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

IN THE MATTER OF THE HEARING)
CALLED BY THE OIL CONSERVATION)
DIVISION FOR THE PURPOSE OF)
CONSIDERING:) CASE NO. 10,981
APPLICATION OF YATES PETROLEUM)
CORPORATION)

MAY 8 1994

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

May 26, 1994

Santa Fe, New Mexico

This matter came on for hearing before the Oil Conservation Division on Thursday, May 26, 1994, at Morgan Hall, State Land Office Building, 310 Old Santa Fe Trail, Santa Fe, New Mexico, before Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

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I N D E X

May 26, 1994
 Examiner Hearing
 CASE NO. 10,981

	PAGE
APPEARANCES	3
APPLICANT'S WITNESSES:	
<u>MECCA MAURITSEN</u>	
Direct Examination by Mr. Carr	4
Examination by Examiner Catanach	11
<u>LESLIE MCKIEVER</u>	
Direct Examination by Mr. Carr	12
Examination by Examiner Catanach	25
<u>DARRICK STALLINGS</u>	
Direct Examination by Mr. Carr	28
Examination by Examiner Catanach	49
REPORTER'S CERTIFICATE	54

* * *

E X H I B I T S

	Identified	Admitted
Exhibit 1	8	10
Exhibit 2	9	10
Exhibit 3	10	10
Exhibit 4	15	25
Exhibit 5	16	25
Exhibit 6	16	25
Exhibit 7	17	25
Exhibit 8	18	25
Exhibit 9	18	25
Exhibit 10	20	25
Exhibit 11	20	25
Exhibit 12	20	25
Exhibit 13	20	25
Exhibit 14	20	25
Exhibit 15	20	25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S (Continued)

	Identified	Admitted
Exhibit 16	20	25
Exhibit 17	20	25
Exhibit 18	22	25
Exhibit 19	22	25
Exhibit 20	22	25
Exhibit 21	22	25
Exhibit 22	22	25
Exhibit 23	22	25
Exhibit 24	32	48
Exhibit 25	37	48
Exhibit 26	40	48
Exhibit 27	44	48
Exhibit 28	45	48

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A P P E A R A N C E S

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By: WILLIAM F. CARR

* * *

1 WHEREUPON, the following proceedings were had at
2 10:13 a.m.:

3 EXAMINER CATANACH: At this time we'll call Case
4 10,981.

5 MR. CARROLL: Application of Yates Petroleum
6 Corporation to amend Division Order No. R-9976 to expand
7 its pilot gas enhanced recovery project within portions of
8 the Pecos Slope-Abo Gas Pool, Chaves County, New Mexico.

9 EXAMINER CATANACH: Are there appearances in this
10 case?

11 MR. CARR: May it please the Examiner, my name is
12 William F. Carr with the Santa Fe law firm Campbell, Carr,
13 Berge and Sheridan.

14 I represent Yates Petroleum Corporation in this
15 case, and we have three witnesses.

16 EXAMINER CATANACH: Any additional appearances?
17 Will the three witnesses please stand to be sworn
18 in?

19 (Thereupon, the witnesses were sworn.)

20 MECCA MAURITSEN,
21 the witness herein, after having been first duly sworn upon
22 her oath, was examined and testified as follows:

23 DIRECT EXAMINATION

24 BY MR. CARR:

25 Q. Will you state your name for the record, please?

1 A. Mecca Mauritsen.

2 Q. And where do you reside?

3 A. Artesia, New Mexico.

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

5 A. I'm employed with Yates Petroleum Corporation as
6 a landman.

7 Q. Ms. Mauritsen, have you previously testified
8 before this Division?

9 A. Yes.

10 Q. At the time of that prior testimony were your
11 credentials as an expert in petroleum land matters accepted
12 and made a matter of record?

13 A. Yes.

14 Q. Are you familiar with the Application filed on
15 behalf of Yates Petroleum Corporation in this case?

16 A. Yes, I am.

17 Q. And are you familiar with the status of the lands
18 in the Pecos Slope-Abo Gas Pool?

19 A. Yes.

20 MR. CARR: Are the witness's qualifications
21 acceptable?

22 EXAMINER CATANACH: They are.

23 Q. (By Mr. Carr) Ms. Mauritsen, initially would you
24 summarize for Mr. Catanach what Yates Petroleum Corporation
25 seeks with this Application?

1 A. We're seeking expansion of our gas enhanced
2 recovery project in the Pecos Slope-Abo Pool in Townships
3 5, 6 and 7 South, Ranges 25 and 26 East, for the drilling
4 of 20 wells to further test the Abo formation as a second
5 wells on the 160-acre spacing units.

6 We're wishing to gather data on the pool and
7 determine if additional wells -- if additional development
8 is necessary in the pool to efficiently and effectively
9 drain this portion of the Abo formation.

10 We're also seeking simultaneous dedication of
11 wells on each proration unit and authorization to produce
12 each well in the project area for a temporary period at
13 unrestricted rates for the remainder of the originally
14 approved two-year test period.

15 Q. Now, Ms. Mauritsen, this case, the first part of
16 this -- The first case involving this pilot project was
17 first heard in August of last year, was it not?

18 A. Yes, sir.

19 Q. And as a result of that hearing, authority was
20 granted for six wells in the Pecos Slope-Abo Gas Pool?

21 A. Yes, sir, it was.

22 Q. And authority was granted to produce those wells
23 at unrestricted rates and also simultaneously dedicate
24 those wells with existing wells on the proration unit?

25 A. Yes, sir, it was.

1 Q. What does Yates hope to demonstrate with this
2 pilot project?

3 A. There are a thousand wells on 160-acre unit pools
4 in this pool. There are 200 cases, we believe, where the
5 existing well is not draining the unit.

6 Our initial data from the six project wells was
7 encouraging but not conclusive. We feel we need to drill
8 additional wells throughout a more representative area of
9 the pool to provide the Division with more meaningful
10 conclusions in August of 1995. Therefore we have chosen 20
11 spacing units where we feel there's significant undrained
12 reservoir left.

13 Q. Now, August, 1995, is the time when pursuant to
14 the original order Yates is to report back to the Division
15 on the results of this pilot project?

16 A. Yes, sir.

17 Q. How were the drilling locations that we're
18 seeking approval of today, how were those locations
19 actually selected?

20 A. Okay, there's three criteria.

21 The location must have good sand thickness on our
22 geologic maps, the location must be outside the calculated
23 drainage areas of existing wells, and the location must be
24 between an on-trend of good cumulative production.

25 And all of these considerations will be reviewed

1 by our geological and engineering witnesses.

2 There were some unorthodox locations, but we
3 attempted to encroach only on Yates-operated tracts in
4 those cases.

5 Q. If this Application is approved and these wells
6 drilled, is it Yates' hope that additional data will be
7 obtained from which it can be determined if in fact
8 fieldwide rules should be established that permit for
9 additional drilling --

10 A. Yes.

11 Q. -- fieldwide?

12 A. Yes, sir.

13 Q. Let's go to what has been marked for
14 identification as Yates Petroleum Corporation Exhibit
15 Number 1. Would you identify that for the Examiner and
16 review it, please?

17 A. Yes, sir, it's a lease map of the original
18 project area and our expansion area. The Yates acreage is
19 shaded in yellow, and each of the subject proration units
20 is outlined.

21 The green outlines in Township 6 South, 25 East,
22 were our original six wells.

23 The red outlines are the new 20 proposed wells.

24 The existing wells are in red dots, the new wells
25 are blue, and all the offset operators are shown on the

1 lease map.

2 Q. Now, what is the area that you're asking be
3 included within the proposed pilot project?

4 A. The project area will be limited just to the 160-
5 acre tracts as outlined. It's not a continuous project.

6 Q. And that's how the first phase of this pilot
7 project, was approved?

8 A. Yes, sir.

9 Q. Let's go now to Exhibit Number 2. Would you
10 identify that for the Examiner?

11 A. This is just a table showing the well names of
12 the new 20 wells, their spacing units, their section,
13 township and range, and their location by footages.

14 Q. Now, are each of the wells that are identified on
15 Exhibit 2 either at standard locations or unorthodox
16 locations which only encroach on Yates-operated spacing
17 units?

18 A. They all are except the very last one which is
19 the Catterson SS Federal Number 7. It encroaches on a
20 tract operated by Merit Energy Company. It was moved for
21 topographical reasons and Merit has waived objection to
22 this location.

23 Q. Is the purpose of this Application simply to
24 enable Yates to produce these particular tracts at
25 unrestricted rates?

1 A. No, our objective is to determine if the pool
2 rules should be changed to permit operators to drill
3 additional wells in part or all of this pool.

4 Q. Is Exhibit Number 3 an affidavit confirming that
5 notice has been provided in accordance with Division rules?

6 A. Yes, sir.

7 Q. To whom has notice been given?

8 A. It's provided to all operators in the Pecos
9 Slope-Abo Pool and all operators of an Abo well within one
10 mile of the pool.

11 Q. And what was the source of the names of these
12 operators?

13 A. That was provided to us by the Oil Conservation
14 Division.

15 Q. And you have indicated Yates will also call
16 geological and engineering witnesses to review the
17 technical portions of this case?

18 A. Yes, sir.

19 Q. Were Exhibits 1 through 3 either prepared by you
20 or compiled at your direction?

21 A. Yes.

22 MR. CARR: At this time, Mr. Catanach, we move
23 the admission of Yates Petroleum Corporation Exhibits 1
24 through 3.

25 EXAMINER CATANACH: Exhibits 1 through 3 will be

1 admitted as evidence.

2 MR. CARR: And that concludes my direct
3 examination of Mecca Mauritsen.

4 EXAMINATION

5 BY EXAMINER CATANACH:

6 Q. Ms. Mauritsen did you say, did you testify that
7 some of these wells are located at unorthodox locations?

8 A. Yes, some are unorthodox, yes, sir.

9 Q. How does Yates propose to get the approval for
10 the unorthodox locations?

11 A. We will have to come before another hearing to do
12 that, sir.

13 Q. Ms. Mauritsen, the acreage in yellow is 100
14 percent Yates acreage?

15 A. No, sir, it's either -- It's acreage Yates has an
16 interest in or operates.

17 Q. How does Yates handle the situation where you
18 have partners in a well? Do you seek to get their approval
19 to drill?

20 A. We have already sent AFEs out to all our
21 partners, and at this time 15 of the 20 are signed up a
22 hundred percent, and we have approximately another week
23 left in our 30-day notice, so not everyone has responded at
24 this time.

25 Q. Is all of this acreage that's not a hundred

1 percent Yates, is that all subject to operating agreements?

2 A. Yes, sir.

3 Q. Have you had any objection from any of your
4 partners about drilling a second well on a proration unit?

5 A. Not at this time. We've had some inquiries, but
6 we've had no objection at this time.

7 Q. The portion of your testimony concerning your
8 request to produce at unrestricted rates, that is for what
9 period of time?

10 A. Until the August, 1995, period that was allowed
11 us under the last hearing. There was a two-year period
12 given to us to do that on the first six.

13 Q. You testified that there may be possibly 200
14 cases where infill drilling may be appropriate in this
15 pool?

16 A. Yes, sir.

17 EXAMINER CATANACH: That's all the questions I
18 have of the witness at this point.

19 MR. CARR: At this time we call Leslie McKiever.

20 LESLIE MCKIEVER,

21 the witness herein, after having been first duly sworn upon
22 her oath, was examined and testified as follows:

23 DIRECT EXAMINATION

24 BY MR. CARR:

25 Q. Will you state your full name and place of

1 residence?

2 A. Yes, my name is Leslie McKiever. I reside in
3 Monticello, Arkansas.

4 Q. How do you spell your last name?

5 A. M-c-K-i-e-v-e-r.

6 Q. By whom are you employed?

7 A. I'm employed by Yates Petroleum Corporation of
8 Artesia, New Mexico.

9 Q. And what is your current position with Yates
10 Petroleum Corporation?

11 A. I am their southern division geologist.

12 Q. Have you previously testified before this
13 Division and had your credentials as a petroleum geologist
14 accepted and made a matter of record?

15 A. Yes, sir, they were.

16 Q. Have you been qualified an expert geologist
17 before?

18 A. Yes, sir.

19 Q. Are you familiar with the Application filed on
20 behalf of Yates Petroleum Corporation in this case?

21 A. Yes, I am.

22 Q. Have you made a geologic study of the portions of
23 the Pecos Slope-Abo Gas Pool which is the subject of this
24 hearing?

25 A. Yes, sir, I have.

1 MR. CARR: Are the witness's qualifications
2 acceptable?

3 EXAMINER CATANACH: They are.

4 Q. (By Mr. Carr) Initially, I think it might be
5 helpful if you could briefly describe the general
6 characteristics of the Abo formation in this area.

7 A. The Abo formation in the Pecos Slope field area
8 represents the distal end of a fluvial clastic wedge
9 deposited on the lower reaches of a meandering channel
10 system.

11 The multi-channel patterns are highly sinuous and
12 are often lenticular in nature, producing sandstones,
13 mostly channel point bar deposits, are very fine grain to
14 silty in texture, with porosities averaging 12 to 14
15 percent. Permeability is low, averaging .03 to .05
16 millidarcies.

17 Q. Generally what is the current status of the
18 development of this pool?

19 A. The Pecos Slope field is developed on 160 acres,
20 covers over 700 square miles. In excess of 1000 wells have
21 been drilled, with over 900 of those wells being completed
22 as gas producers.

23 Q. What have you attempted to determine with your
24 initial geologic study?

25 A. Yates is seeking to drill a second producing gas

1 well on 20 specific 160-acre spacing units in hopes of
2 finding significant amounts of undrained reservoir, that
3 is, incremental reserves that would otherwise not be
4 recovered.

5 In this effort, the geological scope has included
6 partitioning the Abo and the uniform and detailed sequences
7 that can be correlated consistently fieldwide and mapping
8 the sand packages within these sequences individually to
9 determine optimum areas of sand thickness, one of the three
10 criteria in choosing other proposed locations.

11 Other geological input has consisted of mapping
12 cumulative production from the field. Another tool to
13 determine the second-develop criteria, the location should
14 be between or on trend with significant cumulative gas
15 production.

16 My testimony will involve reviewing the
17 geological results of the six initial infill wells by the
18 method of cross-sections and introducing both cross-
19 sections and maps as evidence for the proposed second
20 infill phase.

21 Q. Could you go to what has been marked for
22 identification as Yates Exhibit Number 4 and identify this
23 for the Examiner?

24 A. Exhibit 4 is a map that highlights in red the
25 locations of the six wells drilled pursuant to Order Number

1 R-9976.

2 Labeled in green are the line of cross-sections
3 that were introduced at the August 12th, 1993, hearing as
4 part of the original application submitted by Yates.

5 The cross-sections have been revised to include
6 the actual drilled well logs, and appropriate geological
7 revisions have been made.

8 Q. Okay, let's go to Yates Exhibit Number 5, the
9 original cross-section as modified, A-A'.

10 A. Exhibit 5 shows the South Alkali "LK" Federal
11 Number 5, drilled on the same 160 spacing unit as the South
12 Alkali "LK" Federal Number 2, a well with a cumulative gas
13 production of over 1.5 BCF.

14 As illustrated, the South Alkali "LK" Number 5
15 encountered significant productive channel sandstones not
16 occurring in the well on the same proration unit.

17 This well, the most successful well of the
18 original pilot program, demonstrates the need to drill
19 additional wells to recover reserves that otherwise would
20 not be produced.

21 Q. All right, let's go to Exhibit 6, cross-section
22 C-C'.

23 A. Exhibit 6 illustrates the YPC Hobbs Federal
24 Number 3, a well location chosen to maximize the thickness
25 of one particular upper sand and to achieve a more optimum

1 position in this channel in respect to the original well
2 drilled in this proration unit.

3 Geologically, this well was successful, but the
4 actual production performance has been poor. The well is
5 an example of one particular instance where the infill well
6 is not economically viable, at least under today's current
7 gas market.

8 The explanation for this poor result may be at
9 least in part explained by the effects of drainage by
10 offset wells on other spacing units. Mr. Stallings will
11 address this in more detail, in later engineering
12 testimony.

13 This unique case, as much as any other,
14 illustrates the uncertainties of infill drilling that can
15 only be addressed by the drilling of additional pilot
16 program, rather than proceed prematurely with permanent
17 fieldwide rule change.

18 Q. This well was, however, successful from a
19 geological point of view?

20 A. From a geological point, it was.

21 Q. All right. Let's go to Exhibit Number 7, cross-
22 section E-E'. Would you review that for Mr. Catanach?

23 A. Exhibit 7 shows the Cleo "ANC" Com. Number 1.

24 This well represents the single geological
25 failure of the initial pilot project and clearly points out

1 the inherent risk involved with predicting the geometry of
2 meandering fluvial channels.

3 Even though this was an area with multiple
4 chances for pay sands, this particular wellbore failed to
5 find adequate sand thickness.

6 This well underscores the geological risk, and
7 unfortunately poor results of this nature will continue to
8 occur occasionally, even with infill development.

9 Q. All right. Let's go now to Exhibit 8, cross-
10 section F-F'.

11 A. Exhibit 8 shows the results of the Kilgore "SO"
12 Number 3 and represents an example wherein geology and
13 engineering predictions were right on target.

14 This well may ultimately recovery more gas
15 reserves than the original well drilled on this particular
16 160-acre spacing unit, and clearly it illustrates new
17 incremental gas reserves can be found in the Pecos Slope
18 field.

19 Q. And finally cross-section G-G', Yates Exhibit
20 Number 9.

21 A. Exhibit 9 denotes the results of the final two
22 gas completions of the initial pilot in Township 6 South,
23 Range 25 East.

24 The YPC Cottonwood Federal 3 again illustrates we
25 achieve our anticipated goals. Pay zones somewhat

1 stratigraphically different from the original well, the YPC
2 Cottonwood Number 2, were encountered. Performance
3 predictions of this well is again expected to exceed the
4 initial well.

5 The last of the six wells to be shown, the Sacra
6 "SA" Com. Number 11, were perceived to be the most
7 geological risk well to be drilled. It did not find a much
8 hoped for lower channel sand, but did achieve adequate sand
9 thickness to be deemed a commercial success. The
10 producer's anticipated ultimate gas recovery is expected to
11 exceed three of the existing wells in this section.

12 Q. Now, Ms. McKiever, what is the significance of
13 this new information that's been obtained in the first part
14 of this pilot project?

15 A. Well, the data that we acquired from the six
16 wells presented here confirms our original premise that
17 there are significant variations in the channel sandstone
18 reservoirs.

19 Due to geological considerations, the very
20 depositional nature of fluvial meandering channel systems
21 and extremely low permeability of the sandstones deposited
22 show areas that are not being effectively drained on 160-
23 acre spacing in Township 6 South, Range 25 East, the very
24 heart of the Pecos Slope field.

25 The results of this infill pilot program are

1 extremely encouraging. New incremental reserves will now
2 be effectively recovered.

3 However, the program is not completely
4 conclusive. There is not enough available data at this
5 time to be derived from the limited scope of these six
6 wells to prudently determine and establish permanent
7 poolwide rules.

8 Q. The data you have, in fact, the new data is from
9 one township?

10 A. Yes, it is.

11 Q. Let's go to Yates Exhibit Number 10. Would you
12 identify that for Mr. Catanach?

13 A. Yates Exhibit 10 is a location map that shows the
14 recommended expansion area submitted for the second phase
15 of infill drilling and the 20 specific locations proposed
16 in this program. They are shown in red circles, encased in
17 blue rectangles.

18 Lines of cross-sections prepared to graphically
19 illustrate the anticipated results are shown in green.
20 They are labeled in alphabetical order from A-A' through
21 G-G'.

22 Q. Let's go now, and I would ask you to initially
23 identify Exhibits 11 through 17, and together explain these
24 to the Examiner.

25 A. Okay. Exhibits 11 through 17 are cross-sections

1 constructed through each of the 20 proposed locations.

2 If it would please the Commission, for brevity I
3 would like to discuss in detail Exhibit 14, labeled D-D',
4 which crosses six of the proposed locations. It is
5 representative of and consistent with all of the cross-
6 sections submitted here today.

7 Q. Let's go to Exhibit 14.

8 A. Exhibit 14, cross-section D-D', runs the length
9 of Township 7 South, Range 25 East, and, as mentioned
10 previously, crosses six of the proposed locations.

11 In the initial hearing last August we had
12 initially subdivided the Abo producing intervals into three
13 separate sequences of sedimentation, with multiple channels
14 occurring within those intervals.

15 To provide more detailed and uniform mapping
16 techniques, we have since divided the Abo producing zones
17 into five sedimentary packages, again with multiple channel
18 sequences occurring within the five divisions. They are
19 labeled, from shallower to deeper, Zone A, B, C Upper, C
20 Lower, and D. And as you can see, there are producing
21 intervals within each of these divisions.

22 Each of the six locations fit within the first
23 criteria that each location must have not only adequate but
24 good sand thickness.

25 The cross-sections, as a whole, provide the

1 proper and consistent framework for uniform and detailed
2 geological mapping fieldwide and also provide a good
3 baseline to evaluate the actual results of this proposed
4 pilot project against the anticipated results.

5 Q. Let's go now to Yates Exhibits 18 through 22.
6 Can you identify those?

7 A. Yates Exhibits 18 through 22 are a series of
8 isopach maps showing the pay sands' thicknesses within each
9 individual interval, as previously defined with the cross-
10 sections labeled Exhibit 11 through 17. They are labeled
11 Zone A, Zone B, Zone C, Zone Lower C, and Zone D.

12 The format of each map is similar with each of
13 the 20 locations marked by white well spots surrounded by a
14 blue rectangle.

15 Each of the maps is contoured on ten-foot
16 intervals, with Map D, Exhibit 22, being the only
17 exception. It is contoured in five-foot increments.

18 The colors grading from yellow to orange
19 highlight the thickest intervals. All of the proposed
20 locations are located to maximize the sand thickness in
21 more than one selected sand package.

22 Q. Let's go now to Exhibit Number 23, your
23 cumulative production map. Would you refer to that exhibit
24 and review the information on it for Mr. Catanach?

25 A. Yates Exhibit 23 is a cumulative production map

1 dated December 31st, 1993. Again, the proposed locations
2 are marked with white well spots in a blue rectangle.

3 This map shows the areas that have greater than
4 .5 BCF cumulative gas production.

5 The contours drawn in increments of a half a BCF
6 grade from yellow to orange. The orange represents areas
7 that wells have cumulative gas productions above or 1.5
8 BCF. A number of wells in this field have produced in
9 excess of 2 BCF.

10 The proposed well locations are situated in such
11 a manner as to be adjacent to and on trend with pre-
12 existing gas wells with substantial production. This was
13 the second criteria in choosing locations for the pilot.

14 Please note that all locations fall within areas
15 mapped in excess of .5 BCF. The exception to this rule is
16 the Papalote OI State Com. Number 5. This was not a change
17 or an omission of our stated criteria, but rather a problem
18 in the final drafting of this map.

19 Q. Okay. Anything further with Exhibit 23?

20 A. No.

21 Q. Could you summarize for the Examiner what you
22 believe your geologic study establishes about the Pecos
23 Slope-Abo Gas Pool?

24 A. This study represents a detailed, if not rather
25 exhaustive, geological effort to ensure and substantiate

1 that each of the proposed wells will encounter not only
2 adequate but good sand thickness, and the wells offset are
3 on trend with good Abo producing gas wells.

4 This geological effort provides a basis for and a
5 background for the engineering testimony to follow.

6 Q. These are the geological considerations for
7 placing each of these wells at the exact location that
8 you're proposing?

9 A. Yes, they are.

10 Q. In your professional opinion, is it the logical
11 next step should be taken to expand the pilot project as
12 you've recommended, and thereby move toward the development
13 of the fieldwide rules?

14 A. Based on my 13 years of experience working within
15 the Pecos Slope, this proposed 20-well expansion program is
16 the prudent and logical next step to acquire further data
17 and evaluate that data to provide a solid basis for sound
18 decision-making as to the proper future of infill drilling
19 practices. I believe that this program will prevent waste
20 and does not harm but does indeed protect correlative
21 rights.

22 Q. Ms. McKiever, were Exhibits 4 through 23 prepared
23 by you?

24 A. Yes, they were.

25 MR. CARR: At this time, Mr. Catanach, we move

1 the admission of Yates Petroleum Corporation Exhibits 4
2 through 23.

3 EXAMINER CATANACH: Exhibits 4 through 23 will be
4 admitted as evidence.

5 MR. CARR: That concludes my direct examination
6 of this witness.

7 EXAMINATION

8 BY EXAMINER CATANACH:

9 Q. Ms. McKiever, of the six wells that have been
10 drilled, how many did you say were geologic successes?

11 A. Five of the six wells.

12 Q. How do you define that as being successful
13 geologically?

14 A. That I predicted adequate sand thickness that the
15 well would produce at commercial rates.

16 Q. Geologically, tell me how the portion of the pool
17 that you plan to test with the new 20 wells, tell me how
18 that differs geologically with the portion of the pool that
19 you've already tested.

20 A. Geologically, it is not that much different.

21 The whole area is past fluvial channel
22 sandstones, and there are multiple pays in these fluvial
23 channel sandstones.

24 What we don't know is whether that Township 6
25 South, Range 25 East, is anomalous in respects to drainage.

1 Geologically, it is not exceptional.

2 Q. You mentioned that -- I believe on the first
3 well, you mentioned the first well of the six, you
4 encountered sands that weren't present in the existing
5 well. Was that the only time that situation arose?

6 A. There were variations of that throughout the
7 other wells, but that was probably the most significant
8 illustration of that particular point.

9 Q. Generally speaking, you probably encountered
10 sands that were already -- that were present in the
11 existing well?

12 A. You would find sands that were present in the
13 existing well and maybe one or two additional sands that
14 weren't present in the additional well.

15 Q. Okay. These new proposed locations were chosen
16 basically on the same criteria that the first six were
17 chosen on?

18 A. Yes, they were.

19 Q. Ms. McKiever, do you feel that the 20 new wells
20 will give you sufficient geologic information with which to
21 make a decision on the infill drilling of this pool?

22 A. I believe they will.

23 They will definitely come a lot closer to making
24 those decisions than, you know, limiting those decisions to
25 the original six wells.

1 Q. Geologically speaking, do you think that just
2 based on the information you've already obtained that you
3 cannot make a good judgment at this time?

4 A. I think that we're still going to find surprises
5 as to the actual size and shape and geometry of these
6 channel sandstones. I would rather not have any surprises
7 in these next 20 wells, but I can assure you I will have
8 one or two.

9 Q. If the geology isn't going to change all that
10 much within the pool, what additional information,
11 geologically speaking, might you gather to help you make a
12 decision?

13 A. Well, I think geologically we understand the
14 nature of the depositional environment, and it is still
15 rather difficult to map on individual channel sandstones.
16 We lump them together in the five intervals.

17 And ultimately I think that we can provide a lot
18 more detailed mapping and delineate particular channels,
19 locations of channels that may not be producing in a nearby
20 well or from the well on the same producing -- proration
21 unit.

22 EXAMINER CATANACH: I have no further questions,
23 Mr. Carr.

24 MR. CARR: Mr. Catanach, at this time we call
25 Darrick Stallings.

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DARRICK STALLINGS,

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

DIRECT EXAMINATION

BY MR. CARR:

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

A. Darrick Stallings.

Q. Where do you reside?

A. In Artesia, New Mexico.

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

A. I'm employed by Yates Petroleum Corporation as a petroleum engineer.

Q. Mr. Stallings, have you previously testified before this Division and had your credentials as an expert witness in petroleum engineering accepted and made a matter of record?

A. Yes.

Q. In fact, you were the engineering witness who testified in the August, 1993, hearing concerning the initial phase of this pilot project?

A. That's correct.

Q. Are you familiar with the Application filed in this case on behalf of Yates Petroleum Corporation?

A. Yes.

Q. Have you made an engineering study of the portion

1 of the Pecos Slope-Abo Gas Pool involved in this case?

2 A. Yes, I have.

3 MR. CARR: Are the witness's qualifications
4 acceptable?

5 EXAMINER CATANACH: They are.

6 Q. (By Mr. Carr) Mr. Stallings, initially could you
7 review for the Examiner how the initial six wells were
8 selected?

9 A. Yes, the six wells were selected as a result of
10 our initial phase of our evaluation of infill drilling
11 potential in the Pecos Slope-Abo.

12 When we began that initial phase of the
13 evaluation, we decided early on to limit the area of our
14 evaluation just because of the size and the number of wells
15 in the entire field.

16 We chose Township 6 South, 25 East, as our study
17 area for a few reasons, one because that is in the heart of
18 the field and it has some of the best producing wells in
19 the field.

20 Also, Yates Petroleum operates most of the wells
21 in that township, so that gives us a lot of detailed well
22 information, and we felt like we would minimize the problem
23 of encroaching on other operators.

24 We had also recently drilled -- At the time we
25 began the study, we had recently drilled several wells in

1 that township, regular spacing wells which provided us with
2 recent drilling and pressure data.

3 Q. Could you summarize from an engineering
4 perspective the results that have been obtained to date
5 from the phase-one portion of this pilot project?

6 A. Yes, we completed drilling the six wells that
7 were approved. Those wells were drilled in November and
8 December of last year, 1993. We measured initial
9 bottomhole pressure in each of those wells, and we now have
10 four to six months, depending on when the well was
11 completed, four to six months of production data from those
12 wells.

13 The results from those wells have been mixed, as
14 Leslie referred to, but we're encouraged by the results.

15 Only four of the six wells appear to be
16 economically successful. However, I estimate that those
17 six wells will recover 2.4 BCF of new reserves that would
18 not have been recovered by the original existing wells in
19 that area. We consider that to be very encouraging.

20 Q. What type data has Yates been attempting to
21 obtain from this pilot project?

22 A. In addition to the geologic data that was just
23 reviewed, we're primarily gathering initial pressure data
24 in the new wells and, of course, production data and
25 decline characteristics of these wells.

1 Q. What did your engineering study focus on?

2 A. I used those two last pieces of data, the
3 pressure data and the production data, to focus on the
4 drainage issue and trying to identify undrained portions of
5 the reservoir.

6 Q. Now, before we get into the details of your
7 presentation, could you just provide a general estimate of
8 what the expansion portion of this project is going to cost
9 in terms of up-front investment?

10 A. Yes, sir. We spent just under \$1.8 million to
11 drill the six wells late last year. That's an average cost
12 of about \$300,000 per well.

13 Those costs should be representative of the next
14 wells we drill, and therefore 20 wells will cost \$6
15 million.

16 Q. Now, Mr. Stallings, let's go to the exhibits
17 you've prepared. First let's go to Exhibits 24 through 26,
18 and if you could initially explain what these exhibits are
19 and what they're designed to show.

20 A. Okay, each of those three exhibits is the same
21 base map of Township 6 South, 25 East, which includes the
22 six pilot wells that we've drilled.

23 On each of these maps I've summarized a different
24 category of engineering data that we've gathered from these
25 wells, and I'll go over these.

1 But the first one is the bottomhole production
2 data, Exhibit 25 is the production-rate data, and then
3 Exhibit 26 is the estimated reserves data from these wells
4 and their offset wells.

5 I'd like to explain how each of these exhibits is
6 organized.

7 The new well has its well name labeled, and it is
8 shown as a red gas well symbol.

9 The offset four wells, the four nearest offsets,
10 are shown as green gas well symbols.

11 And I've outlined the proration unit where the
12 new well lies as a purple box.

13 Q. Okay, there's posted data on the exhibits?

14 A. That's correct. And in addition to that, I've
15 posted the data from the new wells in red numbers, and the
16 legend for each map will tell you what the units are in
17 those numbers. The offset well data is posted in green.

18 I've posted the data specifically for the
19 original well on the proration unit, and then out to the
20 side beside each proration unit I've posted the average
21 value for the four nearest offsets.

22 Q. Let's go now to just Yates Exhibit Number 24,
23 your bottomhole pressure data. Would you review the
24 information on this exhibit for Mr. Catanach?

25 A. Yes, sir, this summarizes the bottomhole pressure

1 data from the new wells, and it also includes current
2 bottomhole pressure data from the existing wells, the
3 nearest offsets.

4 The initial bottomhole pressure that we measured
5 in the new wells is shown in red in p.s.i. We measure
6 these pressures from a five-day pressure buildup test upon
7 initial completion of each of these wells.

8 The green numbers shown are the pressures for the
9 offset wells. Those pressures are static pressures that we
10 measured in November of 1993, roughly the same time we were
11 drilling these wells. We had an opportunity to measure
12 those pressures because there had been a fieldwide shut-in
13 of all wells for an extensive period of time, and we felt
14 like the static pressures were valid at that time.

15 Q. Generally what conclusions have you been able to
16 reach from your review of the information on this exhibit?

17 A. These pressures will show -- and I'll go through
18 these, but they'll show that in five of the six wells we
19 encountered reservoir pressure significantly higher in the
20 new well than what is the current reservoir pressure in the
21 existing wells.

22 As I go through these numbers, it will be helpful
23 to recognize that the original reservoir pressure in the
24 pool was 1125 p.s.i.

25 But what we find is that five of the six wells

1 again encountered higher reservoir pressure than the
2 offsets, but none of them encountered virgin reservoir
3 pressure. This is an indication of limited communication
4 with the offset wells, and I think that is explained by the
5 geology that Leslie just reviewed.

6 Again, this reservoir is made up of several sand
7 channels, and in a given well we'll vertically intersect
8 generally more than one of those. I think that some of
9 those channels are in communication with the offset wells,
10 and some of those channels are not. But yet we complete
11 all those channels together, and the pressure that we
12 measured was one pressure, which is actually an aggregate
13 of the individual pressures in those given channels.

14 The channels that are in communication with the
15 offset wells probably have a lower pressure than what we've
16 measured and shown here. And the channels that are not in
17 communication, we feel have a higher pressure than the
18 aggregate pressure and possibly are even at original
19 pressure.

20 Q. All right. Let's look at the individual wells,
21 now, if you would, that were included in the first phase of
22 this pilot project, and summarize generally the sort of
23 results you obtained.

24 A. All right. I think we'll show that, again, these
25 wells -- the pressures indicate that in most cases we

1 encountered new reserves.

2 I'd like to go through these well by well,
3 starting at the bottom of the plat down in Section 35.

4 The Sacra "SA" Com. Number 11 had an initial
5 reservoir pressure of 880 p.s.i. At the same time, the
6 existing well in that proration unit had a pressure of 291
7 p.s.i., and the average of the four offsetting wells in
8 that section is 309 p.s.i.

9 The fact that we have almost 900 p.s.i. in the
10 new well compared to 300 p.s.i. in the existing wells is an
11 indication that we have encountered a portion of the
12 reservoir that's not being drained by the original wells,
13 and therefore a significant portion of the reserves that
14 will be produced from this new well will be new reserves.

15 As we move -- If we could move on up the plat, up
16 into Sections 26 and 24, the next two wells I'd like to
17 discuss, the Cottonwood Federal Number 3 in Section 26,
18 Kilgore "SO" Number 3 in Section 24, have very similar
19 results.

20 Those two wells came in with approximately 900
21 p.s.i. reservoir pressure. At the same time, their offsets
22 are on the order of 300 p.s.i. reservoir pressure, again
23 indicating that these wells have encountered portions of
24 the reservoir not being drained by the existing wells and
25 that a portion of the reserves that they're going to

1 produce will be new, unique reserves.

2 Up in Section 11 is the Cleo "ANC" Com. Number 1.
3 This is one of the two economically unsuccessful wells that
4 we drilled. It had an initial reservoir pressure of 680
5 p.s.i., and its offsets had an average reservoir pressure
6 of 219 p.s.i.

7 I don't think this well was unsuccessful because
8 of the low reservoir pressure. Instead, I think the fact
9 that the new well came in with 700 p.s.i., as compared to
10 roughly 200 p.s.i. in the existing wells, is an indication
11 that again this well encountered a reservoir that was left
12 undrained by the existing wells.

13 As Leslie discussed, in this case, this well was
14 uneconomic because we encountered inadequate sand thickness
15 for an economic well. I think that in fact this well --
16 Because the pay quality is poor and thin, this well would
17 be uneconomic even if we would have encountered it at
18 initial virgin reservoir pressure.

19 Moving up just north there into Section 1, the
20 South Alkali "LK" Number 5 had initial reservoir pressure
21 of 667 p.s.i., and its offsets average 237 p.s.i. This is
22 a similar pressure to the previous well we discussed, the
23 Cleo Number 1. But yet the South Alkali Number 5
24 encountered much better pay quality and sand thickness.
25 And that well is, in fact, producing as if it's going to be

1 the best well of these six that we've produced -- that we
2 drilled in this pilot.

3 The sixth well, the final well over in Section 8,
4 is the Hobbs Federal Number 3. This is the other
5 uneconomic or unsuccessful well that we drilled of the six.
6 It had initial reservoir pressure of 479 p.s.i., compared
7 to its offset wells averaging 249 p.s.i. at this time.

8 I think this well is basically uneconomic because
9 we drilled into a portion of the reservoir that's being
10 depleted by the offset wells. This well is producing, but
11 I don't think that a very large percentage of the gas it
12 recovers will be unique reserves.

13 This well points out the drainage risk involved
14 in infill drilling in this field, and it's obviously the
15 kind of well that we hope to avoid drilling in the future.

16 Q. Let's go now to your production rate data,
17 Exhibit 25. Would you review the information on this
18 exhibit for the Examiner?

19 A. This exhibit, the symbols are set up just like
20 the previous exhibit. The numbers posted here, in red I've
21 posted two production rates for the new wells. The top
22 number is the daily production rate in MCF per day for the
23 first month that that well was on line. The lower number
24 is the daily production rate at the most current data we
25 have as of April of 1994. For the offset wells, I have

1 shown their actual daily production in April of 1994.

2 Overall, this data is consistent with the
3 pressure data that I've just discussed in that the four
4 wells that appear to be economic and appear to be producing
5 significant new reserves, they are producing at much higher
6 rates than the existing wells surrounding them.

7 The reason that I included two numbers for the
8 new wells, the first month's production rate and the
9 current production rate, is to show an indication of how
10 these wells had declined early in their life. We're
11 watching the characteristic of decline of these wells
12 because we feel like that's going to be a indication of
13 depletion in the drainage area accessed by these new wells.

14 What I've found is that these wells are declining
15 very similarly to wells in the field that are drilled on
16 regular spacing.

17 In 1992, we drilled 20 wells in the Pecos Slope-
18 Abo, regular 160-acre locations. Those wells declined 41
19 percent from their first month's production rate to their
20 third month's production rate. By comparison, five of
21 these six wells have declined an average of 43 percent from
22 their first month to their third month. So I think that's
23 very similar to the way wells on regular spacing are
24 acting.

25 The exception to that is the South Alkali Number

1 5 up in Section 1. That well only declined ten percent in
2 its first three months, and again an indication of what a
3 good producing well that well appears to be.

4 I've seen no cases of steep, abnormally steep
5 declines in these wells, which indicates to me that the
6 drainage areas of these new wells have not been severely
7 depleted by the offset existing wells.

8 Q. All right. Let's go now and look at individual
9 well performance, if you could briefly review that.

10 A. Again, starting down in Section 35, the Sacra
11 "SA" Com. Number 11, I'll concentrate on the current
12 producing rate as compared to the offsets.

13 That well in April produced 230 MCF per day. Its
14 offset wells in that section averaged 23 MCF per day.

15 In this case, if we assume a per-well economic
16 limit rate of 15 MCF per day, it would follow that the
17 original wells in this section have very few remaining
18 reserves, because they're very near their economic limit
19 rate. Therefore, the reserves that the Sacra Number 11 are
20 going to recover will be mostly new reserves that would not
21 be recovered by the other wells.

22 Moving up the page, again, grouping the two wells
23 in Sections 24 and 26 together, these wells are producing
24 on the order of 350 MCF per day. At the same time, their
25 offsets are producing around 120 MCF per day. That

1 significant increase in production from the new wells
2 indicates to us that those wells have again encountered new
3 reserves that won't be drained by the original wells.

4 Up in Section 11, the Cleo Number 1 again is one
5 of the uneconomic wells that we drilled. That well is
6 producing 51 MCF per day in April, compared to 70 MCF a day
7 in the offset wells. I think that's explained because the
8 pay in that well is much thinner and poorer quality than
9 that in the offsets, and that's why it was such a geologic
10 surprise. But it just does not appear to have the pay
11 quality to produce significant reserves and pay out the
12 well.

13 The South Alkali Number 5 up in Section 1 is
14 producing 742 MCF per day, compared to a current rate of
15 110 MCF a day in the offset wells, indicating significant
16 new reserves to be recovered by that well.

17 And then over in the Section 8, the other
18 unsuccessful well we drilled, the Hobbs Fed Number 3, is
19 producing 39 MCF per day, compared to 52 MCF per day in the
20 four nearest offsets. This well, again, I think, just
21 accessed reserves that were already being drained by the
22 other wells and therefore did not result in a rate greater
23 than the previously existing wells.

24 Q. All right, let's go now to Yates Exhibit Number
25 26, the reserve data. Would you review that information?

1 A. Yes, sir. Again, this map is set up just like
2 the previous two. The numbers that I show here, I show two
3 numbers for the new wells, two reserve numbers.

4 The top number is total reserves, the entire
5 amount of reserves that we expect to produce through that
6 wellbore. That number has been calculated from decline-
7 curve analysis.

8 The second number are the unique reserves that we
9 expect to recover.

10 Q. What are unique reserves?

11 A. The unique reserves are the portion of the total
12 reserves that would not have been recovered by offset
13 wells. New reserves is another term we use.

14 For the offset wells, I have shown the remaining
15 reserves in those wells as of January of 1994. Those
16 reserves were calculated from decline-curve analysis
17 consistent with the way the new wells were evaluated.

18 I'd like to go into a little more detail about
19 the percent unique reserves. Again, the total reserves are
20 based on decline-curve analysis. That's an established
21 method of predicting reserves in the Pecos Slope-Abo field.

22 We've estimated what percentage of those reserves
23 are unique, based on the pressure data that we encountered,
24 and it's based on the premise that if we encounter virgin
25 pressure in an infill well, 100 percent of the reserves

1 that well will produce in its life will be new, unique
2 reserves.

3 Conversely, if we drill a well that is at exactly
4 the same pressure as its offset wells, zero percent of the
5 gas that well produces will be new reserves; it will just
6 be accelerating production of reserves that would have been
7 recovered by the existing wells.

8 Based on that pressure-to-unique-reserves
9 relationship, the reserves in these six wells range -- our
10 estimate ranges from about 30 percent in the Hobbs 3, which
11 is the lowest pressure that we measured, to 90 percent
12 unique reserves in some of the more successful wells.

13 The average -- Rather than going through all
14 these numbers, again, you can see the numbers there, Mr.
15 Examiner, the average reserves for the four successful
16 wells, the average unique reserves are 570 million cubic
17 feet. The average for the two unsuccessful wells is about
18 60 million cubic feet.

19 Q. Mr. Stallings, how do you characterize the
20 results you've obtained to date in the pilot project?

21 A. Well, the fact that we've found new reserves, I
22 consider that encouraging. I think that the results are
23 inconclusive to make a fieldwide judgment.

24 We have shown that at least in this part of the
25 field there are reserves that are remaining that will not

1 be drained by the existing wells. However, this is the
2 heart of the field, it's a relatively localized area, and
3 I'm just not sure that we have some question as to whether
4 these results can be extrapolated to a fieldwide basis.

5 That is why that we feel like it would be prudent
6 to drill additional wells to get additional data. I think
7 that if we were to wait two years for the pilot period to
8 expire, basically the only additional data we will gather
9 for these six wells will be their production data. And I
10 think with the mixed results that we've had, we will not be
11 able to make a conclusive and completely informed
12 recommendation, even in two years.

13 So we would like to proceed with additional
14 drilling to develop -- to gather additional data in a
15 broader area of the field to see if in fact our models and
16 our drainage theories and the -- hold and whether we could
17 find new reserves in a broader area of the field and
18 therefore make a more educated recommendation at the end of
19 the pilot period.

20 Q. And you're recommending that the pilot period not
21 be extended; you're working with the same two-year period
22 originally approved?

23 A. That's correct, we see no reason to recommend
24 extending the pilot period.

25 Q. Let's go to what has been marked Yates Exhibit

1 27. Could you identify that, please?

2 A. I call this my drainage map. This map shows the
3 20 proposed locations as red dots. It shows the existing
4 wells in the area of those proposed wells, and it shows two
5 pieces of information about the existing wells.

6 The number posted by the well is the estimated
7 ultimate recovery from that well. That gives us another
8 indication of how good that well is, the wells in that area
9 are.

10 The green circles around each well represent the
11 calculated drainage areas of those wells. Those areas were
12 calculated with the volumetric equation for gas wells in a
13 depletion-drive gas reservoir. I went into detail last
14 August at the original hearing as to how that calculation
15 was done.

16 But we are able to use this map in conjunction
17 with the geology maps that were presented earlier to
18 identify portions of the reservoir that have been left
19 undrained by the existing wells.

20 Q. And so each of these wells would be outside
21 existing drainage areas?

22 A. You can see from where the wells are spotted that
23 that, in fact, is true, that the proposed wells do lie
24 outside the calculated drainage areas of the existing
25 wells.

1 Q. But also in the area of good producers?

2 A. That's correct.

3 Q. All right, let's move to Yates Exhibit Number 28.

4 A. Okay.

5 Q. Would you identify this and explain how it
6 differs from the preceding exhibit?

7 A. Exhibit 28 is another drainage map; it looks very
8 similar to the previous map that I just showed. Again, the
9 prospects are shown in red. The estimated ultimate
10 recovery is posted beside each well -- those are exactly
11 the same numbers as were shown on the previous exhibit --
12 and the calculated drainage areas around each well are
13 shown as circles.

14 The difference in this map and the previous map
15 is the method in which the drainage areas were calculated.
16 Whereas the previous map we used just the volumetric
17 equation to estimate drainage areas, we saw a need as a
18 result of the first six wells we drilled and the one
19 unsuccessful well that we drilled that appears to be
20 depleted, that maybe we need to refine our technique of
21 calculating drainage areas.

22 So another engineer in our company developed a
23 brand-new technique, completely independent of the
24 volumetric technique that was used on the previous map. He
25 did a reservoir simulation of Pecos Slope-Abo wells. He

1 matched that simulation, he history-matched it with actual
2 data from the field. He was then able to develop a set of
3 tight curves from which he can predict drainage areas for
4 all of the wells in the Pecos Slope-Abo field.

5 Again, this method does not include a lot of the
6 assumptions that were included in the volumetric
7 calculations, and so it's completely independent.

8 What I think is significant is, after we went
9 through that effort we find that in most of the cases if
10 you overlay these maps, that the calculated drainage areas
11 agree very closely with each other from the two different
12 techniques.

13 Again, on the second map with the yellow circles,
14 the proposed wells fall outside the drainage areas of the
15 existing wells.

16 Q. Mr. Stallings, what does Yates hope to learn from
17 the expansion of this pilot project? Or maybe a better way
18 to state that is, why are these 26 wells' totals needed?

19 A. Well, we've revised and refined our evaluation
20 techniques. We felt a need to do that as a result of the
21 mixed success that we had in the original six wells. We've
22 reviewed that we're now mapping in five sand packages,
23 rather than three sand packages, which was previously done.
24 We feel like this will give us a more detailed look at the
25 reservoir and better be able to predict geology.

1 But again, it's just a prediction. Now, we need
2 to test that technique against actual drilling to see how
3 well this prediction tool is.

4 We've also developed an additional way to
5 estimate drainage areas in the existing wells. We'd like
6 to test that against new wells, the data that we gather
7 from new wells.

8 We feel like that additional wells are needed to
9 cover a broader, more representative area of the field as a
10 whole. The original pilot, again, was concentrated in the
11 heart of the best producing part of the field. We hesitate
12 to recommend fieldwide changes or make fieldwide decisions
13 based on that localized area.

14 We feel like that this area covering four
15 additional townships will provide a more -- a better look
16 to make a fieldwide-basis decision.

17 Q. If this pilot project is expanded as you request,
18 is it your hopes that in August of 1995 you will be able to
19 make recommendations to this Division concerning changes in
20 the rules fieldwide?

21 A. We fully expect to be able to do that, yes, sir.

22 Q. Mr. Stallings, what does Yates project or
23 anticipate to be the additional reserves that can be
24 recovered if this effort is in fact successful and infill
25 drilling occurs in the pool?

1 A. I think Mecca mentioned earlier that we think
2 that on Yates' acreage alone there may be as many as 200
3 proration units that would benefit economically from an
4 additional well.

5 I think that the average reserves from those
6 wells may be on the order of half a BCF per well, that that
7 results in 100 BCF of remaining reserves in the field, and
8 we've just looked at our acreage portion of the field.

9 Q. And are these reserves reserves that otherwise
10 would not be recovered?

11 A. I think that's correct. I think that that would
12 be our incentive in doing that, would be if we feel like
13 there's reserves that will not be recovered by these --

14 Q. And this program, therefore, would present waste
15 to that magnitude?

16 A. That's correct.

17 Q. Will correlative rights also be protected if this
18 Application is granted?

19 A. Yes.

20 Q. Were Exhibits 24 through 28 prepared by you?

21 A. Yes, sir.

22 MR. CARR: Mr. Catanach, at this time we move the
23 admission of Yates Exhibits 24 through 28.

24 EXAMINER CATANACH: Exhibits 24 through 28 will
25 be admitted as evidence.

1 MR. CARR: That concludes my direct examination
2 of Mr. Stallings.

3 EXAMINATION

4 BY EXAMINER CATANACH:

5 Q. Mr. Stallings, the geologist has testified
6 there's really not much geologic difference in the field,
7 and yet you emphasize the need to expand into a broader
8 area. Can you explain that reasoning?

9 A. My reasoning for that is, there may not be a
10 difference in the depositional environment or the other
11 geologic features as you spread across the field. There
12 certainly is a difference in the producing characteristics
13 of the wells in general. There are sweet spots in the
14 field.

15 The single best part of the field is where the
16 original pilot took place, and I think that we've shown
17 that there is remaining gas in that area. I'm just not
18 sure that you'd ever believe me if I came back and told you
19 that there's remaining gas over the whole field, just
20 because there's remaining gas in the best part of the
21 field, based on production data.

22 Q. What kind of different producing characteristics
23 are you talking about?

24 A. Well, those are summarized, and it's -- That is a
25 very general statement, but it's based on cumulative

1 production of wells, and those are posted on the last two
2 maps that we looked at, actual ultimate recoveries of those
3 wells.

4 They vary widely, granted, from well to well even
5 in a given area. But when we look very closely at the
6 data, we find that a high concentration of very good wells
7 is in Township 6 South, 25 East, and the wells are more
8 mixed, as you get away from that in all directions, as far
9 as the economics, the ultimate recovery of those wells.

10 I guess it's also of concern to me that even in
11 the heart of the field, we had mixed success. I would
12 certainly hope that in the future for an infill program a
13 two-thirds success rate -- I don't know if that's
14 acceptable for a fieldwide program, if it's good.

15 The economics for these six wells in aggregate
16 are marginally attractive, when you throw in the two
17 uneconomic wells.

18 I think that before we and other operators will
19 be encouraged to do a significant amount of infill
20 drilling, we'd need to be able to show better success and
21 better overall economics than we could show you as a result
22 of these six wells.

23 Q. Do you have a number as to what kind of unique
24 reserves you would drill a well to recover?

25 A. Yes, a rule of thumb we use is, the minimum

1 reserves, and therefore the minimum unique reserves,
2 required to make a well economic is about 400 million cubic
3 feet.

4 Our target for infill wells, our management has
5 said that the minimum target that we want to drill for is
6 500 million cubic feet. So that will provide us a
7 profitable well, with 400 million being the minimum
8 economic well we could drill. And I guess that's obviously
9 based on current gas prices.

10 Q. Why 20 additional wells, when you originally only
11 asked for six?

12 A. Twenty is not a magic number. I don't know that
13 20 is better than 25. We just feel that we need some
14 additional wells over a broader area of the field. Twenty
15 is a number that our management was willing to spend money
16 on. We're willing to spend the \$6 million to gather the
17 data from these wells.

18 Q. The area that you've got on Exhibit Number 27 or
19 28, what portion of the whole field does that area
20 represent?

21 A. I wished I had a map of the field limits to tell
22 you. I can tell you in rough terms that the south -- the
23 field extends south roughly to Range 28 -- no, Township 8,
24 excuse me. It goes as far north as Township 4. Township
25 25 is roughly the western edge of the field, and Township

1 26 is roughly the eastern edge of the field.

2 So we've shown the east and west limits, but
3 we've not shown the north and south limits on this map. Is
4 that a fair a general statement? I think that's --

5 MS. MCKIEVER: Twenty-four and 27.

6 THE WITNESS: Twenty-four and 27.

7 Q. (By Examiner Catanach) Is there a reason why
8 you're not expanding this pilot into other areas of the
9 pool besides -- I mean to even get a broader --

10 A. Yeah --

11 Q. -- what might --

12 A. The reason, quite frankly, is because we just --
13 we didn't do the work and evaluate those areas.

14 There are a thousand wells out here, and the
15 detail work that we've done, we felt like this was a
16 representative area for a pilot, and we're saving the
17 fieldwide study. We felt like that time would be most
18 appropriately spent if the time comes when fieldwide rules
19 are adopted.

20 Q. What kind of additional engineering evidence do
21 you hope to gather to substantiate your -- or to support
22 your position?

23 A. More of the same. The pressure -- The initial
24 pressure and the production data, again, are the primary
25 engineering tools to evaluate depletion out here. So we'll

1 use a similar analysis technique to the one I've described.
2 Again, we just feel like we want it over a broader, more
3 representative area of the field.

4 EXAMINER CATANACH: I have nothing further, Mr.
5 Carr.

6 MR. CARR: Mr. Catanach, that concludes our
7 presentation in this case.

8 EXAMINER CATANACH: Okay. There being nothing
9 further in this case, Case 10,981 will be taken under
10 advisement.

11 (Thereupon, these proceedings were concluded at
12 11:25 a.m.)

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19 I do hereby certify that the foregoing is
20 a complete record of the proceedings in
the Examiner hearing of Case No. 10981,
21 heard by me on May 26 1994.
David R. Catanach, Examiner
22 Oil Conservation Division
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