

1 STATE OF NEW MEXICO
2 ENERGY AND MINERALS DEPARTMENT
3 OIL CONSERVATION DIVISION
4 STATE LAND OFFICE BLDG.
5 Santa Fe, New Mexico

6 18 March 1987

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Sage Energy Company CASE
10 for an unorthodox oil well location, 9105
11 Lea County, New Mexico.

12
13
14 BEFORE: David R. Catanach, Examiner

15
16 TRANSCRIPT OF HEARING

17
18
19 A P P E A R A N C E S

20
21 For the Division: Jeff Taylor
22 Legal Counsel to the Division
23 Oil Conservation Division
24 State Land Office Bldg.
25 Santa Fe, New Mexico

For the Applicant: W. Thomas Kellahin
Attorney at Law
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I N D E X

JAY HARDY

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E X H I B I T S

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MR. CATANACH: Call next Case
Number 9105.

MR. TAYLOR: The application of
Sage Energy Company for an unorthodox oil well location, Lea
County, New Mexico.

MR. CATANACH: Are there
appearances in this case?

MR. KELLAHIN: If the Examiner
please, I'm Tom Kellahin of Santa Fe, New Mexico, appearing
on behalf of Sage Energy Company and Mr. Jay Hardy is my
engineering witness.

MR. CATANACH: Are there any
other appearances in this case?

Will the witness please stand
and be sworn in?

(Witness sworn.)

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

1 DIRECT EXAMINATION

2 BY MR. KELLAHIN:

3 Q Mr. Hardy, for the record would you
4 please state your name and occupation?5 A My name is Jay Hardy and I'm a petroleum
6 engineer for Sage Energy Company in Midland, Texas.7 Q Mr. Hardy, have you previously testified
8 before the Division as a petroleum engineer and had your
9 qualifications accepted and made a matter of record?

10 A Yes, I have.

11 Q Would you summarize for the examiner --
12 let's turn to Exhibit Number One and perhaps use that as an
13 example.14 First of all, summarize for the examiner
15 approximately where the well is located and what the poten-
16 tial producing formation is for the well.17 A The proposed well is the John Etcheverry
18 No. 2, located by the red dot in Section 29, Township 14
19 South, 34 East, and it's located 1100 feet from the west
20 line, 560 feet from the south line in Section 29.21 Q What is the pool to which this well will
22 be dedicated?23 A This is the Tres Papalotes West Penn
24 Field.

25 Q All right, sir, West Tres Papalotes Penn,

1 I think.

2 A Yes.

3 Q All right. And what is the spacing in
4 that pool, Mr. Hardy?

5 A It's 160 acre spacing.

6 Q Would you describe for the Examiner what
7 the well location rules are for the West Tres Papalotes Penn
8 Pool?

9 A Right. The standard location is 150 feet
10 from the center of a quarter quarter.

11 Q And your proposed location is at what
12 footage location?

13 A It's 1100 feet from the west line and 560
14 from the south line.

15 Q That location will make it too close to
16 one of the interior quarter quarter section lines within
17 your 160-acre spaced unit.

18 A That's correct.

19 Q All right, you're not moving closer to an
20 outer boundary than permitted by the rules.

21 A That's correct.

22 Q As a result of not crowding an outer
23 boundary, are there any other operators or working interest
24 owners that you're encroaching towards or to which you might
25 affect?

1 A No, sir.

2 Q Have you made a study of the facts that
3 surround your application?

4 A Yes, I have.

5 MR. KELLAHIN: At this point,
6 Mr. Examiner, we tender Mr. Hardy as an expert petroleum en-
7 gineer.

8 MR. CATANACH: Mr. Hardy is so
9 qualified.

10 MR. KELLAHIN: Mr. Examiner, it
11 is our understanding that because Sage Energy is moving
12 closer to an internal 40-acre boundary and is not encroach-
13 ing on an outer boundary, we have not notified any of the
14 offsetting operators that have wells adjacent to the 160-
15 acre tract. We believe that's a correct understanding of
16 the notice rules. If it is not, then we'll have to provide
17 some notice which we have not yet done.

18 MR. CATANACH: That's correct,
19 Mr. Kellahin.

20 Q Mr. Hardy, let's turn now to Exhibit Num-
21 ber Two. Again locate for us the well.

22 A The proposed well is listed there as No.
23 2 and it's shown as the red dot, which is located once again
24 1100 feet from the west line and 560 feet from the south
25 line.

1 Q All right, let's use Exhibit Number Two,
2 then, to identify the exhibit and to show specifically where
3 the well location is in reference to the 40-acre line that
4 separates the southwest of the southwest from the southeast
5 of the southwest.

6 A I believe it would be 220 feet from that
7 particular line.

8 Q All right, and -- and the rule would re-
9 quire that you be 510 to that line and so if you take 510
10 and subtract the 220 from it, you're going to get the dif-
11 ference for the encroachment.

12 A That's correct.

13 Q All right. You're 290 feet too close, I
14 understand.

15 All right, describe for the examiner what
16 it is that you're showing on the structure map.

17 A This is structure map that really shows
18 that structure does not play a great part in the development
19 of this field. This field is mainly a stratigraphic trap.

20 Q Okay. Let's turn to Exhibit Number Three
21 and look at the information depicted on that exhibit. Would
22 you again identify for us how you've located the subject
23 well?

24 A Well, once again the subject well is the
25 red dot in Section 29 in the southwest of the southwest.

1 Q What is Exhibit Number Three?

2 A Exhibit Number Three is an Isopach of the
3 main Tres Papalotes zone, our contour interval being two
4 feet; the porosity cutoff is 5 percent or greater, and also
5 on this map is some drainage radius -- the map also shows
6 the drainage radius circles based on the cumulative produc-
7 tion of the wells that are in the center of the circle. And
8 inside the circle there's a number there, which is also in-
9 side a circle, and that's the cumulative production of the
10 well itself.

11 Q If you were at the closest standard loca-
12 tion for a well in this 40-acre tract, where would that
13 place you on the Isopach?

14 A I would be at 660 out of the corner there
15 or on the -- about the 16-foot contour.

16 Q What is your reason for not wanting to
17 locate the well at that position?

18 A We feel that that well at that position
19 would be too close to a well which is in the southeast of
20 the southeast of 30 and has produced 156,000 barrels of oil
21 and has been plugged. We're afraid that we might encounter
22 too much drainage by being too close to that particular
23 well.

24 Q If you had to go to the 40-acre tract in
25 the southeast of the southwest, would you have a drillable

1 location at the closest standard location within that 40-
2 acre tract?

3 A You have have a drillable location but we
4 don't particularly like that one, either.

5 Q All right, that puts it in proximity to
6 that dry hole that's indicated to the east on the plat?

7 A That's correct.

8 Q With regards to the 160-acre unit then,
9 the optimum location is the proposed unorthodox location?

10 A In our opinion it is.

11 Q All right, and what can you accomplish at
12 that location?

13 A Well, at that location there we feel that
14 we will recover approximately 50,000 barrels of oil remain-
15 ing, which has not been recovered by any of the offsetting
16 wells.

17 Q And is that additional recovery that you,
18 in your opinion as a petroleum engineer, believe cannot and
19 will not be recovered by current wells?

20 A In my opinion that's correct.

21 Q Let's turn to Exhibit Number Four, Mr.
22 Hardy, and have you identify that exhibit.

23 A Exhibit Number Four is a cross section
24 going --

25 Q Did you prepare this exhibit?

1 A No, I didn't but someone prepared it at
2 my direction.

3 Q And have you reviewed the information
4 contained on this exhibit and satisfied yourself that it's
5 true and accurate to the best of your knowledge?

6 A Yes, I have.

7 Q And have you relied upon this exhibit in
8 formulating your opinions and conclusions?

9 A Yes, I have.

10 Q First of all, would you help orient us by
11 showing us the -- taking the schematic or the plat on the
12 right side and showing us the location of each of the wells
13 as we go across the cross section and then come back and
14 tell us the information that you want to draw our attention
15 to?

16 A Okay. The cross section starts down in
17 there in Section 30 on the southeast of the southeast. It
18 goes to the well producing in the northwest of the southwest
19 of Section 29, the John Etcheverry No. 1, and then we have
20 our projected location, which is shown just as a borehole.

21 And then it, the cross section goes up to
22 A', which is a dry hole, the John Etcheverry No. 1-A, which
23 is also A' on the cross section.

24 Q What's the significance of the red shad-
25 ing on two of the logs on the cross section?

1 A The -- that red shading designates the
2 porosity cutoff of approximately 5 percent that we call the
3 cutoff, and in following it from the wells from left to
4 right you can see it goes to zero on the dry holes.

5 Q What opinions do you draw as an engineer
6 from the information contained on the cross section?

7 A Well, that this particular field here is
8 a stratigraphic play and it's limited by the dry hole that
9 we have up there on the far righthand side of the cross sec-
10 tion, and which is also shown on the Isopach.

11 And so projecting that down to our loca-
12 tion here, we're fairly close to a dry hole and that's why
13 we don't want to go any further to the east of this thing.

14 Q As you move east, then you become more
15 standard in your location yet the geologic and engineering
16 data available to you demonstrates to you that's less favor-
17 able than the proposed location.

18 A It's definitely more risky, yes.

19 Q All right. In order to minimize the risk
20 involved for your company, Mr. Hardy, in your opinion will
21 approval of this application prevent waste and protect cor-
22 relative rights?

23 A I believe it will.

24 Q Will it allow you an opportunity to
25 recover oil that you might not otherwise produce?

1 A That's correct.

2 Q Were Exhibits One through Four prepared
3 by you or compiled under your direction and supervision?

4 A Yes, they were.

5 Q When do you propose to commence your well,
6 Mr. Hardy?

7 A We would like to commence this well Mon-
8 day.

9 Q All right. This is on fee acreage?

10 A Yes, it is.

11 MR. KELLAHIN: That concludes
12 my examination of Mr. Hardy. We would move the introduction
13 of his Exhibits One through Four.

14 MR. CATANACH: Exhibits One
15 through Four will be admitted into evidence.

16

17 CROSS EXAMINATION

18 BY MR. CATANACH:

19 Q Mr. Hardy, you indicated that there were
20 approximately 50,000 barrels of reserves. Is that total re-
21 serves?

22 A That's total reserves.

23 Q How did you calculate this?

24 A Just with volumetrics based on the area
25 that is outside those circles.

1 Q The area that is outside the two drainage
2 circles --

3 A Right.

4 Q -- that you have indicated?

5 A Right, uh-huh.

6 Q Have you calculated the drainage area for
7 the well located in the southeast southeast of 30?

8 A No, I haven't, but it would be -- as you
9 can see, it would intercept the circles I do have there.

10 Q So with your proposed location you are
11 moving towards a less net pay zone, right?

12 A That's correct.

13 Q Is that well in the southeast quarter,
14 the southeast of Section 30, is that still producing?

15 A No, it's not. It's plugged.

16 Q How long did it produce, do you know?

17 A It produced until '84, from 1972 to '84.

18 Q Mr. Hardy, what's the current status of
19 the well located in that same quarter section, Section 29,
20 the --

21 A The John Etcheverry No. 1?

22 Q Yes, sir.

23 A Right, that's producing. It's making 5
24 barrels a day, no water.

25 Q Who's the operator of that well?

1 A We are.

2 Q Are you going to continue producing that
3 well?

4 A If we can. If I have to shut it in, I'll
5 shut it in.

6 Q But you would -- would you like to simul-
7 taneously dedicate those two wells to the proration unit?

8 A Yes, I would.

9 Q Mr. Hardy, have you done a calculation
10 that shows the additional amount of oil you would recover at
11 the proposed location rather than drilling a standard loca-
12 tion at the southwest quarter southwest quarter?

13 A No, I haven't.

14 Q Do you have any idea what that -- you say
15 you don't know what that might be?

16 A No, I don't, but I'm really afraid of the
17 drainage that has taken place from the well in the southeast
18 of the southeast.

19 Q Do you think that well actually drained
20 160 acres?

21 A I don't think it drained 160 acres but it
22 came over into Section 29.

23 MR. CATANACH: I have no fur-
24 ther questions of the witness. He may be excused.

25 Is there anything further in

1 Case 9105?

2 If not, it will be taken under
3 advisement.

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(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 the foregoing Transcript of Hearing before
the Oil Conservation Division (Commission) 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. 9105,
heard by me on March 18 1987.

David L. Catant, Examiner
Oil Conservation Division

ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION



March 26, 1937

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Re: CASE NO. 9105
ORDER NO. R-8418

Applicant:

Sage Energy Company

Dear Sir:

Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.

Sincerely,

FLORENE DAVIDSON
OC Staff Specialist

Copy of order also sent to:

Hobbs OCD	<u>x</u>
Artesia OCD	<u>x</u>
Aztec OCD	

Other _____