

INDEX MICHAEL R. HERRINGTON Direct Examination by Mr. Carr -4 Cross Examination by Mr. Stamets EXHIBITS UT Exhibit One, Plat UT Exhibit Two, Map UT Exhibit Three, Schematic UT Exhibit Four, Decline Curves UT Exhibit Five, Decline Curves UT Exhibit Six, Wellbore Sketch UT Exhibit Seven, Cross Section UT Exhibit Eight, Cross Section UT Exhibit Nine, Gas/oil Ratios UT Exhibit Ten, Production Records UT Exhibit Eleven, Lab Report 

1 3 2 MR. STAMETS: We'll call next 3 Case 8184. 4 MR. PEARCE: That case is on 5 the application of Union Texas Petroleum Corporation for 6 downhole commingling, Rio Arriba County, New Mexico. 7 MR. CARR: May it please the 8 Examiner, my name is William F. Carr with the law firm Camp-9 bell, Byrd and Black, P. A., of Santa Fe, appearing on be-10 half of Union Texas Petroleum Corporation. would request at this We time 11 that you also call Case 8185 and consolidate them for the 12 purposes of testimony. 13 MR. STAMETS: Okay, let's call 14 that and we will consolidate those cases. 15 MR. PEARCE: That case is also 16 on the application of Union Texas Petroleum Corporation for 17 downhole commingling, Rio Arriba County, New Mexico. 18 MR. CARR: Mr. Stamets. our witness will be Michael R. Herrington and I would request 19 that the record show that he has been sworn and remains un-20 der oath and that his qualifications as an expert witness in 21 petroleum engineering have been accepted. 22 MR. STAMETS: The record will 23 so show. 24 25

1 4 2 MICHAEL R. HERRINGTON, being called as a witness and having been previously sworn 3 upon his oath, testified as follows, to-wit: 4 5 DIRECT EXAMINATION 6 BY MR. CARR: 7 Mr. Herrington, are you familiar with the 0 8 application filed in this case? 9 Α Yes, I am. 10 Are you familiar with the wells that are 0 the subject of this application? 11 Yes, sir, I am. Α 12 Would you briefly state what Union Texas 0 13 Petroleum Corporation seeks to accomplish with this applica-14 tion? 15 A Yes. By this application Union Texas Pe-16 troleum Corporation is requesting an order from the New Mex-17 ico Oil Conservation Division to give us approval to com-18 mingle the Gallup and Dakota production in our proposed Jicarilla G No. 1-E, located in Unit E of Section 1, Township 19 26 North, Range 5 West, and our proposed Jicarilla G Well 20 No. 8-E, located in Unit I of Section 2, Township 26 North, 21 Range 5 West. Both wells are located in Rio Arriba County, 22 New Mexico. 23 Q Have you prepared or has there been pre-24 pared under your direction and supervision certain exhibits 25 for introduction in this case?

1 £. 2 Α Yes. Would you refer to what has been marked 0 3 identification as Union Texas Petroleum Corporation Exfor 4 hibit Number One, identify this exhibit and review it for 5 Mr. Stamets? 6 Exhibit Number One is a plat Α showing 7 Petroleum Corporation operated acreage in the Union Texas 8 subject area. 9 The proposed Jicarilla G Wells 1-E and 8-E are identified by the dark green dots in Sections 1 and  $2_{\mu}$ 10 Township 26 North, Range 5 West. 11 The plat further shows existing com-12 mingles already approved in the area. Mesaverde-Dakota com-13 mingles are indicated in red and Gallup-Dakota commingles 14 are shown in green. 15 Two geologic cross sections, A-A' and B-16 B', are identified on this plat by the broken lines and will 17 be discussed in later testimony. 18 What pools do you propose to downhole 0 commingle in this area? 19 A Referring to Exhibit Number Two, we can 20 see that the existing -- the existing pools in relation to 21 the subject wells. We propose to commingle the Undesignated 22 Callup, B. S. Mesa Gallup Extension, the Basin Dakota Pool 23 in both the G 1-E or excuse me, the Jicarilla G 1-E is lo-24 cated in the extension area of the B. S. Mesa Gallup Pool, 25 as shown on that exhibit.

1 6 the ownership common in each of the Q Is 2 zones to be downhole commingled? 3 the Gallup and Dakota have common А Yes, 4 ownership in the proposed commingled wells. 5 Will you now refer to your Exhibit Number 0 6 Three and review this for the Examiner? 7 Yes. Exhibit Three is a wellbore schema-A 8 tic of Amoco's Jicarilla Apache 102 Well No. 10 in which 9 Gallup and Dakota are successfully commingled and produced up the tubing using the Dakota gas for lifting energy. 10 The No. 10 Well is located in Unit M of 11 Section 9, Township 26 North, Range 4 West. 12 This well was completed by perforating 13 the selected pay zones, breaking each zone down with acid 14 and isolating the two zones while fracing with sand and gel-15 led water during the completion operations. 16 Would you now refer to your Exhibits Four 0 17 and Five and review these? 18 Exhibits Number Four and Five show typi-A cal decline curves for the Gallup and Dakota in commingled 19 wells located near the proposed Jicarilla G Wells NO. 1-E20 and 8-E. 21 In Exhibit Number Four Amoco's Jicarilla 22 Apache 102 No. 10 is shown on the top curve and Consoli-23 dated's Hoyt No. 1 is shown on the bottom. 24 In Exhibit Five our Jicarilla H No. 7 is 25 the top curve and Amoco's Jicarilla 102 14-E shown on ís

1 7 shown on the bottom curve. Gallup production is shown 2 on the left and Dakota production on the right of each of these 3 exhibits. 4 We can see that both zones remain coa-5 stant or increased in production after commingling. 6 Will you now review Exhibit Six? 0 7 Α Exhibit Six shows the proposed downhole 8 commingling of the Gallup and Dakota in the Jicarilla G 9 Wells No. 1-E and 8-E. 10 0 All right, Mr. Herrington, would you refer now to your cross sections, Exhibits Seven and Eight, 11 and review these for Mr. Stamets? 12 Α Yes. These geologic cross sections are 13 constructed using electric logs in the area of the applica-14 tion. 15 These two cross sections demonstrate the 16 continuity of the producing intervals from the area of ao-17 plication to areas where commingling of these reservoirs has 18 been permitted. 19 we can see the Gallup and Dakota producing intervals occur and correlate throughout this area. 20 Q Will you now refer to Exhibit Nine and 21 explain that? 22 Exhibit Nine shows typical gas/oil ratios A 23 in the subject area. It can be seen that the Gallup and Da-24 kota have similar pressure gradients and nearly identical 25 pressures when compared at a common datum.

1 8 Q Have you prepared a compilation of bottom 2 hole pressure data for each zone to be commingled in this 3 area? 4 A Yes. Again referring to Exhibit Nine, we 5 believe that the bottom hole pressures for the Gallup and 6 Dakota presented are consistent with data presented in off-7 setting wells for commingling. 8 0 What does this exhibit show as far as the 9 pressures and the differential pressures that you expect 10 will be experienced across the perforatons in each of these zones? 11 A This exhibit shows a very small differ-12 ence in pressure gradient in the subject zones and nearly 13 identical bottom hole pressures when corrected to a common 14 datum. 15 Q \_ Will these pressure differentials result 16 in the migration of gas between zones? 17 Α No. The bottom hole producing pressure 18 should be below any of the individual reservoir pressures, which will not allow cross flow to occur. 19 Aqain, if the well is shut in some cross 20 flow may occur as pressure stabilizes in the wellbore, but 21 involved would be recovered when the well is reany qas 22 turned to production. 23 Are both the zones to be commingled 0 in 24 the subject wells capable of only marginal production? 25 А No; however the Dakota proration unit of

1 9 2 the Jicarilla G No. 1 Well is classified as marginal and the proration unit of the Jicarilla G No. 8 Well is underpro-3 duced by 12 months under its present -- under its current 4 nonmarginal status and allocation. 5 Exhibit Number Ten shows production re-6 cords for wells in the vicinity of the subject wells and in-7 dicates average daily rates of 67.7 Mcf and 4/10ths of 8 barrel of oil per day for the Gallup; 106.7 Mcf per day and 9 6/10ths of a barrel of oil per day for the Dakota. 10 Are the zones flowing or being artifi-0 cially lifted? 11 zones both tend to These flow and iŕ Α 12 there were any problem removing produced liquids from the 13 wellbore, plunger lifting or pumping would be easily affect-14 ed in the commingled well. 15 Have you taken production data and calcu-0 16 lated an average rate of production from each zone? 17 In Exhibit Ten we show the average А Yes. 18 daily rates for the Gallup and Dakota production in the vicinity of the proposed commingled wells. 19 Are you prepared to make a recommendation Q 20 to the Examiner today as to the allocation of production to 21 each of the commingled zones? 22 Again referring to Exhibit Ten, we А Yes. 23 approximate allocation split, but there again show an ī 24 would recommend that the District Supervisor be consulted 25 that an allocation be drawn up after drilling and testand

2 ing of each of the two wells.

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3 Q Would you describe the characteristics
4 and make a comparison of the compatibilities of the fluids produced from each zone?

6 A Exhibit Number Eleven is a recent laboratory analysis of oil samples from the wells in the area.

7 It can be seen from the analyst's remarks 8 that no detrimental effects are expected in commingling of 9 the oils and in Exhibit Number Nine we can see that the BTU 10 content of the gases is also very similar and no detrimental 11 effects have been observed in the offsetting wells that have 12 been commingled.

13 Q Are the reservoir characteristics of these pools such that underground waste will not be caused 14 by the proposed downhole comingling?

A Because of the marginal nature of the Dakota and the Gallup in this area, the proposed commingling
will result in additional recovery of hydrocarbons.

18 Q In your opinion will granting this appli-19 cation result in the increased recovery of hydrocarbons?

20 A Yes, most definitely. First, the re21 serves which would be left undeveloped otherwise can be pro21 duced, and second, based upon the offsetting wells in which
22 commingling has been approved, increases in production rate
23 have been observed upon commingling.

24 Q Will the value of the commingled produc25 tion exceed the sum of the values of the production from

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1 1 each of the individual zones? 2 Α Yes, it should. 3 C Will economic savings result from the 4 proposed downhole commingling? 5 Yes. A 6 Û. In your opinion will granting this appli-7 cation be in the best interest of conservation, the preven-8 tion of waste, and the protection of correlative rights? 9 Yes, it will. Α 10 MR. CARR: At this time, Mr. Stamets, we would offer into evidence Union Texas Petroleum 11 Corporation Exhibits One through Eleven. 12 MR. STAMETS: These exhibits 13 will be admitted. 14 MR. CARR: I have nothing fur-15 ther on direct of this witness. 16 MR. STAMETS: Questions of the 17 witness? 18 CROSS EXAMINATION 19 BY MR. STAMETS: 20 I presume you're still aware that if you Q 21 get six times overproduced you have to shut the wells in? 22 А Yes, sir. We'll be running 5-1/2 inch 23 in these wells and if that becomes a significant casing 24 problem we'll still have the option of doing a conventional 25 slim hole dual in the area.

MR. STAMETS: Any other questions? The witness may be excused. Anything further in these cases? MR. CARR: Nothing further, Mr. Stamets. They will be MR. STAMETS: taken under advisement and if there is nothing further, the hearing is adjourned. (Hearing concluded.) 

CFRTIFICATE SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY that I, foregoing Transcript of Hearing before 0i1 the the Conservation Division was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability. I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner meaning of Case No. ( heard by the on Uni Examiner **Öll Conservation Division**