

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

4 IN THE MATTER OF THE HEARING)
5 CALLED BY THE OIL CONSERVATION)
6 DIVISION FOR THE PURPOSE OF)
7 CONSIDERING:) CASE NO. 10521

8 CASE NO. 10521 BEING REOPENED
9 -----

10 REPORTER'S TRANSCRIPT OF PROCEEDINGS

11 EXAMINER HEARING

12 BEFORE: Michael E. Stogner, Hearing Examiner
13 Jim Morrow, Hearing Examiner

14 February 17, 1994

15 Santa Fe, New Mexico

16 This matter came on for hearing before the
17 Oil Conservation Division on February 17, 1994, at
18 Morgan Hall, State Land Office Building, 310 Old
19 Santa Fe Trail, Santa Fe, New Mexico, before Deborah
20 O'Bine, RPR, Certified Court Reporter No. 63, for the
21 State of New Mexico.

22 **ORIGINAL**

23 MAR 21 1994

I N D E X

February 17, 1994
 Examiner Hearing
 CASE NO. 10521

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APPEARANCES

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Dana Delventhal

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James William Hawkins

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REPORTER'S CERTIFICATE

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FOR AMOCO:

Exhibit 1

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CUMBRE COURT REPORTING

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A P P E A R A N C E S

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FOR GAS COMPANY VICTOR LYONS
OF NEW MEXICO:

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1 EXAMINER STOGNER: This hearing will come
2 to order. At this time I'll call reopened case No.
3 10521, which is in the matter of said case being
4 reopened pursuant to the provisions of Division Order
5 No. R-8170-L, which promulgated special rules and
6 regulations for the South Blanco-Pictured Cliffs,
7 establishing a minimum gas allowable for said pool.

8 At this time, I'll call for appearances.

9 MR. CARR: May it please the examiner, my
10 name is William F. Carr with the Santa Fe law firm,
11 Campbell, Carr, Berge & Sheridan. In this case, I
12 represent Union Oil Company of California, d/b/a
13 Unocal, Arco Permian, and Amoco Production Company.
14 I have two witnesses.

15 EXAMINER STOGNER: Unocal, Arco and who?

16 MR. CARR: Amoco.

17 EXAMINER STOGNER: Any other appearances?

18 MR. LYONS: Victor Lyons, consulting
19 engineer, appearing for Gas Company of New Mexico.
20 We won't have any witnesses or statements.

21 EXAMINER STOGNER: Any other appearances?
22 Will the witnesses please stand to be sworn at this
23 time.

24 (Witnesses sworn.)

25 EXAMINER STOGNER: Mr. Carr?

1 MR. CARR: At this time we call Dana
2 Delventhal.

3 DANA DELVENTHAL,
4 the witness herein, after having been first duly
5 sworn upon her oath, was examined and testified as
6 follows:

7 EXAMINATION

8 BY MR. CARR:

9 Q. Will you state your name for the record,
10 please.

11 A. I'm Dana Delventhal.

12 Q. Where do you reside?

13 A. Farmington, New Mexico.

14 Q. By whom are you employed?

15 A. I'm currently a consultant for Union Oil
16 of California.

17 Q. And in what area are you consulting?

18 A. As a reservoir engineer.

19 Q. Have you previously testified before the
20 New Mexico Oil Conservation Division?

21 A. No, I have not.

22 Q. Could you briefly summarize your
23 educational background for Mr. Stogner?

24 A. I received a Bachelor of Science Degree in
25 Petroleum Engineering from the New Mexico Institute

1 of Mining and Technology.

2 Q. Following graduation, could you summarize
3 your employment history?

4 A. Following graduation, I went to work for
5 Amoco Production Company in Farmington, New Mexico.
6 I was with them for five years before starting an
7 independent consulting firm in 1989.

8 Q. Are you familiar with the South
9 Blanco-Pictured Cliffs Pool and the producing status
10 of wells in that pool?

11 A. Yes, I am.

12 Q. Have you prepared certain exhibits for
13 presentation in that case?

14 A. Yes, I have.

15 Q. Are you prepared to make recommendations
16 to the Division concerning continuation of the 100
17 Mcf per day minimum allowable for the pool?

18 A. Yes, I am.

19 MR. CARR: I would tender Miss Delventhal
20 as an expert witness in petroleum engineering.

21 EXAMINER STOGNER: Miss Delventhal is so
22 qualified.

23 Q. (BY MR. CARR) Can you briefly state what
24 Unocal seeks in this case?

25 A. Unocal seeks the promulgation of permanent

1 pool rules for the South Blanco-Pictured Cliff Pool,
2 which would provide for a minimum of 100 per day gas
3 allowable per acreage factor of 1.

4 Q. When was this pool originally created?

5 A. It was originally created in May of 1952
6 under Order No. R-156.

7 Q. When was prorationing instituted in the
8 pool?

9 A. Prorationing became effective January 1st
10 of 1955 under Order No. R-565.

11 Q. Could you refer to what has been marked as
12 Unocal Exhibit No. 1, identify this exhibit, and then
13 review it for Mr. Stogner?

14 A. Unocal's Exhibit No. 1 shows an outline of
15 the San Juan Basin with the individual Pictured Cliff
16 pools outline. It gives a general idea of the size
17 and positioning of the Pictured Cliff pools within
18 the Basin.

19 Q. How many of these Pictured Cliffs pools
20 were prorated at one time?

21 A. At one time as many as five.

22 Q. And which ones are they?

23 A. The Fulcher Kutz Pictured Cliffs, Aztec
24 Pictured Cliff, West Kutz Pictured Cliff, the Ballard
25 Pictured Cliff and the Tapacitos Pictured Cliff Pools

1 were all prorated.

2 Q. And how many of those pools are prorated
3 today?

4 A. Currently only two pools are, the South
5 Blanco-Pictured Cliff and the Tapacito Pictured
6 Cliff.

7 Q. What happened to prorationing in the other
8 PC-prorated pools?

9 A. The others, proration was dropped after an
10 industry committee recommended deprorationing of
11 those pools in 1974. This was Order No. R-1670-R.
12 The committee had determined the productivity of
13 these wells had declined, that the average well
14 production rate of 100 Mcf a day would not cause
15 waste nor impair correlative rates if the pools were
16 deprorated.

17 However, the South Blanco-PC and Tapacito
18 PC at that time had two separate pipelines serving
19 those wells, Gas Company of New Mexico and an El Paso
20 line. Their fear was that the two different system
21 pressures would allow nonratable takes between
22 individual wells should they be prorated.

23 Q. So prorationing remained for that reason
24 in these pools?

25 A. That's correct.

1 Q. Was Unocal the original applicant in Case
2 10521 heard by the Division in August of 1992?

3 A. We were.

4 Q. What did Unocal seek at that time?

5 A. We sought deproportioning of the entire
6 pool.

7 Q. At that time what were the average
8 producing rates for wells in this pool?

9 A. Roughly 24 Mcf per day.

10 Q. Has that rate changed significantly since
11 that time?

12 A. Not significantly.

13 Q. The pool, therefore, is in an advanced
14 state of depletion?

15 A. Yes, it is.

16 Q. Is there still a potential for nonratable
17 taking in this pool?

18 A. No. With the spot market system now and
19 most of these PC's being so depleted, they all are
20 producing at the low pressure systems or from behind
21 a compressor; so they're not bucking different system
22 pressures.

23 Q. What was the result of the original
24 hearing on Unocal's application in this case?

25 A. The application to prorate the entire pool

1 was denied; however, the Division did set a new rule,
2 setting a minimum allowable of 100 Mcf per day to
3 become effective December 1, 1992.

4 Q. Are there wells in the pool that can
5 produce in excess of that 100 Mcf per day?

6 A. Yes, there are. Out of roughly 1,500
7 wells, 24 to 30 wells are capable of reaching 100 Mcf
8 per day.

9 Q. In reaching this conclusion, what was the
10 reason stated by the Division in the original order?

11 A. Although they were comfortable that it was
12 a low permeability reservoir and that it was in an
13 advanced state of depletion, there was some concern
14 that a higher-rate producer may be able to drain in
15 excess of 160 acres, depending on individual net
16 pays.

17 Q. And they were concerned that that would
18 impair correlative rights?

19 A. That was their concern, yes.

20 Q. Today Unocal is not recommending that
21 prorationing cease in this pool; is that correct?

22 A. No, we are not.

23 Q. In 1991, the first hearing of this matter,
24 Unocal identified certain advantages that would
25 result if the pool was depronated. What were those?

1 A. There were several advantages that we
2 foresaw by deprecating the entire field. One, it
3 would allow for future development, either through
4 workover or new drills. Secondly, it would eliminate
5 a fairly extensive testing system that in essence
6 only curtailed the production of a handful of wells.
7 And, also, it would ensure that the pool could
8 maintain market share now that so much of the San
9 Juan Basin gas was not being prorated.

10 Q. Let's go now to Unocal Exhibit No. 2.
11 Would you identify that exhibit for the examiner and
12 review it, please.

13 A. Exhibit No. 2 is a plot of the Blanco
14 South Pictured Cliffs Pool. It gives both pool
15 production, historic figures as well as the number of
16 wells producing. The items of interest show that in
17 1992, since we've instituted the minimum allowable,
18 we have seen a few more wells brought to production,
19 and the average rate per well really hasn't changed
20 at all.

21 Q. Bringing these wells to production, has
22 that been the result of workovers?

23 A. In 1991, there were 1,480 wells that
24 produced during that year. In 1992, there were
25 1,491. So there were 11 wells that produced that had

1 not produced before. This would primarily be wells
2 put on compression or wells returned to production
3 that had been shut in.

4 Q. Prior to that time, prior to the
5 institution of minimum allowables, had there been any
6 workover activity in this field?

7 A. There hadn't been in the immediate years
8 before this time.

9 Q. Curtailment of production from the pool or
10 implementation of minimum allowables in the pool,
11 does this in fact have any real impact on overall
12 pool production?

13 A. Currently, no. In the last year, the 100
14 Mcf per day, we've seen no change in the pool's
15 production either in the total amounts or in an
16 average rate per well.

17 Q. Would you go down to Unocal Exhibit No. 3,
18 identify and review that, please.

19 A. Exhibit No. 3 is a graph showing the South
20 Blanco-Pictured Cliffs Pool daily flow rate on a per
21 well basis. This takes the total pool's production,
22 dividing by the number of wells on line to give you
23 an idea of production ability at any one time. As
24 you can see in '92 and '93, there's been no change.

25 Q. Let's go on now to Exhibit No. 4.

1 Identify that.

2 A. Exhibit No. 4 just gives an idea of the
3 production comparison of the South Blanco-PC Pool
4 versus the San Juan Basin total. In 1992, production
5 for the Basin was up and production for the pool was
6 up slightly, and you can also see the percentage of
7 the total Basin production that is coming from the
8 South Blanco-PC Pool has increased slightly. So
9 we've been able to maintain our market share of the
10 San Juan Basin gas.

11 Q. So basically this shows a production from
12 this particular pool represents now a larger
13 percentage of total Basin production then prior to --

14 A. Just slightly, but we are not declining,
15 which is what we were hoping for.

16 Q. And that is in fact what was predicted by
17 Unocal in the 1991 hearing; isn't that correct?

18 A. That's correct. We did not predict that
19 there would be much change to total takes in the
20 field.

21 Q. At this point in time, has establishment
22 of minimum allowables eliminated unnecessary
23 paperwork in the field?

24 A. Not entirely. We're still required to do
25 the deliverability testing and of course the

1 record-keeping for proration purposes.

2 Q. If these rules are made permanent and a
3 permanent minimum allowable established, does Unocal
4 intend to seek relief from the deliverability testing
5 requirements for the extremely marginal wells in the
6 pool?

7 A. Yes, we would. We would seek to exempt
8 wells which are not able to make 100 Mcf per day from
9 the testing requirements.

10 Q. What operational changes or improvements
11 have occurred as a result of the minimum allowable?

12 A. For Unocal as an operator, we have chosen
13 to include some of the South Blanco-PC wells into
14 some of our stratal compression systems, figuring
15 that they would justify the cost of that connection.
16 Should we be limited on gas takes, there may be some
17 of those wells that would not be connected.

18 Q. Miss Delventhal, in your opinion will
19 establishment of these minimum allowables on a
20 permanent basis impair correlative rights?

21 A. No, it will not.

22 Q. In fact, the maintenance of that 100 Mcf
23 per day limitation is a limit that the OCD had
24 imposed two years ago to protect correlative rights;
25 isn't that correct?

1 A. That is correct.

2 Q. Will adoption of a minimum allowable
3 otherwise be in the best interest of conservation and
4 the prevention of waste?

5 A. Yes, it will.

6 Q. Will it enable the pool to maintain its
7 market share of general overall production from the
8 San Juan Basin?

9 A. Yes, it will.

10 Q. Will it reduce or lead to the reduction of
11 paperwork that burdens both the OCD and the operators
12 in the pool?

13 A. It is our intention that it will, yes.

14 Q. In your opinion, will it ultimately result
15 in the increased recovery of gas from the pool?

16 A. Yes, it will.

17 Q. Were Exhibits 1 through 4 prepared by you
18 or compiled under your direction?

19 A. Yes, they were.

20 MR. CARR: At this time, Mr. Stogner, we
21 move the admission of Exhibits 1 through 4.

22 EXAMINER STOGNER: Exhibits 1 through 4
23 will be admitted into evidence at this time.

24 MR. CARR: That concludes my direct
25 examination of this witness.

EXAMINATION

BY EXAMINER STOGNER:

Q. Miss Delventhal, on Exhibit No. 1, this appears to be one of the biggest, if not the biggest, Pictured Cliff pool up in the San Juan Basin. Do you know if that holds true for its production? Is there any other Blanco Pictured Cliffs or Pictured Cliffs pool that has more production than the South Blanco?

A. No, there doesn't. It has the highest cum of the Pictured Cliff pools. However, on a per well basis, it isn't the most productive.

EXAMINATION

BY EXAMINER MORROW:

Q. Did I understand you to say that you would come in later and ask for relief on the deliverability test, or are you asking for that now?

A. If it cannot be made a part of this order, and we are not pushing for it particularly, but we will try to submit a case to eliminate the testing on those wells. They're due for testing this year, and out of our 124 wells, only one makes in excess of 100 a day.

Q. I looked through the proration schedule that was issued last fall and noticed some of the wells there didn't have that minimum assigned to

1 them. Do you know how that operates? You know
2 you've got the 100. What notification did you get,
3 anything other than this order?

4 A. No, that's the only thing outlining the
5 100 Mcf per day was the temporary order.

6 Q. Are some of the wells, due to line
7 pressures, capable of producing more than their
8 deliverability actually indicates?

9 A. Generally, no. The only ones that are
10 hurt in the deliverability calculations are wells
11 that have produced in excess of 100 a day largely due
12 to compression. The way the deliverability
13 calculation -- wells that are placed on compression,
14 the ratio of the shut-in wellhead pressure to the
15 producing wellhead pressure, it is smaller, and they
16 are curtailed more sharply than wells that are
17 producing without compression. So they would be the
18 only ones being hurt under the current system.

19 Q. So would it be your understanding that the
20 way this would work, regardless of what the
21 deliverability test is, so long as I guess it's as
22 much as 100, that whatever the poolwide calculation
23 calculated for that well, using the F1 and F2
24 factors, if that well had had an acreage factor of 1
25 would be assigned 3,000 a month?

1 A. Correct.

2 EXAMINER STOGNER: I have no other
3 questions, Mr. Carr.

4 MR. CARR: I have no further questions of
5 this witness.

6 EXAMINER STOGNER: She may be excused.

7 MR. CARR: At this time, we would call for
8 Amoco Production Company, Mr. Bill Hawkins.

9 JAMES WILLIAM HAWKINS,
10 the witness herein, after having been first duly
11 sworn upon his oath, was examined and testified as
12 follows:

13 EXAMINATION

14 BY MR. CARR:

15 Q. Will you state your name for the record,
16 please.

17 A. James William Hawkins.

18 Q. Where do you reside?

19 A. In Denver, Colorado.

20 Q. By whom are you employed and in what
21 capacity?

22 A. I'm employed by Amoco Production Company
23 as a petroleum engineer.

24 Q. Have you previously testified before this
25 Division and had your credentials as a petroleum

1 engineer accepted and made a matter of record?

2 A. Yes, I have.

3 Q. Have you testified in all recent allowable
4 hearings for Amoco Production Company?

5 A. Yes.

6 Q. Are you familiar with the allowables in
7 the recent production from the South Blanco-Pictured
8 Cliffs Pool?

9 A. Yes.

10 Q. Are you prepared to make recommendations
11 today to the Division concerning the continuation of
12 a minimum allowable for that pool?

13 A. Yes, I am.

14 MR. CARR: Are the witness's
15 qualifications acceptable?

16 EXAMINER STOGNER: They are.

17 Q. (BY MR. CARR) Mr. Hawkins, would you
18 briefly state the purpose of Amoco's testimony in
19 this proceeding?

20 A. Amoco is testifying in this case to
21 request that the Division continue with a permanent
22 100 Mcf per day minimum allowable for the South
23 Blanco-Pictured Cliffs Pool, and we're also going to
24 request that some exceptions be granted to
25 deliverability testing for wells that produce less

1 than that 100 Mcf per day minimum allowable.

2 Q. Have you prepared exhibits for
3 presentation today?

4 A. Yes.

5 Q. Could you refer to what has been marked
6 for identification as Amoco Production Company
7 Exhibit No. 1, identify that, and review it for Mr.
8 Stogner.

9 A. Yes. Exhibit No. 1 shows the average
10 monthly sales for the San Juan Basin prorated pools
11 for the period of October 1992 to March 1993. This
12 information comes from the October '93 to March '94
13 proration schedule; so it was the most recent sales
14 information that I had available on all of the pools.

15 What it shows is that the South
16 Blanco-Pictured Cliffs Pool produces just under 1.4
17 Bcf per month; that all the four prorated pools
18 together produce about 28 Bcf per month; and that the
19 South Blanco-Pictured Cliffs Pool is just slightly
20 under 5 percent of the total prorated pool
21 production.

22 If we were to add in the rest of the pools
23 from San Juan Basin, I think that would be similar to
24 what Unocal showed. It would be around 2 to 3
25 percent probably of the total San Juan Basin

1 production.

2 Q. Let's move on to Exhibit No. 2, your
3 proration data. Would you review this for the
4 examiner?

5 A. Yes. This, again, is just a summary of
6 the information provided in the proration schedule,
7 the latest one being that October '93 to March '94
8 schedule, and I've made a table showing the
9 information related to Amoco's operated wells and to
10 the total pool.

11 Amoco operates about 268 wells in the
12 pool. There are approximately 40 of those that are
13 shut in at this point in time, 220 some odd are
14 actively producing. The total pool, there are
15 roughly 1,500 wells in the total South Blanco-
16 Pictured Cliffs Pool.

17 I've also shown the average monthly sales
18 for both Amoco operations and the total pool, but if
19 we skip to the next line, the point is that for
20 Amoco-operated wells and for the total pool, the
21 average monthly sales per well is just under 1,000
22 Mcf or just slightly under 30 Mcf per day.

23 I also checked to see how many wells were
24 producing over 3,000 Mcf a month. In the October '93
25 to March '94 schedule, we showed 10 wells under

1 Amoco's operations that were producing over 3,000 Mcf
2 per month, and the total pool had 36 wells. Again,
3 that would have been based on the sales data from
4 October '92 through March '93. So it was a one year
5 prior sales period.

6 In addition to that, we've made some
7 estimates of the number of deliverability tests that
8 will have to be run on wells in this pool. Amoco
9 operations will test approximately 190 wells, and in
10 the total pool, probably in excess of the 1,000 that
11 I've shown here. That's simply based on the
12 percentage of -- the same percentage, about 65 to 70
13 percent of the total wells that we operate.

14 And I think the point there again is that,
15 considering that only a very few number of wells in
16 the pool can produce over the 100 Mcf per day, we're
17 having to deliverability test an extraordinarily
18 large number of wells in the pool that will have no
19 impact on the wells' allowable.

20 Q. Let's go to the last exhibit, Exhibit 3,
21 and I'd ask you to review your conclusions and
22 recommendations for Mr. Stogner.

23 A. This is just a real quick summary of the
24 first two exhibits. The South Blanco-Pictured Cliffs
25 Pool represents a very small percentage of the total

1 San Juan Basin production. The average well there
2 produces approximately 30 Mcf per day.

3 Our recommendation is that within this
4 pool that the Division retain the minimum allowable
5 of 100 Mcf per day in order to promote efficient and
6 economic production of these low-rate wells. And we
7 also ask that the Division grant exceptions to
8 deliverability testing for all wells in the pool that
9 produce less than the 100 Mcf per day.

10 Q. Mr. Hawkins, if the minimum allowable is
11 established, the results of those deliverability
12 tests would have no impact whatsoever on the
13 allowable; is that right?

14 A. That's my understanding, that's correct.

15 Q. That's the basis for your request for
16 relief from deliverability testing?

17 A. Yes, it is.

18 Q. If that can't be done in this proceeding
19 today, will Amoco proceed to pursue this matter
20 either administratively or with a subsequent hearing?

21 A. Yes, we will. And I would like to bring
22 to the attention of the examiner that under Rule 9C
23 in Order R-8170 -- I think it's J is the current one
24 -- that the Director does have the authority to
25 allow exceptions to deliverability testing on

1 marginal wells where the deliverability is of such a
2 volume that it would be insignificant in comparison
3 to the GPU's allowable.

4 Q. In your opinion, would approval of minimum
5 allowables on a permanent basis and a blanket
6 authorization for relief from deliverability testing
7 for the marginal wells in this pool be in the best
8 interests of conservation, the prevention of waste,
9 and the protection much correlative rights?

10 A. Yes, it would.

11 Q. Were Exhibits 1 through 3 prepared by you?

12 A. Yes, they were.

13 MR. CARR: At this time, Mr. Stogner, I
14 move the admission of Amoco Exhibits 1 through 3.

15 EXAMINER STOGNER: Amoco Exhibits 1
16 through 3 will be admitted into evidence at this
17 time.

18 MR. CARR: That concludes my direct
19 examination of Mr. Hawkins.

20 EXAMINER STOGNER: Are there any
21 questions? He may be excused.

22 EXAMINER MORROW: Wait just a minute. I
23 was trying to think of one.

24 EXAMINATION

25 BY EXAMINER MORROW:

1 Q. Are there very many of the gas proration
2 units that are developed on any density less than
3 160, or two-well units in this pool?

4 A. For the most part, as far as I am aware,
5 the majority of these are all developed on one well
6 per 160.

7 Q. So if those deliverability tests were
8 eliminated -- I'm trying to visualize how the thing
9 would work. I guess only those operators who wanted
10 more than 3,000 a day for their well would need to
11 run a deliverability test. If they chose not to run
12 it, they would get a maximum of 3,000 a day, assuming
13 they had 160 acres assigned to their well?

14 A. I think that's a good way to look at it.
15 A lot of these wells, though, I don't think are going
16 to be even capable of making the 3,000 Mcf a month.
17 So it might be that an operator would choose not to
18 produce more than 3,000 a month and be excused from
19 the deliverability testing, or that the well is just
20 incapable of making 3,000 a month and the well had
21 exception from deliverability testing.

22 Q. I guess you said there were just 30 of
23 those, is that right, 36?

24 A. I counted 36 in the last proration
25 schedule. And of course that data is about a year

1 old in terms of sales and production. So there may
2 be fewer than that at this point.

3 Q. Of those 36, how would you characterize
4 those? What's their capability, from 3,000 to 10,000
5 or --

6 A. No. They're going to be very close to
7 3,000. I don't even know if there's one well --
8 maybe there's one well in that whole pool that made
9 4,000 a month. So even that would be less than 150
10 Mcf per day.

11 Q. So a 4,000 cap would get everything then?

12 A. Probably, just about.

13 EXAMINER MORROW: That's all I have.

14 EXAMINER STOGNER: Thank you, sir. I
15 don't believe there's any other questions at this
16 time.

17 MR. CARR: Nothing further in this case.

18 EXAMINER STOGNER: Does anybody else have
19 anything further in Case 10521 at this time? If not,
20 this case will be taken under advisement at this time
21 then.

22

23

24

25

CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)

) ss.

COUNTY OF SANTA FE)

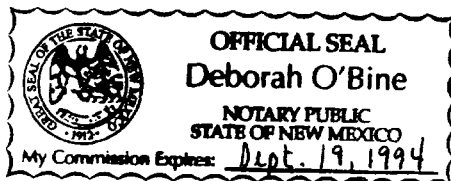
I, Deborah O'Bine, Certified Shorthand Reporter and Notary Public, HEREBY CERTIFY that I caused my notes to be transcribed under my personal supervision, and that the foregoing transcript is a true and accurate record of the proceedings of said hearing.

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, February 28, 1994.

Deborah O'Bine

DEBORAH O'BINE
CCR No. 63



I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 10521 (Reopened) heard by me on Feb. 28, 1994.
Marking E. [Signature], Examiner
Oil Conservation Division