented all the way back to the
15 surface?

16 A. Yes, sir, it is. We go through a lot of
17 extra pains to ensure that we do get cement returns to
18 the surface. And if we don't, we'll do a top job to
19 get cement to the surface.

20 Q. Is the Captan Reef present in this area?

21 A. I'm not sure.

22 Q. Not sure?

23 A. Not sure.

24 Q. Okay. Let's talk about the vertical
25 portion. You'll be coming out from underneath a

1 13-3/8, and drilling approximately 7,800 feet?

2 A. Yes, sir.

3 Q. That will then be logged, then?

4 A. Yes, sir, it will.

5 Q. What kind of problems do you expect in this
6 area? Are there any loss circulation zones out there?

7 A. Well, as of recent we have encountered some
8 loss circulation in our producing formations, in our
9 target formations, the Cisco. It's not prolific, it's
10 not something that we haven't been able to control
11 with minor loss circulation material, but we do see
12 some loss circulation in our target interval. Other
13 than that, none.

14 Q. And when we talk about loss circulation
15 down in your target interval, is it corrected by your
16 brine starch solution, or by pumping a loss
17 circulation material?

18 A. We'll generally have a loss circulation
19 material mixed into a pill and premixed, and have it
20 ready, so that when we see the loss circulation, we
21 can spot it at that time and minimize how much losses
22 loss we have to the formation.

23 Q. What kind of time interval are we talking
24 about, from the time you come from underneath the
25 surface casing and drill your pilot hole, log it, and

1 plug that interval off?

2 A. Well--

3 Q. Or back, I should say.

4 A. Yeah. I'm going from memory, of course,
5 but it seems like about 20 days that we're talking
6 about to do that. And by drilling vertically through
7 the formation, and logging that section of hole, it's
8 going to add about five days or so to our drilling
9 program--four or five days.

10 At this point we feel like it's important
11 enough, number one, to identify the reservoir at that
12 location, since it is sort of a step out in a pilot
13 program. And, number two, if you would imagine or
14 look at this 88-degree wellbore laid out, if you make
15 just a few feet of error in your TVD direction, it
16 throws you off by several hundred feet in a horizontal
17 direction. So we think it's important enough that
18 we've got to identify the top of the target formation.

19 Q. That's unusual to have that kind of a zone
20 open-hole before running casing. That's going to give
21 you some additional worries, I would assume?

22 A. Well, of course at that point, you know, at
23 the point that we plug back, we'll set cement plugs to
24 isolate the old wellbore.

25 Q. Then you'll be setting a whipstock, I would

1 assume, at 7,100?

2 A. We'll set a cement plug that will be
3 capable of kicking off of with a steering tool. Once
4 we get kicked off, then we'll be drilling with a
5 directional drilling assembly, with a motor and MWD,
6 so that we can control our build section.

7 Q. Once the 9-5/8" casing is set, what are
8 your plans for the cementing of that string? Will
9 that be tied back into the surface?

10 A. Yes, sir. As a minimum, I think we would
11 tie that back into the surface casing. We would, of
12 course, not have any other open hole below us whenever
13 we set that casing string, and we wouldn't drill the
14 lateral until after we've set and cemented that
15 intermediate string.

16 Q. And I'm sorry, I missed it. Once you get
17 your 9-5/8" casing set, you'll be using the mud motor,
18 and what fluid will you be utilizing in your last
19 stage?

20 A. Right now we're planning on fresh water and
21 really as simple a system as we can go with. We may
22 see, in the process of drilling it, that we need to
23 use some gel or some other additives to give us some
24 adequate hole cleaning, but at this time we think
25 we'll be able to get by with fresh water.

1 Q. What do you anticipate your drilling rate
2 to be in that horizontal section?

3 A. Generally what we figured is about
4 half-rate for the horizontal, versus if you were
5 drilling it at vertical. And from memory, I'm saying
6 generally we get about 16 to 20 foot, so that would
7 mean we're planning on about 8 to 10 foot rate of
8 penetration.

9 Knowing that this is a pilot project and
10 this is our initial project out here, we generally
11 plan things conservatively, you know. In other words,
12 time and how we're setting up our casing program,
13 there was quite a bit of interest in scaling down the
14 size of our casing program, but it being the pilot
15 well out there, we figured that we would be
16 conservative and more or less give ourselves some
17 insurance to make sure we could get the wellbore down.

18 Q. You mentioned earlier that you have
19 experienced loss circulation in this area, even if you
20 have to drill without returns. Do you anticipate that
21 happening, or would there be any problems in the
22 horizontal section?

23 A. Yes. Drilling the horizontal section with
24 the idea of possible loss returns, we're opening up a
25 lot more formations. I can see what you're leading

1 to. If we're able to go with fresh water, of course
2 that would be a situation where we're not dealing with
3 a fluid that would harm anything, you know,
4 formation-wise, and would not be real expensive. So
5 we could do some dry drilling. And at that point
6 we'll just have to try some loss circulation pills and
7 see how they react. If not, then, we would do some
8 dry drilling.

9 Q. Are these vuggy structures noticeable
10 when they're drilled into them? The rate of
11 penetration, of course, will go up, but are they also
12 recordable?

13 A. I think on not the last well that we
14 drilled but the one before that, they had a real
15 noticeable instance that happened to them where the
16 bit actually fell a couple of feet whenever they
17 encountered one of them. I think that's maybe an
18 extreme. I think in general they're not real
19 noticeable, but in some cases you'll see the torque
20 and in that case, an extreme, we actually saw the
21 drill string fall a couple of feet whenever they
22 encountered that.

23 MR. STOVALL: Let me ask an additional
24 question to follow-up on that, if I might.

25 EXAMINATION

1 BY MR. STOVALL:

2 Q. I assume when you're talking that, you're
3 talking a vertical hole and the string just dropped
4 vertically through the vug, is that right?

5 A. Yes, sir.

6 Q. Does that cause a problem if you're going
7 horizontally and you hit one of these large holes? Do
8 you have a problem losing your ability to control the
9 direction of that hole?

10 A. It may give us some effect for a short
11 distance, but being as we're going to be using a
12 steerable system, and it will be stabilized, you know,
13 back up from the bit it will be stabilized, I believe
14 you would be able to correct for it without a lot of
15 problem. It's something that getting the surveys up
16 to the surface on a continuous basis, we'll be able to
17 correct for that.

18 EXAMINER STOGNER: Any other questions of
19 Mr. Faul?

20 MR. STOVALL: I just have a couple of real
21 quick questions, thinking in terms of the future of
22 establishing horizontal drilling rules, so that each
23 one is not an exception.

24 Q. (BY MR. STOVALL) Do you have an opinion,
25 with respect to the identification of a surface hole

1 location for a well such as this, or identifying this
2 as being unorthodox because, in fact, the surface
3 location is 10 feet from the proration unit boundary?
4 Do you have a recommendation in terms of the future,
5 as far as identification of the well location,
6 orthodox or unorthodox, or anything?

7 A. I have an opinion, for what it's worth.

8 Q. That's all I want is an opinion, because it
9 really has no bearing on your case. We're trying to
10 build some information on that.

11 A. We, at Conoco, for the last two years, have
12 been trying to identify prospects, and this is
13 probably the closest we've actually gotten to drilling
14 one. It's something that is definitely a problem in
15 West Texas, and I'm sure it is in Southeast New
16 Mexico, but just being able to physically go in and
17 identify a large enough area to lay a lateral out,
18 you've almost got to have special considerations in
19 being able to back up your surface location so that
20 your vertical and your build section, which would not
21 be in a producing formation, may be in an unorthodox
22 position.

23 If you don't, if you've only got so much
24 area and you use that up with your build section,
25 well, then, what it does is limit the length of your

1 lateral which, in this case I think we've identified
2 as plus or minus a thousand feet, before it even
3 becomes economic, well, then, you would kill a lot of
4 projects, of course. A lot of projects wouldn't be
5 able to survive economically.

6 Q. Once again I would ask for your opinion,
7 and I recognize you're speaking mostly for yourself,
8 possibly for Conoco, but would you recommend, perhaps,
9 that the orthodox location be defined as the producing
10 interval of a high-angle deviated well?

11 A. Yes, sir, I would, you know, because really
12 thinking of what affects offset production and what
13 affects everybody else, really is what's in the
14 producing interval. Everything else is kind of just
15 rented space, you might say.

16 MR. STOVALL: I appreciate your comments.
17 We're, as I say, moving towards the direction of
18 trying to define some rules for this, but we're trying
19 to do it with experience; so your input is helpful.
20 Thank you. Nothing further.

21 EXAMINER STOGNER: Any other questions of
22 Mr. Faul?

23 MR. KELLAHIN: No, sir.

24 EXAMINER STOGNER: I may later have some
25 more questions.

1 Mr. Kellahin?

2 MR. KELLAHIN: I would like to call Mr.
3 Mark McClelland.

4 MARK McCLELLAND

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

7 EXAMINATION

8 BY MR. KELLAHIN:

9 Q. Mr. McClelland, would you please state your
10 name and occupation?

11 A. My name is Mark McClelland. I work with
12 Conoco as a senior reservoir engineer.

13 Q. Mr. McClelland, on prior occasions have you
14 testified before the Division as a reservoir engineer?

15 A. No, I have not.

16 Q. Summarize for us your education.

17 A. I received a B.S. in petroleum and natural
18 gas engineering from Pennsylvania State University in
19 1983. In 1989 I received a Master's in engineering
20 management from the University of Southwestern
21 Louisiana, and also in 1989 I was registered, by exam,
22 as a professional engineer in the State of Louisiana.

23 Q. Summarize for us your employment
24 experience.

25 A. My first five years I worked in the Gulf

1 Coast with Conoco as an area engineer. My assignments
2 were primarily as a production and also reservoir
3 engineer for one of our onshore fields.

4 Since then I've worked in mainly lease
5 evaluation, reservoir studies, acquisitions,
6 dispositions, and in the last year and a half I've
7 worked in Southeast New Mexico performing reservoir
8 studies.

9 Q. Summarize for us your experience in the
10 North Dagger Draw Pool.

11 A. My experience in North Dagger Draw has
12 involved a reservoir study to determine recovery
13 efficiencies, rates, reserves of development, and also
14 to identify the horizontal drilling prospects.

15 Q. As part of that study, have you reached
16 certain conclusions and opinions about the feasibility
17 of the high angle/horizontal well that Conoco is
18 seeking to have approved today?

19 A. Yes, sir, I have.

20 MR. KELLAHIN: We tender Mr. McClelland as
21 an expert reservoir engineer.

22 EXAMINER STOGNER: Mr. McClelland is so
23 qualified.

24 Q. Mr. McClelland, let me ask you about how
25 you went about organizing the information upon which

1 then to study and ultimately reach conclusions about
2 the feasibility of this project?

3 A. Trying to predict rates and reserves for a
4 horizontal well in a vuggy dolomite is a very
5 difficult task. To help in this analysis, I've spent
6 almost a month and a half primarily studying the
7 vertical well performance, and from that data I
8 gathered, I was able to go ahead and predict rates and
9 reserves for the horizontal well, based on the
10 vertical well performance.

11 Q. What methodology did you apply, as a
12 reservoir engineer, to determine recoveries and
13 performance of vertical wells in this type of
14 reservoir?

15 A. I analyzed the production of all of the
16 Conoco-operated vertical wells in the North Dagger
17 Draw field. From this analysis, I was able to
18 determine typical type recoveries and also to
19 determine reservoir parameters from the production
20 performance history of those wells.

21 Q. What methodology did you apply in order to
22 come up with recoveries for the wells?

23 A. The methodology for the recovery was based
24 on volumetrics, calculations, and also it was verified
25 by the production performance.

1 Q. Do you have a case example of a vertical
2 well in the North Dagger Draw from which, then, you
3 have determined that it was a typical well, in terms
4 of vertical performance and reserve potential?

5 A. Yes, I do, and that is shown in Exhibit 10.

6 Q. Let's turn to Exhibit 10 and before you
7 explain your conclusions, tell us how to read the
8 display?

9 A. Exhibit 10 is just a fluid production
10 history of the Barbara Federal No. 6, from 1976 until
11 1985.

12 Q. Why did you choose the Barbara Federal No.
13 6 well?

14 A. Barbara Federal No. 6 shows what we feel is
15 a typical type profile in the North Dagger Draw area,
16 and it shows a dual porosity type production history.
17 Dual porosity means we have a high initial decline
18 rate on the oil production in the first two years, and
19 after that time the well stabilizes with less decline,
20 10 to 15 percent.

21 Q. Having selected a typical producing
22 vertical well in North Dagger Draw, what then did you
23 do with this information?

24 A. With this information, I was able to nail
25 down some of the reservoir parameters that we did not

1 have data for, those being primarily the effective
2 permeability and also the amount of porosity and
3 thickness in the reservoir.

4 Q. From the information plotted on Exhibit No.
5 10, were you able to extrapolate a decline for the oil
6 rate on this well?

7 A. Yes, I did, and that decline is noted in
8 the solid back line. The green line is the oil
9 production on the Barbara Federal No. 6. The blue
10 plus symbols is the water production, the red squares
11 on top is the GOR for the life of the well.

12 Q. Having done that, what then did you do?

13 A. Having determined the decline in production
14 history, and also the vertical well parameters in the
15 North Dagger Draw field, I was able to analyze or
16 predict the horizontal well performance.

17 Q. Let's turn now to Exhibit No. 11. Identify
18 and describe that display.

19 A. Exhibit 11 shows the oil production curve
20 from Exhibit 10, again for the Barbara Federal No. 6,
21 in the heavy green line. The blue connected squares
22 is a type-curve match that I constructed using various
23 reservoir properties.

24 Q. What conclusion do you reach about the
25 match of your typical profile versus actual

1 performance of the No. 6 well?

2 A. As you can see, the match is fairly
3 representative of the actual performance of the
4 Barbara Federal No. 6. Therefore, we conclude that
5 the reservoir parameters that I've based the match on,
6 are reasonable.

7 Q. Let's turn now to Exhibit No. 12, Mr.
8 McClelland. Would you identify that display for us?

9 A. Exhibit 12 is a summary of the reservoir
10 parameters that I determined are affecting the North
11 Dagger Draw field.

12 On the top of Exhibit 12 are the reservoir
13 parameters for the vertical type curve match, and on
14 the bottom are the reservoir parameters I used in
15 predicting the horizontal well performance.

16 Q. Without reading each of the parameters,
17 give us a general sense of the key components, in
18 terms of comparing the parameters and the values for
19 each of those parameters, as we move from a vertical
20 well to a horizontal well.

21 A. The key components, as Mr. Hardie
22 discussed, is the amount of reservoir that is in
23 contact with the wellbore.

24 As you can see in the vertical well case,
25 we're showing 100 feet of pay. In the horizontal well

1 case, we're showing 1,320 feet of wellbore.

2 The other key component that affects oil
3 production is your effective permeability in the
4 reservoir, and from the type curve match, we were able
5 to determine that at two millidarcies.

6 Q. What is the underlying data upon which you
7 have made the engineering assessment of the
8 permeability?

9 A. The permeability, the effective well
10 permeability that comes from a type curve match, we
11 made an initial estimate of it and then, by adjusting
12 this figure, we were able to match the initial rate of
13 the Barbara Federal No. 6.

14 Q. Any other key parameters and values you
15 want to direct the Examiner's attention to?

16 A. The first line on the seconds section. The
17 vertical perm to horizontal perm ratio is a key
18 component in predicting horizontal well performance.
19 The .3 ratio we've shown here is based on core data
20 from the Barbara Federal No. 1.

21 Q. What does that mean? 0.3 is a ratio to
22 what?

23 A. 0.3 is a ratio of the vertical perm divided
24 by the horizontal perm. Normally your vertical perm
25 is less than your horizontal perm. In this case we're

1 saying, if we have 100 millidarcies of horizontal
2 perm, we would have 30 millidarcies of vertical perm.

3 Q. From analysis of the core, the data from
4 the core will give you both a value for a vertical
5 permeability as well as a horizontal permeability
6 value?

7 A. Yes. It's characteristic to measure
8 permeabilities from hole core in both the X and Y
9 directions, both vertical and horizontal directions.

10 Q. Anything else about the parameters you want
11 to direct the Examiner's attention to?

12 A. Just using these parameters in the
13 horizontal well bank, the initial rate will be
14 calculated at 1,700 barrels of oil per day, and
15 cumulative recovery is calculated at 790,000 barrels
16 of oil.

17 Q. Based on your experience and engineering
18 judgment and your opinion, are these reservoir
19 parameters reasonable?

20 A. Yes, they are.

21 Q. Let's turn to see what conclusions you
22 reach when you take these parameters and apply them to
23 forecasting production in the North Dagger Draw with a
24 vertical well and with a horizontal well. First of
25 all, let's go to Exhibit 13.

1 A. Exhibit 13 is a prediction of production
2 for two cases. The first case is the horizontal well
3 case shown in the dark green line. The second case
4 would be the other development scenario, and that
5 would involve drilling two vertical wells on the
6 80-acre tract that's open for development.

7 Q. The assumption of spacing, then, is an
8 80-acre spacing?

9 A. That's correct.

10 Q. You're dealing with two vertical wells, one
11 on each 40?

12 A. That's correct.

13 Q. And comparing that to what would happen
14 with a vertical well, with the assumption of 80 acres?

15 A. A horizontal well.

16 Q. I'm sorry, a horizontal well with the
17 assumption of 80 acres?

18 A. That's right.

19 Q. Take us through, before we start the
20 horizontal, take us through the sequence with the
21 first vertical well and the second vertical well, in
22 terms of forecasting production.

23 A. The first vertical well decline profile is
24 based on the typical decline profile we saw earlier in
25 Exhibit 6. Its initial rate is 500 barrels of oil per

1 day. The well would decline out every nine years and
2 produce 300,000 barrels of oil.

3 Under this development scenario, we would
4 drill a second well approximately one year later, and
5 that's shown as the footnote number two. This well
6 will be drilled in a down-structure location and would
7 probably encounter a higher water cut. For that
8 reason we've risked the initial rate and have a
9 calculated rate of 340 barrels of oil per day.

10 In summary, the rate profile shown is for a
11 vertical well development of this 80-acre tract.

12 Q. Contrast that now to the results you may
13 achieve with a horizontal well.

14 A. The horizontal well, as I said previously,
15 estimated an initial rate of 1,700 barrels of oil per
16 day. However, our proration unit allowable is 700
17 barrels of oil per day, so we'll be rate-restricted on
18 that. We have a 50 barrel of oil per day currently on
19 that proration unit, so the uncaptured amount is 650
20 barrels of oil per day.

21 We should be able to maintain a constant
22 production of 650 barrels of oil per day for
23 approximately one and a half years, and there on out
24 we'll go on a decline that is similar to the vertical
25 well performance decline.

1 Q. Have you also plotted what would be the
2 results of cumulative oil recovery, when you compare
3 vertical to the horizontal well?

4 A. Yes, I have, and that information is shown
5 in Exhibit 14.

6 Q. All right, let's turn to that.

7 A. Exhibit 14 shows the cumulative production
8 profile for both cases again. The dark green line is
9 for the horizontal well and the blue line is for the
10 two-vertical-well-development scenario.

11 In summary, the horizontal well cum'd
12 790,000 barrels of oil after nine years. The two
13 vertical wells would cum 300,000 and 190,000 barrels
14 of oil, respectively, for a total of 490,000 barrels
15 of oil.

16 By drilling horizontally and in turn by
17 contacting more of the reservoir with the wellbore, we
18 would make an additional 300,000 barrels of oil over a
19 nine-year period.

20 Q. Can you give us a general range of the cost
21 of the vertical well versus the horizontal well?

22 A. It's roughly two-to-one. Vertical wells
23 are running \$800,000 to drill and complete, and we're
24 projecting the horizontal well at \$1.65 million.

25 Q. Under this reservoir analysis, is it

1 economically feasible for your company to undertake
2 this horizontal pilot project?

3 A. Yes, it is, mainly in part due to the
4 uncaptured proration unit allowable that exists in
5 this location.

6 Q. Are you familiar with the operators that
7 have joined the spacing unit, Mr. McClelland?

8 A. Yes. To the north, Yates Petroleum
9 operates--

10 Q. Let's go back to one of the first exhibits.
11 Let's look at Exhibit No. 2. Do you have that before
12 you?

13 A. Yes, I do.

14 Q. Explain to the Examiner the operators of
15 the spacing units surrounding this 160 acres?

16 A. The only other operator besides Conoco is
17 Yates, to the north. They operate in Section 7 and
18 8. Conoco operates Section 17 and 18.

19 Q. They've been contacted about your
20 application?

21 A. Yes, they have.

22 Q. In fact, they're present in the hearing
23 room today, are they not?

24 A. Yes, they are.

25 Q. Have you received any objections from any

1 of the offsetting operators or any interest owner
2 involved in this prospect?

3 A. No, we have not.

4 Q. In your opinion, Mr. McClelland, would you
5 request that the Examiner approve this application?

6 A. Yes, I do.

7 Q. In your opinion, will it afford the
8 opportunity to Conoco to explore the feasibility of
9 recovering hydrocarbons from this pool, that might not
10 otherwise be recovered?

11 A. It definitely will do so. This pilot
12 project allows us to evaluate the rate and recovery of
13 the horizontal well. We're predicting that we should
14 be able to recover more oil than we can in vertical
15 wells, so it will maximize the efficiency of the
16 recovery from the reservoir.

17 Q. You're proposing that the producing oil
18 rate for this horizontal well be controlled by the
19 proration unit allowable for this spacing unit, which
20 is the maximum, 700 barrels of oil per day?

21 A. Yes, sir.

22 MR. KELLAHIN: That concludes my
23 examination of Mr. McClelland. We would move the
24 introduction of Exhibits 10 through 16.

25 EXAMINER STOGNER: Exhibits 10 through 16

1 will be admitted into evidence at this time.

2 EXAMINATION

3 BY EXAMINER STOGNER:

4 Q. Mr. McClelland, when you were doing your
5 study, were you able to actually research similar
6 horizontal wells and their performance in a formation
7 such as this?

8 A. Yes, sir, I did.

9 Q. And which formations or which areas did you
10 look at?

11 A. Case histories in the vuggular dolomite are
12 fairly rare currently. There are two--well, two good
13 examples by Elf-Aquataine, one in the Rospo Mare field
14 offshore Italy, very similar to North Dagger Draw.
15 It's a vuggular quartz type reservoir, and from that
16 literature I based my analysis on that literature and
17 used that for an upper limit of production
18 prediction. In some of their wells, they saw an
19 increase of horizontal to vertical of over
20 four-to-one. That is, their horizontal wells produced
21 four times their vertical wells.

22 Q. And they drilled two wells up there? Or
23 you said there was another one?

24 A. Actually, in the case history I'm referring
25 to, in the Rospo Mare Field, the only way they could

1 develop the field was through horizontal well
2 technology. It was non-economical under vertical well
3 technology.

4 Q. But there were two wells in that field that
5 you were referring to in your case history?

6 A. No, that field had seven or eight wells
7 that were developed.

8 Q. Were there any other case histories that
9 you utilized?

10 A. There was one other case history, a small
11 field in France, the name escapes me currently, but
12 Elf-Aquataine actually developed some of their
13 horizontal technology drilling onshore first, and then
14 they used that technology to develop the Rospo Mare
15 Field I'm referring to. I can supply the case history
16 to you there.

17 Q. Any case histories in New Mexico that you
18 know of--I'm sorry. No, of course not--in the United
19 States?

20 A. In vuggy dolomites, now Conoco has
21 drilled a horizontal well in a Pinnacle Reef type
22 formation in Michigan, that's somewhat similar and we
23 can draw an analogy to this case. We drilled
24 approximately a thousand feet through a Pinnacle Reef
25 to try to reduce the coning effects in that reef, and

1 we were successful in doing so.

2 Q. Was that a gas bearing reservoir or oil?

3 A. It was both. It had a gas cap to it, with
4 an underlying water lake.

5 EXAMINER STOGNER: I have no other
6 questions of this witness. Any other questions of
7 this witness?

8 EXAMINATION

9 BY MR. STOVALL:

10 Q. Again, looking towards a more long-term
11 approach, in your opinion what is the difference, in
12 terms of a draining lateral, that is not the length of
13 the wellbore but perpendicular to the wellbore
14 drainage effect of a horizontal well in this type of
15 reservoir, as opposed to a vertical?

16 A. The extent of drainage would be no more
17 than the current vertical well drainage. But the
18 benefit of the horizontal well is that you contact
19 more pay, have a more efficient drainage in that area.

20 Q. When you measure perpendicularly or
21 circularly around the bore itself, you're saying there
22 is no--

23 A. It's the same amount of lateral drainage
24 that you have with the vertical well.

25 MR. STOVALL: That's the only question I've

1 got.

2 EXAMINER STOGNER: If there are no other
3 questions of Mr. McClelland, he may be excused.

4 MR. KELLAHIN: That concludes our
5 presentation in this case, Mr. Examiner, unless you
6 would like to recall any of the witnesses.

7 EXAMINER STOGNER: There are a couple of
8 points I would like to cover. First I would like to
9 recall Mr. Hardie.

10 WILLIAM E. HARDIE
11 the witness herein, after having been previously duly
12 sworn upon his oath, was examined and testified
13 further as follows:

14 FURTHER EXAMINATION
15 BY EXAMINER STOGNER:

16 Q. Could you go into a little more detail the
17 vuggy structure, how it was formed, and maybe the
18 orientations of the actual cavities themselves? Are
19 they symmetrical, both vertically and horizontally, or
20 are you expecting to see them larger crossways as
21 opposed to high?

22 A. The reservoir itself was first deposited as
23 a limestone, and then later preferentially
24 dolomitized. And then, at some point, this
25 dolomitized interval was leached and created the

1 secondary porosity. At that point the reservoir was,
2 essentially, created.

3 We have recently cored a well from the top
4 of the reservoir to the bottom, the Barbara Federal
5 No. 12. The initial results from that core indicate
6 that there's no preferred orientation to these vugs.
7 They're primarily controlled by the depositional
8 fabric within the reservoir. It's even more random
9 than we thought before.

10 The typical vug zone is about 25 feet in
11 height. We don't know the exact horizontal limit of
12 these vug zones, but we do know that they cannot be
13 correlated in closely spaced wells, so they can't
14 extend for very far laterally.

15 Q. The leaching process, was that a shallow
16 type of an environment?

17 A. Probably a shallow fresh water influx which
18 leached out the dolomite preferentially.

19 EXAMINER STOGNER: That's all the questions
20 I have. The other question I'm going to through
21 out--I hate to use this word--but plugging of such
22 wells, could somebody answer me that question? How
23 you plan to plug them, what's the operation and the
24 procedure in plugging these wells?

25 MR. KELLAHIN: Why don't you step down,

1 Bill, and let's recall Mr. Faul.

2 GARY FAUL

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

6 FURTHER EXAMINATION

7 BY EXAMINER STOGNER:

8 A. Well, I guess from the cased-hole
9 standpoint, if it were a wellbore that were cased, it
10 would not be a lot different than conventional
11 pluggings in that you would want to put a plug such
12 that it would isolate this formation or the producing
13 formations from any other formations up the hole.

14 In the case of a horizontal, where you have
15 a large section of open hole, well, then I think the
16 same thing applies. It would just be what method you
17 use to isolate that section from anything else that
18 you don't want to be contacted. With the way we have
19 this well set up, we're setting an intermediate string
20 that, of course, is going to isolate everything from
21 our producing formation and above, and so we probably
22 want to set some cement plugs at specific intervals
23 coming up the hole, to isolate things such as fresh
24 water zones or other than that.

25 Q. So, essentially, as far as filling the

1 Cisco formation up with cement, there's really no
2 need? Just tack a plug up on top of the intermediate
3 casing? Is that what I'm hearing?

4 A. I would think so, unless in the course of
5 doing it you expose something that was totally
6 different than what you expected; say you crossed a
7 fault and got into something that was totally
8 different, well, then, I would think within your
9 horizontal unit, you would want to isolate between
10 whatever your formation is and whatever you saw that
11 was different.

12 EXAMINER STOGNER: That's all the questions
13 and topics I have to cover.

14 Are there any questions of any of the
15 witnesses at this time?

16 Mr. Cross, would you like to make a
17 statement or anything at this time?

18 MR. CROSS: No, sir.

19 EXAMINER STOGNER: All right. Mr.
20 Kellahin, do you have anything further?

21 MR. KELLAHIN: No, sir.

22 EXAMINER STOGNER: Does anybody else have
23 anything further in Case No. 10339?

24 Well, it's been about 37 years since Conoco
25 was in here proposing horizontal drilling. It took a

1 while.

2 We'll take this case under advisement.

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1 CERTIFICATE OF REPORTER

2

3 STATE OF NEW MEXICO)

4 COUNTY OF SANTA FE) ss.

5

6 I, Carla Diane Rodriguez, Certified

7 Shorthand Reporter and Notary Public, HEREBY CERTIFY

8 that the foregoing transcript of proceedings before

9 the Oil Conservation Division was reported by me; that

10 I caused my notes to be transcribed under my personal

11 supervision; and that the foregoing is a true and

12 accurate record of the proceedings.

13 I FURTHER CERTIFY that I am not a relative

14 or employee of any of the parties or attorneys

15 involved in this matter and that I have no personal

16 interest in the final disposition of this matter.

17 WITNESS MY HAND AND SEAL July 1, 1991.

18 

19 CARLA DIANE RODRIGUEZ

20 CSR No. 91

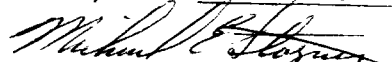
21 My commission expires: May 25, 1995

22 I do hereby certify that the foregoing is

23 a complete record of the proceedings in

24 the Examiner hearing of Case No. 10339,

25 heard by me on 27 June 19 91.

 , Examiner

Oil Conservation Division