1 STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT 2 OIL CONSERVATION DIVISION STATE LAND OFFICE BLDG. SANTA FE, NEW MEXICO 3 11 July 1984 4 EXAMINER HEARING 5 . 6 7 IN THE MATTER OF 8 Application of Shell Western E & P, CASE 9 Inc. for infill findings, unortho-dox locations, and directional drilling, Lea County, New Mexico. 8262 8263 10 (8264) 11 12 BEFORE: Richard L. Stamets, Examiner 13 14 TRANSCRIPT OF HEARING 15 16 17 APPEARANCES 18 19 For the Oil Conservation 20 Division: 21 22 Michael Fredette For the Applicant: Attorney at Law 23 Shell Oil Company E&P Western U.S. 24 i P. O. Box 576 Houston, Texas 77001 25

INDEX STATEMENT BY MR. FREDETTE T. J. VAN AKKEREN Direct Examination by Mr. Fredette W. R. LANCASTER Direct Examination by Mr. Predette Cross Examination by Mr. Stamets T. J. VAN AKKEREN Direct Examination by Mr. Fredette

1 A 2 We'll call next MR. STAMETS: 3 Case 8262, being an application of Shell Western E&P, Inc. 4 for infill drilling -- infill findings, Lea County, New 5 Mexico. 6 FREDETTE: Examiner, MR. Mr. 7 we'd like to consolidate for hearing purposes this case and 8 Docket Numbers 8263 and 64. 9 MR. STAMETS: All right, let me 10 call those other cases and if I hear no objection, they will be consolidated. 11 8263 application of is the 12 Shell Western E&P, Inc. for unorthodox locations, Lea 13 County, New Mexico. 14 And the last case, application 15 of Shell Western E&P, Inc. for directional drilling and un-16 orthodox locations, Lea County, New Mexico. 17 **PREDETTE:** My name is Mike MR. 18 Fredette and I'm appearing today in association with the Montgomery Law -- Montgomery and Andrews Law Firm here in 19 Santa Fe. 20 I'm appearing on behalf of 21 Shell Western E&P, Inc. a subsidiary of Shell Oil Company 22 and the applicant in this case. 23 I'll try to be brief but I'd 24 like to make an introductory statement. 25 The Oil Conservation Commission

1 5 by its Order No. R-6198, dated November 19th, '79 approved 2 statutory unitization of the North Hobbs Grayburg-San Andres 3 Unit Area, consisting of a portion of the Hobbs Grayburg-San 4 Andres Pool, located in Lea County, New Mexico. 5 By its Order No. R-6199, also 6 dated November, 1979 the Commission authorized the institu-7 tion of the North Hobbs Grayburg-San Andres Unit Pressure 8 Maintenance Project in the unit area. 9 Shell Western, as operator, proposes to drill as infill wells 38 unit wells. The infill 10 wells and the proposed locations are described in the appli-11 cation of Shell Western and will be further identified in 12 today's hearing. 13 Each of the wells will be dril-14 led in an existing proration unit and each will be drilled 15 at an unorthodox location. 16 Three of the wells will be 17 directionally drilled. 18 Shell Western requests three forms of relief in this hearing. We request a finding that 19 each of the wells is necessary to effectively and efficient-20 ly drain a portion of the pool underlying the existing pro-21 ration unit to which it will be drilled. 22 We request approval of the un-23 orthodox locations and permission to directionally drill the 24 wells. 25 I might add for the of sake

1 6 2 clarity that these 38 wells are part of a 48-well infill 3 Five of the 48 wells have been drilled as proprogram. Five additional injectors will be drilled in the 4 ducers. future and their permitting will be attempted administra-5 tively, and the 38 wells which are the subject of today's 6 hearing will be drilled as producers. 7 We will have two witnesses, Mr. 8 Van Akkeren and Mr. Lancaster. 9 Mr. Van Akkeren will describe 10 the pool and its characteristics, the unit, its performance, 11 and the locations of the proposed infill wells. 12 Mr. Lancaster will describe the development of the unit, the necessity for infill drilling, 13 and the additional recovery which will result from the pro-14 gram. 15 Pollowing Mr. Lancaster's tes-16 timony, we will recall Mr. Van Akkeren who will then de-17 scribe the necessity for directionally drilling the three 18 wells and the manner in which these wells will be drilled. 19 We would like to have our wit-20 nesses sworn at this time. MR. STAMETS: Okay. Lest I 21 forget to suggest at the end, it could be useful if you wish 22 to prepare some draft orders on at least the infill find-23 ings. If you'd like to do some draft orders on all three of 24 these things it could be finished up. 25 MR. FREDETTE: Oh, in that case

1 7 2 I'd be only too happy --3 MR. STAMETS: All right, very good. 4 MR. FREDETTE: -- to try doing 5 that. 6 MR. STAMETS: Let's have both 7 witnesses stand and be sworn at this time, please. 8 9 (Witnesses sworn.) 10 11 MR. FREDETTE: I'd like to add that we will introduce approximately six exhibits which are 12 plats of the North Hobbs Unit. You will notice and probably 13 wonder why the exhibits vary in size. There's no particular 14 reason for this other than our drafting department decided 15 not to follow our instructions. 16 17 T. J. VAN AKKEREN, 18 being called as a witness and being duly sworn upon his 19 oath, testified as follows, to-wit: 20 DIRECT EXAMINATION 21 BY MR. FREDETTE: 22 Mr. Van Akkeren, please state your name Q 23 and business address for the record. 24 My name is Tom Van Akkeren. My business λ 25 address is 200 North Dairy Ashford, Houston, Texas.

1 8 2 By whom are you employed and in what cap-0 3 acity? I'm employed by Shell Western E&P, Incor-A 4 porated as a Senior Production Engineer. 5 Have you previously testified before the 0 6 **Oil Conservation Division?** 7 No. A 8 Would you briefly describe, then, your 0 9 educational background and work experience for the record? 10 I attended the University of Wisconsin A 11 from 1965 to 1970; graduated with a BS degree in mining and metallurgical engineering; started working with Shell Oil 12 Company the same year; been employed in various positions in 13 engineering and operation surveillance of fields of West 14 Texas, New Mexico, and Michigan. 15 In April of 1983 I became involved with 16 the Shell operated North Hobbs Grayburg-San Andres Unit and 17 in October of 1983 I was selected as the team leader of a 18 group of engineers that was organized to optimize the 19 development of the North Hobbs Grayburg-San Andres Unit, and I presently serve in that capacity. 20 FREDETTE: MR. Van Are Mr. 21 Akkeren's qualifications acceptable? 22 MR. STAMETS: Yes. 23 MR. FREDETTE: Okay. 24 Have you prepared exhibits for today's Q 25 testimony?

1 9 2 Yes, I have. A 3 Would you please describe the location of Q 4 the Hobbs Grayburg-San Andres Pool and in that regard I direct your attention to what's been marked as Shell Western's 5 Exhibit Number One and ask you to identify and briefly de-6 scribe the exhibit. 7 Exhibit Number One is an exhibit to de-8 pict the geographical and geological location of the Hobbs 9 Field. 10 It's located in Lea County in southwest 11 -- southeast New Mexico, and it's on the northern edge of 12 the Central Basin Platform near the San Simon Channel. At this point I'll ask you to describe 13 0 the characteristics of the pool and in that regard I direct 14 your attention first to what's been marked as Shell Western 15 Exhibit Number Two and ask you to identify the exhibit. 16 Exhibit Number Two is a structure λ Okay. 17 map of the Hobbs Grayburg-San Andres Field contoured on the 18 top of the San Andres interval. The structure is a north-19 west/southeast trending anticline nearly eight miles long 20 and approximately three and a half miles wide, with nearly 21 400 feet of closure above the original oil/water contact at -614 feet. 22 The pool is developed by the Shell West-23 ern North Hobbs Unit, the Amoco-operated South Hobbs Gray-24 burg-San Andres Unit, by two Moranco leases to the north and 25 by a Conoco and a Getty lease in the southern portion of the

1 10 2 field. The North and South Hobbs Units and the 3 Moranco leases are currently undergoing water injection to 4 improve recovery. 5 0 I now direct your attention to what's 6 been marked for identification as Shell Western's Exhibit 7 Number Three and ask you to identify that exhibit. 8 Exhibit Number Three is a type log of the Ά 9 San Andres pay, using a gamma ray sonic log from the Amoco 10 State "G" 5 Well, located in the southeast guarter of the northwest quarter of Section 33, Township 18 South, Range 38 11 East, Lea County, New Mexico. 12 This exhibit depicts development of the 13 San Andres pay. I'd like you to notice that the Upper San 14 Andres is erosional, which affected the development of the 15 upper portion of this pay interval. 16 The lower part of Zone 1 is very 17 permeable and known to be cavernous in places. The Zone 1 18 interval is connected to an active aquifer and is under 19 strong natural water drive. Separating Zone 1 from Zone 2 is a thin 20 shaley barrier that is an effective permeability barrier 21 over most of the field. 22 The Zone 2 porosity is also very well 23 developed, especially in the crest of the field. At the 24 base of the Zone 2 is a 10 to 20 foot interval that the old 25 drillers called Sandy Break, a sandy dolomite that acts as a

1 11 2 very effective permeability barrier between Zones 2 and 3, and Zone 3 is subdivided into an upper and lower 3 zone, is generally characterized by thinner bedding. 4 Zones 2 and 3 were under solution drive 5 on primary depletion and are currently undergoing water in-6 jection for secondary recovery. 7 Mr. Van Akkeren, does the San Andres ex-Q 8 hibit good pay continuity? 9 It exhibits good continuity in a А gross 10 sense but there are some very rapid facies changes in both 11 horizontal and vertical direction that preclude making a definitive correlation between individual stringers between 12 wells. 13 We do feel that there are localized bar-14 riers to flow, as evidenced by production performance in 15 offsetting wells. 16 Does Exhibit Three depict the entire uni-Q 17 tized interval? 18 Α No. The unitized interval consists of 19 both the Grayburg and the San Andres zones. This exhibit not show the Grayburg pay which is better developed 20 does along the flanks of the field, but this area has insuffi-21 cient pay development to warrant infill drilling at this 22 The wells in our proposed infill program will be comtime. 23 pleted in the San Andres pay. 24 Q I direct your attention now to what's 25 marked for identification as Shell Western's Exhibit been

1 12 Number Four and ask you to identify this exhibit. 2 Exhibit Number Four А is a tabulation of 3 properties and fluid characteristics of the reservoir the 4 Hobbs Grayburg-San Andres Pool. 5 The exhibit shows the original reservoir 6 pressure, oil gravity and viscosity, the oil formation 7 volume factor at saturation, solution gas/oil ratio, region-8 al solution gas/oil ratio, and it shows the irreducable water 9 saturation to be 22 percent. The original gas/oil contact was 600 10 The original oil/water contact was 360 feet subsea. 614 11 feet subsea. 12 The second tabulation summarizes the 13 average porosity, permeability values for the various San 14 Andres zones, shows the original oil in place in millions of 15 barrels, net feet of pay in the productive area for each of 16 the San Andres zones. 17 Van Akkeren, would you describe the Q Mr. 18 North Hobbs Grayburg-San Andres Unit and in that regard I direct your attention to what's been marked for identifica-19 tion as Shell Western's Exhibit Number Five? 20 Exhibit Number Five is a current plat of A 21 the North Hobbs Grayburg-San Andres Unit, showing the sec-22 tion lines and mineral leases along with the existing pro-23 ducing and injection wells. 24 The unit covers approximately 10,650 ac-25 res and is currently developed by 264 wells, 190 producing

1 13 wells, 68 injectors, and 5 shut-in or temporarily abandoned 2 wells. 3 The producing wells are indicated by the 4 solid circles and the injection wells by the solid 5 triangles. 6 The unit wells are uniquely identified by 7 the number of the section in which they're located and a 8 three digit number that defines the well's location in the 9 section. The first two numbers in this three digit 10 number defines the proration unit by identifying the row and 11 tier in which the well is located. I direct your attention 12 to Section 27 on the right side of the exhbiit, that shows 13 how we have divided up the section into sixteen blocks that 14 coincide with the proration units. We just use a completely 15 numeric numbering system. 16 The well numbers are listed with the row 17 numbers first and then the tier number. And the third num-18 ber in the well number system identifies a priority in which the well was drilled in the proration unit with the -- with 19 the newest well having the highest number. 20 North Hobbs Grayburg-San Andres Unit 21 Area, or the unitization of North Hobbs Grayburg-San Andres 22 Unit Area and the institution of the North Hobbs Grayburg-23 San Andres Pressure Maintenance Project were approved by the 24 Oil Conservation Division in October or November, 1979, and 25 the unit became effective in February of 1980.

1 14 2 Q Mr. Van Akkeren, would you describe the performance of the unit? 3 In this regard I direct your attention to what has been marked for identification as Shell 4 Western's Exhibit Number Six and ask you to identify and 5 briefly describe the exhibit. 6 Exhibit Number Six depicts the A perfor-7 of the unit since it became effective in Pebruary of mance 8 1980. 9 The oil and produced water and injected 10 water volume are scaled on the left side of the scale in thousands of barrels per day. 11 The gas/oil ratio is scaled on the right-12 hand side of this -- our graph in thousands of cubic feet 13 per barrel. 14 As you can see, the oil production has 15 shown steady increase from initial rate of 6050 barrels of 16 pil a day to a rate of 11,071 barrels of oil a day in May of 17 this year. 18 injection started in September Water of 19 1980 and the water production has shown a rapid increase in the last two years. We feel that this is largely due to a 20 very aggressive program to open additional pay and install 21 larger lift to prepare the wells for flood response. 22 We do not feel that this additional water 23 production is due to significant water breakthrough. 24 Would you describe the proposed locations Q 25 of the 38 wells which are the subject of today's hearing and

1 15 2 in that regard I direct your attention to what's been marked for identification as Shell Western's Exhibit Number Seven 3 and ask you to identify this exhibit. 4 A Exhibit Number Seven is a plat of the 5 existing North Hobbs Grayburg-San Andres Unit wells as in-6 troduced in Exhibit Five and in addition it shows the sur-7 face and bottom hole locations for the proposed infill 8 wells, along with the proration units in which they'd be 9 drilled. 10 The new wells are identified with the red dots and the proration units are identified with the orange 11 -- the squares outlined in orange. 12 In addition there will be five injection 13 wells identified with the blue triangles for which we make 14 separate administrative application to drill these wells. 15 Van Akkeren, were Exhibits One 0 Mr. 16 through Seven prepared by you or under your supervision? 17 А Yes. 18 MR. FREDETTE: Mr. Examiner, 19 we'll ask at this time that Exhibits One through Seven be admitted into evidence. 20 MR. STAMETS: Exhibits One 21 through Seven are admitted. 22 MR. FREDETTE: I have no fur-23 questions on direct for Mr. Van Akkeren at this time ther 24 but he will be recalled after our subsequent witness. 25 MR. STAMETS: I have none for

1 16 him at this time, either, and I presume no one else does. 2 He may be excused at this time. 3 FREDETTE: MR. Our next 4 witness, Mr. Lancaster, as I explained earlier, will 5 describe the development of the unit, the necessity for the 6 unit drilling program, and the additional recovery which we 7 would expect from the program. 8 You might be able to follow his 9 discussion of the first three exhibits, Eight, Nine, and Ten, if you were to hold them side by side. 10 MR. STAMETS: Okay. 11 12 W. R. LANCASTER, 13 being called as a witness and being duly sworn upon his 14 oath, testified as follows, to-wit: 15 16 DIRECT EXAMINATION 17 BY MR. FREDETTE: Q Mr. Lancaster, would you state your name 18 and business address for the record? 19 My name is Bill Lancaster. I am employed A 20 by Shell Western E&P with the address at 200 North Dairy 21 Ashford, Houston, Texas. 22 Okay. You are employed by Shell Western 0 23 in what capacity? 24 A I am a Staff Reservoir Engineer. 25 0 And have you previously testified before

1 17 2 the Oil Conservation Division and had your qualifications as 3 a reservoir engineer accepted as a matter of record? Yes, I have. Α 4 MR. FREDETTE: Is Mr. Lancaster 5 accepted? 6 STAMETS: He is considered MR. 7 qualified. 8 Have you prepared exhibits for today's 0 9 hearing? 10 A Yes, I have. 11 0 I direct your attention first to what's been marked for identification as Shell Western's Exhibit 12 Number Eight and ask you to identify the exhibit briefly and 13 describe what it shows. 14 A Exhibit Eight is a plat of the North 15 Hobbs Grayburg-San Andres Unit in which we have highlighted 16 in green the producing wells and the proposed infill area 17 that existed at the time the unit was formed in Pebruary of 18 1980. 19 The shaded area around each well repre-20 sents approximately 20 acres of what we feel has been the area that was effectively drained during primary. 21 The areas that are in white are the areas 22 that are probably less effectively drained, although they've 23 been drained, they have not recovered all of the oil that's 24 been in that area. 25 The wells that are lighter colored, there

1 18 2 are ten of them, are wells that will subsequently be in 1980 3 and '81 converted to injectors. The other, the remaining green wells will remain as producers. 4 One of the reasons for illustrating or 5 showing this exhibit is to illustrate how wells, how the 6 cluster wells, or how the wells were clustered as a result 7 of the competitive drilling where wells were drilled 330 8 feet from the corner, and in fact that in drilling this way 9 they concentrate their recovery at a very small area, leav-10 ing large portions of the field relatively undrained. 11 Just for the sake of clarity, these 20-0 acre circles do not necessarily represent the drainage --12 No, no. They represent what we think is Α 13 the area that's well drained. 14 Okay. I direct your attention now Õ to 15 what has been marked for identification as Shell Western's 16 Exhibit Number Nine and ask you to identify that exhibit. 17 Exhibit Number Nine depicts the develop-A 18 ment of the North Hobbs Unit as it exists today, with the 19 exception that there are five infill wells that have been 20 drilled. Again the green circles are the producing 21 wells and the blue and red circles are the injection wells. 22 Included on this, the ten wells that were 23 converted are now blue wells. We have added twenty new 24 drilled wells at infill locations and we've added, well, in 25 1983 we developed a line agreement with the South Hobbs Unit

1 19 2 and there are fifteen wells, fifteen injection wells, along the South Hobbs Unit. Eleven wells were drilled; four wells 3 were converted. 4 The wells colored in red are operated by 5 South Hobbs Unit. The wells in blue are the North Hobbs 6 Unit. 7 These wells, the wells that we drilled in 8 the north were located in the -- in the areas that we 9 thought were poorly drained and to kind of confirm this, 10 three of the twenty wells were converted or were produced 11 for short periods of six to nine months to test the infill These three wells are marked in yellow on your potential. 12 chart, and from left to right, the furthermost west well on 13 The center well was 30-222, and the the left was 24-242. 14 well on the right or the easternmost well was 29-132. 15 NO. 24-242 tested primarily all water at 16 approximately 2-to-300 barrels a day. 17 The Wells 30-222 and 29-132 both flowed 18 initially and produced in excess of 200 barrels a day oil 19 throughout their period of testing, indicating that there was additional pay that had not been effectively drained by 20 existing wells, wells that had been producing since the 21 thirties. 22 The wells offsetting the injection wells Q 23 which were produced for a period of time, what was their 24 average? 25 They averaged ---Α

1 20 2 During that period? Q 3 -- during the same time, the wells off-A setting the infill wells that were tested averaged probably 4 less than 100 barrels a day. 5 And those offsetting wells had produced 0 6 for approximately since the 1930's? 7 А Yes. 8 All right. Again for the sake of clarity 0 9 and you may have stated it, the wells which are shaded 10 either in green, blue, yellow, or pink, these do not 11 represent all of the wells in the unit at this time, is that correct? 12 No, they don't. A 13 Simply the wells in the infill area? Q 14 That's right. They represent the wells A 15 that are in the area that was studied and is used as the --16 At this point I direct your Q Okay. 17 attention, then, to what's been marked for identification as 18 Shell Western's Exhibit Number Ten and ask you to identify 19 the exhibit and briefly describe what it shows. 20 Α Exhibit Ten is a plat of the North Hobbs Grayburg Unit showing the current development and the 21 proposed -- and the infill area as depicted in Exhibit Nine. 22 In addition we have included the 48 infill locations that 23 were selected using the criteria, number one, that they were 24 in the areas of relatively poor drainage, and that they had 25 at least 12 net porous feet of pay in Zones 2 and 3, San

1 21 2 Andres Zones 2 and 3. The next thickness was kind of a minimum 3 cutoff criteria used for the infill program. 4 Now five of these dots, as located in 5 black, were completed during late 1983, early 1984, to test 6 the pay development and productivity potential. They did 7 find the pay development as expected and the productivity 8 indicated in their early tests will be something on the or-9 der of 100 barrels a day each. 10 are currently going through We these wells and zone testing them so we don't have the completion 11 date, the completion data at this point. 12 Okay, there are also five wells indicated 13 These are the five recommended locations with orange dots. 14 for new injectors which will be handled administratively at 15 a later date. 16 The remaining 38 infill locations are the 17 recommended locations for the wells which are the subject of 18 today's hearing. 19 Lancaster, is it your opinion as 0 Mr. a reservoir engineer that each of the proposed 38 infill wells 20 at its recommended unorthodox location is necessary to ef-21 fectively and efficiently drain a portion of the North Hobbs 22 Grayburg-San Andres Pool underlying the existing proration 23 unit into which it will be be drilled that would not be 24 drained by another well within that unit? 25 A Yes. As a result of the competitive

1 22 2 drilling prior to unitization and the current injection pattern, a portion of the existing proration unit into which 3 each of the proposed 38 wells will be drilled is not being 4 effectively drained at this time. 5 The proposed infill wells will improve 6 pay continuity and sweep efficiency resulting in the re-7 covery of otherwise unrecoverably hydrocarbons. The neces-8 sity for improving continuity was evidenced by the better 9 than average performance in two of the three injection wells that were tested during 1980-81. 10 0 Would you describe then the improved 11 sweep efficiency which will result from the proposed infill 12 program, and in that regard I direct your attention to what 13 been marked for identification as Shell Western's Exhihas 14 bit Number Eleven and ask you to identify and briefly de-15 scribe the exhibit. 16 A Exhibit Eleven is a typical pattern in North Hobbs Unit and what it represents, we just ex-17 the tracted the wells that existed in Section 30. 18 Okay, this illustrates the four modified, 19 what we call 160-acre 5-spot patterns, where you have one 20 injector offset by four producers, the four producers being 21 clustered at the corner of the proration units with the in-22 jector at the center of the quarter section. 23 Now this pattern yields a producer to in-24 jection ratio of 4-to-1, which is rather unequal. We'd like 25 to have it be 2-to-1 or 1-to-1.

1 23 2 Okay, the shaded areas shown on this each 3 in between these 160-acre patterns consist of approximately 4 40 acres and represent the areas that we think will have poorer than average sweep efficiency. The poor sweep ef-5 ficiency or the lack of sweep is based on the fact that 6 there's no pressure sink in this area, there's no drainage 7 point in order to pull the water through it. 8 Consequently, to improve sweep efficiency 9 we propose to drill our infill wells in the middle of these 10 shaded areas as shown by the open circles and these lines 11 will be drilled along the quarter section and sections 12 lines, as indicated. 13 Mr. Lancaster, does Shell Western plan Q any further revisions in the injection pattern in the unit 14 as far as this infill program, and in this regard I direct 15 your attention to what has been marked for identification as 16 Shell Western Exhibit Number Twelve and ask you to identify 17 and briefly describe the exhibit. 18 Exhibit Twelve is a plat of the North A 19 Hobbs Unit where we have highlighted the location of the 20 five infill wells in blue. These five wells will be drilled 21 as injectors in 1984. We feel that in order to achieve an opti-22 mum sweep efficiency in this North Hobbs Unit, in the San 23 Andres, about half fo the 38 infill wells which are subject 24 to today's hearing will have to be converted to injectors in 25 about 1987, which will create a line drive flood pattern.

1 24 2 With such a pattern it's important that 3 the injectors be lined along rather than across any permeability trends and in order to ascertain if there is a per-4 meability trend and what effect it might have, we plan to 5 install a north/south and east/west pilot line drive in '84. 6 illustrated in Exhibit Twelve. As the 7 five infill injectors, along with existing injectors, form 8 the center, north/south and east/west, lines of this pilot. 9 Have you determined the incremental oil 0 10 recovery which will result from the proposed infill drilling 11 program and if so, please describe this incremental recovery and the basis for your opinion. In this regard I direct 12 your attention to what has been marked for identification as 13 Shell Western's Exhibit Number 13 and ask you to identify 14 and briefly describe the exhibit. 15 Exhibit Thirteen documents the published A 16 infill drilling experience of Amoco and Exxon in various 17 fields and Shell's estimate of additional recovery for 20-18 acre infill drilling the West Texas Wassam Field Denver 19 Unit. 20 The two most important factors that contribute to additional recovery by infill drilling are the 21 resulting increase in waterflood sweep efficiencies and im-22 proved zone continuity between wells. 23 Since each reservoir is unique, the 24 volumes of estimated additional recovery are generall made 25 using the data on hand, such as log, core data and per-

1 25 2 formance, and by analogy with similar reservoirs that have 3 already been infill drilled. For the North Hobbs Unit we have esti-4 mated that the unique or additional oil to be recovered by 5 the infill drilling, as indicated in Exhibit Thirteen, will 6 be 4 percent of the oil and gas in place in Zones Two and 7 Three in the 40-acre drainage area immediately around each 8 infill well. 9 This additional recovery averages 125,000 10 barrels and 80 MMCF per well, and for the 48 infill wells 11 the total is 6-million barrels of oil and 4-billion cubic feet of gas, or 1.7 percent of the oil in place in Zones Two 12 and Three in the North Hobbs Unit. 13 Now, as shown on Exhibit Thirteen, Amo~ 14 infill experience has been documented by Vance Drisco's 15 coll's paper entitled Infill Drilling, Concepts, Analysis, 16 and Field Results. In this paper he lists a range of re-17 coveries from 2 to 8 percent of the oil in place in the 40-18 acre tracts around infill wells and comes up with an average 19 or typical recovery of 4 percent. 20 Exxon's experience in infill drilling ís documented in their 1982 paper by Barbara George Styles and 21 Thompson entitled Infill Drilling to Increase Reserves, Ac-22 tual Experience in Nine Fields in Texas, Oklahoma, and Illi-23 nois. 24 this paper they estimate Exxon's In in-25 creased recovery as a result of infill drilling will range

1 26 2 from 5 to 8 percent of the oil in place for 40 acres. Shell, in requesting authority to in-3 crease their Wassam Field Denver Unit, estimated the addi-4 tional recovery would be 5 percent of the oil in place for 5 40 acres with 3 percent of this coming as a result of im-6 proved sweep and 2 percent as a result of improved continu-7 ity. 8 Although we believe the North Hobbs San 9 Andres has a better than average pay quality and is a good 10 candidate for infill drilling, we have discounted the recovery slightly because of the problems associated with a 11 natural influx into Zone 1, some of which has crossflowed 12 into the lower San Andres zones. As a result we have used 4 13 percent of the oil in place for 40 acres as the estimated 14 additional recovery per well. 15 Mr. Lancaster, you mentioned the Shell 0 16 operate Denver Unit. Is that -- produces from the San An-17 dres, is that correct? 18 That's right. Α 19 And that's in West Texas? Q A Yes. 20 Is the reservoir similar to the Hobbs Q 21 Grayburg-San Andres Pool? 22 Yes, it is. A 23 And you also mentioned the opinions Q ex-24 pressed in two papers regarding infill drilling. Were those 25 opinions based on studies of similar reservoirs similar to

1 27 2 the Hobbs Grayburg-San Andres Pool? In some of the fields it, well, 3 Δ some of the fields were San Andres fields. Many of them, in fact 4 most of them, were carbonates. 5 I direct your attention now to what has 6 been marked for identification as Shell Western's Exhibit 7 Number Fourteen and ask you to identify the exhibit and 8 briefly describe what it shows. 9 Fourteen is an example of the average inλ 10 well production function that was used in evaluating fill 11 the infill drilling potential. It represents an initial rate, this is for each well, an initial rate of 70 barrels a 12 day, which at the time of the evaluation was the averge 13 production for a San Andres well in the field. It shows an 14 increase in production over four and a half years to 100 15 barrels of oil per day as the wells and the field respond to 16 water injection. 17 It remains roughly flat for six and a 18 half years a sthe water cut increases but the pressure also 19 increases and then declines over a thirteen and a half year period as the water cut. 20 I direct your attention to what has been Q 21 marked for identification as Shell Western's Exhibit Number 22 Fifteen and ask you to identify the exhibit and briefly de-23 scribe what it shows. 24 Α Exhibit Fifteen is an example of what the 25 water -- of what the infill drilling will have -- what ef-

1 28 2 fect the infill drilling will have on the overall North 3 Hobbs Grayburg-San Andres Unit production, production function. 4 The lower line represents the anticipated 5 production function with no infill drilling. 6 The upper line represents the effect of 7 the -- of adding the infill wells to our production. 8 The sharp drop observed in 1987 repre-9 sents the conversion of about half of the 38 wells to injec-10 tors, as we create the line drive, line drive flood. 11 And finally, I direct your attention to Q what has been marked for identification as Shell Western's 12 Exhibit Number Sixteen and ask you to identify and briefly 13 describe this. 14 A It kind of reiterates and puts into per-15 spective what the 6-million barrels -- what the 6-million 16 barrels represents. 17 As shown here, the two axes are the mil-18 lions of barrels and percent of recovery of the oil in place 19 for Zones 2 and 3. 20 Under the primary production we will recover approximately 89.3-million barrels. 21 With the waterflood we would have, as it 22 existed, we would have recovered 48.6-million barrels for a 23 total of 137-million barrels, or 40 percent of the oil in 24 place. 25 The additional 6-million barrels that we

1 29 2 would recover from the infill drilling program will increase this to 143-million barrels or 41.7 percent of the oil in 3 place. 4 0 Mr. Lancaster, were Shell Western's Exhi-5 bits Eight through Sixteen prepared by you or under your su-6 pervision? 7 A Yes, they were. 8 MR. PREDETTE: Mr. Examiner, we 9 tender at this time Exhibits Eight through Sixteen. 10 These exhibits MR. STAMETS: will be admitted. 11 MR. FREDETTE: I have no fur-12 ther questions for Mr. Lancaster. 13 14 CROSS EXAMINATION 15 BY MR. STAMETS: 16 0 Mr. Lancaster, how many infill wells have 17 been drilled to this point? 18 Five. Well, we drilled 20 injectors. A They were, the 20 wells we drilled during 1980 and '81 were 19 all injectors. We tested three of them for a short period 20 of time and then converted them when we --21 So that would leave two other producing Q 22 wells that were drilled as infill wells, is that correct? 23 A No, no. Okay, we drilled -- we drilled 24 20 wells in 1980 and '81. We came back in '83 and '84 and 25 drilled 5 more.

1 30 2 Now, the 5 that we drilled, if we could go back and refer to --3 I'm a little confused so let me --Q 4 A Okay. 5 if I can ask this question cor-0 -- see 6 rectly. 7 You've drilled a number of infill wells. 8 Have those all been injection wells? 9 The five wells we drilled this last A No. 10 year are all producers. 11 They're all producers, okay, and what has Q your experience with those five infill wells? been You 12 talked about some of the injectors that you kept on produc-13 tion for a period of time. What about those? 14 The five wells that we drilled in late A 15 '83, early '84, we have been in the process of zone testing. 16 We've actually been coming up and testing 30, 40 foot inter-17 vals. 18 0 So at this point you don't have the evi-19 dence as to what those -- whether those produce more than you would expect a typical older well to produce or not. 20 They are probably producing about --A No. 21 well, we would expect when we put them on to produce about 22 the same as the other older wells, maybe with a lower water 23 cut, but oil-wise we haven't really put them on. What we've 24 done is test individual zones and individual zones would say 25 that we're going to make more than 100 barrels per day per

1 31 2 well. 3 The average well in the field makes 80. There's not as sharp a differential with these as perhaps 4 would seem to be. 5 Is there any reason why these, what was O 6 it, two injectors that you tested for some period of time 7 were somewhat better than the average infill well? 8 Yes. Again, if you refer to this Eleven, A 9 when -- when we drilled our -- the wells we're talking about 10 here were injectors that were drilled in the middle of these 11 areas and you have probably -- if you drew 20-acre circles around these corner wells, you have approximately, well, 12 maybe 90 acres out here, so you have a much larger drainage 13 area for what we observed in the first sequence of wells. 14 Now we're coming back and we're infill 15 drilling in between here and the undisturbed area is 16 smaller. 17 Pine. Thank you, I understand. 0 18 MR. STAMETS: Are there any 19 other questions of Mr. Lancaster? He may be excused. 20 MR. FREDETTE: I would like to recall Mr. Van Akkeren at this time. 21 22 T. J. VAN AKKEREN, 23 being recalled and being previously sworn upon his oath, 24 testified as follows, to-wit: 25

1 32 2 DIRECT EXAMINATION BY MR. FREDETTE: 3 Mr. Van Akkeren, Shell Western proposes O 4 to directionally drill three of the 38 infill wells, Wells 5 Nos. 28-242, 33-312, and 30-312. 6 describe the Please necessity for 7 directionally drilling the wells and in this regard I direct 8 your attention to what has been marked for identification as 9 Shell Western's Exhibit Number Seventeen. 10 Exhibit Number Seventeen λ Okay. is a 11 aerial photograph of the Hobbs area, or the recent Hobbs townsite, with the base map of the North Hobbs Grayburg-San 12 Andres Unit superimposed on it. 13 It also includes the proposed infill 14 wells that are the subject of this hearing. 15 of surface obstructions that Because 16 could not be avoided without seriously compromising our 17 proposed pattern, three of the wells, which are identified 18 by the red arrows, will have to be directionally drilled. 19 Two of these are located within the Hobbs Townsite. The upper arrow is Well No. 28-242. 20 The desired bottom hole location is in a developed subdivision 21 but there -- the desired bottom hole location is 1100 feet 22 from the south line and 2400 feet from the west line of Sec-23 tion 28, which I said before is within that developed subdi-24 vision. 25 An acceptable surface location is avail-

1 33 2 able to the west at a location 1163 feet from the south line 3 and 2014 feet from the west line of Section 28, and this approximately 391 feet away from the desired bottom hole loca-4 tion. 5 The desired botton hole location for 33~ 6 312, the arrow, the lower arrow on the right side, is 1330 7 feet from the east line and 10 feet from the north line of 8 This location is on Sanger Street in the City Section 33. 9 of Hobbs but there is an acceptable surface location in the 10 Gulf Pipeyard at a location 1830 feet from the east line and 11 110 feet from the north line of Section 33. This is 510 feet away from the desired location. 12 The third location. Well No. 30-312, is 13 indicated by the arrow in the middle of the unit area. This 14 is outside the city limits but there is a road, some houses 15 and powerlines located near the desired location, but there 16 is a surface drilling -- acceptable surface drilling site 17 available at 500 feet from the north line and 1448 feet from 18 the east line of Section 30. That would result in a 504 19 foot kick to the bottom hole location at 10 feet the north line and 1330 feet from the east line of Section 30. 20 FREDETTE: MR. Mr. Examiner, 21 our next three exhibits, Eighteen, Nineteen, and Twenty, are 22 drilling prognosis and proposed survey for each fo the wells 23 to be directionally drilled. 24 Now each of these wells will be 25 drilled in essentially the same manner. For the sake of

1 34 2 saving time, I believe it is easier if we describe in some 3 detail one of the wells and simply refer to any pertinent differences in the following two exhibits. 4 STAMETS: That sounds just MR. 5 fine. 6 Mr. Van Akkeren, I direct your attention 0 7 first to what has been marked for identification as Shell 8 Western's Exhibit Eighteen and ask you to identify it. 9 The Exhibit Number Eighteen is a drilling A 10 prognosis and a directional survey for the proposed Well 30-11 312. 12 The drilling prognosis shows the surface and proposed bottom hole locations, the estimated eleva-13 tions, the formation tops, and the proposed drilling and 14 casing program. 15 The well will be drilled to approximately 16 1520 feet, 20 feet into the Rustler anhydrite, and cased 17 with 8-5/8ths inch 24-pound casing, which will be cemented 18 to surface. 19 A 7-7/8ths inch bit will be used to drill 20 below the 8-5/8ths inch casing. As indicated on the directional survey, 21 the kickoff point for directional drilling will be at 1700 22 feet. The hole angle will be built at a rate of 1-1/2 de-23 grees per 100 feet until a maximum deviation of 12.46 de-24 grees is reached, approximately 2551 feet. 25 At that point a straight hole assembly

1 35 2 be run and to intersect a bottom hole target of a will 75-3 foot radius circle centered on the desired bottom hole location at a true vertical depth of 4350 feet, which is the 4 proposed TD of this well. 5 After reaching TD we plan to run 5-1/26 inch 14-pound casing which will be cemented to surface and 7 the cement job will be confirmed with a cement bond log. 8 I direct your attention to what has been 0 9 marked for identification as Shell Western's Exhibit Number 10 Nineteen and ask you to identify and briefly describe that 11 exhibit. Exhibit Number Nineteen is a drilling 12 λ prognosis and directional survey for Well No. 28-242, again 13 showing the surface and bottom hole locations, elevation, 14 formation depths, drilling program. 15 The basic change is that the maximum hole 16 angle will only be 9.28 degrees, which will be reached at 17 approximately 2332 feet, and again we will drill to a bottom 18 hole target of a 75-foot radius circle at 4350 feet true 19 vertical depth. And finally I refer you to what has been 20 0 marked for identification as Shell Western's Exhibit Number 21 Twenty and ask you to identify the exhibit and briefly de-22 scribe what it shows. 23 Exhibit Number Twenty is a drilling prog-A 24 nosis and directional survey for North Hobbs Unit Well No. 25 33-312 with similar information as shown on previous two ex-

1 36 2 hibits. The main difference in this well is 3 that the maximum hole angle will be 12.57 degrees, which will be 4 reached at approximately 2563 feet measured depth and then 5 the hole will be drilled with a straight hole assembly to a 6 bottom hole target of a 75-foot radius around the proposed 7 bottom hole depth, or bottom hole target. 8 Mr. Van Akkeren, were Shell Western's Ex-0 9 hibits Seventeen through Twenty prepared by you or under 10 your supervision? 11 A Yes. MR. FREDETTE: Mr. Examiner, we 12 tender Exhibits Seventeen through Twenty. 13 MR. STAMETS: The exhibits will 14 be admitted. 15 Are there any questions of the 16 witness? He may be excused. 17 Does anyone have anything fur-18 ther they wish to add in any of these cases? 19 The cases will be taken under advisement and the hearing will be adjourned. 20 21 (Hearing concluded.) 22 23 24 25

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3	CERTIFICATE
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5	I, SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY
6	that the foregoing Transcript of Hearing before the Oil Con-
7	servation Division was reported by me; that the said tran-
8	prepared by me to the best of my ability.
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