

**NEW MEXICO OIL CONSERVATION COMMISSION
EXAMINER HEARING
SANTA FE, NEW MEXICO
OCTOBER 1, 1992 - 8:15 A.M.**

NAME	REPRESENTING	LOCATION
Ray Westfall	Ray Westfall OPR	Loco Hills, NM
William F. Gray	Campbell, Gray, Foyt & Sunda	Santa Fe
Darrell Gillen	Northwest Arabia	SLC Utah
Mike Turnbaugh	Williams Prod. Co.	" "
Maurice Trimmer	RW Byrnam	SF
Paul Cooter	Rodey Law Firm	SF
Zut L. Paul	Paul & Snyder	SF
Robert Lee	State Oil	Coswell.
Bob Fant	Yates Petr	Artesia
Sion Hall	MILLER LAW FIRM	SF
Jo S. Hall	Fenton	Tot worth TX
Jerry Hoover	Conoco	Midland TX
Bill Hardie	Conoco	Midland, TX
W. K. Kellin	Kellin & Kellin	Santa Fe
Mike Herthinton	Great Western	Midland, TX

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NAME	REPRESENTING	LOCATION
Russell Richards	Great Western Drilling	Midland, TX
Dennis Hendric	Great Western Drilling	"
James Bruce	Hinkle Law Firm	Santa Fe
PAUL ERDMANN	ENER TRADE INC	Font Worth TX
Bald Ware	COLLINS & WARE, INC	MIDLAND, TX
RANDALL HARRIS	Ray Weston Osgood	Local Hills nm
CHARLES KNIGHT	COLLINS & WARE, INC.	MIDLAND, TEXAS

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

CASE 10,562

EXAMINER HEARING

IN THE MATTER OF:

Application of Siete Oil & Gas Corporation for
special pool rules, Eddy County, New Mexico

TRANSCRIPT OF PROCEEDINGS

BEFORE: MICHAEL E. STOGNER, EXAMINER

STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO

October 1, 1992

ORIGINAL

A P P E A R A N C E S

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1 WHEREUPON, the following proceedings were had
2 at 8:23 a.m.:

3 EXAMINER STOGNER: This hearing come to order
4 for Docket Number 32-91. I'm Michael E. Stogner,
5 appointed Hearing Examiner for today.

6 MR. STOVALL: 32-92?

7 EXAMINER STOGNER: I'm sorry, 32-92. I can't
8 even read typing today.

9 Please note today's date, October 1st, 1992.
10 With this I will call first case, number
11 10,562.

12 MR. STOVALL: Application of Siete Oil & Gas
13 Corporation for special pool rules, Eddy County, New
14 Mexico.

15 EXAMINER STOGNER: Call for appearances.

16 MR. PADILLA: Mr. Examiner, Ernest L.
17 Padilla, Santa Fe, New Mexico, for the Applicant.

18 I have two witnesses.

19 MR. BRUCE: Mr. Examiner, Jim Bruce for Santa
20 Fe Energy Operating Partners, L.P., appearing in
21 support of this application.

22 We have no witnesses.

23 EXAMINER STOGNER: Are there any other
24 appearances in this matter?

25 Will the witnesses please stand to be sworn?

1 (Thereupon, the witnesses were sworn.)

2 ROBERT S. LEE,

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

5 DIRECT EXAMINATION

6 BY MR. PADILLA:

7 Q. Mr. Lee, for the record please state your
8 full name.

9 A. My name is Robert Steven Lee.

10 Q. Mr. Lee, do you work for Siete Oil and Gas
11 Corporation, the Applicant in this case?

12 A. Yes, I do.

13 Q. What is your capacity?

14 A. I'm the production manager there.

15 Q. Mr. Lee, have you previously testified before
16 the New Mexico Oil Conservation Division or the
17 Commission and had your credentials accepted as a
18 matter of record before a Hearing Examiner?

19 A. Yes, I have.

20 Q. In what capacity?

21 A. As a engineer, production engineer, reservoir
22 engineer.

23 Q. Mr. Lee, have you familiarized yourself with
24 the Application and made a study of the GOR
25 characteristics of the Parkway-Delaware Pool?

1 A. Yes, I have.

2 MR. PADILLA: Mr. Examiner, we would tender
3 Mr. Lee as an expert petroleum engineer.

4 EXAMINER STOGNER: Mr. Lee is so qualified.

5 Q. (By Mr. Padilla) Mr. Lee, let's turn first
6 to -- Let me hand you what we have marked as Exhibit
7 Number 1 and have you identify that, please.

8 A. This is a notice of a hearing that was sent
9 to the offset operators of the Parkway Pool.

10 Q. And who are those offset operators?

11 A. On the second page they're listed as Meridian
12 Oil, Ray Westall, UMC Petroleum, Strata, Presidio Oil
13 Company, Santa Fe Energy, Chevron, Conoco, Eastland Oil
14 Company and Fortson Oil Company.

15 Q. And how did you determine that these were the
16 offset operators you needed to send notices to?

17 A. This comprises the operators within one mile
18 of the pool.

19 Q. The pool is one mile?

20 A. Yes.

21 Q. What's in the remaining portions of Exhibit
22 Number 1?

23 A. We have the certified receipts from those
24 people, showing that they did receive the letters. We
25 have waivers from UMC Petroleum, Strata, Meridian,

1 Eastland Oil. And we should have one from Santa Fe.

2 Q. Let me hand you what we have marked as
3 Exhibit 1A and have you identify that.

4 A. Yes, here is the waiver from Santa Fe Energy.
5 And in this packet marked as Exhibit 1 we also have a
6 letter from Meridian Oil in support of the higher GOR,
7 which we're asking here in the Delaware Pool.

8 Q. And that's the last attachment of Exhibit
9 Number 1?

10 A. Yes, it is.

11 Q. Okay. Mr. Lee, let's have you describe in
12 general terms why it is that you're seeking this
13 Application for Siete Oil and Gas Corporation.

14 A. The Parkway-Delaware Pool produces from the
15 Brushy Canyon formation within the Delaware, and it
16 currently has a gas/oil ratio limit of 2000 to 1.

17 We're going to demonstrate today that this is
18 a solution gas drive reservoir, and one of the
19 characteristics of a solution gas drive reservoir is
20 that the GOR will increase over time. We're going to
21 show that today.

22 And we're also going to show that the
23 reservoir is not rate-sensitive and that by increasing
24 the GOR to 5000 to 1, reserves will not be increased or
25 decreased.

1 Q. Are you experiencing any type of production
2 problems out in this reservoir at this time which would
3 compel you to seek this Application?

4 A. Yes, we are. Some of our wells are -- have
5 recently started producing gas in excess of 2000 to 1.
6 We have a flowing well that currently, at that gas
7 limit, will load up and die.

8 If we could get a higher GOR, it would be
9 capable of making about 400 MCF a day and 80 barrels a
10 day.

11 And just -- You know, our gas is going up.
12 We want to stay in compliance. That's why we're here
13 today trying to get an increased GOR.

14 Q. Have you been in touch with the Artesia
15 district office of the Oil Conservation Division with
16 regard to your problems out there in the field?

17 A. Yes, we have. The Artesia office has advised
18 us that we need to stay within the 160-MCF-per-day-per-
19 well rule. And like I said, when we do that one of our
20 wells, flowing well, loads up with water and oil and
21 kills itself.

22 Q. At what rate will it kill itself?

23 A. If you hold it to the 160 MCF per day.

24 But we've shown that if we can open it up a
25 little bit and be making, say, you know, 400, 420 MCF a

1 day, it will continue to flow on a released choke -- a
2 choke that size.

3 Q. Is this Application solely for this well?

4 A. No, it's for the entire pool.

5 Q. So the well is not the sole reason for you
6 seeking a GOR exception?

7 A. No, no, it's for the entire pool.

8 Q. Okay. Are you ready to go on to Exhibit
9 Number 2?

10 A. Yes.

11 Q. Let me -- Do you have that before you?

12 A. Yes, I do.

13 Q. What is Exhibit Number 2?

14 A. Exhibit Number 2 is a plat showing the wells
15 in the immediate area around our leases. This shows
16 the field cumulative production.

17 Near each well there's going to be a little
18 cross. In the upper left-hand side we have cumulative
19 oil. In the upper right-hand side we have cumulative
20 barrels of water. In the lower left we have the
21 cumulative MCF. And in the lower right the cumulative
22 GOR, or the GOR of those cums.

23 I really don't want to go through each one of
24 these wells here. I feel like the important thing here
25 is down at the bottom of the page in the middle, we

1 have the field cums showing that as of December of 1991
2 we have produced about 1.2 million barrels of oil, a
3 little over 2.5 BCF of gas, for a GOR of 2.2.

4 So on a cumulative basis the field already is
5 exceeding -- has exceeded the 2000-to-1 GOR limit.

6 MR. STOVALL: If I might interrupt for a
7 moment, Mr. Lee. Mr. Lee, are all of these numbers
8 times 1000 --

9 THE WITNESS: Yes, yes.

10 MR. STOVALL: -- to get the actual numbers?
11 Is that correct?

12 THE WITNESS: I'm sorry, the "M" in front of
13 BO's and BW's and MCF indicates they're times 1000,
14 that's correct.

15 Q. (By Mr. Padilla) And this would be the
16 legend at the bottom right-hand corner; is that --

17 A. That's correct.

18 MR. STOVALL: And -- Excuse me. And that's
19 specifically the GOR too, when you say 2.2, you're --

20 THE WITNESS: -- it's times 1000. It's
21 really --

22 MR. STOVALL: It's 2200?

23 THE WITNESS: -- 2200 standard cubic feet per
24 barrel.

25 MR. STOVALL: Okay.

1 Q. (By Mr. Padilla) Okay, let's go on to
2 Exhibit Number 3.

3 A. Exhibit 3 shows basically the same thing with
4 the water left off for only the 1991 production. Once
5 again, the oil produced in 1991 is shown in the upper
6 left, MCF is shown in the upper right, and the GOR is
7 shown below. And all these numbers are multiplied by
8 1000.

9 And you can see that in 1991 -- in the center
10 we have the field production -- the GOR was about 2.4
11 or 2.36 here, to be exact.

12 And then we compared that to what we have
13 listed as Exhibit 4, which shows the 1992 production of
14 -- I believe this was through May, most current OCD
15 books that we have.

16 This shows the same thing as the Exhibit 3,
17 but it's interesting to note here that on the field
18 basis, the GOR has increased to 2.6, 2600 standard
19 cubic feet per barrel, an increase of almost 200
20 standard cubic feet per barrel from just 1991 to so far
21 in 1992, indicating that the GOR is gradually going up
22 with time as we deplete the reservoir pressure.

23 Q. Mr. Lee, earlier you mentioned that this is a
24 solution gas drive pool.

25 A. That's correct.

1 Q. Is this typical of a solution gas drive pool?

2 A. Very typical.

3 Q. Have you studied other similar pools in the
4 area to determine whether you have similar
5 characteristics to other pools?

6 A. Yes, we have. We looked at the Avalon-
7 Delaware Pool, which is about eight miles to the west
8 of our pool. Principal operators in their is Exxon and
9 Yates.

10 About a year ago, a little over a year ago,
11 they were also granted a GOR increase. So we compared
12 our producing characteristics to what we saw at the
13 Avalon field.

14 MR. PADILLA: Mr. Examiner, we'd ask the
15 Division to take administrative notice of Case 10,145
16 and Order R-6368B, which is the Avalon Yates Case.

17 EXAMINER STOGNER: We'll take administrative
18 notice of said case and order. Thank you, Mr. Padilla.

19 Q. (By Mr. Padilla) Ready to move on to Exhibit
20 5, Mr. Lee?

21 A. Yes, sir.

22 Q. What is Exhibit 5?

23 A. Exhibit 5 is a plot of our -- of the Parkway-
24 Delaware field, plotting GOR in standard cubic feet per
25 barrel versus cumulative oil production in thousands of

1 barrels.

2 And you can see that over time the GOR here
3 has gradually gone up. When the field was, say,
4 initially discovered, the GOR was below 1500 standard
5 cubic feet per barrel for the most part. And recently
6 it has climbed up above 2700 standard cubic feet per
7 barrel, which is normal in a solution gas drive
8 reservoir. You would expect to see this sort of
9 behavior.

10 And then we compared that with Exhibit 6,
11 which is the same plot done for the Avalon-Delaware
12 field, and once again, you can see the low GOR's early
13 on in the life of the field and the increase in the GOR
14 with cumulative production. And, you know, the curve
15 shapes are very similar. It's just a gradual increase.
16 Like I said, just pretty much what you would expect
17 from a solution gas drive reservoir.

18 Q. Is that all you have on Exhibits 5 and 6, Mr.
19 Lee?

20 A. Yes, sir.

21 Q. Mr. Lee, your Application states that you're
22 asking for relief, or a retroactive effect to the date
23 of discovery of the pool. Is that really necessary?

24 A. Probably not.

25 Q. Why have you asked for some retroactive

1 effect?

2 A. Because there is some overproduction in the
3 field in recent months due to the GOR increasing and us
4 having to flow our wells at a higher gas rate in order
5 to keep them flowing.

6 Q. Have you discussed this with the Oil
7 Conservation Division in Artesia?

8 A. Yes, they are aware of our problem, and the
9 Division office there -- Like I said, they want us to
10 hold it back to the 160 MCF per day, say, rather than
11 letting us produce a monthly allowable and then
12 shutting the well in.

13 Q. When you do it on a daily basis, what kind of
14 problems do you encounter, specifically with, say, the
15 well that you mentioned before?

16 A. What will happen is that as you choke it back
17 and get your gas down to 160, it starts gassing out
18 real bad. It just starts flowing gas and will stop
19 bringing fluid, and within a matter of about a day, the
20 fluid will build up, kill the well, and then we have to
21 get a pulling unit out there and swab the well in,
22 incurring additional costs to do that.

23 We've had to do that twice so far.

24 Q. Have you also over- -- Well, you've said you
25 tested the wells for GOR. Have you made GOR tests?

1 A. Yes, we have.

2 Q. Tell the Examiner what kind of testing was
3 done in that regard.

4 A. What we had done -- and Mr. Wilson will be
5 going over this in a minute -- is take a well that's --
6 We used Osage 1 as flowing 80 barrels a day, and we
7 increased the choke size. I think we took it up a
8 notch or two notches every day, kept track of the oil
9 rate and the gas rate, and see whether or not the GOR
10 increases with increased production, see whether or not
11 the GOR is rate-sensitive.

12 And Mr. Wilson will show a plot that shows
13 the reservoir is not rate-sensitive; the GOR does not
14 increase as you increase the production.

15 Q. To conduct those tests did you have to
16 overproduce the wells?

17 A. Yes, we did.

18 Q. And that --

19 A. That has led to some of the overproduction
20 that we have incurred, that's correct.

21 Q. Okay. Are you interested in the Division
22 granting an expeditious order in this case?

23 A. Yes, we are. The reason is, with the -- Like
24 I said, with the constraints that has been imposed on
25 us by the Artesia OCD office, we're having to keep our

1 well choked back. It's constantly loading up and
2 dying.

3 And like I say, we have to get a pulling unit
4 out there every time, get it swabbed off, a swabbing
5 unit, get it kicked off again.

6 If we could get some relief from that fairly
7 quick, we would be able to open our well up, produce it
8 at a higher gas rate, and keep our well flowing, which
9 we feel is the most efficient and effective means of
10 producing that well.

11 Q. You keep saying "well", but that's not the
12 only problem. You have a field-wide problem; is that
13 right?

14 A. That's true. Yeah, the fact that there's --
15 We have probably about three, four wells that would,
16 you know, benefit from this increased GOR, and I'm sure
17 some of the other operators probably do too.

18 Q. Mr. Lee, would approval of this Application,
19 in your opinion, be in the best interests of the
20 conservation of oil and gas?

21 A. Yes, it would be.

22 Q. Would it impair any other operator's
23 correlative rights?

24 A. No, it would not.

25 Q. Why not?

1 notice.

2 Q. And what is the pool boundary?

3 A. I don't have that in front of me, exactly
4 what the pool boundaries are. Whatever is listed in
5 the definition of a pool, OCD.

6 Q. Okay. If you would, would you please supply
7 me a map to be -- in conjunction with this particular
8 order -- I mean, I'm sorry, with this particular
9 exhibit --

10 A. Okay.

11 Q. -- substantiating who those interests are and
12 such.

13 A. Okay.

14 Q. Also, are the other -- How many other
15 operators are in this pool? Are they listed here too?

16 A. Well, the other operators are Meridian, Santa
17 Fe, Eastland and Strata and Presidio, and they were all
18 notified, and I believe they all supplied waivers.

19 Santa Fe and Meridian and Siete control the
20 bulk of the field. And like we said, the -- Santa Fe
21 and Meridian both have given support to this
22 Application.

23 MR. STOVALL: I think, Mr. Lee and Mr.
24 Padilla, what the Examiner is looking for and what
25 would be most helpful would be a plat that shows the

1 pool and the offset operators -- and all the operators
2 within the pool, and then the boundaries.

3 THE WITNESS: Okay.

4 MR. PADILLA: Okay.

5 THE WITNESS: Can we -- When we get back
6 we'll send that --

7 MR. STOVALL: Yeah, I don't -- We don't need
8 it right now.

9 THE WITNESS: Okay.

10 MR. STOVALL: Supplement the record.

11 EXAMINER STOGNER: And we'll just make that a
12 part of Exhibit 1, Mr. Padilla --

13 MR. PADILLA: Okay.

14 EXAMINER STOGNER: -- and the attachment.

15 MR. PADILLA: We'll call --

16 EXAMINER STOGNER: Well, I'm not through.
17 I'm not through with Mr. Lee here.

18 MR. PADILLA: I'm sorry.

19 Q. (By Examiner Stogner) In looking at Exhibits
20 Number 3 and 4 -- This is the field production in 1991,
21 Exhibit Number 3?

22 A. Uh-huh.

23 Q. Now, when you look at Exhibit Number 4, this
24 is the field production for 1992, as of what date?

25 A. As of May, through May, it includes

1 production.

2 Q. You kept referring to one well --

3 A. Uh-huh.

4 Q. -- that was being limited to 160 MCF a day,
5 if I heard that right.

6 A. There's several wells that are being limited
7 at the 160 MCF a day. We have one well that loads up
8 and dies.

9 Q. Okay, which one is that one well that loads
10 up and dies?

11 A. That is the Renegade Number 2, and it is
12 located in Section 35, in the southwest quarter of the
13 northeast quarter.

14 Q. Okay, that's the one I'm looking at, Exhibit
15 Number 4, that has the 12.2 --

16 A. -- 21.8, 1.8 underneath it, that's correct.

17 Q. Okay. That's the Renegade Number 2?

18 A. Yes, sir. The lease names are listed at the
19 top of the leases, and then the wells are numbered
20 within the lease.

21 Q. Okay. Do you know what other wells are being
22 limited to the 160 MCF a day, as imposed by the Artesia
23 office?

24 A. I have two, the Renegade Federal Number 1,
25 which is directly west of the Number 2, the Osage

1 Federal Number 1, which is directly south of the Number
2 2, and I'm not sure what other wells of the offset
3 operators are in a GOR bind or problem.

4 Q. But do you know generally if there are some
5 other wells being operated by other parties that are
6 also being imposed 160-MCF-a-day limit, either by
7 talking with the operators or the Artesia office?

8 A. Right, okay. Yeah, Meridian has at least two
9 and maybe three wells that are being limited to the --
10 by the 160-a-day. And I'm not sure that Santa Fe --
11 No, I'm sure Santa Fe does not have any that are
12 limited by the 160-a-day.

13 MR. STOVALL: Which leases are Meridian's?
14 Where are they located?

15 THE WITNESS: The Apache A lease which is
16 north of the Renegade Federal, and the Apache Lease
17 which is east of the Renegade Federal.

18 If you were to look at the gas production
19 numbers for those wells, you can see they're all in the
20 mid to low 20's, which for this time frame would give
21 you about the 160-MCF-a-day limit.

22 So it looks like that at least two of them
23 are limited, and possibly some more to the north.
24 Maybe all four of them.

25 Q. (By Examiner Stogner) The wells that you

1 show on Exhibits 2, 3 and 4, is that the present
2 producing wells within this pool at this time, or are
3 there some other wells outside the scope of these
4 plats?

5 A. There are some other wells outside the scope
6 of these plats. Eastland operates some wells over to
7 the east. They were not included on this because they
8 don't appear to have the GOR problems like we have.
9 And this is the bulk, the main portion of the
10 reservoir.

11 And also, it looks like the Eastland wells
12 produce out of a different section in the Delaware than
13 our wells do.

14 Q. Do you know what section they produce out of?

15 A. They produce out of a higher zone.

16 Q. Is it still within the Brushy Canyon?

17 A. I'm not sure if it's still within the Brushy
18 Canyon. It's still within the Delaware section.

19 Q. Now, when you're referring to those Eastland
20 wells, I take it that they're further east than --

21 A. -- than the map has.

22 Q. -- what's in Section 36?

23 A. That's right, that's right. In fact, I
24 believe they're in the -- I think they're in the
25 section just right east of Section 36, one section

1 over.

2 Q. But they're within the pool of the Parkway-
3 Delaware?

4 A. They are within the Parkway-Delaware Pool,
5 that's correct.

6 Q. And they would also be subject to a higher
7 GOR?

8 A. If it's so granted, that's correct, they
9 would be subject to the higher GOR.

10 Q. Do you know if they're top allowable wells
11 or --

12 A. I don't believe they are. I think they're
13 pretty poor wells.

14 Q. Okay. Referring to Exhibit Number 6, this is
15 the Avalon-Delaware GOR versus the cum plat.

16 A. That's correct.

17 Q. We also took administrative notice of Order
18 R-6368B. Do you know when that particular Order took
19 effect and also what the GOR increase was?

20 A. The GOR was increased to 4000 to 1.

21 I'm not smart enough to read this. I'm going
22 to let Ernie take a look at it. I think that was 1990
23 sometime.

24 MR. PADILLA: It seems like January of 1991,
25 Mr. Examiner. We have a copy of this Order out of

1 Byram's. I'll let you have this if you'd like.

2 MR. STOVALL: That increase became effective
3 as of the date of the Order, Mr. Padilla, to the best
4 of your knowledge, or the month following or --

5 MR. PADILLA: Well, it was issued on December
6 11th, 1990, so I'm not sure when it became effective.
7 Yeah, December 11th, 1990.

8 EXAMINER STOGNER: What I was trying to
9 formulate here is, if I can look at this plat and
10 knowing my cumulative oil, what it corresponded to with
11 the effective date on that, what -- can I see -- can I
12 expect to see some sort of an increase, or how would
13 that Order affect this plat?

14 MR. STOVALL: Mr. Examiner, the Order
15 provides that it becomes effective on January 1st,
16 1991.

17 THE WITNESS: There's nothing on this.

18 What I'd have to do is go look at the
19 production book for 1991, see what the cumulative
20 production was at January, and then look at this plot
21 and see where that point fell. I'm not sure when that
22 occurred.

23 EXAMINER STOGNER: That's all the questions I
24 have for Mr. Lee at this time.

25 MR. STOVALL: I've got just a couple.

EXAMINATION

1
2 BY MR. STOVALL:

3 Q. Mr. Lee, I hesitate to venture into
4 engineering, but I do need a couple things explained
5 here.

6 Am I correct that in my understanding, that
7 as, in a reservoir such as this, the GOR is going to go
8 up and production, as shown on your exhibits here, is
9 going to be limited but the GOR is going to remain -- I
10 mean, it's going to be the same for the well regardless
11 of production limits, or it's --

12 A. That's correct, and we're going to show a
13 graph here in a minute that demonstrates that.

14 Q. So if we looked at the -- What is it? I
15 guess it's 6 -- 5 and 6 for the Parkway and the
16 Avalon -- Those GOR limits are going to be -- I mean,
17 those GOR's are going to go up, and the cumulative
18 production is really going to be a function of
19 allowable and not GOR in that case, isn't it?

20 A. Cumulative production.

21 Q. If you're saying -- If you're plotting
22 cumulative against GOR --

23 A. Uh-huh.

24 Q. -- the amount of oil you actually produce is
25 a function of how much you're allowed to produce,

1 rather than -- in addition -- which may be affected by
2 the GOR but is not a product of the GOR specifically;
3 is that correct? Do you follow what I'm saying?

4 A. Yeah, the cumulative oil, it is a function of
5 the allowable, and the GOR will naturally increase as
6 you increase the withdrawal from the reservoir, you
7 allow the gas to come out of solution and fill the
8 voidage that's filled by the oil initially. And as you
9 increase that amount of free gas in the reservoir, you
10 start bringing more of it with you, and that's what
11 results in your GOR going up.

12 And, you know, as you drop the pressure and
13 drop -- and free more gas, you continue to push out
14 more oil.

15 And what we're going to show is that that is
16 not dependent upon the rate at which you drop the
17 pressure. You recover the same amount of oil, whether
18 you reduce the pressure slowly or more rapidly, as long
19 as you don't, say, overproduce the wells to the point
20 that the GOR, you know, streams outside -- goes way up.

21 Q. But you just forget about the oil and just
22 take the gases? Would you --

23 A. Well, we wouldn't want to do that.

24 Q. Right.

25 A. That would be detrimental.

1 If we increased -- If we produced it to the
2 point that the GOR was to, you know, stream outside,
3 and at the rates that we're to talking about, you know,
4 80 barrels a day, that doesn't happen.

5 If you were to produce those wells at -- You
6 know, they probably wouldn't produce that much oil.
7 But if you were to produce, say, a tremendous rate and
8 really start drawing that gas, well, that would
9 probably, you know, be detrimental.

10 But we're not going to be in that situation
11 at all, as we'll show here in a minute.

12 Q. I guess what I'm saying is, if I were to put
13 a plotted -- Let's, say, look at the Avalon.

14 If I were to plot a GOR curve, that curve
15 would be going up regardless of what the allowable was,
16 correct? Just the GOR, not the GOR versus cum. If
17 that GOR is increasing, if you're drawing more --
18 creating more void and more room for the gas to come
19 out.

20 A. That's true, that's true. The GOR will
21 increase as you reduce -- as you increase the amount of
22 production and withdraw it, no matter what the rate.

23 Q. And so the effect is of -- One explanation
24 for the cum increasing with increased GOR is really an
25 effect of the allowable GOR being increased rather than

1 the reservoir GOR; is that -- ? Which allows more
2 total production, which means you're going to recover
3 more oil, correct?

4 A. That's correct.

5 Q. Okay, just wanted to make sure I understood.

6 The only other question I've got is, you were
7 talking about the -- I think it was the Renegade you
8 said was your problem well, the one that's loading up?

9 A. That's -- Yes.

10 Q. And if I look at your chart, it looks like
11 you're looking at an 1800 to 1900 GOR, according to
12 Exhibits 3 and 4?

13 A. That's correct, on those exhibits. If I look
14 at the cumulative for the year, that's right.

15 What we have seen here is that this is a
16 problem that has really cropped up in, say, the last
17 three to four months, you know, and like -- you know,
18 we only have this production through May, so my problem
19 starts seeing -- you know, after July, and that
20 production is not shown -- not represented on this
21 table.

22 Q. So if you had current production on here,
23 you'd -- are you telling me your GOR would be much
24 higher than the 1.9?

25 A. It would be higher than the 1.8 that's shown

1 on the 1992, that's correct.

2 MR. STOVALL: Okay, that's all I have.

3 EXAMINER STOGNER: Mr. Padilla?

4 MR. PADILLA: Nothing else.

5 MR. STOVALL: Oh, one other question, Mr.
6 Lee.

7 THE WITNESS: Sure.

8 Q. (By Mr. Stovall) Now, you discussed -- You
9 say, as you indicated, your Application was asking for
10 a retroactive GOR?

11 A. Yes, we did.

12 Q. And you indicated in your initial question
13 that you are not really looking for retroactive back to
14 the date of discovery?

15 A. That's not necessary, that's correct.

16 Q. We are faced with a -- perhaps a little
17 technical problem. The advertisement does not refer to
18 any sort of retroactive GOR.

19 If we, say, did this as effective as of
20 today, for example, the date of the hearing, the 1st of
21 October --

22 A. Uh-huh.

23 Q. -- would that give you some relief and help
24 on --

25 A. It would give us some relief on the -- as far

1 as the rates that we're able to produce our wells at.

2 It wouldn't help me much on the
3 overproduction that I've incurred in the last couple of
4 months.

5 Q. How much -- Is that pretty extensive, or is
6 that -- How quickly could you make that up if you had a
7 little more room to produce?

8 A. Well, the total gas overproduction is a
9 little over 17,000 MCF for probably about three wells.

10 Q. But I guess my question would be, is, if we
11 wanted to go back and do some sort of retroactive, I
12 would want to know what date we were retroactive to,
13 and then I would want to know if you...

14 Given the fact that that might result in a
15 re-advertisement, which would postpone getting this
16 Order out for another 30 days or more, would you prefer
17 to go with the current adjustment and work off the
18 overproduction off a current adjustment, or have your
19 allowable delayed, or your increase delayed for a
20 couple months, but get a retro- -- potentially get a
21 retroactive --

22 A. I would prefer to try to work off the
23 overproduction and go ahead and get the Order approved
24 as soon as possible, go something like that.

25 MR. STOVALL: Okay.

1 EXAMINER STOGNER: Thank you, Mr. Lee.

2 Mr. Padilla?

3 MR. PADILLA: Nothing further.

4 DANIEL L. WILSON,

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

7 DIRECT EXAMINATION

8 BY MR. PADILLA:

9 Q. Mr. Wilson, would you please state your full
10 name?

11 A. My name is Daniel L. Wilson.

12 Q. Mr. Wilson, where do you live?

13 A. I live in Austin, Texas.

14 Q. Are you a consultant for Siete in this case?

15 A. Yes, sir, I am.

16 Q. And have you previously testified before the
17 Oil Conservation Division and had your credentials
18 accepted as a reservoir engineer?

19 A. Yes, sir.

20 Q. And have you made a study of the reservoir
21 characteristics of the subject pool --

22 A. Yes, I have.

23 Q. -- for this hearing?

24 Have you prepared certain exhibits for
25 introduction at this hearing?

1 A. Yes, sir.

2 MR. PADILLA: Mr. Examiner, we would tender
3 Mr. Wilson as an expert reservoir engineer.

4 EXAMINER STOGNER: Mr. Wilson is so
5 qualified.

6 Q. (By Mr. Padilla) Mr. Wilson, let me hand you
7 what we have marked as Exhibit Number 7 and have you
8 identify that, please.

9 A. Exhibit Number 7 is a reservoir data sheet
10 prepared on the Parkway-Delaware Pool.

11 It shows the drive mechanism to be a solution
12 gas drive reservoir, with initial pressure of about
13 1838 pounds per square inch absolute.

14 The current reservoir pressure, as of
15 September, 1991, when we were studying the reservoir,
16 was about 1241 pounds. So it's lower than that now.

17 Q. So you're seeing a gradual reduction in
18 pressure in the pool; is that --

19 A. Yes, that's correct.

20 Q. What would the pressure be today? What kind
21 of -- If you have a reduction in pressure, what would
22 it be today?

23 A. I haven't extrapolated it out, but it would
24 be probably somewhere around 1100 pounds, 1100 to 1200
25 pounds.

1 Q. And is that in conjunction with what Mr. Lee
2 said before, that if you have a pressure reduction,
3 you're going to have more gas in solution, filling the
4 core space?

5 A. Well, there will be more gas coming out of
6 solution and developing more free gas in the reservoir.

7 Q. Then that increases the GOR, in and of
8 itself?

9 A. That's correct.

10 Q. What other information do you want to address
11 on this Exhibit Number 7?

12 A. One thing I might note on here is the initial
13 solution GOR of the reservoir is about 483 standard
14 cubic feet per barrel, and the current solution GOR is
15 around 370. And as we know, the wells produce somewhat
16 over 2000, so we know that free gas is being produced
17 from the reservoir.

18 Q. Okay. Anything further on Exhibit Number 7?

19 A. No, sir.

20 Q. Let me hand you Exhibit Number 8, and
21 identify that for the Examiner, please.

22 A. Exhibit Number 8 is a two-page exhibit. The
23 first page is a plot of the reservoir pressure
24 performance of the reservoir versus cumulative oil
25 production, and you can see that the pressure is

1 declining from the initial pressure of 1838 pounds to a
2 little over 1200 pounds.

3 Q. What's on the second page?

4 A. The second page is the tabular data that was
5 utilized in preparation of the plot on the first page.

6 Q. And that's information that's taken from one
7 well; is that --

8 A. The information was taken from several wells.
9 There's one on January 18th, 1991, which was taken from
10 Apache 2A and the Osage Federal. And then the last one
11 there, September 6th, 1991, was taken from Apache 2A
12 and the Osage Federal Number 2.

13 Q. Anything further in Exhibit 8?

14 A. What this plot indicates is a declining
15 reservoir pressure characteristic of a solution gas
16 drive reservoir.

17 Q. Okay. Let me hand you what -- Exhibit Number
18 9. Exhibit Number 9 is -- Identify that, please, and
19 tell the Examiner what it contains.

20 A. Exhibit Number 9 is also a two-page exhibit.
21 The first page is a plot of a gas/oil ratio versus oil
22 production rate. The second page is the tabular data
23 or actual test data that we used in preparation of the
24 plot.

25 What this graph is and what the tabular data

1 is, is the results of testing that was done by Siete
2 over a period of five days whereby the oil production
3 rate was increased and the gas was measured and GOR was
4 calculated to determine whether the GOR was increasing
5 with an increase in oil production rate.

6 Q. Was the GOR increasing with the increase in
7 oil production?

8 A. No, sir. As indicated on the plot, the GOR
9 was not increasing with increased oil production rate,
10 which indicates that the reservoir is not rate-
11 sensitive, and with an increase in the GOR allowable,
12 waste will not occur in the reservoir.

13 Q. What significance does -- When you say the
14 reservoir is not rate-sensitive, how is that
15 significant to the GOR Application here today?

16 A. Some reservoirs are rate-sensitive, whereby
17 if you increase the oil production rate, you have an
18 increase in gas/oil ratio, which means that you're
19 pulling out gas that is in the reservoir and is not
20 being used effectively and efficiently to drain the
21 reservoir.

22 Q. In connection with these type of hearings,
23 I've heard the term "channeling", "gas channeling".
24 How does -- Would gas channeling occur in this
25 situation if -- with an increase in GOR to 5000 to 1?

1 A. I don't believe that so-called gas channeling
2 is going to occur too much in this reservoir.

3 I think the free gas that's developed in the
4 reservoir has developed at a saturation that is above
5 the critical saturation for the gas, and above that
6 free gas will start to flow. The critical gas
7 saturation in this reservoir is about five percent.

8 Q. Okay. Do you have anything further on
9 Exhibit 9?

10 A. No, sir.

11 Q. Let me hand you Exhibit Number 10, and
12 identify that and tell the Commissioner what -- or the
13 Examiner what that contains.

14 A. This exhibit is a table that shows the
15 results of a reservoir simulation analysis that we have
16 performed.

17 We looked at production from the reservoir
18 under two scenarios. One was with a gas limit of 160
19 MCF per day on the wells, and one was without a gas
20 limit on the wells. And what it shows is that the
21 recoverable oil is almost identical, which indicates,
22 again, that the reservoir is not rate-sensitive.

23 Q. Mr. Wilson, do you have anything further to
24 add to your testimony?

25 A. No, sir.

1 Q. Mr. Wilson, in your opinion would approval of
2 this Application be in the best interests of
3 conservation of oil and gas?

4 A. Yes, sir.

5 Q. Would approval of the Application protect
6 correlative rights?

7 A. Yes, sir.

8 MR. PADILLA: Mr. Examiner, we have nothing
9 further of Mr. Wilson, and we tender Exhibits 7 through
10 10.

11 EXAMINER STOGNER: Exhibits 7 through 10 will
12 be admitted into evidence at this time.

13 Mr. Bruce, do you have any questions?

14 MR. BRUCE: No, sir.

15 EXAMINATION

16 BY EXAMINER STOGNER:

17 Q. Mr. Wilson, referring to Exhibit Number 8,
18 I'm curious about -- There's not that much reservoir
19 pressure data.

20 Was this all you had to work with, or --

21 A. Yes, sir.

22 Q. Is this indicative of the reservoir?

23 A. I think it's indicative of the reservoir.
24 But in answer to your other question, it is all the
25 data that we've had to work with, yes, sir.

1 Q. Were the other companies in the pool
2 approached to supply reservoir data, reservoir pressure
3 data?

4 A. Yes, sir, the Apache wells, we have pressure
5 from those wells.

6 Q. Okay. Any from Eastland or --

7 A. No, sir.

8 Q. So I'm clear on the record, this 160 MCF,
9 there again, referring to Exhibit Number 10, with a gas
10 limit of 160 MCF a day on all the wells, you've come up
11 with this form- -- Where does the 160 come from on
12 those? The limitation's set by Artesia, but as you
13 understand, where did that number come from?

14 A. The 160 MCF per day on each well comes from a
15 gas limit based on the 2000-to-1 GOR and 80 barrels per
16 day allowable.

17 Q. Which has a casinghead gas allowable per
18 month of -- ? Off the top of my head? Or off the top
19 of your head, what is it?

20 A. 6000, I guess.

21 Q. But that's how that is calculated?

22 A. 160 -- Well, it would be 160 times 30 or 31,
23 whatever that number is. 4800, I believe.

24 Q. What would that number be for MCF a day for
25 the casinghead gas allowable if 5000 to 1 was approved?

1 A. 400. It would be 400 per day per well.

2 Q. Now, are there any wells -- or which wells
3 are capable of doing 400 MCF per day per well, or --
4 per day?

5 A. I know the -- I believe the Renegade 2 is
6 capable of doing that, and I believe the Renegade 1 is
7 also capable of doing that, and I think some of the
8 Meridian Wells are capable of doing that.

9 Q. Now, the wells that are capable of doing --
10 obtaining the 400 MCF per day, what can be forecasted
11 for those particular wells? Will the GOR drop off?
12 Will we see less gas being produced?

13 A. I think the GOR will be essentially the same,
14 and continue to go up as the pressure is declining.

15 What will happen is, as you allow 400 MCF per
16 day to be produced, more oil will come with that gas.

17 But the GOR will not go down, until later in
18 the life of the reservoir when -- typical of a solution
19 gas drive reservoir, later in life the reservoir, as
20 you deplete the free gas, the GOR will go down.

21 Q. Will this affect any offsetting wells?

22 A. I think as far as protection of correlative
23 rights, I think allowing the 5000-to-1 GOR limited
24 reservoir will afford each of the operators a fair
25 opportunity to produce their hydrocarbons under their

1 tracts.

2 EXAMINER STOGNER: Any other questions of Mr.
3 Wilson?

4 MR. BRUCE: No.

5 MR. STOVALL: Not that I can think of.

6 EXAMINER STOGNER: Mr. Padilla?

7 MR. PADILLA: I have nothing further, and
8 we'll get you that land map.

9 EXAMINER STOGNER: Okay, does anybody else
10 have anything further in Case Number 10,562?

11 If not, this case will be taken under
12 advisement.

13 Thereupon, these proceedings were concluded
14 at 9:10 a.m.)

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