| NEW MEXICO OIL CONSERVATION COMMISSION |
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EXAMINER HEARING

SANTA FE , NEW MEXICO

Hearing Date_____

MARCH 21, 1991 Time: 8:15 A.M.

REPRESENTING LOCATION H. Babe Beederth. glforo, TX Slow natural Sor Morman Gilbreath Caprock Energy aztec M.M. Gilbreath Energy Soretta Silbreath 7 Anta Fe Eaufbed and Hack, P.A Sillian & Edy Lobert Dempse/ F.ha M-dland Tx Joe Pleminons. Robert Martin ABQ-DEMa Colf Morri & Jon Dallas, Tx OIYX Energy Charles Gray Shelley have 11 Han BEERS 11 SF Byram Q. Maurice Trining MTA Oil Prod milland TV Store Salmon Consultant Have Spee Foun MM Santa Fe 1201 Cooter Roden Law Firm Warren Cursis NWP/WPC SCC Darrell Gillen SLC NWP/WPC.

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REPRESENTING NAME LOCATION DAN CURRENS Amoco Provoction Con PANY Hausson JIM COLLIER Mike Cubay Denver 10 Hawken 1 mil Farmington Tommy Roberts Jangy Low From Montgomen attudness PATSatate Perry Reans Sinch) Cela MARATHON OIL COMPANY MOLAND, TX Ames Buce Hintele Law Pirm Albuquerque falle Brokf Albusun BLM 11 arleve Salazar BLM Robert Kent DENVER, Co MARALEX RESOURCES A.M. O'HARE Robert L. Baylen, Producer Kevin Mª Cord formington F. Chang OCB - Oztu Rossell Stevens Oil Carp Pitcher Margler Resources

1 STATE OF NEW MEXICO 2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT 3 OIL CONSERVATION DIVISION 4 IN THE MATTER OF THE HEARING 5 CALLED BY THE OIL CONSERVATION) DIVISION FOR THE PURPOSE OF) 6 CONSIDERING: CASE NO. 10264) 7 APPLICATION OF ROBERT L. BAYLESS) FOR DESIGNATION OF A TIGHT) 8 FORMATION, RIO ARRIBA COUNTY,) MEXICO) 9 10 **REPORTER'S TRANSCRIPT OF PROCEEDINGS** 11 EXAMINER HEARING 12 BEFORE: MICHAEL E. STOGNER, Hearing Examiner 13 March 21, 1991 14 8:15 a.m. Santa Fe, New Mexico 1516 This matter came on for hearing before the Oil Conservation Division on March 21, 1991, at 8:15 a.m. 17 at Oil Conservation Division Conference Room, State Land 18 Office Building, 310 Old Santa Fe Trail, Santa Fe, New 19 20 Mexico, before Paula Wegeforth, Certified Court Reporter No. 264, for the State of New Mexico. 21 22 23 24 FOR: OIL CONSERVATION BY: PAULA WEGEFORTH DIVISION Certified Court Reporter 25 CSR No. 264

| | | 2 |
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| 1 | INDEX | |
| 2 | March 21, 1991 Examiner Hearing | |
| 3 4 | CASE NO. 10264 APPEARANCES APPLICANT'S WITNESS | PAGE 3 |
| 5 6 | KEVIN H. McCORD Direct Examination by Mr. Roberts Examination by Examiner Stogner | 6 23 |
| 7 | RECESS | 23 |
| 8 | REPORTER'S CERTIFICATE | 32 |
| 9 | EXHIBITS | |
| 10 | APPLICANT'S EXHIBIT | ADMTD |
| 11 | 1 through 14 | 23 |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
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(505) 982-9770

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1 2 APPEARANCES 3 FOR THE DIVISION: ROBERT G. STOVALL, ESQ. 4 General Counsel Oil Conservation Commission 5 State Land Office Building 310 Old Santa Fe Trail 6 Santa Fe, New Mexico 87501 7 FOR THE APPLICANT: TANSEY, ROSEBROUGH, GERDING 8 & STROTHER Attorneys at Law 9 BY: TOMMY ROBERTS, ESQ. 621 West Arrington 10 Farmington, New Mexico 87401 11 FOR AMOCO PRODUCTION BILL HAWKINS, ESQ. 12 COMPANY: Attorney at Law Denver, Colorado 13 AND CAMPBELL & BLACK, P.A. 14 Attorneys at Law BY: WILLIAM F. CARR, ESQ. 15 Santa Fe, New Mexico 87501 16 FOR MALLON OIL COMPANY TANSEY, ROSEBROUGH, GERDING 17 AND SCHALK DEVELOPMENT & STROTHER COMPANY: Attorneys at Law 18 BY: TOMMY ROBERTS, ESQ. Farmington, New Mexico 87401 19 20 FOR EL PASO NATURAL H.L. KENDRICK GAS COMPANY: Conservation Engineer 21 El Paso, Texas 79978 22 23 × * × 24 25

4 1 EXAMINER STOGNER: Call the hearing to order. Today's 2 date is March 21, 1991. I'm Michael E. Stogner, the 3 hearing officer for today's cases. At this time we'll call the first case, 4 5 No. 10264. MR. STOVALL: Application of Robert L. Bayless for 6 7 designation of a tight formation, Rio Arriba County, 8 New Mexico. 9 EXAMINER STOGNER: Call for appearances. 10 MR. ROBERTS: Mr. Examiner, my name is Tommy Roberts. 11 I'm with the law firm of Tansey, Rosebrough, Gerding & 12 Strother in Farmington, New Mexico, and I'm appearing on 13 behalf of the applicant, Robert L. Bayless. I have one 14 witness to be sworn. EXAMINER STOGNER: Any other appearances? 15 MR. HAWKINS: I'm Bill Hawkins with Amoco Production 16 17 Company from Denver. Amoco has no witnesses for this case. 18 We are a working-interest owner in part of the acreage to be included in this application. We'd like to be a party 19 of record. 20 We'd also like a copy of the order and the 21 22 exhibits that are presented in the case. 23 MR. CARR: May it please the examiner, we'd like the record to reflect that Campbell & Black has filed its 24 appearance in this case for Amoco. 25

MR. ROBERTS: Mr. Examiner, Tommy Roberts with the 1 2 Tansey law firm of Farmington, New Mexico. I'm also 3 appearing on behalf of Mallon Oil Company and Schalk Development Company. We have no witnesses to be sworn for 4 5 those parties in interest; however, they would like me to 6 read a statement into the record. 7 EXAMINER STOGNER: Are there any other appearances? MR. BUCKINGHAM: Point of order. We have four people, 8 9 and I see there's no place to sit. Can we stand in the 10 hall and you put in a loudspeaker or something? 11 EXAMINER STOGNER: Is there anybody in here that's not 12 interested in this case that maybe can afford some seats 13 for these gentlemen? 14 For the record, Mr. Buckingham, would you 15 identify yourself? 16 MR. BUCKINGHAM: L.L. Buckingham, Bureau of Land 17 Management, Albuquerque District Office, and there's three 18 more coming. 19 MR. KENDRICK: H.L. Kendrick with El Paso Natural Gas 20 Company. No witnesses. 21 EXAMINER STOGNER: Let's go off the record for this 22 time. 23 (Discussion off the record.) 24 EXAMINER STOGNER: Mr. Roberts, you may proceed. 25 * * * * *

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| 1 | KEVIN H Macopp |
| 2 T | the Witness honoin use evenined and testified as follows. |
| 2 | DIDECT EVANIANTIAN |
| 3 | DIRECT EXAMINATION |
| 4 | BY MR. ROBERTS: |
| 5 | Q. Would you state your name and place of residence |
| 6 | for the record, please? |
| 7 | λ. My name is Kevin McCord, and I reside in |
| 8 | Farmington, New Mexico. |
| 9 | Q. What is your occupation? |
| 10 | A. I'm a petroleum engineer. I'm a consultant. |
| 11 | Q. How long have you been in that profession? |
| 12 | A. I've been a consultant for ten years. I've been |
| 13 | a petroleum engineer for 14 years. |
| 14 | Q. What is your professional relationship to the |
| 15 | applicant in this case? |
| 16 | A. I oversee a considerable portion of Robert L. |
| 17 | Bayless' operations. |
| 18 | Q. Have you testified before the New Mexico Oil |
| 19 | Conservation Division on any previous occasion? |
| 20 | A. I have. |
| 21 | Q. In what capacity? |
| 22 | A. As a petroleum engineer. |
| 23 | Q. Have your qualifications been accepted as a |
| 24 | matter of record? |
| 25 | A. They have. |

Are you familiar with the operations of the 1 Q. 2 applicant in this case in the area of interest? Yes, I am. 3 Α. 4 Q. Have you made a study of pertinent data for 5 purposes of providing testimony in this case? Yes, I have. 6 Α. 7 Q. Have you been involved in other 8 tight-gas-formation applications before? 9 Α. I have. 10 MR. STOVALL: Mr. Roberts, let's take care of one 11 little technicality. I don't think we got the witness 12 sworn on this case. 13 MR. ROBERTS: That's right. 14(At this time the witness was duly sworn.) 15 Q. (By Mr. Roberts) Could you describe your 16 involvement in those previous tight-gas applications? 17 Α. I believe I did a total of seven or eight 18 different applications in the San Juan Basin with various 19 formations for various operators. 20 And during what period of time? Q. 1980 to 1983. 21 Α. MR. ROBERTS: Mr. Examiner, I would tender Mr. McCord 22 23 as an expert in the field of petroleum engineering. EXAMINER STOGNER: Mr. McCord is so qualified. 24 25 Q. (By Mr. Roberts) Mr. McCord, would you briefly

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1 describe the purpose of this application?

2 Α. Robert L. Bayless is applying for portions of 3 the East Blanco, Choza Mesa and Gobernador Pictured Cliffs 4 gas pools to be designated as a tight formation under 5 Section 107 of the Natural Gas Policy Act of 1978. The 6 proposed Cabresto tight gas area is located in the northeastern portion of the San Juan Basin. 7 The area is 8 located in Rio Arriba County, approximately 45 miles northeast of the town of Bloomfield in northwestern 9 10 New Mexico.

The Pictured Cliffs formation in the Cabresto 11 12area meets the criteria established in Section 107 of the 13 Natural Gas Policy Act of 1978 to be designated as a tight 14 gas formation in that the estimated average in situ gas 15 permeability throughout the pay section is expected to be 16 0.10 millidarcy or less. The stabilized gas production 17 rates, without stimulation, at atmospheric pressure of 18 these gas wells are not expected to exceed the maximum 19 allowable production rate of 105 MCF of gas per day for an average depth of 3,715 to the top of the Pictured Cliffs 20 formation in this area, and no well drilled into the 21 22 Pictured Cliffs formation in this area is expected to 23 produce more than five barrels of crude oil per day prior to stimulation. 24

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Q. Would you briefly describe or summarize the

ownership interests of Robert L. Bayless in the proposed 1 2 Cabresto tight gas area? 3 Α. Robert L. Bayless has a substantial leasehold operating rights position in this proposed tight gas area. 4 5 He also operates over 30 wells in the area. Refer to what's been marked as Exhibit No. 1 and 6 0. 7 identify that exhibit and explain its significance to this 8 case. 9 Α. Exhibit No. 1 displays the proposed Cabresto 10 tight gas area on a map showing the Pictured Cliffs 11 formation wells in the San Juan Basin. The Cabresto tight 12 gas area includes approximately 193,090 acres described as 13 follows: 14 In Township 29 north, 2 west -- all sections; 15 Township 29 north, 3 west -- all sections; 16 Township 29 north, 4 west -- all sections' 17 Township 30 north, 2 west -- all sections; Township 30 north, 3 west -- all sections; 18 19 Township 30 north, 4 west -- Sections 1 and 2, 11 through 14, 23 through 26 and 35 and 36; 20 21 Township 31 north, Range 2 west -- Sections 2 22 through 36; 23 Township 31 north, 3 west -- all sections: 24 Township 32 north, 2 west -- Sections 7 through 25 10, 15 through 22 and 27 through 35;

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and Township 32 north, Range 3 west -- all 1 2 sections. 3 And that total is 193,090 acres. 4 Q. Refer to what's been marked as Exhibit No. 2 and 5 identify that exhibit. EXAMINER STOGNER: Excuse me; before we leave 6 7 Mr. McCord's Exhibit No. 1, there's a line designated in the upper left-hand corner and the lower left-hand corner 8 as the Pictured Cliffs outcrop. There is also an unmarked 9 10 line on the far eastern side of this map. 11 Is that also the outcrop? 12 THE WITNESS: That's correct. 13 EXAMINER STOGNER: Okay. And there's also well 14 designations in there, and those are the present wells in 15 the Pictured Cliffs? 16 THE WITNESS: That's correct. EXAMINER STOGNER: Just some preliminary things I 17 18 needed to cover. 19 No problem. THE WITNESS: 20 EXAMINER STOGNER: Thank you, sir. 21 (By Mr. Roberts) Redirect your attention to 0. 22 Exhibit No. 2. 23 Α. Exhibit No. 2 is a Pictured Cliffs formation 24 completion and production map of the proposed Cabresto 25 tight gas area. Shown on this map are all the wells that

1 penetrated the Pictured Cliffs formation in this area. The 2 production figures presented for each Pictured Cliffs 3 producing well are date of initial potential, initial gas 4 potential in MCF per day, the current production capability 5 of the Pictured Cliffs well in MCF per day and cumulative 6 production for the well in MCF as of November 1st, 1990. 7 If the Pictured Cliffs well produced any oil or condensate, 8 this production data is presented also.

9 Exhibit No. 2 also presents completion and
10 production data from some Pictured Cliffs wells surrounding
11 the proposed tight gas area.

12 Q. Now I direct your attention to what's been
13 marked as Exhibit No. 3, and identify that exhibit; explain
14 its significance to this application.

15 Α. Exhibit No. 3 is a list of well name, operator and production data for Pictured Cliffs wells within the 16 17 Cabresto tight gas area. The Cabresto tight gas area 18 contains 124 wells which have penetrated and evaluated the 19 Pictured Cliffs formation. At this time 53 wells are 20 capable of production, producing from the Pictured Cliffs 21 formation. The average depth to the top of the Pictured 22 Cliffs formation in this area is 3,715 feet.

Q. Mr. McCord, would you describe the geology found
in the proposed Cabresto tight gas area?

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A. The Pictured Cliffs sandstone is a marine,

1 clay-filled, fine-grain sandstone. This sandstone was 2 deposited as a beach, and as near shore, generally aligned northwest-southeast with a source generally to the 3 southwest. These deposits represent the last marine strata 4 5 in the northeasterly regression of the Cretaceous sea. 6 There are two main zones within the Pictured 7 Cliffs sandstone. Each zone represents a regressive 8 sequence separated by a marine tongue of Lewis shale which 9 represents a transgression. Production of gas in the Cabresto tight gas area is from stratigraphic entrapment. 10 11 Sample examination indicates that the Pictured 12 Cliffs formation in this area consists of very fine to 13 fine-grained, fairly well-sorted, subrounded to subangular, slightly calcareous, salt-and-pepper sandstone. 14 The dark 15 grains are predominantly glauconite, mica and carbonaceous 16 shale. Interbeds of the Lewis shale are present in the 17 lower part of each main zone but become fewer and thinner 18 upward.

Microscopic examination of the Pictured Cliffs formation reveals that the sandstone grains are coated with mixed layer illite-smectite authigenic clay. These clay coatings are pervasive throughout the vertical extent of the Pictured Cliffs. The clay coatings of the sandstone grains reduce the effective permeability of the sand in this area.

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Q. Now direct your attention to what's been marked as Exhibit No. 4 and identify that exhibit.

A. Exhibit No. 4 is a type log of the Pictured
Cliffs formation in the Cabresto tight gas area. This well
is the Robert L. Bayless Jicarilla 464 No. 4 well located
in the northwest-southeast of Section 31, Township 30
north, 3 west, in Rio Arriba County, New Mexico.

8 This type log is representative of potential pay 9 in both the upper and lower zones of the Pictured Cliffs 10 formation. The lower zone of the Pictured Cliffs is 11 blanket-like in the southwest portion of Cabresto tight gas 12 area but thins and pinches out a few miles northeast of the 13 Jicarilla 464 No. 4 well. In contrast, the upper zone of 14 the Pictured Cliffs is much more lenticular in nature.

Q. Now refer to what's been marked as
Exhibit No. 5. Identify that exhibit and explain its
significance to this case.

Exhibit No. 5 is a cross section A-A' 18 Α. 19 illustrating Pictured Cliffs sandstone development across 20 the Cabresto tight gas area. The datum for this cross section is the top of the Pictured Cliffs formation. 21 The cross section shows that the Pictured Cliffs sandstone is a 22 23 continuous lithologic unit throughout the Cabresto tight 24 gas area.

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MR. ROBERTS: Mr. Examiner, would it be helpful to put

1 those on the wall?

2 EXAMINER STOGNER: I know we should have done that 3 before, but let's continue on. MR. ROBERTS: 4 Okay. 5 (By Mr. Roberts) Mr. McCord, direct your 0. 6 attention to what's been marked as Exhibit No. 6 and 7 identify that exhibit. 8 Α. Exhibit No. 6 presents a natural, unstimulated 9 production test taken on the Robert L. Bayless Jicarilla 10 31-3-32 No. 1 well located in the northwest-southwest of 11 Section 32, Township 30 north, Range 3 west -- excuse me; 12 that is 31 north, 3 west -- in Rio Arriba County,

13 New Mexico.

14 The average unstimulated net -- excuse me. 15 Obtaining stabilized unstimulated gas production rates for 16 Pictured Cliffs wells is not a standard procedure used by 17 operators when completing their wells in the San Juan 18 Basin. Past experience has shown that these 19 low-permeability Pictured Cliffs wells must be stimulated 20 to obtain commercial production. However, in preparation 21 for this tight gas area study, Robert L. Bayless performed 22 a natural gas production test on this well before it was fracture stimulated. 23

The average unstimulated natural gas production rate for this well is 22 MCF of gas per day. This rate is

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considered representative for the Cabresto tight gas area and is well below the 105 MCF of gas per day allotted for tight-formation gas wells having an average depth of 3,715 feet.

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5 It should be noted that this production test was 6 taken after stimulation of the formation with acid. Acid 7 was used to insure that the perforations in this well were 8 open. Therefore, true, unstimulated natural gas production 9 within its strict definition would be less than this 10 recorded gas flow rate.

11 Not all of the natural production tests taken from this area were used to calculate the representative, 12 unstimulated, natural production rate for the Cabresto 13 14 tight gas area. John E. Schalk conducted natural 15 production tests on the Schalk 29-4 No. 6 and the Schalk 29-4 No. 10 wells in 1981 and 1982, respectively. These 16 17 wells are located in the southwest-southwest of Section 25 and the southwest-southwest of Section 23 of Township 29 18 19 north, Range 4 west, Rio Arriba County, New Mexico.

Although both of these wells made some gas naturally, it was such a small amount that it was too small to measure. Rather than average in these two zero values, the value of 22 MCF of gas per day from the Bayless well was used as the most representative, natural, unstimulated production rate for the Cabresto tight gas area. Q. Mr. McCord, does the production history of wells located in the proposed Cabresto tight gas area indicate significant oil production?

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No, it doesn't. The natural gas produced from 4 Α. 5 the Pictured Cliffs formation in this area is virtually dry There has been very little oil or condensate recorded 6 gas. 7 for the wells that have produced in this area. Some of the 8 wells will have small amounts of oil or condensate 9 production with the gas, but significant oil production is 10 not common.

Examination of the production data supplied in Exhibit No. 3 support these statements. These dry gas production figures indicate a well drilled in the Pictured Cliffs formation in the Cabresto tight gas area is not expected to produce, without stimulation, more than five barrels of crude oil per day.

Q. What can you say regarding the natural
permeability of the Pictured Cliffs formation in the
San Juan Basin in general and more specifically in the
Cabresto tight gas area?

A. The Pictured Cliffs formation in the San Juan
Basin is dependent on stimulation techniques to be
commercially productive due to the low permeability of the
reservoir rock. Exhibits No. 7 through 10 present core
analysis data used to determine the average laboratory

permeability to air for the Pictured Cliffs formation in the Cabresto tight gas area.

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The exhibits contain the actual core analysis 3 4 reports plus selective analysis of the cores taken from 5 only the productive portion of the Pictured Cliffs formation for each well. The cored intervals chosen for 6 7 permeability averaging were determined by examination of 8 the individual core analysis reports for each well. Only 9 cored intervals of sand which had greater than 10 percent 10 porosity from the core analysis were used for permeability 11 averaging.

12 The average permeability value determined for 13 each well in Exhibits No. 7 through 10 are average 14 laboratory-determined permeability values. The actual in 15 situ permeability of the formation is less than this 16 laboratory-determined value due to water saturation and net 17 confining pressures found in the Pictured Cliffs reservoir.

18 Exhibit No. 11 is a summary of all the
19 laboratory core analysis results for the Cabresto tight gas
20 area. The average laboratory permeability to air obtained
21 for the Cabresto tight gas area from the four wells is 0.66
22 millidarcy.

Q. Refer to what you have marked as Exhibit Nos. 12
and 13 and identify those exhibits and describe their
contents.

1 Α. Exhibit No. 12 presents a technical paper 2 entitled "Effect of Overburden Pressure and Water 3 Saturation on Gas Permeability of Tight Sandstone Cores" written by Thomas and Ward of the U.S. Bureau of Mines. 4 5 This paper presents relationships between 6 laboratory-determined permeability in cores and actual in 7 situ permeability found in reservoirs. 8 Exhibit No. 13 explains how in situ permeability 9 is calculated from the core analysis using the technical paper presented. 10 11 An average in situ permeability value of 0.035 12 millidarcy was calculated from the average laboratory 13 permeability value of 0.66 millidarcy for the Cabresto 14 tight gas area. This 0.035 millidarcy permeability value 15 calculated from core data is well below the 0.10 millidarcy 16 cutoff for tight gas reservoirs. 17 Q. Refer to Exhibit No. 14 and identify that 18 exhibit. 19 Exhibit No. 14 is another method of determining A. 20 reservoir permeability which was performed as a check, 21 making use of the representative unstimulated natural 22 production tests taken in the area. The average 23 unstimulated gas flow rate of 20 MCF of gas per day along 24 with other Pictured Cliffs reservoir data for the Cabresto 25 tight gas area was used to calculate a reservoir

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permeability using Darcy's Law. The use of Darcy's Law calculates an average reservoir permeability value of 0.017 millidarcy for the Cabresto tight gas area.

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This permeability value compares to the 0.035 millidarcy permeability value determined by core analysis methods. These two methods produced fairly similar permeability values, both of which are well below the 0.10 millidarcy tight gas limitation.

9 From examination of the two sources of 10 permeability data, the reservoir permeability data value of 11 0.035 millidarcy determined by core analysis methods is 12 thought to be the best estimate of reservoir permeability 13 for the Cabresto tight gas area because it uses actual core 14 data from the Pictured Cliffs formation. Therefore, the 15 estimated average in situ gas permeability throughout the 16 Pictured Cliffs formation pay section is expected to be 17 0.10 millidarcy or less in this area.

Q. Mr. McCord, in your opinion, will the
development of the Pictured Cliffs formation in the
proposed Cabresto tight gas area adversely affect or impair
any fresh water acquifers in the area?

A. It will not. Existing state and federal
regulations will assure that the development of the
Pictured Cliffs formation will not adversely affect or
impair any fresh water aquifers that are being used or are

expected to be used in the future for domestic or agricultural water supplies.

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Regulations require that casing programs be designed to seal off potential water-bearing formations from oil-and-gas-producing formations. These fresh water zones exist from the surface of the ground to the base of the Ojo Alamo formation.

8 Most Pictured Cliffs wells drilled in the 9 Cabresto tight gas area are drilled with natural mud that 10 will not contaminate fresh water zones. A normal casing 11 design consists of eight-and-five-eighths-inch O.D. 12 surface casing being set from the surface to a depth of 150 13 to 250 feet. The production casing normally used is 14 four-and-a-half-inch or five-and-a-half-inch O.D. and is 15 set from surface to total depth.

16 The surface casing is cemented in place by 17 circulating cement to the surface, protecting the near 18 surface formations from down hole contamination. The 19 production casing is cemented from total depth to the 20 surface or to a depth sufficient to cover the Ojo Alamo 21 formation in the older wells. The newer wells are required 22 to circulate cement to the surface. This process protects 23 the Pictured Cliffs and other hydrocarbon-bearing 24 formations from contaminating any fresh water aquifers. 25 Therefore, productive and fresh water zones are protected

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1 by both casing and cement.

Stimulation of the Pictured Cliffs formation involves varied fracture treatments, depending on the operator. Fracture treatments usually consist of a one or two percent potassium chloride water-base fluid with sand, or a nitrogen-water foam-base fluid in sand. Either treatment will not harm a fresh water aquifer.

8 Fresh water protection is assured during these 9 fracture stimulation treatments due to zone isolation 10 caused by cementation. A distance of well over 500 feet 11 between the Pictured Cliffs formation and the closest fresh 12 water aquifer in the well bore is additional insurance that 13 an existing fresh water zone will not be contaminated by 14 stimulation of Pictured Cliffs wells in this wear.

Therefore, New Mexico and federal regulations
will protect fresh water aquifers from the drilling,
completing and producing of the Pictured Cliffs in this
area.

Q. What conclusions do you draw from the
information that's contained in the exhibits you have
prepared in this case?

A. Evidence presented in this case substantiates
the following for the Cabresto tight gas area proposed by
Robert L. Bayless:

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Number one, for an average Pictured Cliffs well

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depth of 3,715 feet, the stabilized production rate at 1 atmospheric pressure of wells completed in the Pictured 2 3 Cliffs formation, without stimulation, is not expected to 4 exceed the maximum allowable rate of 105 MCF of gas per 5 day. Two, no well drilled into the Pictured Cliffs 6 7 formation in the Cabresto area is expected to produce, 8 without stimulation, more than five barrels of crude oil 9 per day. 10 And three, the estimated average in situ gas 11 permeability throughout the Pictured Cliffs pay section is 12 expected to be 0.10 millidarcy or less. 13 The proposed Cabresto tight gas area meets all 14 the specifications required as stated and should be 15 designated a tight formation in the Pictured Cliffs 16 formation under Section 107 of the Natural Gas Policy Act 17 of 1978. 18 0. Is the Pictured Cliffs formation in the proposed 19 Cabresto tight gas area authorized to be developed by 20 in-field drilling? 21 Α. It is not. 22 Mr. McCord, in your opinion, will the granting Q. 23 of this application be in the best interests of 24 conservation and result in the prevention of waste and the 25 protection of correlative rights?

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It will. 1 A. 2 Were Exhibits No. 1 through 14 either prepared Q. by you or at your direction and under your supervision? 3 4 A. They were. MR. ROBERTS: Mr. Examiner, I would move the admission 5 6 of Exhibits No. 1 through 14. 7 EXAMINER STOGNER: Exhibits 1 through 14 will be 8 admitted into evidence at this time. 9 (Whereupon Exhibits 1 through 14 were admitted into 10 evidence.) 11 MR. ROBERTS: I have no other questions for this 12 witness on direct. 13 EXAMINER STOGNER: Let's take a five-minute recess. 14 (At 8:45 a.m. a recess was taken.) 15 EXAMINATION 16 BY EXAMINER STOGNER: 17 Q. Mr. McCord, in looking at particular Township 30 18 north, Range 3 west, which is on the west side of the 19 Jicarilla Apache Indian Reservation -- I'll let you get 20 that open. 21 Α. Yes, sir. 22 Especially that line -- the line of wells in the Q. 23 two sections bordering the western boundary of the 24 Jicarilla Apache Reservation, the current production 25 capability is somewhat high, in particular over the 105 MCF

1 cutoff. Are these wells indeed stimulated? 2 Yes, they are. Every -- I don't know if I want Α. 3 to say "every well." I know every well in 30 and 3 --4 because I'm very intimate with those -- was fracture 5 stimulated. 6 And in what method or manner? Could you be a 0. 7 little more specific on that? 8 Α. Sure. Each one had a water-foam stimulation 9 job, approximately 100,000 pounds of sand, I believe it was about 50,000 gallons of foam fluid, pumped at 30 barrels a 10 minute. I believe. 11 12 0. So we can make the record a little bit more clear, Mr. McCord, in particular the ones that I have here 13 14 have 251 average production. That appears to be in 15 Section 19. 16 Α. Yes, sir. 17 0. And then the one above it, 171. 18 Uh-huh. A. 19 Then I go further down, in Section 29, 164, and Q. 20 then I go up to Section 7; there's 250. Could you please 21 provide me with some well records showing the stimulation on those wells? 22 23 Α. I'd be happy to. 24 0. The more the better. 25 Α. Okay.

HUNNICUTT REPORTING

0. Also, while we're on that same subject, down in 1 2 Section 32, 29 north, 4 west, there's one that's producing 218 MCF a day. You'll provide me that information, too, on 3 that stimulation program? 4 5 A. Okay. 29, 4, Section 32, southeast, correct? 6 0. Yes. 7 Α. 218. Okay. And just so I get everything right, 8 30 and 3, Section 7, the No. 8 well, which is 250; the 9 Section 19, the number 4 well, 251. 10 Q. Correct. 11 Α. Section ---12 Q. How about the one in Section 30, the No. 1? 13 Α. Section 30, No. 1 well, 262. Is that all? 14 Those four wells? 15 Q. Let's go with the one in Section 29, the No. 7. 164. Okay. 16 Α. 17 Q. And how about Section 20, No. 2? 18 Α. Okay. 19 Q. And looking at your core data -- or your data in 20 particular, could you be a little more specific on your 21 correlation between the porosity and permeability in the 22 Pictured Cliffs formation in this area, and in particular 23 why do you use a ten percent cutoff on your porosity? 24 Α. Generally speaking, once again from my 25 knowledge, my intimate knowledge, of the wells we've

HUNNICUTT REPORTING

completed in 30 north and 3 west, that's our -- that
porosity cutoff is what we use on the logs to indicate
which zones to perforate and not to. In many cases, as is
consistent with coring, you want to core the Pictured
Cliffs interval, you get an awful lot of Pictured Cliffs
interval which you would not normally perforate.

7 Therefore, I use the criteria we normally use to 8 be classified a productive well to give myself a good 9 knowledge of whether -- rather than just averaging the 10 whole thing, which would make the numbers considerably 11 lower, I'm using productive -- I'm confident that those 12 would be productive portions of the Pictured Cliffs 13 interval due to our porosity cutoffs.

Does that answer your question?
Q. Are there any times where you perforate a zone
that has less than ten percent?

17 A. Yes, it's possible. But, generally speaking,
18 ten percent is our cutoff.

There have been specific cases in wells where -let's just say it's a lesser well -- that we'll reach a little bit and use a lesser porosity cutoff to see if we can get some gas out of the zone. Generally speaking, those are probably poorer wells.

Q. Is it accurate to say or assume that thepermeability will naturally go down when the porosity goes

1 down in this area?

2

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A. Generally speaking, yes.

3 Q. You were a little bit hesitant. How about some 4 of the exceptions?

5 A. Well, you've always seen exceptions to that 6 correlation. It's certainly not a straight-line 7 correlation at all with porosity and permeability. It 8 depends on different areas.

9 We've used porosity as a cutoff or as a productive cutoff because porosity is easy to look at the 10 11 logs. Permeability is very difficult. As I stated before, 12 natural production tests calculating permeability or 13 getting the core data to even get to permeability is all 14 expensive, and you know you have to fracture stimulate the 15 well anyway, so it's not commonly done. So it's very 16 difficult to get permeability information, but porosity you 17 can get.

And generally speaking, if you get a lot of high porosity, you tend to get a better well. It's not always the case. But I think, as a general correlation, I feel comfortable saying that the higher the porosity, the better the permeability, and lower porosity, lower permeability. Q. Are these phenomena where this doesn't occur, is it widespread? Are we looking at stringers? Or do they

appear -- what might be the geological phenomenon that

1 would cause this?

| 2 | A. Oh, I would think the the probably the |
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| 3 | thing that comes to mind, if you have a let's just say |
| 4 | you have a very good producer, but your logs indicate you |
| 5 | have poor porosity. The good producer would indicate that |
| 6 | you have better permeability. That could be either |
| 7 | established through the frac job, establishing better |
| 8 | permeability. It may be opening your fracture into a |
| 9 | better zone than the logs indicate, or possibly just |
| 10 | indicate into some natural fracturing, which is certainly |
| 11 | always possible; very, very difficult to predict. |
| 12 | There are cases one in particular, the No. 8 |
| 13 | well you talked about I happen to know it pretty well. |
| 14 | The logs don't look very good on that well, and it's been a |
| 15 | very good producer. |
| 16 | Q. Which one is No. 8? |
| 17 | A. In Section 7 of 30 and 3. |
| 18 | We were quite disappointed with the logs, and |
| 19 | it's turned out to be a pretty decent producer, so that's |
| 20 | one of those phenomena where you think you've done |
| 21 | something through your fracture stimulation where you've |
| 22 | enhanced your reservoir more than the logs would indicate. |
| 23 | EXAMINER STOGNER: Are there any other questions of |
| 24 | this witness? |
| 25 | Mr. McCord, do you have anything further? |
| | |

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1 THE WITNESS: I believe that's it. 2 MR. ROBERTS: We have nothing further. 3 EXAMINER STOGNER: Would anybody like to make any statements at this time? 4 5 MR. ROBERTS: Mr. Examiner, I have two statements to 6 read into the record, if I may. 7 EXAMINER STOGNER: Please. MR. ROBERTS: This is a letter addressed to the 8 9 attention of Mr. William LeMay, director of State of 10 New Mexico Energy and Minerals Department, referencing Case 11 No. 10264, application of Robert L. Bayless for designation 12 of the Cabresto area of the Pictured Cliffs formation as a 13 tight formation.

14 "Gentlemen: We have reviewed in detail the
15 Application of Robert L. Bayless for designation of the
16 Cabresto Area of the Pictured Cliffs Formation in Rio
17 Arriba County, New Mexico, as a tight formation.

18 "As an operator with a number of wells in the
19 area we are very familiar with the Cabresto Pictured Cliffs
20 formation. Based on that experience we are in full support
21 of the referenced Bayless Application.

22 "Thank you for your consideration.
23 Yours very truly, Schalk Development Company,
24 John E. Schalk, Operator."

Signed by Steve Schalk, agent.

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1 The next statement is in the form of a letter, 2 dated March 19th, 1991, addressed to the attention of 3 Mr. William LeMay, State of New Mexico, Energy and Minerals 4 Department, referencing Case No. 10264, application of 5 Robert L. Bayless for designation of the Cabresto area of the Pictured Cliffs formation as a tight formation, Rio 6 7 Arriba County, New Mexico. 8 "Gentlemen: Mallon Oil Company has reviewed the 9 above referenced Application of Robert L. Bayless and fully 10 supports the designation of this area for classification as a tight sand area. 11 12 Mallon Oil Company has a significant acreage 13 position in the proposed area with interests in 29 Pictured 14 Cliffs wells. Engineering and geologic data reviewed in 15 detail by Mallon indicates that in this area the Pictured 16 Cliffs Formation meets the criteria established in 17 Section 107 of the NGPA of 1978 for designation as a tight 18 sand. 19 "Again, Mallon fully supports this Application. 20 "Sincerely, Mallon Oil Company, Kevin M. 21 Fitzgerald, President." 22 EXAMINER STOGNER: Is that all you have, Mr. Roberts? 23 MR. ROBERTS: Yes. 24 EXAMINER STOGNER: Mr. Roberts, I might add, any 25 additional information that you'll be providing to me

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today, would you also send a copy of that to the U.S. 1 2 Bureau of Land Management in Albuquerque in care of 3 Mr. L.L. Buckingham? MR. ROBERTS: Yes. 4 EXAMINER STOGNER: Does anybody else have anything 5 6 further in this case at this time? 7 If not, then this case will be taken under 8 advisement. 9 10 (The foregoing hearing was concluded at the 11 approximate hour of 9:05 a.m.) 12 * * X 13 14 15 I do hereby certify that the forceping is 16 a complete record of this increasings in e Examiner het il. 17 1016 leard by me 1991 18 uh. , Examiner 19 Oil Conservation Division 20 21 22 23 24 25

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| 1 2 | STATE OF NEW MEXICO) |
| 3 |) ss. COUNTY OF SANTA FE) |
| 4 | |
| 5 | REPORTER'S CERTIFICATE |
| 6 | |
| 7 | |
| 8 | I, PAULA WEGEFORTH, a Certified Court Reporter and |
| 9 | Notary Public, DO HEREBY CERTIFY that I stenographically |
| 10 | reported these proceedings before the Oil Conservation |
| 11 | Division; and that the foregoing is a true, complete and |
| 12 | accurate transcript of the proceedings of said hearing as |
| 13 | appears from my stenographic notes so taken and transcribed |
| 14 | under my personal supervision. |
| 15 | I FURTHER CERTIFY that I am not related to nor |
| 16 | employed by any of the parties hereto, and have no interest |
| 17 | in the outcome hereof. |
| 18 | DATED at Santa Fe, New Mexico, this 26th day of March, |
| 19 | 1991. |
| 20 | |
| 21 | Duly woodlast |
| 22 | PAULA WEGEFORT |
| 23 | My Commission Expires:Certified Court ReporterApril 25, 1993CSR No. 264, Notary Public |
| 24 | |
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