

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION COMMISSION

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION OF NEW MEXICO FOR  
THE PURPOSE OF CONSIDERING:

CASE NO. 9111  
Order No. R-3401-B

APPLICATION OF BENSON-MONTIN-GREER  
DRILLING CORPORATION FOR EXPANSION OF  
THE PROJECT AREA FOR ITS WEST PUERTO  
CHIKUITO-MANCOS PRESSURE MAINTENANCE  
PROJECT, RIO ARriba COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9:00 a.m. on March 18, 1988, at Santa Fe, New Mexico, before the Oil Conservation Commission of New Mexico, hereinafter referred to as the "Commission." Decision on the case was deferred until possibly related testimony in Cases 7980, 8946, 8950 and 9412 was received at the hearing held June 13, 1988.

NOW, on this 5th day of August, 1988, the Commission, a quorum being present, having considered the testimony presented and the exhibits received at said hearing, and being fully advised in the premises,

FINDS THAT:

(1) Due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) Applicant requests expansion of the West Puerto Chiquito-Mancos Pressure Maintenance Project area to include the below-described area which would make the project area coterminous with the Canada Ojito Unit area and the Mancos Participating Area of the unit:

TOWNSHIP 24 NORTH, RANGE 1 WEST, NMPM  
Sections 5 through 8

TOWNSHIP 25 NORTH, RANGE 1 WEST, NMPM  
Sections 5 through 8  
Sections 17 through 20  
Sections 29 through 32

TOWNSHIP 26 NORTH, RANGE 1 WEST, NMPM

W/2 Sections 5, 8, 17, and 20

Sections 6, 7, 18, 19, 29, 30, 31 and 32

All in Rio Arriba County, New Mexico

(3) The expanded project area would abut the Gavilan-Mancos Pool boundary at the West line of Range 1 West.

(4) Applicant was supported in its application by Sun Exploration and Production Company and was opposed by Mallon Oil Company, Mesa Grande Resources, Inc., Mobil Texas-New Mexico Producing, Koch Exploration and others.

(5) Critical to the case is the degree, if any, of pressure communication across a low permeability zone at or near the present western boundary of the project area which is approximately two miles east of the western boundary of the unit.

(6) The two westernmost rows of sections inside the unit area are in effective pressure communication with the Gavilan-Mancos pool as demonstrated by shut in pressure measurements.

(7) The unit area east of the proposed expansion of the area described above exhibits a significantly greater pressure than the proposed expansion area and the adjacent Gavilan area, as a result of gas injection at the structurally higher and more easterly portion of the unit.

(8) The pressure differential across the low-permeability area which resides in the third row of sections east of the western boundary of the unit is in the range of 350-400 psi, and thus indicates limited pressure communication between the injection wells and the proposed expansion area.

(9) Limited transmissibility across the low-permeability zone has been shown by (1) transmission of a pressure pulse from a hydraulically fractured well to wells across the low permeability zone, (2) failure to increase the average pressure east of the zone by overinjection of gas, and (3) the lower gas-oil ratio of wells in the proposed expansion area as compared to adjacent Gavilan-Mancos wells.

(10) The gas credit provided by Rule 7 of Order R-3401, as amended, in the project area provides a reduced GOR penalty for wells in the project area because the pressure maintenance process results in a smaller reservoir voidage per barrel of oil produced than would occur if the gas were not reinjected.

(11) The permeability restriction described in Finding No. (5) limits the benefit which the proposed expansion area can receive from the pressure maintenance gas injection.

(12) There is evidence that wells within both the WPC and the Gavilan Pools are in communication with areas outside of those pools, particularly in a north-south direction. As a result there may be gas flow and repressurization from the pressure maintenance project in a northerly and southerly direction and that it may extend beyond the northern and southern boundaries of the pressure maintenance project.

(13) Because of Findings (11) and (12), giving full injection credit to those wells in the proposed expansion area would give those wells an advantage over the adjacent wells in the Gavilan-Mancos Pool and would impair the correlative rights of the owners in the Gavilan-Mancos Pool.

(14) Limited expansion of the project area, and reduced credit to wells in the expansion area for reinjected gas in the project area will encourage continued gas injection, will increase the ultimate recovery of oil in the West Puerto Chiquito-Mancos Oil Pool and will also protect correlative rights in the Gavilan-Mancos Pool wells offsetting the unit.

(15) The project area should be expanded only one tier of sections to the west leaving one tier of sections between the expansion area and Gavilan.

(16) The evidence is not conclusive as to the amount of injection credit which the wells in the expansion area of the project should receive, and pending further data evaluation, a 50% injected gas credit is reasonable.

(17) The gas credit amount in the expansion area granted by this order should be modified upon presentation of evidence that an advantage is gained by either pool over the other.

(18) The Aztec district office of the Division, in consultation with the operators in the two pools should determine the wells and procedures to be employed to obtain accurate, representative BHP's on either side of the common pool boundary on a semi-annual basis for detection and evaluation of any drainage across the said boundary and a basis for adjusting the gas injection credit assigned the wells in the expansion area.

IT IS THEREFORE ORDERED THAT:

(1) The Project Area of the West Puerto Chiquito-Mancos Pressure Maintenance Project is hereby expanded to include the following described area:

TOWNSHIP 24 NORTH, RANGE 1 WEST, NMPM  
Sections 5 and 8

TOWNSHIP 25 NORTH, RANGE 1 WEST, NMPM  
Sections 5, 8, 17, 20, 29 and 32

TOWNSHIP 26 NORTH, RANGE 1 WEST, NMPM  
W/2 Sections 5, 8, 17 and 20 and all of  
Sections 29 and 32

All in Rio Arriba County, New Mexico.

(2) Rule 6 and Rule 7 of the Special Rules for the West Puerto Chiquito-Mancos Pressure Maintenance Project established by Order No. R-3401, as amended, are hereby amended to read in their entirety as follows:

"Rule 6. The allowable assigned to any well which is shut-in or curtailed in accordance with Rule 3, shall be determined by a 24-hour test at a stabilized rate of production, which shall be the final 24-hour period of a 72-hour test throughout which the well should be produced in the same manner and at a constant rate. The daily tolerance limitation set forth in Commission Rule 502 I (a) and the limiting gas-oil ratio for the West Puerto Chiquito-Mancos Oil Pool shall be waived during such tests. The project operator shall notify all operators offsetting the well, as well as the Commission, of the exact time such tests are to be conducted. Tests may be witnessed by representatives of the offsetting operators and the Commission, if they so desire."

"Rule 7. The allowable assigned to each producing well in the Project shall be equal to the well's ability to produce or top unit allowable for the West Puerto Chiquito-Mancos Oil Pool, whichever is less, provided that any producing well in the project area which directly or diagonally offsets a well outside the Canada Ojitos Unit Area producing from the same common source of supply shall not produce in excess of top unit allowable for the pool. Production of such well at a higher rate shall be authorized only after notice and hearing. Each producing well shall be subject to the limiting gas-oil

ratio for the West Puerto Chiquito-Mancos Oil Pool except that any well or wells within the project area producing with a gas-oil ratio in excess of the limiting gas oil ratio may be produced on a "net gas-oil ratio" basis, which shall be determined by applying credit for daily average gas injected, if any, into the West Puerto Chiquito-Mancos Oil Pool within the project area to such high gas-oil ratio well. The daily adjusted oil allowable for any well receiving gas injection credit shall be determined in accordance with the following formula:

$$A_{adj} = TUA \times F_a \times \frac{GOR}{\frac{P_g - I_g}{P_o}}$$

where  $A_{adj}$  = the well's daily adjusted allowable.

TUA = top unit allowable for the pool.

$F_a$  = the well's acreage factor (1.0 if one well on a 640 acre proration unit or 1/2 each if two wells on a 640 acre unit, and 1/2 for a well in a section along the Gavilan boundary which lies closer than 2310' from the Gavilan boundary).

$P_g$  = average daily volume of gas produced by the well during the preceding month, cubic feet.

$I_g$  = the well's allocated share of the daily average gas injected during the preceding month, cubic feet.

$P_o$  = average daily volume of oil produced by the well during the preceding month, barrels.

GOR = limiting gas-oil ratio for the West Puerto Chiquito-Mancos Oil Pool.

In no event shall the amount of injected gas being credited to a well be such as to cause the net gas-oil ratio,  $\frac{P_g - I_g}{P_o}$  to be less than the limiting gas-oil ratio for the West Puerto Chiquito Mancos Oil Pool.

Provided however, that wells located in the area described as: Sections 5 and 8, Township 24 North, Range 1

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West; Sections 5, 8, 17, 20, 29 and 32,  
Township 25 North, Range 1 West; Sections 29  
and 32 and W/2 of Sections 5, 8, 17 and 20,  
Township 26 North, Range 1 West

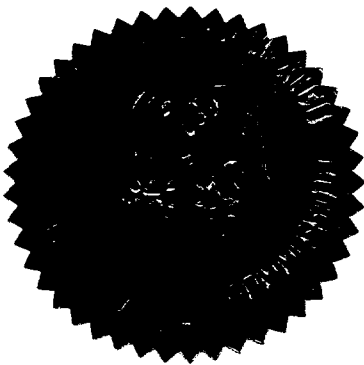
shall be limited to 50% of the allocated share of injection  
gas in the  $I_g$  term of the formula above.

(3) The Aztec district office of the Division, with due  
counselling and advice from pool operators, shall, by October  
1, 1988, develop a program for semi-annual bottomhole pressure  
surveys of wells in both pools located not less than 3/8 mile  
and not more than 1 1/2 miles from the common pool boundary,  
designed to measure accurately the pressure differential  
across the pool boundary and to be used as a basis for  
adjusting the gas injection credit to wells in the expansion  
area. The program shall be presented for approval to the  
Commission Conference on October 6, 1988.

(5) This order may be modified, after notice and hear-  
ing, to offset any advantage gained by wells on either side of  
the common boundary of the Gavilan and West Puerto Chiquito  
Oil Pools, as a result of this order.

(6) Jurisdiction of this cause is retained for the entry  
of such further orders as the Commission may deem necessary.

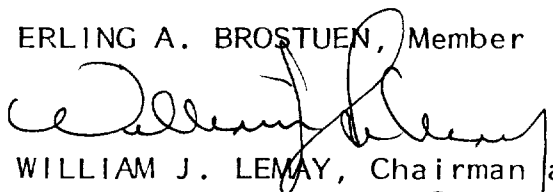
DONE at Santa Fe, New Mexico, on the day and year  
hereinabove designated.



STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION

  
WILLIAM R. HUMPHRIES, Member

ERLING A. BROSTUEN, Member

  
WILLIAM J. LEMAY, Chairman and  
Secretary

S E A L

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES CEPARTMENT  
OIL CONSERVATION COMMISSION

DISSENTING OPINION REGARDING FINDINGS AND ORDERS CONTAINED  
IN NEW MEXICO OIL AND GAS CONSERVATION COMMISSION CASES AND  
ORDERS:

CASE NO. 9412  
ORDER NO. R-8712;

CASES NOS. 7890, 8946 and 8950  
ORDER NO. R-7407-F  
ORDER NO. R-6469-F

CASE NO. 9111  
ORDER NO. R-3401-B

AS APPROVED AND SIGNED BY NEW MEXICO OIL CONSERVATION  
COMMISSIONERS WILLIAM J. LEMAY, CHAIRMAN, AND WILLIAM R.  
HUMPHRIES, MEMBER, DATED AUGUST 4, 1988 AND AUGUST 5, 1988.

The above described cases and orders are all closely related.  
They affect the West Puerto Chiquito Mancos Pool and the  
Galivan Mancos Pool both located in Rio Arriba County,  
New Mexico.

Central to all issues in the above cases and orders is the  
determination of the existence of a permeability barrier  
or permeability restriction, and the effectiveness thereof,  
separating the two pools. By Order No. R-8711 in Case No.  
9412, dated August 4, 1988, Commission Members LeMay and  
Humphries have determined that there was not substantial  
evidence presented to show that two separate sources of  
supply exist. As dissenting Commission Member, I take  
the position that the preponderance of the evidence  
demonstrates that the Gavilan Mancos Pool and the West  
Puerto Chiquito Mancos Pools are separate sources of  
supply.

In the findings and orders issued in the above cases, there  
are areas of concurrence and non-concurrence between  
Commission Members LeMay and Humphries and myself. The  
cases will be discussed below in the order presented above  
with areas of concurrence noted and areas of non-concurrence  
indicated with reasons therefore.

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Dissenting Opinion  
Cases Nos. 9412, 7890,  
8946, 8950, 9111

CASE NO. 9412  
ORDER NO. R-8712

FINDINGS:

(1), (2), (3). I concur.

(4) I do not concur. The preponderance of evidence demonstrates that the Gavilan Mancos Pool and the West Puerto Chiquito Mancos Pool are two separate sources of supply that are effectively separated by a permeability restriction or barrier approximately two miles east of the line separating Range 1 West from Range 2 West, the present common boundary between the two pools.

Compelling evidence of the presence of the barrier include:

- ° The lack of well interference and frac pulse response between wells on either side of the barrier. Opponents to Mesa Grande Resources request and the consultant to the Commission from the New Mexico Petroleum Recovery Research Center discussed such well interference and frac pulse response evidence, however, the only communication demonstrated between wells was limited to wells on either side of the barrier and communication was not demonstrated between wells across the barrier. The opponents attempted to demonstrate communication by frac pulse response between the COU B-32 and the COU C-34 wells, the COU B-29 and the COU C-34 wells, the COU B-32 and the COU A-16 wells, and the COU A-20 and the COU D-17 wells by Horner Plot analysis. The proponents effectively demonstrated, utilizing accepted petroleum engineering practices, that the opponents were in error and that in fact proper analysis indicated the presence of and distance from the postulated barrier. The calculated distances to the barrier very closely approximated the scaled distances between the wells and the barrier. See proponents exhibits 42 and 43.
- ° The isobaric contouring of pressure gradients presented in proponents exhibits demonstrated the presence of the barrier and two separate sources of supply. See proponents exhibits 48, 49 and 50.



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Case Nos. 9412, 7890,  
8946, 8950, 9111

- ° Proponents exhibit 20 consisting of a comparison of Canada Ojitos Unit field pressure history and Gavilan Mancos Pool field pressure history over a 25 year period clearly demonstrates the lack of communication between the two pools. Initial static reservoir pressure in Canada Ojitos Unit was approximately 1900 psi corrected to +370 feet. The initial static reservoir pressure for Gavilan Mancos Pool nearly 20 years following the discovery of production in Canada Ojitos Unit was approximately 1800 psi corrected to +370 feet. Pressure declines for the two pools show no relationship in the five years following discovery of Gavilan Mancos Pool. The 25 year interference test shows no communication between the two pools.
  - ° The presence of non-productive wells along the barrier. In properly developed pools, pool boundaries are commonly delineated by the presence of dry holes. Wells which do not exhibit the presence of economically recoverable reserves are commonly plugged and abandoned as dry holes. Benson, Montin, Greer Drilling Corp. is the operator of the COU F-20 and the COU G-32 wells located in Sections 20 and 32 respectively in Township 26 North Range 1 West, the COU J-8 well in Section 8, Township 25 North, Range 1 West, and the COU D-17 well in Section 17, Township 25 North Range 1 West. These wells are non-productive and do not exhibit the presence of economically recoverable reserves. They are located on or adjacent to the postulated barrier and are further evidence of the barriers existence and effectiveness. The COU K-8 well located in Section 8, Township 24 North, Range 1 West is also located on or adjacent to the barrier and as of April 1988 was capable of producing less than 2 barrels of oil per day.
- (5) I do not concur. Approval of the requested change in field boundaries should be granted. The tracts in question are in communication with the Gavilan Mancos Pool, and are not in communication with the West Puerto Chiquito Mancos Pool. Approval of the requested action would protect the correlative rights of any working interest owner or royalty interest owner that may have been included in the Canada Ojitos Unit through the New Mexico Statutory Unitization Act, 70-7-1 NMSA 1978.

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8946, 8950, 9111

ORDER:

- (1) I do not concur. The application in Case No. 9412 should be approved.
- (2) I concur. Jurisdiction in this matter should be retained by the Commission.

STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION

A handwritten signature in cursive script, reading "Erling A. Brostuen".

ERLING A. BROSTUEN, Member

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Dissenting Opinion  
Case Nos. 9412, 7890  
8946, 8950, 9111

CASES NOS. 7890, 8946 and 8950  
ORDER NO. R-7405-F  
ORDER NO. R-6469-F

FINDINGS:

- (1), (2), (3), (4) I concur. Typographical error in (4), line 3, "provide" should be changed to "prevent".
- (5) I concur. The incorporation of "to prevent waste and protect correlative rights" in the finding would be proper.
- (6), (7), (8), (9), (10), (11), (12) I concur.
- (13) I do not concur. The preponderance of evidence demonstrates that Gavilan Mancos Pool and West Puerto Chiquito Mancos Pool are separate sources of supply and are separate and distinct pools. For reasons for non-concurrence, I refer you to my comments on finding (4), Case No. 9412, Order No. R-8712 above.
- (14), (15) I concur.
- (16) I concur in part. I concur in that wells within the two individual pools exhibit a high degree of communication between wells, particularly in a north-south direction, however, communication between wells is not exhibited across pool boundaries. It is also my position that the two rows of sections immediately to the east of the present common boundary separating the pools are in communication with the Gavilan Mancos pool, are not in communication with the West Puerto Chiquito Mancos Pool and are by definition of a pool, part of the Gavilan Mancos Pool. I concur that 72 hour shut in periods for the purpose of static reservoir pressure testing are insufficient. The dual porosity nature of the pools require a longer shut in period. Pressures taken during the previous testing periods were related essentially to the high capacity fracture system. Longer shut in periods are necessary to stabilize reservoir pressures due to the decreased build up rate of the low capacity matrix system. The lower capacity matrix system

has been attested to by the proponents in testimony and by exhibit. It has also been attested to by Benson, Montin, Greer Drilling Corp. through a paper co-authored by Albert R. Greer. The paper "Fracture Permeability in Cretaceous Rocks of the San Juan Basin" by Frank D. Gorham, Jr, Lee A. Woodward, J. F. Callender, and Albert R. Greer; New Mexico Geol. Soc. Guidebook, 28th Field Conf., San Juan Basin III, 1977, discusses the contribution of the lower capacity matrix system. The paper states that Benson, Montin, Greer Drilling Corp. continued to produce a suitable well (Canada Ojitos Unit C-34) after the high-capacity system was essentially swept (gas to oil ratio increased from an initial ratio of 300 to about 10,000). The paper continues that after reaching the 10,000 to 1 GOR, the well continued to produce at a rate of approximately 100 BOPD for 3 years with no further increase in GOR. The subject well reached a 10,000 to 1 GOR in May, 1974. Cumulative production at that time was 296.0 MBO. Cumulative production to May, 1988 is 609.5 MBO. It follows that the lower capacity matrix porosity system has contributed 313.5 MBO of production to the well. It is also probable that the lower capacity matrix system was contributing to production prior to the well reaching a 10,000 to 1 GOR. It is apparent that the tight blocks or lower capacity matrix system play a major role in production from the Gavilan Mancos Pool and the West Puerto Chiquito Pool. It is also apparent that pressures recorded following a 72 hour shut in period are not representative of reservoir static pressures and that evaluations and calculations based thereon will be erroneous.

(17) I concur.

(18) I concur with the first sentence. I do not concur with the remainder of the finding. Evidence presented by the opponents based upon pressures and production recorded during the testing periods indicate a higher production per pound pressure drop at the lower production allowable rate. The consultant to the Commission also calculated a higher production per pound pressure drop at the lower production allowable rate. Proponents, however, contend that the opponents and the consultant to the Commission erred in their analysis due to invalid reservoir pressure data.

Dissenting Opinion  
Case Nos. 9412, 7890,  
8946, 8950, 9111

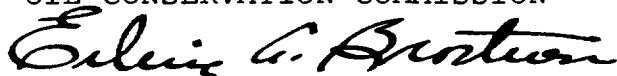
The proponents utilized field wide average pressure differential rather than the 72 hour shut in pressures. Their analysis indicated that higher production per pound pressure drop was achieved during the higher production allowable rate. In view of my discussion of the relative importance of the lower capacity matrix contribution to cumulative production in finding (16) above, it is my opinion that a top oil allowable and limiting gas oil ratio will have little or no effect in the prevention of waste and the protection of correlative rights.

- (19) I concur in part. I concur that a higher top oil allowable and a higher limiting gas oil ratio will enable high productivity wells to produce at more efficient rates without significantly impairing correlative rights. I am concerned that the recommended top oil allowable of 800 barrels per day with a limiting gas oil ratio of 2000 to 1 may be achieved in some better wells without the desired effect of increasing the pressure differential between the high capacity fracture system and the lower capacity matrix system.

ORDERS:

- (1) I concur.
- (2) I concur in part. I am in agreement that the top oil allowable and limiting gas oil ratio must be increased for reasons stated in comments on finding (19) above. No conclusive evidence was presented that would justify a top oil allowable or limiting gas oil ratio.
- (3) I concur in part. Refer to my comments in (2) above.
- (4) I concur.

STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION

  
ERLING A. BROSTUEN, Member

Dissenting Opinion  
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CASE NO. 9111  
ORDER NO. R-3401-B

FINDINGS:

- (1), (2), (3), (4), (5), (6) I concur.
- (7) I concur in part. I concur that the area east of the proposed expansion area exhibits a significantly greater pressure than the proposed expansion area and the adjacent Gavilan Mancos Pool. While this greater pressure is no doubt related to gas injection in the structurally higher and more easterly part of the unit, it is also related to the presence of a permeability barrier which separates the proposed expansion area and Gavilan Mancos Pool from West Puerto Chiquito Mancos Pool.
- (8) I do not concur. The pressure differential discussed here in no way indicates limited pressure communication between the injection wells and the proposed expansion area. This finding is absurd.
- (9) I do not concur. (1) Transmission of a pressure pulse from a hydraulically fracture well to wells across the permeability barrier has not been demonstrated. Refer to my comments in Case No. 9412, Order No. R-8712, Finding (4). (2) Failure to increase the average pressure east of the zone by overinjection of gas is not related to transmissibility across the permeability barrier. The Canada Ojitos Unit has been so poorly monitored by the operator as regards pressure measurements. From 1971 until pressure measurements were required by order of the Commission in 1987, no pressure measurements were taken or if taken were not reported to the Commission or Division. I assume that such pressure measurements if taken and if they would be beneficial to the opponents case, would have been furnished to the Division or to the Commission in hearing. (3) The variation in gas oil ratios across Gavilan Mancos Pool has no relationship to proximity to the Canada Ojitos Unit. Structural position is generally the governing factor with higher gas oil ratios in wells that are higher structurally and lower gas oil ratios in wells that are lower structurally. Variations in permeability in different areas of a pool will also affect gas oil ratios. In tighter areas gas oil ratios will generally be higher due to the preferential permeability to gas relative to oil.

(10) I concur.

(11) I do not concur. The permeability restriction is an effective barrier to any significant movement of fluids. In addition, there has been no demonstration that the pressure maintenance project in Canada Ojitos Unit has had any beneficial effect on production. To the contrary, Gavilan Mancos Pool and that area in communication therewith west of the permeability barrier in West Puerto Chiquito Field have performed far better than has the Canada Ojitos Pressure Maintenance Area. In addition, the Canada Ojitos Pressure Maintenance Area has performed more poorly than other fractured Mancos pools in spite of its pressure maintenance program. See proponents exhibits 25 and 26.

(12) I concur in part. Both pools are still being defined. Boundaries are still being delineated. Only Gavilan Mancos Pool is being developed in an orderly manner.

(13) I do not concur. There has been no evidence presented that demonstrates any movement of fluids between the present pressure maintenance unit and the proposed expansion area. There is no justification for any injection credit in the proposed expansion area. There has been no evidence presented that has demonstrated that any gas injection program has been successful in a solution gas drive fractured reservoir. The example presented in opponents exhibit 6 has no relationship to fractured Mancos reservoirs. The reservoir in the cited example consists of a sucrosic limestone with low dip, limited fractures and high porosity and permeability. If communication did exist across the permeability barrier or restriction it is highly questionable whether gas injection should be allowed to continue in Canada Ojitos Unit in view of reimbibition effects. Any gas injection credit as proposed in would seriously adversely affect the correlative rights of owners in the Gavilan Mancos Pool.

(14) I do not concur. No evidence has been presented that demonstrates that gas injection in Canada Ojitos Unit has had any beneficial effect on production, prevention of waste and the protection of correlative rights. Refer to comments under (11) above.

(15) I do not concur. There is no justification for any expansion of the pressure maintenance area or for injection credit in the proposed expansion area recommended in (15).

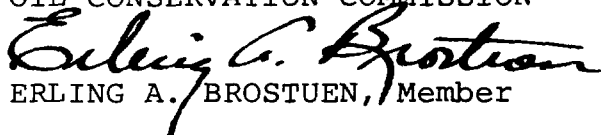
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- (16) I do not concur. The assigning of a 50% injection gas credit to the proposed expansion area is arbitrary and capricious and has no basis in any evidence demonstrated in Case No. 9111.
- (17) I do not concur. No gas credit should be allowed. Refer to comments on (11), (13) and (14) above.
- (18) I do not concur. The reservoir pressure testing will not provide any indication of movement of fluids across the permeability barrier or restriction the will justify injection gas credit. It has already been established that the two rows of sections immediately to the east of the common boundary of the Gavilan Mancos Pool and the West Puerto Chiquitos Mancos Pool are in communication and are one common source of supply and by definition part of the same pool.

ORDER:

- (1) I do not concur. There has been no evidence presented that determines the movement of fluids across the permeability barrier or restriction into the proposed expansion area. Refer to comments on findings and orders relating to all cases discussed above.
- (2) I do not concur. No evidence has been presented that would demonstrate justification of enlargement of the injection credit area.
- (3) I do not concur. Refer to comments on (1) above.
- (4) Omitted.
- (5) I concur. This order is badly in need of modification.
- (6) I concur.

STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION

  
ERLING A. BROSTUEN, Member