

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO

13 February 1985

EXAMINER HEARING

IN THE MATTER OF:

Application of Blanco Engineering, CASE
Inc., for salt water disposal, 8480
Eddy County, New Mexico.

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation Division:	Jeff Taylor Attorney at Law Legal Counsel to the Division State Land Office Bldg. Santa Fe, New Mexico 87501
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For the Applicant:	W. Thomas Kellahin Attorney at Law KELLAHIN & KELLAHIN P. O. Box 2265 Santa Fe, New Mexico 87501
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3 MR. STOGNER: We'll call next
4 Case Number 8480.

5 MR. TAYLOR: The application of
6 Blanco Engineering, Inc., for salt water disposal, Eddy
7 County, New Mexico.

8 MR. KELLAHIN: If the Examiner
9 please, I'm Tom Kellahin of Santa Fe, New Mexico, appearing
10 on behalf of the applicant and I have one witness to be
11 sworn.

12 MR. STOGNER: Are there any
13 other appearances in this matter?

14 If not, will the witness please
15 stand and be sworn?

16 (Witness sworn.)

17 MR. KELLAHIN: Mr. Examiner,
18 Blanco Engineering, Inc., seeks a salt water disposal well
19 in Eddy County.

20 This application represents our
21 effort to find an alternative wellbore. Mr. White of Blanco
22 Engineering in the last few months had applied for use of
23 the Flint Well in this area for salt water disposal. As a
24 result of that application, it was contested by Yates and
25 another examiner has entered an order that allowed Yates
Petroleum Corporation to test a well, the Flint Well, for

1 production, and in the event that that wellbore is not suit-
2 able for production it will be turned over to Mr. White for
3 use as a disposal well.

4 Because of the length of time
5 involved in that process and because the current method of
6 trucking the produced water from Mr. White's wells is an ex-
7 pense of about \$1000 a day, it's necessary for, and Mr.
8 White seeks approval of this LaRue Muncy well as a disposal
9 well, understanding that our first choice is the Flint well,
10 but we would seek approval of this well as an alternative.

11 PAUL G. WHITE,

12 being called as a witness and being duly sworn upon his
13 oath, testified as follows, to-wit:

14
15 DIRECT EXAMINATION

16 BY MR. KELLAHIN:

17 Q Mr. White, for the record would you
18 please state your name and occupation?

19 A My name is Paul G. White and I'm
20 President of Blanco Engineering, Incorporated.

21 Q Mr. White, are you a petroleum engineer,
22 sir?

23 A Yes, sir.

24 Q And have you previously testified before
25 the Oil Conservation Division?

A Yes, sir, I have.

1
2 Q And have you made a study of the facts
3 surrounding the use of the LaRue Muncy Well as a salt water
4 disposal well?

5 A Yes, sir.

6 MR. KELLAHIN: We tender Mr.
7 White as an expert petroleum engineer.

8 MR. STOGNER: Mr. White is so
9 qualified.

10 Q Mr. White, I think it might be helpful if
11 in the package of exhibits you'll turn to the area map
12 first, sir. You'll find that contained in the C-108 package
13 of information.

14 And if you'll help orient the Examiner as
15 to what -- to the location of the proposed disposal well and
16 to your producing wells in the area for which you need a
17 disposal well.

18 First of all, identify for us, sir, the
19 proposed salt water disposal well.

20 A The proposed salt water disposal well is
21 the C. E. LaRue and B. N. Muncy, Jr. Nix and Curtis No. 1 in
22 Unit E. It's located 1980 feet from the north line and 660
23 feet from the west line, Section 25, Township 18 South,
24 Range 26 East, Eddy County, New Mexico.

25 Q Mr. White, have you obtained the right to
use this wellbore for disposal purposes as requested in the
Wolfcamp formation?

A Yes, sir, we have.

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Q What is the status of the well now?

A The present status of the well now, it's temporarily abandoned.

The well was drilled and completed in July of 1959 as an Abo producer. It produced 8,258 barrels of oil up to May of 1975, and at that time was abandoned, temporarily.

Q Would you describe for the Examiner what the source is of the water that you propose to dispose of in this well?

A The water is produced in four wells that are completed in the Glorieta Yeso formation and all of these wells are in Section 25, Township 18 South, Range 26 East, Eddy County.

Q All right, sir, let's turn back to the front of the package of exhibits and have you identify for us first of all Exhibit Number One.

Exhibit Number One consists of three letters written to Mr. Stamets, Director of the Commission, the Oil Conservation Division, and these letters are from three of the offset operators in the area, one of which is the LaRue and Muncy people, and we also had telephone conversations with Yates petroleum and Ralph Nix, the other two offset operators, and they agreed that there would be no protest to the application.

Q All right, sir, let's turn now to what is marked as Exhibit Four, Five, and Six, and perhaps it might

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2 be convenient, Mr. White, to simply place all three of those
3 exhibits in front of you, and using those exhibits describe
4 for the Examiner what your first proposed alternative is for
5 the recompletion of this well for disposal.

6 A The first option, because of the expense
7 involved, would be to look at Exhibit Number Five, and that
8 exhibit diagrams the condition of the wells if we were to
9 convert it to salt water disposal using an open hole Lyons
10 inflatable packer between the Abo zone and the Wolfcamp
11 zone.

12 The packer would be run on 2-7/8ths inch
13 plastic-lined tubing. The plastic-lined 2-7/8ths would be
14 run to about 5200 feet. This would be reduced to 2-3/8ths
15 tubing and that would be run to a depth of 6200 feet and
16 seal off the formation, the formations between the Abo,
17 which is located from 5408 down to 5680, and the Wolfcamp,
18 which is located below the packer setting depth, the Lyons
19 packer setting depth, and this would be our first option.

20 Q Let's compare your first option on Exhi-
21 bit Five with the present condition of the well as repre-
22 sented on Exhibit Four so the Examiner will have an oppor-
23 tunity to see exactly what you propose to do.

24 A Okay, Exhibit Four is a schematic well
25 diagram, and that shows the present condition of the well.
That's what's in the well at the present time.

It shows the 8-5/8ths casing at 1155,
circulated cement to the surface.

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2 Then it shows the 5-1/2 casing which was
3 run, cemented at 5373 feet with 100 sacks of cement.

4 Then it has a short 4-inch flushed joint
5 liner, the top of which is inside the 5-1/2 at 5293, the
6 bottom of which is at 5408, and this liner was cemented back
7 into the 5-1/2 casing.

8 It shows the Abo zone open hole and there
9 is presently a Hydromite (sic) plug from 5680 to 5700 be-
10 tween the Abo and the Wolfcamp zone.

11 Q Now in looking at your preferred option
12 for the completion for disposal, as depicted on Exhibit
13 Five, will you tell us what, in your opinion, are the advan-
14 tages to using the Lyons inflated open hole packer arrange-
15 ment?

16 A The advantages of this option for us
17 would be the fact that we would not have to try to recover
18 the short 4-inch flushed joint liner out of the well. That
19 could be an expensive operation. We, with 20 sacks of ce-
20 ment we might be able to jar it out and pull it, but if we
21 could not, we'd have to mill it out.

22 The -- the running of the Lyon inflatable
23 packer would eliminate pulling the short liner.

24 The Lyons inflatable packer, in my opin-
25 ion, would be -- it would be more easily to check the injec-
tion of fluids into the Wolfcamp and the absence of contami-
nation of fluids into the Abo zone because of the -- the ef-
fect of the packer against the open hole.

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2 If a liner were cemented in the well from
3 the 5-1/2 down to total depth and perforated, I don't be-
4 lieve you'd have as effective a check with a packer in be-
5 tween the two zones in the casing as you would with a packer
6 set in the open hole, and it would be cheaper. That's an-
other distinct advantage.

7 Q What causes you to believe that there
8 would not be flow into the Abo in the event that there was a
9 leak in the inflatable packer?

10 A If the inflatable packer developed a
11 leak, we would begin to circulate -- we would fill the annu-
12 lar space full of inert fluid on top of the Lyons packer.
13 In the event of a leak in the Lyons packer, we would begin
14 to pressure up and see evidence of it on the monitor valve
and gauge on the surface.

15 Q Why would not that leak migrate into the
16 Abo formation?

17 A That leak would not migrate into the Abo
18 formation and the packer would be pulled and repaired, of
19 course, and set back in the wellbore. The leak would not
20 migrate nor penetrate the Abo formation because the perme-
21 ability of the Abo formation in the area, it would not leak
22 into there without pressurization at the surface where the
pumps are or some other means of pressure.

23 Q Is your pressure at the surface one that
24 would be restricted by the Division guideline of 0.2 psi per
25 foot of depth?

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A Yes, sir, it is, and with that restrictive pressure there's no way we could pump into the Abo zone.

Q Is the Lyons inflatable open hole packer used in salt water disposal operations in other areas, Mr. White?

A Yes, sir, it's been used quite a bit. I don't know in New Mexico. I'm not sure about New Mexico; possibly in the Hobbs area.

I know it's used quite a bit over in some of the Texas operations. In fact, we have one over there where it's used, but I don't know. I'm not sure.

Q All right, sir, in -- in the event the Division is not comfortable using the Lyons inflated open hole packer as a method of setting this well up for disposal, do you have an alternative as diagramed for us on Exhibit Number Six?

A Yes, sir, I do.

Q All right, sir, would you describe that for us?

A This alternative would be to go ahead and retrieve, try -- attempt to retrieve the short 4-inch flushed joint liner that's in the well now, and that might be done with a center spear and hydraulic jars; if not, the short liner would have to be milled out.

Then we would clean up the hole to 6531 and run a liner down to the top of the Wolfcamp zone and

1 cement it into the 5-1/2, and then we would have pipe and
2 cement across the entire Abo interval.

3 Q What's the disadvantage, if any, Mr.
4 White, of using the approach as diagramed on Exhibit Number
5 Six?

6 A Exhibit Number Six, the -- the disadvan-
7 tage for us, of course, the major one is expense. We'll
8 have to use, probably, to mill this up, it will take, prob-
9 ably, four mills. We'll be spending \$100,000 on just the
10 milling tool, and that would be the distinct disadvantage to
11 us to do this.

12 The other disadvantage is, as I stated, I
13 feel there's a more adequate check -- system of checks set
14 up by using the open hole Lyons inflatable rather than
15 having the Abo zone behind a liner of casing and cement, be-
16 cause it's very difficult in the best of conditions to get a
17 cement job on a liner.

18 Q What did you anticipate or estimate for
19 the cost of using the method of completion shown on Exhibit
20 Number Five?

21 A On Exhibit Number Five I think \$60,000
22 would convert to the -- the well for salt water disposal.

23 Q All right, sir, and using Exhibit Number
24 Six, what are the estimated costs for the completion in that
25 manner?

A It would be \$182,000.

Q What are the volumes of water you antici-

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pate to dispose of in the disposal well?

A We have projected a minimum, depending on how many more wells we drill, of course, but we've projected a minimum of 2000 barrels of Glorieta Yeso water per day and a maximum of 3500 barrels per day.

Q All right. The minimum is 2000 barrels a day and the maximum is 3500 a day?

A Yes, sir.

Q And the disposal interval, again, sir, is what?

A The disposal interval would be the Wolfcamp zone from 6302 to 6531.

Q All right, sir, let's go through some of the requirements of the C-108, now, Mr. White.

We have discussed briefly the area map. On that map you've identified for us a 2-mile radius and a 1/2-mile radius?

A Yes, sir, that's correct.

Q Within the 1/2-mile radius, Mr. White, have you identified any wells that penetrated through the Wolfcamp formation?

A There are none except for the well on the application.

Q All right, the proposed disposal well.

A Yes, sir.

Q All right. Attached to the package of exhibits is simply a tabulation of all wells in the 1/2-mile

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radius regardless of their depth?

A Yes, sir, that's right. That's just a tabulation made up showing the condition and present status of all the wells around the proposed salt water disposal well.

Q And those are all shallow San Andres, Glorieta Yeso wells?

A Yes, sir, and these are taken from records at the New Mexico Oil Conservation Commission.

Q Have you caused to be submitted or are there on file with the Division District Office, Mr. White, copies of the suite of logs for the proposed disposal well?

A Yes, sir, they're on file with the District Office.

Q In terms of water analysis, Mr. White, have you submitted to the Division copies of water analysis on the water produced from your wells --

A Yes, we have --

Q -- being disposed of?

A -- on the Glorieta Yeso wells we have submitted those samples and the analysis are attached to the package.

Q Are you aware, Mr. White, of any fresh water sources within a 1-mile radius of the disposal well?

A Yes, sir, I am.

Q And what is the approximate producing depth or interval for fresh water wells?

1 A The fresh water producers in this area
2 from the -- basically from two different sections, there's a
3 shallow water that produces down to a depth of about 270
4 feet, and the Artesian water produces from the formation
5 down to about 860 feet.

6 Q So the depth of the deepest producing
7 fresh water is about 860. Your perforations in the Wolfcamp
8 are 6302?

9 A Yes, sir, that's right.

10 Q Within that vertical difference of in ex-
11 cess of 5000 feet, are you aware of any hydrologic connec-
12 tion, any fracture system, or other methods by which dispo-
13 sal in the Wolfcamp would place that formation in communica-
14 tion with any fresh water aquifers?

15 A No, sir, there are none above nor none
16 below with the proper casing and cementing.

17 Q In your opinion is the engineering method
18 for completion of the disposal well, whether it's the one
19 with the inflatable packer or the second alternative, are
20 both of those methods consistent with sound engineering
21 practices so that the disposal of water in the Wolfcamp for-
22 mation will not pose a risk to, or potential contamination
23 of, fresh water supplies as designated by the State Engin-
24 eer?

25 A Yes, sir, that is correct.

26 Q Can you identify for us, Mr. White, who
27 the owner is of the surface at the proposed disposal loca-

1 tion?

2 A The surface is owned by Donald Fanning
3 and Sons, Incorporated.

4 MR. KELLAHIN: Mr. Examiner,
5 Exhibit Eight, attached to our exhibits, represents the re-
6 turn receipt cards by which we've notified the surface own-
7 er. We've sent him a copy of the C-108 and attachments.
8 The balance of those cards represent operators within the
9 1/2-mile radius.

10 Mr. Examiner, there were four
11 individuals, or companies, that in our efforts to notify we
12 were unable to obtain a current address.

13 We have searched the Oil Con-
14 servation Division records in Santa Fe, and in Artesia.

15 The list was compiled based
16 upon the operators and working interest owners of any of the
17 old wells and new wells within the half mile radius, of
18 which there are considerable.

19 Of the four individuals, or
20 companies, that we could not obtain more accurate informa-
21 tion on, they were National Drilling Company of Artesia;
22 that attempt to notify them has been returned to us.

23 There's a Gary A. Swartz, S-W-
24 A-R-T-Z, of Roswell; that attempted notification was re-
25 turned to us.

There's an R. D. Collier, C-O-
L-L-I-E-R, of Artesia that was returned to us.

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2 And then there's a Nelson and
3 Pope Bearing Equipment of Artesia and that notice was re-
4 turned.

5 With those exceptions, Mr. Exa-
6 miner, all others have received and acknowledged receipt of
7 the appropriate notices.

8 MR. STOGNER: Excuse me, that's
9 the Bearing Equipment?

10 MR. KELLAHIN: Yes, sir, rather
11 than "hearing". It's a "B" instead of an "H".

12 A I might add, Mr. Kellahin, that Mr. Col-
13 lier, that Collier, and the Pope and Nelson are deceased.

14 Q Let me have you described for the Exam-
15 iner, Mr. White, what you currently are doing with the pro-
16 duced water and why it is no longer, if it ever was, a suit-
17 able way to dispose of the produced water.

18 A Our produced water now we're hauling, at
19 \$1.12 a barrel, to a disposal well near Loco Hills, New
20 Mexico; probably about thirty miles away.

21 It costs us \$1.12 to haul it.

22 Q I characterized for the Examiner that the
23 expense involved in disposing of the water for all your
24 wells was about \$1000 a day. Is that a fair estimate?

25 A Yes, that is very close. It will run
from \$700 a day to \$1200 a day, just depending on what the
wells make that particular day.

Q Without the use of a suitable and con-

1
2 venient disposal well for your own wells, will you cause
3 your producing wells to be prematurely abandoned?

4 A Oh, yes, sir, there's no question about
5 that. When our wells get down to 25 barrels a day, the eco-
6 nomic limit is reached if we have to dispose of the water by
7 hauling it.

8 Q Have you made a thorough and comprehen-
9 sive search for possible disposal wellbores that might be
10 utilized by you in this area?

11 A Yes, sir, we have. We've made an exhaus-
12 tive search for the previous hearing on salt water disposal
13 well.

14 We have, yes, sir.

15 Q And what -- what remains your first al-
16 ternative for a disposal well in the area, Mr. White?

17 A At this present time we would still like
18 very much for the Commission to return the Flint Well to us
19 as soon as Yates has had an opportunity to test for hydro-
20 carbons.

21 The second alternative and option, of
22 course, is this well, preferably on option one with the
23 Wolfcamp being isolated with a Lyons inflatable open hole
24 packer.

25 Q Why is your -- why do you have a prefer-
ence for the use of the Flint Well as opposed to the LaRue
Muncy Well?

A We have already tested the Flint Well and

1 know that we can get our proper water injected at the res-
2 trictive pressures that the Commission will allow us.

3 This well we have not physically tested
4 the Wolfcamp zone, and until we do and have the Commission
5 witness the pump-in test, we don't know for sure if it will
6 take the water.

7 MR. KELLAHIN: That concludes
8 my examination of Mr. White.

9 We move the introduction of Ex-
10 hibits One through Eight.

11 MR. STOGNER: Exhibits One
12 through Eight will be admitted as evidence.

13 CROSS EXAMINATION

14 BY MR. STOGNER:

15 Q Mr. White, on your land plat are there
16 any Abo and/or Wolfcamp producing wells within a 2-mile ra-
17 dius?

18 A Yes, sir, there is. There's not in the
19 1/2-mile but there is in the 2-mile radius, Mr. Stogner.

20 There's a well in Section 36 and I -- I
21 believe it -- I know it produces from the Abo and I think
22 it's the Kendall (sic) oil well up in the northeast quarter
23 of the northwest quarter of Section 36, and it's an active
24 producer in the Abo. It's very light. It doesn't produce,
probably, 2 barrels a day of Abo oil.

25 And there's another Abo well located well

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-- well over west. I think it's just on the fringe of the 2-mile radius.

Q In what section is it?

A Mr. Examiner, I'm not sure where it's at, but it is an Abo -- it's listed in the Dayton Abo Pool on the proration schedules.

Q How about any Wolfcamp producers?

A No Wolfcamp producers in the 2-mile radius or the 1/2-mile.

Q On your listing of all the wells within the 1/2-mile radius you show TD's on about 14 wells, or 13 wells.

What is the total depth on wells numbered 14 through 22?

You don't show the total depth of them.

A Well, we didn't pick them up but they're listed there, Mr. Examiner, as Grayburg, so they would be in that 12 -- 11, 1200 foot interval. They were just left off for some reason, but the Grayburg zone is the producing zone over on the right, so they'd all be in that eleven hundred thousand fifty to twelve hundred foot depth.

Q Well, that's where they show completions are first, but did they go down and test the Wolfcamp or Abo?

A Well, the well that I'm looking at, operated by Joe Finn (sic) is in 14 on down column. No, they did not. They did not drill deeper than the -- than the

1 zone they're completed in.
2

3 Q Okay, I take it that you will probably
4 give me that information on the total depth of all those
5 wells --

6 A Yes, sir, I certainly can.

7 Q Okay. Let's refer back to Exhibits Five
8 -- Four, Five, and Six.

9 When was the 4-inch liner set in this
10 well?

11 A That liner was set right after the --
12 right before they completed the well in July, 1959.

13 Q Okay. In Exhibit Five you show to place
14 the Lyons inflatable packer, oh, roughly about 6300 feet, is
15 that right?

16 A 6200.

17 Q 62.

18 A Yes, sir.

19 Q Okay. And is that within the -- is that
20 within the Abo or the Wolfcamp formation?

21 A That will be below the Abo and just above
22 the Wolfcamp zone.

23 Q Okay. What separates these two zones?
24 What kind of --

25 A There's an interval of fairly hard drill-
ing between the 5680 and down to 6302.

MR. KELLAHIN: Do you have a
copy of one of the logs?

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A Yes, I do.

MR. KELLAHIN: Let's show him the log and let him see it.

MR. STOGNER: If you have a log there, maybe make that an exhibit.

A All right, here, looking at the radioactive log, we've got an interval that starts at 50 -- actually starts at 5800, and the section shows no porosity on the radioactive logs and a fairly tight -- tight dolomite, probably, on the gamma ray, down to about -- about 6000 feet. There's a real tight, dense --

MR. KELLAHIN: What would correlate to the base of the Abo?

A Well, we're calling the base of the Abo 5860 on the -- on the information on the completion on the 105 filed with the Commission.

Q Well, I'm real interested about where your Lyons packer is going to be set, what that is.

A Okay, that would be down around 60 -- in the 6200 foot interval there is absolutely no porosity. There's a very tight zone at 6200 feet, as a matter of fact, and that would be -- that would be where we'd set the Lyons packer, 6200.

Q In your opinion what -- what do you think it is, shale?

A Well, it's got to be some -- there's got to be some shale, a little bit of shale, and probably a do-

1 lomitic substance. It's very tight. There's no porosity at
2 all, just down on the zero line, and the porosity tends to
3 develop around 6255.

4 MR. KELLAHIN: Indicate on the
5 log for us, Mr. White, where you will set the Lyons packer.

6 A Okay, we would set the Lyons packer at --
7 try to set it at 6205, and that would be in a very dense
8 part of the hole.

9 Q On the Lyons packer, the inflatable model
10 that you will be running, how long of a tool is that?

11 A You can -- you can run double Lyons
12 packer or single. The tool itself would probably be about
13 6-foot long. With a plug attached to it, it runs about 8
feet long.

14 Q How about the inflatable part itself?

15 A The inflatable part will run about 4
16 feet, 3-1/2 to 4 feet.

17 Q And if you run a double, that would be
18 about 8 feet of --

19 A Yes, sir, that would be about 8 feet of
20 inflatable packer.

21 Q Do you plan to run a dual?

22 A We can. Usually the only reason they run
23 the dual is to straddle a section, but you can, if -- you
24 can run the double packer above the formation, if that's the
plan, we can do so, yes, sir.

25 Q But you're really planning to run just

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one.

A Yes, sir, I was.

MR. STOGNER: What exhibit is this, Mr. Kellahin?

MR. KELLAHIN: It will be Number Nine, Mr. Examiner.

Q Mr. White, do you know if there's been a caliper log run on this well?

A No, sir, I don't think there was. I never could find one, Mr. Examiner, I could not find a caliper and it would have been on the -- more than likely on the gamma ray neutron log.

Q And this is the only log that exists that you know of at this time?

A Well, sir, there's three open hole logs, which I have here, but they didn't have any caliper written on it.

Q No caliper at all.

A No, sir.

Q These all -- these logs were all run around '59, I assume.

A Yes, sir, and the -- now they could very easily be -- we could easily take a caliper log across the zones of interest in this well. We could run a caliper log. In fact it probably would be a very good idea to run one before you selected the -- exactly the spot that you were going to set one.

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Q Yeah.

A But a caliper log would be feasible, and we could run it.

Q If when you run this Lyons packer you will set it, test it, and see if it leaks.

A Yes, sir.

Q And if it happens to leak in that zone, will you then deflate it and move it up the hole some and then re-inflate it or --

A Well, if we -- of course, underneath the packer would be where we want to pump in the injection fluid, the salt water -- the salt water into that zone, and if we had any kind of communication around the back side of the packer, then we would probably, in all probability, close and run another packer until we got a seal.

Q Okay.

A The Lyons packer sets with pressure on the surface by blowing a plug down below the packer, and when we set that, once we set that, if we then start injecting on the tubing and we get some kind of -- of communication around on the back side, then we'd have to pull it. There's no resetting.

Q No resetting.

A No, sir, we have to pull it and run a new one.

Q I thought they had modernized that thing up somewhat, and I guess I was wrong.

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A No, they're an all or nothing situation,
Mr. Examiner.

Q Unfortunately. Let's see, you're going
to have to run 2-7/8ths inch tubing down to approximately
5200 feet and --

A Yes, sir.

Q -- change over to a 2-inch tubing, a cat
whisker configuration in your tubing?

A Yes, sir, we do plan to run -- the reason
for that is, of course, to have room in that -- that little
flushed joint liner, 2-7/8ths couplings are very close to
the ID of the 4-inch liner, and we'd run our 2-3/8ths plas-
tic-lined in that interval and then expand out to -- the ta-
pered string to 2-7/8ths.

Q Okay. If all else fails and you have to
go to plan B, or your alternate plan, you show that you
would set a packer at the bottom of your 2-7/8ths inch tub-
ing in the 5-1/2 inch casing. That would be above the 4-
inch liner, would it not?

A Yes, sir, it would. Now, there -- the
only reason for doing that is we could continue with our 2-
7/8ths to the packer depth. There would be no problem run-
ning that packer down to a depth which is just above the
Wolfcamp zone by again reducing to 2-3/8ths tubing and run-
ning just a regular (not clearly understood) packer.

Q Into the 4-inch.

A Yes, sir, there's no problem there, if

1 that would be the -- if the Commission so desired.

2 Q So in both configurations you would not
3 be injecting into the Abo formation at all, would you?

4 A No, sir, we would not.

5 Q Although it was advertised as such.

6 MR. KELLAHIN: We've amended it
7 since the advertisement, Mr. Examiner. I neglected to tell
8 you that we only want to use the Wolfcamp.

9 MR. STOGNER: May I ask why you
10 don't want to use the Abo?

11 MR. KELLAHIN: We received an
12 objection from Ralph Nix.

13 MR. STOGNER: Thank you, sir.
14 I have no further questions of this witness.

15 Is there anything else of this
16 witness?

17 MR. KELLAHIN: No, sir.

18 MR. STOGNER: If not, he may be
19 excused.

20 Anything further in Case Number
21 8480?

22 MR. KELLAHIN: No, sir.

23 MR. STOGNER: The case will be
24 taken under -- I'm going to leave this case remaining opened
25 until we get the supplemental --

26 A The total depth.

MR. STOGNER: Yeah.

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2 A Okay, sir, I'll get those back in to you
3 and thank you very much.

4 (Hearing concluded.)
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C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY
CERTIFY that the foregoing Transcript of Hearing before the
Oil 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.

Sally W. Boyd CSR

I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 8480
heard by me on 13 February 19 85.

Michael E. Shaw, Examiner
Oil Conservation Division