

1 NEW MEXICO OIL CONSERVATION DIVISION

2 STATE LAND OFFICE BUILDING

3 STATE OF NEW MEXICO

4 CASE NO. 10570

5
6 IN THE MATTER OF:7
8 The Application of Marathon Oil Company
9 to Qualify a Portion of the South
10 Eunice Seven Rivers Queen Unit
11 Waterflood Project for the Recovered
Oil Tax Rate Pursuant to the "New
Mexico Enhanced Oil Recovery Act,"
Lea County, New Mexico.12
13
14 BEFORE:

15 DAVID R. CATANACH

16 Hearing Examiner

17 State Land Office Building

18 October 15, 1992

19
20
21 REPORTED BY:22 CARLA DIANE RODRIGUEZ
23 Certified Court Reporter
for the State of New Mexico24
25
ORIGINAL

A P P E A R A N C E S

FOR THE APPLICANT:

KELLAHIN & KELLAHIN

Post Office Box 2265

Santa Fe, New Mexico 87504-2265

BY: W. THOMAS KELLAHIN, ESQ.

I N D E X

Page Number

Appearances 2

WITNESSES FOR THE APPLICANT:

1. ERIC D. CARLSON
 Examination by Mr. Kellahin 6, 34
 Examination by Mr. Catanach 31, 35
2. M. T. WISKOFSKE
 Examination by Mr. Kellahin 36
 Examination by Mr. Catanach 53

Certificate of Reporter 60

E X H I B I T S

Reference

Exhibit No. 1	7
Exhibit No. 2	13
Exhibit No. 3	18
Exhibit No. 4	24
Exhibit No. 5	25
Exhibit No. 6	26
Exhibit No. 7	28
Exhibit No. 8	8
Exhibit No. 9	8
Exhibit No. 10	21
Exhibit No. 11	41
Exhibit No. 12	42
Exhibit No. 13	45
Exhibit No. 14	46
Exhibit No. 15	46
Exhibit No. 16	47
Exhibit No. 17	48
Exhibit No. 18	50

1 EXAMINER CATANACH: At this time we'll
2 call Case 10570, the application of Marathon Oil
3 Company to qualify a portion of the South Eunice
4 Seven Rivers Queen Unit waterflood project for
5 the recovered oil tax rate pursuant to the New
6 Mexico Enhanced Oil Recovery Act, Lea County, New
7 Mexico.

8 Are there appearances in this case?

9 MR. KELLAHIN: May it please the
10 Examiner, I'm Tom Kellahin of the Santa Fe law
11 firm of Kellahin & Kellahin appearing on behalf
12 of the Applicant, and I have two witnesses to be
13 sworn.

14 EXAMINER CATANACH: Are there any other
15 appearances in this case?

16 Will the two witnesses please stand to
17 be sworn in.

18 [The witnesses were duly sworn.]

19 MR. KELLAHIN: Mr. Examiner, Marathon
20 is seeking approval of a portion of its South
21 Eunice Seven Rivers Queen Unit waterflood project
22 for the New Mexico Enhanced Oil Recovery Act
23 recovered oil credit.

24 I'll provide you a copy of the Act so
25 that you can specifically see what we're looking

1 to accomplish. It's found in 7-29 A-2. It's
2 subsection D, and then it follows over on the
3 second page. I've highlighted in yellow the
4 specific portion of the Act that we seek to
5 qualify this project with.

6 The southern end of the waterflood
7 project has an area we've designated as the
8 project area. After exhausting efforts to
9 improve primary recovery as well as waterflood
10 secondary recovery on an 80-acre pattern, the
11 Applicant has conducted geologic and engineering
12 studies to demonstrate that by reducing that
13 pattern to a 40-acre pattern, it will
14 substantially increase the secondary oil
15 recovery.

16 We believe it qualifies and should be
17 approved under the Enhanced Oil Recovery Act of
18 New Mexico, and that's what we'll focus in on.

19 We'll call two witnesses. Mr. Eric
20 Carlson is a geologist and he's the first
21 witness. Mr. Michael Wiskofske is the
22 engineering witness. He spells his name
23 W-I-S-K-O-F-S-K-E.

24 At this time, I would like to call Mr.
25 Carlson.

1 **ERIC D. CARLSON**

2 Having been first duly sworn upon his oath, was
3 examined and testified as follows:

4 EXAMINATION

5 BY MR. KELLAHIN:

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

8 A. My name is Eric D. Carlson. I am a
9 petroleum geologist.

10 Q. Mr. Carlson, on prior occasions have
11 you testified as a petroleum geologist before the
12 Oil Conservation Division?

13 A. Yes, sir.

14 Q. What has been your activity with
15 regards to the waterflood project described as
16 the South Eunice Seven Rivers Queen Unit
17 Waterflood Project?

18 A. For the past three years I've been the
19 geologist assigned to this project, this area.

20 MR. KELLAHIN: Mr. Examiner, we tender
21 Mr. Carlson as an expert petroleum geologist.

22 EXAMINER CATANACH: He is so
23 qualified.

24 MR. KELLAHIN: Before we commence Mr.
25 Carlson's geologic displays, I would like to

1 share with you the Administrative Order that
2 approved the conversion of certain producers to
3 injectors within what we propose to qualify as
4 the project area. It's Administrative Order
5 WFX-629 entered effective as of April 9, 1992.

6 Q. All right, Mr. Carlson, let's turn to
7 your first display. Identify for us the map.

8 A. Exhibit No. 1 is a summed net sand map
9 for five stringers that are in the Queen
10 formation. We exclude the Penrose because it's
11 not productive. The sand really doesn't develop
12 here. We're talking about just the Queen
13 formation as part of the pool here.

14 Q. What is the purpose of the yellow
15 outline?

16 A. The yellow outline is the unit boundary
17 for the Seven Rivers Queen Unit here.

18 Q. Within the unit boundary, you've
19 identified a well with an orange dot or an orange
20 circle around the well location?

21 A. Yes. That well is Unit Well 439. That
22 is the type well that I will show you some core
23 information very shortly. Frankly, what I'm
24 doing with this map is to give you a general
25 shape, first of all, where the sands are in this

1 unit. You can note that in the northeast portion
2 of this unit we have a thick area. In the
3 southeast portion we have a relatively thick
4 area. Those are the best parts of the unit.

5 If you look in the north-central part
6 of the unit, you can see the sand quality is very
7 poor and there isn't much sand at all.

8 Q. As a point of reference, Mr. Carlson,
9 let me ask you to turn to Mr. Wiskofske's
10 engineering exhibits, and if you'll look at
11 Exhibits 8 and 9--and, Mr. Examiner, if you would
12 also pull out those plats, I think they'll serve
13 as a guide so you can see the proposed project
14 area that we want to qualify for the oil credit.

15 Do you have those displays before you,
16 Mr. Carlson?

17 A. Yes, I do.

18 Q. On Exhibit No. 8, there's an area
19 stippled or shaded in gray. What does that
20 represent?

21 A. That's the pattern reduction project
22 area.

23 Q. Let's take that area and have you help
24 me understand geologically why that area is
25 suitable for the reduced pattern project?

1 A. Sure. First of all, I'll point out the
2 reduced pattern area. On Exhibit No. 1, we see
3 that it is in the southern portion of the unit.
4 What we found is that basically this map is the
5 state of our knowledge in 1989, before I was
6 asked to come in and look at this unit, late in
7 its life. Can we find some more opportunities
8 for drilling or other recovery methods that might
9 perhaps extend the life of this unit, keep it
10 economical longer?

11 So I was hired in, brought in, rather,
12 to this project as a geologist with the new
13 concepts of the late 80s and early 90s, if you
14 will. The previous geologic work had been
15 through the 70s. What I had to do at this point
16 was to take this relatively general map and
17 attempt to explain the production anomalies we
18 saw in the secondary recovery.

19 As we had been waterflooding for a long
20 time by then, we saw that almost all the new
21 waterflood or almost all the recovery from the
22 waterflood were from the northeast portion and
23 the south-central portions of the unit. We saw
24 very uneven recoveries. And we had drilled some
25 wells in the 80s, starting from about 434 or so

1 and 435. Most of the wells, 435 through 440 are
2 infills, if you will, on tighter spacing in the
3 pattern area.

4 Q. In order to establish a reference in
5 terms of the development of the unit, in 1989,
6 were there infill wells yet drilled in what we've
7 defined as our pattern reduction project area?

8 A. Yes. All the wells were drilled by
9 1989. So, I had all this data and we had cored
10 the wells 435 through 440 as well, so I was able
11 to take a look. What I found out is that this
12 examination, this look here of net sand, this is
13 on a particular scale that people often look at
14 to drill wells, but what I had to do was to look
15 at a finer scale, at the various individual
16 stringers of this formation, to actually diagnose
17 what had happened in this waterflood.

18 So that how I'm going to take you
19 through this geologic argument is to go to a
20 scale that we don't usually look at. It's late
21 in the life, we have a lot of information, and we
22 had to look at the scale to diagnose why we had
23 so many production anomalies.

24 Q. Before we go through the specific
25 details of that geologic evaluation, let me have

1 you summarize the geologic conclusions that are
2 applicable to the application today, and why you,
3 as a geologist, can now conclude that there is a
4 geologic explanation to the ability to improve
5 secondary oil recovery for a project defined
6 within this pattern reduction project area.

7 A. What we found is that these individual
8 stringers within the reservoir are very
9 discontinuous. To use some words that many
10 people often do, we found that this is a very
11 heterogeneous reservoir system rather than
12 homogeneous, and that we had to take a look and
13 we saw that variations from well to well on the
14 increased density were still very great. We
15 still saw a lot of differences even from, say, 40
16 acres away. There were great variations and, in
17 fact, unless you drill tight enough you won't
18 really be able to flood from one stringer to
19 another.

20 As a result of this, in fact, as an
21 aside, when we went to flood Section 16 in the
22 next year or so after I looked here, we realized
23 to begin with we had to be on tighter spacing, so
24 we put this application to use here and also
25 northwest, five miles away.

1 Q. Was the existing 80-acre flood pattern
2 in place at the point in time when you're
3 commencing your geologic examination of this
4 area?

5 A. Yes. All the wells were already
6 drilled and the patterns were already on 80-acre
7 flood. Those wells that were injectors at the
8 time that are outside the pattern area are
9 obvious in the north part of the unit
10 particularly. You can see all the injectors that
11 were already set up on an 80-acre flood.

12 Q. What is your conclusion, geologically,
13 about the 80-acre flood pattern for the southern
14 portion of the unit?

15 A. The 80-acre flood pattern in the Queen
16 is insufficient to waterflood properly. You
17 leave too much oil in the ground on an 80-acre
18 flood.

19 Q. What is your recommendation, then, with
20 regards to a flood pattern?

21 A. You need to tighten that flood pattern
22 up to a 40-acre pattern.

23 Q. Having realized the conclusion that
24 you've reached from your study, let's go back and
25 touch on some of the pieces for the Examiner so

1 he can see how you've gone through your thought
2 process to reach that conclusion. Let's go to
3 what you've called the type log.

4 A. Okay. I would like to direct your
5 attention, Mr. Catanach, to Exhibit No. 2, the
6 type log. Once again, the general picture that I
7 showed you in Exhibit No. 1 was not specific
8 enough to address the problems that we saw, so we
9 went back to the beginning, we took a look at the
10 core data and compared it to the log data.

11 Now, this example is Well 439. It's
12 the orange dot on your geologic map. There's a
13 lot of information on here. We did have a great
14 amount of data, and I'm going to take you kind of
15 slowly through it to help you kind of visualize
16 what's going on.

17 Very quickly, first of all I would like
18 you to note the scale is five inches to 100 feet,
19 just like a standard detail log that you would
20 see. We have, from the left, a gamma ray caliper
21 log, then we have some resistivity logs, some
22 neutron density logs with a PE curve. We have a
23 core time and core gamma for correlation
24 purposes, and then the rest of the information
25 from Bell Petroleum Services' core analysis,

1 porosity, permeability, water and oil saturations
2 and, of course, your grain density. So we have a
3 lot of information.

4 Q. What portion of the pool are you
5 examining with the data shown on this display?

6 A. Okay. We are examining that portion of
7 the pool that's from the top of the Queen
8 formation, which you see marked in your
9 resistivity log track, down through the Queen
10 sands that are productive in this pool.

11 Q. Are there any other producing members
12 of the pool--

13 A. No, sir.

14 Q. --other than this Queen?

15 A. This represents the entire productive
16 portion of the pool in this unit area.

17 Q. And the names that you've placed within
18 these individual stringers of the Queen are names
19 that Marathon uses internally?

20 A. Yes, sir. These are simply
21 designations for the stringers. I just happened
22 to choose the alphabet and started with A, and
23 later on I realized there was a stringer I had to
24 map above that, hence the "Z," but basically
25 they're in alphabetical order.

1 Q. Without describing all the details on
2 the display, give us a summary of the key
3 components to the display and the conclusions
4 you've reached.

5 A. The key components are the lithological
6 analysis, the porosity analysis, especially the
7 comparison of log to core, and that allows us to
8 establish a pay cutoff, a minimum porosity for
9 pay cutoff. And also just to mention, we do see
10 also some saturation information which is helpful
11 in describing the seals. And that's the main
12 portions of this log.

13 In sum detail, very quickly, the purple
14 is dolomite in the left track and left depth
15 track; the purple is dolomite and the yellow is
16 sand. Those are the two components of this
17 system.

18 Q. Does the dolomite produce oil from the
19 reservoir?

20 A. No. The dolomite contains oil but it
21 is extremely tight and it will not produce oil.
22 The oil is all being produced from the sands.
23 And as we go to the neutron density log, we see,
24 for instance, a PE curve which I've highlighted
25 in color as well. Once again, dolomite is that

1 portion of the PE curve to the right, increasing
2 greater than 2.75 on the PE, and then the sands
3 are the yellow highlighted less than 2.75. So I
4 have a PE to really help the lithology
5 determination here.

6 We did a lot of work with core-to-log
7 porosity to really try and understand this thing,
8 and what we find is the sand is pretty
9 fine-grained but where you don't have impurities
10 in the sand, it's really a pretty good producer.
11 So, as you look, I've indicated with a slanted
12 red line in the neutron density track there and
13 also a slanted red line in the porosity track.

14 As you see around 22 percent log,
15 neutron density plus porosity, it's about 20
16 percent core porosity. So, when the sand is very
17 porous it's very clean and almost all the
18 porosity, Mr. Catanach, is effective porosity.

19 As your log porosity towards the top of
20 that slanted line gets down to 14 percent, you'll
21 see the core porosity is now reading
22 approximately eight percent. What that means is
23 that as the pay quality diminishes, you start
24 getting clays into that sand that effectively are
25 read as nonporosity, read as formation by the

1 core porosity, which is just the connected
2 porosity.

3 We look at our permeability associated
4 with these, and we see in the Klinkenberg
5 permeability, which is a permeability calculated
6 back to reservoir temperature and pressure, that
7 in fact the 20-percent porosity stuff is looking
8 at 100 millidarcies. It's a really good
9 permeability ride. If you look at 15 percent,
10 you're down around 10 millidarcies. If you want
11 to establish a pay cutoff, I've circled the zone
12 at the top of the neutron density log, and that
13 zone is approximately eight percent density
14 neutron plus porosity. And you'll see it's about
15 one millidarcy permeability.

16 That left basically our pay cutoff,
17 eight percent. You'll see that the dolomites
18 have permeabilities around .1 millidarcy.
19 They're tight. They're not productive.

20 So, those are the points I want to show
21 you, again, the relationship of the various sand
22 stringers, the great variation in porosity and
23 permeability that we see and how it compares to
24 the core, and it established the minimum porosity
25 cutoff in the sands of eight percent. It shows

1 the dolomite is seal facies, and the sands,
2 that's the pay facies.

3 Q. Mr. Carlson, have you prepared a
4 cross-section that illustrates your conclusion
5 about the discontinuity of the sands in the
6 reservoir through the project area?

7 A. Yes, sir. Exhibit No. 3 is a print of
8 a cross-section that I did in 1989 as part of
9 this work. Once again, the type well is on this
10 section. You can see on the right-hand display
11 there, the unit boundary again in yellow, the
12 cross-section runs west to east from the left to
13 the right, from A to A'. We have eight wells on
14 the cross-section.

15 I would also like to point out, Mr.
16 Examiner, the vertical scale below the map which
17 shows you, once again, that there's 30 feet in
18 almost an inch of vertical scale there. Once
19 again we're looking at detail logs on this
20 display.

21 Q. If we look back at Mr. Wiskofske's
22 Exhibit No. 8 to give us the project area, find
23 the producer in the southeast corner of the
24 project area, it's Well 439?

25 A. Yes.

1 Q. That corresponds to your Well No. 6 on
2 the cross-section and that's your type log well?

3 A. Yes. Once again, this is the same
4 density neutron log you've just seen on Exhibit
5 No. 2.

6 Q. Let's start with Well No. 6 which is
7 Unit Well 439, and have you describe for us the
8 reservoir thickness of this sand on that log, and
9 demonstrate for us what happens to that sand as
10 we move both east and west of that location.

11 A. What we've found is that Well 439 saw
12 one particular stringer, which I've highlighted
13 in yellow on this display, that stringer is in
14 the Able sand. And it was quite thick, 28-feet
15 net, I believe, in that interval.

16 We see, as you go west from Well 439 to
17 Well 435, just one 40-acre location away, we can
18 see that the overwhelming majority of this sand
19 is just not present. We can also see if we go
20 just a little further, one 40-acre spacing away
21 to Well 701, that this sand is absent for all
22 intents and purposes. We see that with an
23 80-acre distance it's completely gone, and within
24 40-acres' distance it's very nearly gone.

25 If we go eastward to Well 414 or

1 actually southeastward, we'll see that Well 414
2 does see this sand, and it's also quite
3 well-developed, and in fact we have found that
4 Well 414, being an injector, has pushed movable
5 oil to Well 439, and it's been a very good
6 recovery.

7 In fact, also Well 413, which is
8 located northwest of 439, has also been able to
9 move oil. So that explained this anomalous high
10 production in Well 439. Just happened to have a
11 single stringer that was well-connected, and we
12 were on a tight enough pattern there to flood oil
13 from the injectors 413 and 414, into 439.

14 As you look, if you go just east from
15 414 again to 417, once again the 40-acre pattern,
16 you're out of it. Again, you have no well sand
17 to speak of in Well 417 to the east. If you look
18 at this shape and cross-section, you'll see it
19 has sort of a beach sand profile and when we make
20 an environmental determination for all these
21 sands, we see they're just about right on the
22 edge of the ocean. And I would submit to you
23 that this Able sand is like a Galveston beach
24 example. I'll show you a map of it in a minute,
25 but this shape, this airplane wing-type shape is

1 indicative of a beach sand here.

2 Q. I want to ask you a question with
3 regards to the pattern and then we'll go into
4 having you give us a demonstration of your
5 isopachs of these various sands.

6 A. Sure.

7 Q. Let's take Exhibit No. 9 at this
8 point. When you look at Exhibit No. 9, the six
9 diamond shapes are the producing wells to be
10 converted to injector?

11 A. That's correct.

12 Q. And that is what we're talking about
13 when we say we're taking the flood pattern from
14 80s to 40s?

15 A. That's correct.

16 Q. Describe for us now, using your type
17 log, what do we achieve geologically by
18 converting all these producers to injectors?
19 What's going to happen?

20 A. What will happen is that these
21 individual stringers will see more than just the
22 one well. They'll see a second well. And so
23 that second well can be used to flood mobile oil
24 into the producer. As long as you're on a tight
25 enough pattern, you can actually have

1 conductivity, connectedness, between two wells.

2 We can actually--you have to get two
3 wells, two straws in the same stringer before you
4 can effectively waterflood. These stringers are
5 so discontinuous, the reservoir system is so
6 heterogeneous, that if you don't have two straws,
7 you'll just be putting water over here and you'll
8 never recover the good, fat sands oil over here
9 because it won't have had any pressure support,
10 so that's what we're doing.

11 I would like to point out one other
12 thing if I could, Mr. Catanach, from this,
13 because it's indicative of the Queen in general
14 and it's an important point and explains why I
15 hung this cross-section the way I did. The
16 dolomites are relatively deposited over a wide
17 area, but the sands are very local. We find that
18 we can hang the stratigraphic datums on
19 dolomite.

20 What I've done, there's a nice dolomite
21 at the base of the Able sand, I've called it the
22 Beta dolomite here. It's fairly regional in
23 extent and it extends up into Section 16 where it
24 separates the Upper from the Lower Queen sands in
25 our flood there. It's easily extendable. It can

1 be traced for at least two townships around
2 here. It's a good stratigraphic time line. What
3 we find is that a lot of the confusion we've had
4 in the Queen pools over the years, if you look
5 and hang it on a time line, you'll see there's an
6 unconformity at the top of the Queen.

7 I've also hung another good time line
8 above that unconformity, which is a lower Seven
9 Rivers A sand which we've discussed in testimony
10 earlier with the Commission here, and that's
11 another good time line. It extends all the way
12 up into Section 16 as well. What we see is about
13 a 30-foot unconformity which has generated a lot
14 of the confusion over the years over just exactly
15 where the top of the Queen is. It was resolving
16 this unconformity factor which allowed me to go
17 in and do a better job of actually mapping these
18 stringers than what people could previously do.

19 The modern geologic concept of rises
20 and falls and sea level help us to explain this
21 unconformity. At the top of the Queen it's a
22 formation boundary and there was a sea level fall
23 there and a sea level rise again, and we were
24 able to deposit some of these Seven Rivers sands
25 above the Queen. That was a very big help to us

1 in understanding the extremely heterogeneous
2 nature of the Queen pays here.

3 Q. To further illustrate that point, Mr.
4 Carlson, let me have you take the composite
5 isopach, Exhibit 1, and let's use that as our
6 base map and then compare each of a number of
7 isopachs to that base map. Let's start now with
8 Exhibit No. 4.

9 A. Exhibit No. 4 is an isopach map of net
10 thickness for the Able sand. This Able sand is
11 the sand I just highlighted for you, Mr.
12 Catanach, in yellow, on the cross-section.

13 You're looking at this beach sand, and
14 you'll see that it's found exclusively, really,
15 in the east and central portions but particularly
16 in the southeast portion of the unit. Because
17 we're right on the coast line here, Mr. Catanach,
18 geologically when we look at the environment of
19 deposition, we have two major influences on the
20 shape of these sand bodies. One is the wave
21 energy that tends to make a nice long beach.
22 This is the end member. This one looks the most
23 like a beach, this Able sand, of all the
24 stringers.

25 We also have a tidal energy which will

1 tend to act and elongate things in a southwest
2 and northeast fashion. I have for you Exhibit
3 No. 5, which is really complementary to Exhibit 4
4 if I could pull it out, please--

5 Q. Before we leave Exhibit 4, you call it
6 a net thickness. What have you used for a
7 porosity cutoff?

8 A. Eight percent.

9 Q. Have you used eight percent on all the
10 maps?

11 A. Yes.

12 Q. Let's compare Exhibit 5 to 4, as you
13 build a geologic picture of the Queen interval
14 for us.

15 A. Remember, Exhibit 4 is a sand in which
16 we see a lot of wave energy. It's a beach sand.
17 If you look at Exhibit 5, you'll see the
18 influence is much more tidal. There's much more
19 tidal influence, so we see a geometry running
20 southwest and northeast. You still see a
21 thickness running roughly parallel to the sand in
22 Exhibit 4. You see the Charlie sand is roughly
23 parallel to the Able sand, if you will, but the
24 exaggeration of the lobes in the Charlie sand is
25 due to stronger tidal influence at that very time

1 than in the Able sand where the lobes are very
2 subdued.

3 So, these are end member sets of what
4 these sands actually look like when you pin them
5 down and start looking at the 5 and the 4 and the
6 10-foot interval thickness. In fact, I've mapped
7 the other sands and I'm not going to burden you
8 with all these details, but these are the end
9 member sets of what these sands look like. They
10 kind of are all distributed in the unit in
11 different places.

12 Q. Let's turn to Exhibit No. 6 and have
13 you identify and describe that exhibit.

14 A. Exhibit No. 6 is a structure map on the
15 top of the Queen formation. Like the previous
16 geological map exhibits, you'll see it still has
17 the yellow border around the unit boundary. It
18 still has the type log, No. 439 in the pattern
19 area indicated with the orange circle.

20 Q. What is the impact of structure on the
21 unit?

22 A. The impact of structure is that the
23 sands in general tend to be cleanest and thickest
24 on structural highs. I'll make a point here,
25 make a case to demonstrate to you, Mr. Examiner,

1 that in fact the theory of synchronous highs,
2 which you're probably familiar with, the notion
3 that your best sands occur on the tops of small
4 structures, that that theory applies very well in
5 looking at the general picture of Queen sand
6 distribution from Section 1. But when you
7 actually look at the little, thin stringers, you
8 have to take into account much more seriously the
9 local geological factors and local depositional
10 environment factors.

11 So, in general, when we take a look at
12 Section 6, we note, first of all, in the very
13 northeast portion of the map, we have a fairly
14 steep gradient for this area. This represents
15 the structure of the formation as it comes off
16 the arrowhead platform. So, there's a buried
17 fault that runs northwest/southeast in the very
18 northeast corner of this map. It's the major
19 structure. Everything else is variations on flat
20 in this map. You'll see we only have a 20-foot
21 contour interval.

22 What we see is that in general there's
23 a low area southwest of this major structural
24 feature, and then that low area basically tends
25 northwest/southeast, and across that area is a

1 little subdued arch that runs southwest/northeast
2 from Section 34 in the southwest, through Section
3 26, and into Section 25. Those are the major
4 structural factors.

5 Now, if you look at this to set up the
6 theory of synchronous highs, I'll show you
7 another structure map below it and show you that
8 what was once high, is later high.

9 Q. Let's turn now to Exhibit No. 7, and
10 this is a structure map on top of the lowest sand
11 member that is productive in the Queen?

12 A. That's correct. This map in Exhibit 7
13 is a structure map on top of the easy sand, the
14 lowestmost member. You'll see, once again, this
15 is only 150-feet deeper so there isn't much
16 difference between these two maps.

17 Once again, the extreme structure we
18 see associated with the fault is on the northeast
19 corner of the map. It's draped over a buried
20 fault, if you will. Again you see a low area
21 running northwest to southeast, from Section 23
22 down to the southeast of the unit. We again see
23 the arch running across from, this time, the
24 southwest corner of Section 35 into Section 25's
25 northwest corner area.

1 So the structure isn't very much
2 different. The theory of synchronous high says
3 that your current bathymetry, which will affect
4 your sand deposition, your current bathymetry is
5 related to deep structure because of differential
6 compaction, which is the word that's used, but
7 basically your compaction is such that your
8 buried structure is reflected in a very minor way
9 in the local sea floor bathymetry.

10 If you have a structural high buried
11 maybe 150-feet deep, you'll see a slight
12 bathymetric effect. What will happen is, wave
13 energy across that slight high, that shallowing
14 of water, if you will, over that deep, buried
15 high, will clean up the sands and allow you to
16 then have productive sand and not dirty, gritty
17 stuff.

18 In general, the reason this unit is
19 productive in the Queen is because if you go
20 north into Section 23, or east into the next
21 township there, you lose the structural advantage
22 that helps you window and clean out those sands.

23 Q. Go back to Exhibit 8. We've used this
24 as a locator plat, if you will. The stippled
25 area in gray, which is our project area of

1 discussion in this application, give us a
2 geologic summary to show us the justification for
3 the project area, in terms of its geology.

4 A. The project area is one of the best
5 areas for development in this pool. It's much
6 structurally higher than the north/central area
7 of the unit, for example, Section 26.

8 As a result, the sands are generally
9 cleaner, but even though they're cleaner, the
10 individual stringers are very, very
11 discontinuous. So, because the individual
12 stringers are very, very discontinuous, you need
13 to tighten up your pattern so that effectively
14 you can see a single stringer with both a
15 producer and an injector.

16 Q. Does this represent the portion of the
17 unit that is Marathon's best opportunity to
18 improve secondary oil recovery by some enhanced
19 oil recovery technique or procedure?

20 A. Yes, it does. Of course, after doing
21 all this detailed geologic work it would have
22 been great if I could have found eight new
23 locations to drill. Unfortunately, this late in
24 the life of the reservoir, we find that with
25 today's economics and prices, we can't justify

1 drilling. We can't justify a lot of new capital
2 expenditure because of prices being what they are
3 and because we're so late in the life of the
4 reservoir.

5 It looked like about the only thing we
6 could do to extend the life of this field, to
7 increase ultimate recovery, if you will, would be
8 to tighten the pattern and flood and, of course,
9 once again as an aside, we took this knowledge
10 and applied it immediately to the McDonald State
11 waterflood in Section 16. There was a benefit of
12 doing this work elsewhere, where we saw that the
13 Queen, in general, has to be tightly flooded in
14 order to really maximize your recovery. So we
15 convert some wells. That's what we recommend to
16 do. That's the best we can do out here.

17 MR. KELLAHIN: That concludes my
18 examination of Mr. Carlson, Mr. Examiner. We
19 move the introduction of his Exhibits 1 through
20 7.

21 EXAMINER CATANACH: Exhibits 1 through
22 7 will be admitted as evidence.

23 EXAMINATION

24 BY EXAMINER CATANACH:

25 Q. Mr. Carlson, is this the only area

1 within the unit that this will work in?

2 A. Well, in a sense, yes, and in a sense,
3 no, Mr. Examiner. First of all, I believe that
4 you could probably do some infill drilling in
5 Section 25 in the northeast corner. There's the
6 easy sand there. The lowest sand is quite thick
7 there. In fact, you could probably get more
8 oil.

9 The question is, can you do it
10 profitably. At this time, the only place where
11 you can tighten the pattern profitably is where
12 the wells already are, so you have to do a
13 conversion. And in that sense, the south portion
14 of the unit is the only place we can do it
15 profitably now.

16 Q. Within the proposed project area, what
17 is the main producing sand?

18 A. I would say the best producer in the
19 project area to date has been the sand we see in
20 Well 39, the Able sand. And that's almost
21 perhaps been coincidental because of the way they
22 set up the 80-acre pattern originally, where the
23 injectors 413 and 414 happened to line up nicely
24 in that sand with 439.

25 I believe there's additional recovery

1 potentials particularly in the Baker sand, and
2 those are going to be more seen, and obviously
3 the Charlie sand if you look is much more
4 developed over in the pattern surrounding Wells
5 440 or 436.

6 So really, it was one of those things
7 where you couldn't just generalize. You had to
8 go in here and root through all of these details
9 and the sand quality for all the individual sands
10 varies that much.

11 Q. Within the pattern reduction area, have
12 you found all the sands to be discontinuous?

13 A. Yes. As a matter of fact, even the wet
14 sands above the top of the Queen, even those
15 Seven Rivers sands, the sand quality varies.
16 There's no producing sand out here that's
17 producible across the entire project area.

18 Q. It is your opinion that recovery from
19 all the sands will benefit from reduction in
20 spacing?

21 A. Yes. You know, originally this thing
22 was set up, once again this scale they were
23 looking at, Mr. Catanach, originally they just
24 perf'd every sand, everything that was an
25 excursion of the gamma ray to the right they

1 perforated, and there wasn't a whole lot of
2 science put into the original flood or the
3 original production.

4 We're still left with the fact that
5 when we do our testing for these wells, it's hard
6 to isolate zones individually. Fortunately, for
7 us, if you're moving oil through a zone and
8 you're producing it out of another well, you
9 create a pressure sink for that zone and not
10 allow the waters that you're injecting to
11 preferentially find that zone and help you
12 produce whatever stringer in the adjacent well.

13 Q. When did waterflood operations commence
14 in this unit?

15 A. I want to say it was in the mid-70s but
16 my associate, Mr. Wiskofske, has memorized all
17 those dates for you.

18 EXAMINER CATANACH: Okay. I believe
19 that's all I have at this time.

20 MR. KELLAHIN: One follow-up question.

21 FURTHER EXAMINATION

22 BY MR. KELLAHIN:

23 Q. Am I correct in understanding your
24 response to Mr. Catanach's question, all the
25 producing wells in the project reduction area

1 have been fully and completed perforated in any
2 of the possible producing sands?

3 A. Yes.

4 Q. We don't have any behind the pipe
5 primary potential in any of those wells?

6 A. Unfortunately, no. We did a little
7 work above the top of the Queen in the Lower
8 Seven Rivers. We tried to open up a zone there
9 in the Lower Seven Rivers A and found,
10 unfortunately, that that was wet, that that Lower
11 Seven Rivers A is wet.

12 The rest of them, however, we found
13 they've already been opened. We've already seen
14 some flooding effect. It's just a matter of
15 maximizing waterflood recovery with this pattern
16 tightening.

17 MR. KELLAHIN: Okay.

18 FURTHER EXAMINATION

19 BY EXAMINER CATANACH:

20 Q. Mr. Carlson, is the Seven Rivers also
21 being injected into?

22 A. No, sir.

23 Q. It's just this portion of the Queen?

24 A. We attempted to see if there were
25 primary reserves in the Seven Rivers. In the

1 area of--well, we were even thinking of drilling
2 a well down in 701 and 702 to see if we could
3 support a well, and I had just enough sand
4 thickness from five or six stringers there that
5 if they had been oil, we would have had a viable
6 economic project.

7 What we did was, we recompleted a well
8 just northwest of there first, a little thin one,
9 to see if there was any oil, and it came back wet
10 so we couldn't do anything more with the Seven
11 Rivers.

12 Q. So, the sands you've identified in your
13 exhibit, those are the only sands being produced
14 in the unit?

15 A. Yes, sir. Those are the only oil
16 productive sands in the unit.

17 EXAMINER CATANACH: Okay. Nothing
18 further.

19 **M. T. WISKOFSKE**

20 Having been first duly sworn upon his oath, was
21 examined and testified as follows:

22 EXAMINATION

23 BY MR. KELLAHIN:

24 Q. All right, sir, would you please state
25 your name and occupation.

1 A. My name is Mike Wiskofske and I'm a
2 reservoir engineer.

3 Q. Mr. Wiskofske, on prior occasions have
4 you testified as a reservoir engineer before the
5 Division?

6 A. No, I have not.

7 Q. Summarize for us your education.

8 A. I graduated from Marietta College in
9 1987 with a bachelor of science degree in
10 petroleum engineering.

11 Q. Summarize for us your employment
12 experience as a reservoir engineer.

13 A. As a reservoir engineer, I've worked
14 for Marathon for about a year and a half in the
15 reservoir department. Four years prior to that I
16 was in production/operations in Iraan, Texas.

17 Since I've been working as a reservoir
18 engineer, pretty much the South Eunice is the
19 field I work on.

20 Q. How long have you devoted your
21 attention to the engineering aspects of the South
22 Eunice Queen waterflood project?

23 A. Approximately a year now.

24 Q. Are you currently familiar with the
25 operations of all those wells and the unit in

1 general?

2 A. Yes, I am.

3 Q. Have you done engineering analysis and
4 calculations on your production and on your
5 reservoir data?

6 A. Yes.

7 MR. KELLAHIN: We tender Mr. Wiskofske
8 as an expert reservoir engineer.

9 EXAMINER CATANACH: He is so qualified.

10 Q. Let's start with Exhibits 8 and 9.
11 We've talked about them, but for the purpose of
12 the record would you identify them?

13 A. Both Exhibits 8 and 9 are well location
14 plats showing the pattern reduction project
15 area. Exhibit No. 8, in the gray, is the project
16 area while Exhibit No. 9 shows the individual
17 patterns of this project area.

18 Q. Let's look at the conversion of
19 producers to injectors. Those wells on Exhibit 9
20 identified by the diamonds, there's one of the
21 wells, 416. Describe for us the status of that
22 well?

23 A. Well 416 is currently a producer.
24 Under the original Administrative Order, I guess
25 was WFX-629, we only applied for five wells to be

1 converted to injection wells. However, for our
2 1993 budget, Marathon Oil also proposed to
3 convert Well No. 416.

4 Q. When we look at the Administrative
5 Order I referenced the Examiner to, that approves
6 the injector wells, the conversion of producers
7 to injectors, for all but 416?

8 A. Correct.

9 Q. You will go ahead and apply for
10 administrative approval to add 416 as an
11 injector?

12 A. Correct.

13 Q. Give us a short history of the unit in
14 terms of its development and production under the
15 primary phase, then move us in through secondary
16 recovery.

17 A. Okay. The majority of the wells in
18 this unit were drilled between 1958 and 1961.
19 The unit was formed in 1971 for the purpose of
20 waterflooding this area. At the time the
21 waterflood was installed, primary recovery was on
22 an average of about 10 percent in the unit.

23 We originally started with a pilot area
24 in the northeast portion of the unit in November
25 of 1972. By June 1975, this waterflood injection

1 had expanded to cover the entire unit, and the
2 patterns which it expanded to were 80-acre
3 five-spot injection patterns.

4 In 1984, we drilled six infill wells on
5 20-acre spacing. Wells 434, -35, -36, -37, -38,
6 -39 and -40, with five of them being in the
7 southern end or the pattern reduction project
8 area.

9 December 1991, we converted five wells
10 to injection wells; however, at the present time,
11 these wells--injection has not been initiated in
12 these wells.

13 Q. What do you see as a reservoir engineer
14 to be the advantage of reducing the flood pattern
15 from 80-acre spots to the 40-acre spot?

16 A. Well, really two advantages. First of
17 all, you're going to improve your aerial sweep
18 efficiency in the area, and secondly you're going
19 to help pressure maintenance in the area.

20 Q. Let me ask you to turn to what is
21 marked as Exhibit No. 10. Would you identify
22 that for us?

23 A. Yes, that is a production and injection
24 plot of daily production injection of the unit.

25 Q. Describe for us the color-code and what

1 is plotted on the display?

2 A. Daily oil production is in green; gas
3 production is in red; water production is in
4 purple; in orange is injection per day. As you
5 can see from the graph, unitization was in 1971,
6 which is what the graph starts, through the
7 present time.

8 Injection was initiated in November of
9 72, and then field-wide in 75. As you can see,
10 peak production was obtained in 1976. We went on
11 pretty much of an established decline until 1984
12 when the infill wells were drilled and we peaked
13 again, and then from that time we again have come
14 on to an established decline until December of
15 91, when we shut in the producers or converted
16 them to injection service.

17 Q. Let's now take your production
18 information and have you demonstrate what that
19 production shows you for what we've described as
20 the pattern reduction project area. Have you
21 plotted that information?

22 A. Yes, I have. It should be in Exhibit
23 No. 11.

24 Q. Let's turn to that and have you
25 describe that display.

1 A. Again, this is a production plot of
2 daily production oil, gas, water, and daily
3 injection. This is for the pattern reduction
4 project area. Again, oil's in green, gas is in
5 red, water's in blue and injection is in purple.

6 From this graph you can see that the
7 injection began in the southern end in 1975 and
8 also, from the oil production plot, you can see
9 that we took a kick in 1977 from the flood
10 response and then we again established a
11 decline. And then, in 1984, we took a production
12 kick from the infill wells and from there we've
13 also gone on an established decline again.

14 Q. As a reservoir engineer, do you find
15 any other viable alternative to improving
16 secondary oil recovery, other than reducing the
17 flood pattern?

18 A. At the present time, no.

19 Q. Let me ask you to turn to Exhibit No.
20 12. In trying to quantify the opportunity for
21 additional secondary oil recovery, have you gone
22 through conventional engineering calculations and
23 methodology to try to determine the approximate
24 additional barrels of oil that might be recovered
25 from the unit if you reduce your flood pattern?

1 A. Yes, I have.

2 Q. Is that what's demonstrated on Exhibit
3 No. 12?

4 A. Yes, it is.

5 Q. Give us a summary of what you've done
6 here and describe the conclusions.

7 A. Okay. The main points would be the
8 original oil in place, the developed primary, the
9 developed secondary, the ultimate recovery, and
10 then the incremental secondary recovery. Those
11 columns.

12 What I did was, I took from Eric's net
13 sand maps, his individual net sand maps, we
14 planimetered each individual sand stringer. We
15 added up the total volume and then, taking
16 average porosity, water saturation values, we
17 determined what the original oil in place of each
18 individual pattern should be.

19 Knowing the developed primary and the
20 developed secondary for the area, we were able to
21 determine so far what percentage of the original
22 oil in place we were able to recover.

23 Now, in 1985 we had done some core work
24 on the infill wells that were drilled and, from
25 this data, we got fractional flow curves and also

1 we did some core flooding. We were able to
2 determine that we should be able to recover 30
3 percent of the original oil in place.

4 That is basically what the theoretical
5 ultimate would be. The difference between what
6 we developed and what we theoretically should
7 develop is the incremental secondary which you
8 see in the following.

9 Q. When you get to the last column on the
10 spreadsheet, the one on the right, it's captioned
11 "Incremental Secondary," what does that mean?

12 A. That is the amount of reserves we
13 should be able to recover by reducing everything
14 to 40-acre spacing in that pattern reduction
15 area.

16 Q. An estimated 366,000 barrels of
17 additional oil?

18 A. Yes.

19 Q. All right. In order to exercise that
20 opportunity for the additional secondary oil, you
21 propose to convert current producers to
22 injectors. That conversion is going to defer or
23 postpone the recovery of a certain portion of
24 this secondary oil, is it not?

25 A. Right.

1 Q. Have you been able to estimate or to
2 quantify the time interval in which that
3 secondary oil is going to be deferred, and give
4 us a sense of the volume of oil that you're going
5 to have to postpone recovery?

6 A. Yes, I have, and that's under Exhibit
7 13.

8 Q. All right. Let's turn to Exhibit 13.
9 Before you give us the conclusions, tell us how
10 to understand the display.

11 A. Okay. This display is basically just a
12 graph of incremental production per day per
13 month. What we're looking at is when a project
14 was initiated in December of 91, we were
15 averaging approximately a little over 13 barrels
16 a day from the wells that were shut in.

17 As you can see, we go on a decline, an
18 established decline from all the wells, and then,
19 in February of 93, we shut in Well No. 416 which
20 is what we were shooting for our budget.

21 Now, after February of 93, again we go
22 on an established decline until Well No. 416
23 becomes uneconomical, which the well would have
24 been shut in anyway.

25 Again, then we go on a decline, and

1 Well No. 14 would have been uneconomical, Well
2 No. 409 uneconomical, and so on, as all the wells
3 decline.

4 It was estimated that the total
5 deferred production would be 22,000 barrels. It
6 is important to note that when I did the reserves
7 for the area, I included these reserves on my
8 total secondary developed. Those numbers are
9 included in there. I didn't shortchange and keep
10 those out knowing that, all right, we'll catch
11 those on this project. No. Based on those
12 declines, those reserves are in that developed
13 secondary.

14 Q. So we are not attempting to take credit
15 for this deferred oil when we get down to our
16 incremental secondary oil that should qualify for
17 the tax credit under the Act?

18 A. No, we're not.

19 Q. Let's turn now to the subject of the
20 cost. Have you provided itemized, detailed
21 information, with regards to the capital
22 investments of the project area? And what I'm
23 talking about here is the pattern reduction
24 project area.

25 A. Yes, I have.

1 Q. Let's turn to Exhibits 14 and 15 and
2 have you identify and describe those displays.

3 A. Exhibit No. 14 is the total capital
4 investments for the project. We replaced some
5 facilities and injection lines. That was
6 \$553,000, and then itemized for each of the
7 conversion and the workovers which we performed
8 for this project. The total cost is about \$1.5
9 million.

10 Exhibit No. 15, on the other hand, is
11 the itemized breakout of just the facilities and
12 the injection line investments. Again, this
13 total was \$553,000.

14 Q. Within the pattern reduction area, have
15 you provided the Examiner with individual well
16 production plots?

17 A. Yes, I have.

18 Q. How were those shown in the exhibits?

19 A. Exhibits 16(a) through 16(l) are the
20 individual--they're on a monthly basis and
21 they're the individual production plots for those
22 wells. They would be for each of the conversion
23 wells, and then also the existing producers right
24 now.

25 Q. In addition to tabulating or plotting

1 individual well production within the project
2 area, have you also prepared production decline
3 plots and forecasted ultimate recoveries for the
4 individual wells within the project area?

5 A. Yes, I have. They are shown in
6 Exhibits 17(a) through 17(j).

7 Q. Let's take 17(a) as an example, and
8 have you demonstrate for us what you've done.

9 A. We've taken the daily production--well,
10 it's monthly production--from each of the
11 individual wells. From the data we try to make
12 the best fit line reflecting the decline of each
13 individual well. On Well 406's case, we used an
14 economic limit of 60 barrels a month or
15 approximately two barrels a day. We drew our
16 best fit line and we calculated the remaining
17 recoverable reserves.

18 Q. Are there any of these decline curves
19 for which you've forecasted ultimate recoveries
20 that you want to comment on, or are they all
21 within a certain pattern? Do you see anything
22 unusual about any of these plots?

23 A. I think the most important thing to
24 point out is that other than Wells 439, 440 and
25 406, the majority of the wells in this area are

1 pretty much at their economic limit, two, three
2 years of economic life left. That's pretty much
3 typical of the entire unit in general.

4 Q. Let me have you go back to Exhibit No.
5 8 at this point. The project area is described
6 as that area that's stippled in gray?

7 A. Yes.

8 Q. Describe for us the wells that will be
9 in that project area and how you have determined
10 what portion of production from those producing
11 wells in the project area ought to qualify for
12 the tax credit.

13 A. Okay. Of the wells included in the
14 area, you have five complete 40-acre five-spot
15 injection patterns with the four injection wells
16 surrounding, with one producer in the middle.
17 You also have a partial pattern 438 which only is
18 surrounded by three wells.

19 Q. When we look at the five wells,
20 excluding 438, is it your engineering
21 recommendation that all of their incremental
22 secondary oil recovery should be attributable to
23 the tax credit?

24 A. On wells-- Pardon? I didn't
25 understand.

1 Q. When you look at Well 440 for example,
2 on the eastern edge of the project area, that is
3 fully enclosed by the 40-acre reduced waterflood
4 injection wells?

5 A. Yes, sir.

6 Q. What have you concluded in terms of
7 what percentage of the oil produced from 440
8 ought to be applied towards the tax credit?

9 A. 100 percent above the incremental.

10 Q. Okay. Is that the same conclusion you
11 reach for each of the other producers, with the
12 exception of 438?

13 A. Yes. Yes, it is.

14 Q. What do you propose to do with 438?

15 A. 438 again it's pretty much 100 percent
16 of the the incremental. The only difference is,
17 438 compared to 439, 437 and 435, is that once
18 416 is converted, just the oil that we're going
19 to be able to recover is just going to be a
20 smaller amount. I don't believe we'll be able to
21 recover all 30 percent of the original oil in
22 place with only the three injection wheels. We
23 feel another injection well would help us and we
24 would be able to recover 30 percent.

25 Q. Let's go to your last display, Exhibit

1 No. 18. Have you provided the Examiner, in
2 Exhibit 18, a baseline production plot by which
3 you can then quantify the additional incremental
4 oil that will be produced from the producer wells
5 in the project area, that is directly
6 attributable to the reduced pattern or this
7 enhanced oil recovery procedure change?

8 A. Yes, I have.

9 Q. Describe for us how you've done that.

10 A. I've taken again, similar to the
11 decline curves which were shown earlier, I added
12 up the production for each of the wells in the
13 area clear back to when unitization occurred in
14 1971.

15 From this data, I was able to graph it,
16 and from this data I was able to obtain a fit
17 between 1987 and 1991 which I felt was the best
18 fit line through this data.

19 As you can see, in 1991 you see the
20 drop off in production and that is basically
21 because of the deferred production which we shut
22 in.

23 Q. Later on, when we're attempting to
24 certify the volume of additional oil above--I
25 think it's characterized as a positive production

1 response, can we use this baseline plot shown on
2 Exhibit 18 by which to determine the positive
3 production response?

4 A. Yes, we can.

5 Q. For the project area, then, when the
6 additional producing wells show a response from
7 the reduced waterflood pattern, there will be a
8 change above this decline curve shown on Exhibit
9 18?

10 A. Yes, there will, as evidenced from some
11 of the other--as the response we've seen
12 elsewhere in the unit. Back in 75 you see the
13 big production spike. We should be able to see
14 similar results from that.

15 Q. You will be able to tell us, in terms
16 of barrels of oil, what that positive production
17 response is?

18 A. Since I have a base decline set up,
19 yes, I will be able to tell that.

20 Q. In your opinion, is the baseline
21 production curve you've shown for the project
22 area an accurate and reliable means upon which to
23 determine a positive production response?

24 A. Yes.

25 Q. Were Exhibits 8 through 18 prepared by

1 you or compiled under your direction and
2 supervision?

3 A. The majority of the ones I did myself.
4 The production plots that were Exhibits 16(a)
5 through 16(1) were done under my supervision.

6 Q. You've examined that information, and
7 to the best of your knowledge, information and
8 belief, it's true and accurate?

9 A. Yes, I have.

10 MR. KELLAHIN: That concludes my
11 examination of this witness, and we move the
12 introduction of his exhibits 8 through 18.

13 EXAMINER CATANACH: Exhibits 8 through
14 18 will be admitted as evidence.

15 EXAMINATION

16 BY EXAMINER CATANACH:

17 Q. Within the pattern reduction area, I
18 count six injection wells and 12 producing wells,
19 is that correct?

20 A. At the present time, not including any
21 conversions?

22 Q. No, that would--let's see.

23 A. If we include the conversions, we
24 should only have, at the present time--we should
25 end up with six producers and the rest injection.

1 Q. 12 injectors, is that right?

2 A. Correct.

3 Q. Now, if I understand your Exhibit No.
4 12, the 366,000 barrels is what you would recover
5 as a result of pattern reduction?

6 A. Yes. If we can eliminate the aerial,
7 say, unconformities, we should be able to recover
8 approximately 30 percent. And to do this it
9 would be to decrease the pattern sizes.

10 Q. Have you calculated what would have
11 been recovered if the pattern reduction would not
12 have taken place in this area?

13 A. If we would never have infill drilled?

14 Q. Right.

15 A. I believe it should have been
16 around--well, it's going to vary through each of
17 the individual patterns. Of course, Well 439,
18 which is the best well in the field at the
19 present time, has recovered more oil. I don't
20 have the numbers in hard copy, no. I can give
21 you a rough estimate of what they would have
22 been, probably between 17--well, 15 to 17.

23 Q. 15 to 17?

24 A. 15 to 17 prior to infill drilling. Now
25 we've gone up in percent recoveries to 15

1 percent, so actually five to 10 percent.

2 Q. You don't have a number in terms of
3 barrels which may have been recovered?

4 A. Yes, I do. Approximately 100,000
5 barrels; 100 to 120.

6 Q. Now, does the 366,000 include that
7 100,000 barrels?

8 A. No.

9 Q. It does not?

10 A. That 366,000 barrels would be taking,
11 if you look at this table under developed
12 secondary, what I did was, I took each of the
13 wells and I declined them out under primary and
14 secondary conditions.

15 Under the secondary conditions for each
16 of these wells, I included what that well should
17 recover at an economic limit. I also did that
18 for the injection wells that we converted over,
19 and those numbers are included under developed
20 secondary. The remaining number is the
21 incremental secondary number based on a
22 30-percent recovery factor.

23 Q. So the 366,000 barrels are additional
24 recovery that will occur directly as a result of
25 pattern reduction?

1 A. Yes, it is.

2 Q. How long do you think it would take to
3 get a response to your positive production
4 response?

5 A. I think you'll be looking at
6 approximately a year.

7 Q. Is it your intent that Exhibit No. 18
8 would be used to demonstrate when that production
9 response would occur that would be the basis for
10 us to use?

11 A. Yes, I felt that was a better fit line
12 through the points I took rather than those end
13 points through the deferred production.

14 Q. The end points represent what, now?

15 A. The end points at the very end, where
16 we had that second decline coming down, that's
17 after we shut in the injection wells--I'm sorry,
18 the producers which we converted to injection
19 service.

20 Q. Okay.

21 A. So really, any oil production made from
22 these wells would be accounted for, that these
23 wells were already making that was swept over
24 into the new wells, are accounted into the
25 production decline curve.

1 Q. Has the conversion work already been
2 done on the wells?

3 A. Yes, it has.

4 Q. Has the facility work been done out
5 there?

6 A. It's completed.

7 Q. The figures you gave me for capital
8 investments, those are accurate, as far as what
9 you have spent out there?

10 A. Yes. Correct. The only numbers--the
11 only difference would be for Well 416, Well 438
12 and Well 437. Work has not been done on those
13 three wells yet. That is just an estimated cost.

14 Q. Okay. Other than the pattern
15 reduction, is there anything else that you're
16 going to change in terms of injection or
17 physically carrying out the waterflood project?
18 Anything you're going to change as opposed to
19 what you've done in the past?

20 A. Not from what base case production is,
21 no.

22 Q. The infill drilling occurred in 1985,
23 did you say?

24 A. End of 84. 84 and 85.

25 Q. How long will the pattern reduction

1 extend the life of the wells in terms of
2 producing the remaining incremental reserves?

3 A. I think you'll be looking at 15 to 20
4 years, depending on, you know, which pattern has
5 most reserves and which one has less.

6 Q. 15 to 20 additional years after the
7 wells were--

8 A. Yeah, I believe we had until, I
9 believe, to the year 2015, so that's about 20
10 years.

11 Q. Is the 30-percent recovery factor going
12 to vary in these producing wells?

13 A. Not knowing really what the
14 heterogeneities that will go into effect, 30
15 percent is a good number. When they did their
16 fractional flow curve, they were able to get
17 recovery factors of 51 percent. That being just
18 on a core, though, and knowing that each of the
19 sands come in, pinch in and pinch out, we cut
20 that down to 30 percent, which is pretty similar
21 to what they got on some disk flood work they
22 did, which I believe the results were 29 percent
23 recovery factor.

24 Q. So that number may vary well to well?

25 A. Right. It could go 35 on some wells

1 and 25 on others. It's a number that, at the
2 present time, no, that's not set in stone.

3 Q. That could increase or decrease your
4 incremental secondary?

5 A. Correct. But just from the available
6 data we had, we felt that 30 percent was a pretty
7 viable number to use.

8 EXAMINER CATANACH: I think that's all
9 I have of the witness.

10 MR. KELLAHIN: That concludes our
11 presentation, Mr. Examiner.

12 EXAMINER CATANACH: There being nothing
13 further in this case, Case 10570 will be taken
14 under advisement.

15 (And the proceedings concluded.)

16

17

18

19

20

21

22

23

24

25

I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 10570,
heard by me on October 15 1992.

David R. Catanch

Examiner

Oil Conservation Division


CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Carla Diane Rodriguez, Certified
Shorthand Reporter and Notary Public, HEREBY
CERTIFY that the foregoing transcript of
proceedings before the Oil Conservation Division
was reported by me; that I caused my notes to be
transcribed under my personal supervision; and
that the foregoing is a true and accurate record
of the proceedings.

I FURTHER CERTIFY that I am not a
relative or employee of any of the parties or
attorneys involved in this matter and that I have
no personal interest in the final disposition of
this matter.

WITNESS MY HAND AND SEAL November 3,
1992.


CARLA DIANE RODRIGUEZ, RPR
CSR No. 4