

1 STATE OF NEW MEXICO  
2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
3 OIL CONSERVATION DIVISION  
4 STATE LAND OFFICE BUILDING  
5 SANTA FE, NEW MEXICO

6 2 March 1988

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Metex Pipe and Supply CASE  
10 for an unorthodox oil well location 9322  
11 Lea County, New Mexico.

12 BEFORE: Michael E. Stogner, Examiner  
13  
14

15 TRANSCRIPT OF HEARING  
16  
17

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

20 For the Division:  
21  
22

23 For the Applicant:  
24  
25

MR. STOGNER: Call next Case Number 9322, which is the application of Metex Pipe and Supply for an unorthodox oil well location in Lea County, New Mexico.

Upon the -- on the applicant's request, this case will be continued to the Examiner's Hearing scheduled for March 16th, 1988.

(Hearing concluded.)

## 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 (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. 9322,  
heard by me on 2 March 19 88.

Michael E. Stomte, Examiner  
Oil Conservation Division

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

16 March 1988

EXAMINER HEARING

IN THE MATTER OF:

Application of Metex Pipe and Supply      CASE  
for an unorthodox oil well location      9322  
Lea County, New Mexico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:

For the Applicant:

James E. Haas  
Attorney at Law  
LOSEE & CARSON P.A.  
P. O. Drawer 239  
Artesia, New Mexico 88211-0239

## I N D E X

N. RAYMOND LAMB

Direct Examination by Mr. Haas 4

Cross Examination by Mr. Catanach 12

## E X H I B I T S

Metex Exhibit One, Map 4

Metex Exhibit Two, Isopach Map 5

Metex Exhibit Three, Cross Section 7

Metex Exhibit Four, Contour Map 11

1  
2 MR. CATANACH: Call next Case  
3 9322. Application of Metex Pipe and Supply for an unortho-  
4 dox oil well location, Lea County, New Mexico.

5 Are there appearances in this  
6 case?

7 MR. HAAS: Yes. I'm Jim Haas,  
8 Losee & Carson, P.A., for Metex Pipe and Supply, Applicant,  
9 and we would present one witness today.

10 MR. CATANACH: Are there any  
11 other appearances?

12 Will the witness please stand  
13 to be sworn in?

14  
15 (Witness sworn.)

16  
17 MR. CATANACH: You may proceed,  
18 Mr. Haas.

19 MR. HAAS: Okay.

20  
21 N. RAYMOND LAMB,  
22 being called as a witness and being duly sworn upon his  
23 oath, testified as follows, to-wit:  
24  
25

## DIRECT EXAMINATION

1  
2 BY MR. HAAS:

3 Q Would you state your name, please.

4 A N. Raymond Lamb, Artesia, New Mexico.

5 Q Mr. Lamb, have you appeared before this  
6 Commission before?

7 A Yes, I have.

8 Q And have your qualifications been accep-  
9 ted as an expert witness?

10 A Yes.

11 MR. HAAS: I tender Mr. Lamb as  
12 an expert witness.

13 MR. CATANACH: He is so quali-  
14 fied.

15 Q Mr. Lamb, would you explain the purpose  
16 of the exhibits you're going to present here to the Commis-  
17 sion today?

18 A Well, there are four exhibits. The first  
19 one is an overall picture of the Wilson Pool and the yellow  
20 area is the area in which we have control and propose to  
21 drill, and I use this exhibit to give the overall picture of  
22 what the Wilson Pool is all about.

23 It is a compound, complex reservoir. The  
24 northeast end is basically Yates Sand production with a few  
25 wells reaching into the Seven Rivers Reef.

1           The middle lobe, which is obvious, is  
2 basically Seven Rivers Reef production, the Yates at this  
3 point is stratigraphic sands of -- filled with gas.

4           And the south end is the true front reef  
5 of the Seven Rivers and is the more prolific of the area. A  
6 little gas is found in the Yates Sand.

7           And the area that we are working on is a  
8 side area to the middle lobe and we feel that it is a  
9 separate structure and that's the purpose of the Exhibit  
10 Number One, is to give a general idea as to where our  
11 project is.

12           Q           Okay, Mr. Lamb, will you explain Exhibit  
13 Number Two to the Commission, please?

14           A           Exhibit Number Two is an Isopach map  
15 concentrating on the area that we propose to drill on.

16           The well that we propose to drill is 100  
17 feet from the north line of Unit B and 200 feet east -- west  
18 of the east line, so it is an unorthodox location and it is  
19 with 100 feet of the property to the north, which we are now  
20 obtaining a waiver. As a matter of fact, we should be the  
21 owner of that property within a few days. We got involved  
22 with a bankruptcy of a bank and if you've ever dealt with  
23 the FDIC, you know what I'm talking about.

24           But we feel that a location at this point  
25 is the most favorable location. I will tell you that the



1 second -- No. 2 Well, which is the old, original, Stanoline  
2 2-P Well, was drilled in the late forties and was plugged  
3 and abandoned somewhere around 1950 and produced 93,000  
4 barrels of oil, at which time it went to water. And we want  
5 to move up-dip to secure additional oil and any recharge oil  
6 that might have been relocated in the area of the drainage  
7 of the 2-P.

8 This is an Isopach map giving the  
9 thickness of the Interval from the base of the salt to the  
10 top of the porosity of the Seven Rivers, and this has been a  
11 key that I've used for a number of years to determine  
12 separate structures. As a matter of fact, the south lobe  
13 was identified by this same type of Isopach map when I went  
14 to work for Wilsons in 1946.

15 So we did locate the lower lobe on this  
16 same type of information, which is the Isopach map, and we  
17 find that we have an Isopach and, obviously, a closure in  
18 this immediate area that covers the area that's identified  
19 by contour of -430 feet. Not minus. I'm sorry, I mentioned  
20 minus but it's not. It's an interval of 430 feet.

21 You'll notice that the thickness increases  
22 both to the east and to the west and, obviously, to the  
23 south, and ties in with the middle lobe of the Wilson basic  
24 pool.

25 Q Okay. Mr. Lamb, would you explain

1 Exhibit Number Three, please?

2           A           Exhibit Number Three is a cross section  
3 through the State 2-P Well, the proposed location, and we  
4 also identify the section line between Section 13 and  
5 Section 24.

6                   And it gives my interpretation as to the  
7 location of the 2 Well -- 2-P Well -- and the area in which  
8 it drained its 93,000 barrels of oil.

9                   At this point I need to go into more  
10 detail about the Seven Rivers Reef production.

11                   Our original idea was that we had a  
12 tremendous interval of reef porosity and that we would drill  
13 the upper part of it and deplete the entire section that  
14 contained oil.

15                   The practice was perfect but the theory  
16 was wrong. Instead of being a massive thickness, we have  
17 layers of porosity separated by impervious zones and as we  
18 produce, in this case the 2-P drained only oil from the top  
19 zone, and only oil down dip from that location.

20                   Your energy source is from the flank and  
21 it is a tremendous force supported by a water drive from the  
22 Seven Rivers formation. We produced 8-million barrels of  
23 oil and 24-million barrels of water from the Wilson Pool and  
24 never dropped the bottom hole pressure one pound.

25                   So the possibility of drawing oil down

1 dip is impractical and impossible because your energy drive  
2 is from the flank of each one of the zones and the movement  
3 is then up and as you take the oil out, it's replaced with  
4 water from the lower level.

5 So it is our opinion that we did not  
6 drain any oil at a structural position higher than the 2-P  
7 Well in this particular case.

8 Now, further on the Sever Rivers reser-  
9 voir, the rock is a vuggy dolomite with extremely high poro-  
10 sity. Viscosity would be almost unlimited, in that the No.  
11 1 Well, which -- on this P Lease -- when it was drilled with  
12 cable tools, they had 1200 feet of 10-3/4 inch casing in the  
13 hole when they drilled into this first zone that's identi-  
14 fied here, and it blew out and the calculated flow was  
15 10,000 barrels a day, and I believe it, because I walked up  
16 on the rig floor, cable tool rig, and put my finger in the  
17 stream of oil, which was a solid 10-inch stream, and it  
18 flowed for three days.

19 So we're dealing with a tremendous poro-  
20 sity and permeability and water drive.

21 The other key to what we're doing is that  
22 in this particular case in the reef, this is a water wet re-  
23 servoir. Most reservoirs are oil wet, but in this particu-  
24 lar case that I know for sure, that this is a water wet re-  
25 servoir, and the oil that is produced is not in contact with

1 the pore space walls. They are free droplets and they are  
2 in migration and thus instead of having 18 to 20 percent of  
3 recovery of the space of porosity, and the oil that's avail-  
4 able, we recovered around 75 percent of the oil in place,  
5 which removes any need for waterflooding or CO2, or what  
6 have you, and I'm talking about 40-acre tracts not only in  
7 the Wilson Pool but in the Lynch Pool, that have produced  
8 400,000 barrels of oil.

9 Now, my reason for knowing that these are  
10 separate porous zones, in the drilling of our No. 29 Well,  
11 the top pay zone was not up to normal standards. So we  
12 drilled to a second zone and completed the well with the two  
13 zones open.

14 After a producing period of No. 29, the  
15 well went to water and we separated the two zones by a  
16 packer with perforations below the packer, which isolated  
17 the second zone, and we produced water-free oil from it.

18 So there is no vertical communication  
19 between these zones. They are separated by the impervious  
20 zone that is shown here.

21 So at this particular time we started a  
22 deepening program to the second zone, isolating the second  
23 zone by producing under a packer.

24 And in the south lobe in Well No. 23, we  
25 found three additional zones other than the original pay

1 zones, and we've produced those, each individually and  
2 separately, until they had gone to water, and we went back  
3 to the top zone, which was original pay, and it had rechar-  
4 ged to the point that we produced 40,000 barrels of water-  
5 free oil from the top zone.

6 And the only way that that could have  
7 been available is for the oil is in motion, is in movement,  
8 and recharges the zones as they go along.

9 Now those conclusions are a little dif-  
10 ferent than what you find in an ordinary pool, and I have  
11 worked all of southeast New Mexico and a lot of west Texas,  
12 and I've never found or studied a field in detail like I  
13 have this one.

14 I started to work on this project in  
15 1946, so it has given me some time to find out this informa-  
16 tion.

17 Now, we feel that a well drilled at the  
18 location we have identified here at a -75 feet subsea will  
19 not draw any water down dip -- I mean any oil down dip; that  
20 the water replacement will be from the flank; and that we  
21 will not be taking any oil from the area up structure. Ac-  
22 tually, as I said in the beginning, and with the bankruptcy  
23 and the FDIC having it cleared, we should own tht in a few  
24 days.

25 So we have no qualms about being drained

1 by a well at this proposed location.

2 We feel that the oil that we produce on  
3 the property to the north will not be drained by the other  
4 well, will not draw any oil down dip.

5 Also, in this No. 2 Well, the well we  
6 propose to drill offsetting No. 2, we feel that we have at  
7 least two additional zones that have not been explored in  
8 this immediate area or on this particular structure.

9 I would stop here and ask if you had any  
10 questions, since this is the key and the meat.

11 MR. CATANACH: Does that con-  
12 clude your testimony?

13 A No, I have one other exhibit.

14 MR. CATANACH: Geological or --

15 A Yes.

16 MR. CATANACH: Why don't you go  
17 ahead with that and then we'll --

18 A Okay.

19 Q Explain Exhibit Number Four.

20 A Exhibit Number Four is a contour map  
21 based on the top of the porosity of the Seven Rivers, so  
22 we're down with the actual reservoir top, and the A-A' that  
23 you see, is the location of the cross section which I  
24 presented under Item Number Three.

25 The two bell-shaped areas at the State 1-

1 P and at the State 2-P, the No. 1 producing 66,000 barrels  
2 of oil and the No. 2, 93,000 barrels of oil, is my interpre-  
3 tation of the drainage area from each of these wells drilled  
4 by Stanoline a number of years ago, and were depleted to the  
5 point of making 100 percent water.

6 So this sets out again my opinion that  
7 neither the 1 or 2-P, nor the location that we are propo-  
8 sing, will drain oil across from the property to the north  
9 or down dip from the structure.

10 Q That it?

11 A I think.

12

13 CROSS EXAMINATION

14 BY MR. CATANACH:

15 Q Okay, the FDIC currently owns that pro-  
16 perty to the north there?

17 A Well, it's more complicated than that. I  
18 briefly will tell you that Marks and Garner acquired the  
19 property and they obtained a loan from a bank that went in-  
20 to bankruptcy and that note was supposed to have been trans-  
21 ferred to a new lender but there's a little problem that the  
22 FDIC did not make a clear distinction that the note was  
23 transferred.

24 So they have all agreed that they will  
25 make that transfer and when they do, then we will purchase

1 that property.

2 Q Okay, what property are you referring to  
3 exactly?

4 A That would be Units O and P of Section  
5 13. It would be the south half of the southeast.

6 Q Is there a well in tht area?

7 A There is a well that has been a disposal  
8 well in the northwest corner of that property and Marks and  
9 Garner are considering attempting to produce it again, and  
10 we have agreed with them as to how we shall share the  
11 allowable if they do get production on it.

12 Q Are you referring to --

13 A It's No. 8. It has -- it will be in Unit  
14 O --

15 Q Okay.

16 A -- of Section 13, and it's the one that's  
17 produced 295,000 barrels of oil and was converted to a salt  
18 water disposal well, and Marks and Gqrner want to make an  
19 attempt to see if they can produce oil out of it.

20 Q Out of the same (unclear)?

21 A Uh-huh.

22 Q Where is it disposing water right now?  
23 What zone?

24 A Where are they putting their water?

25 Q Yes, sir.



1           A           They're putting their -- all their water  
2 in a well up to the north, a little west. It will No. 9, is  
3 where they're putting all their water now. There've been  
4 any number of water disposal wells down there.

5           Q           Right. Okay, the No. 8 is still produ-  
6 cing.

7           A           No, it -- they are attempting to put it  
8 on production, but we don't know whether -- they don't know  
9 and I don't know whether it will make any -- I don't know  
10 what the affect of the water disposal is going to be on the  
11 reservoir over the time that it's been there.

12                   I might say one other problem which we  
13 have, which is for your information, we are required under  
14 our farmout agreement from BTA to commence this well by Ap-  
15 ril the 1st.

16           Q           Did the No. 2 Well, the 2-P, what -- what  
17 zone did that produce from, just that upper -- upper (un-  
18 clear) zone?

19           A           Upper -- upper porous zone that -- they  
20 -- they never drilled into the lower zones, you see. These  
21 wells, one of them was abandoned in 1950 and the other one  
22 in '52.

23                   So we're working on the theory that if  
24 there is migration, those zones will be recharged complete-  
25 ly. We not only will get the amount of oil we produce from

1 the location -- I mean from the area between the two wells,  
2 but from the area that No. 2 drains its oil from.

3 Q Okay, it looks like the No. 2 Well  
4 drained a substantially large area, according to your bell  
5 curves here. Do you think your well will drain that large  
6 an area?

7 A Well, I think that it probably will drain  
8 a larger area because we'll be higher on structure. I think  
9 the area will be larger. There's no reason to believe that  
10 the water/oil contact will be any different than it was ori-  
11 ginally, approximately 195 feet.

12 Q So it may drain more than 40 acres, is  
13 what you're saying.

14 A Well, I'm -- I have some questions and  
15 the reason I have this question, our Well No. 32, due south  
16 of here, had 18 inches of pay and produced 101,000 barrels  
17 of oil, so you don't know about the porosity and permeabil-  
18 ity or the drainage area, either.

19 It's a very prolific reservoir.

20 Q What's the landowner or the lease owner-  
21 ship to the south there on the flank?

22 A BTA owns that and we have a farmout on  
23 the Unit's A and B of Section 24.

24 Q So they own G and H?

25 A They own all the rest of the half sec-

1 tion, and we have a waiver from them.

2 Q Okay, you have notified them?

3 A Yes. Yes.

4 Q I'm still a little bit confused about the  
5 ownership to the north there. You say it's still --

6 A Well, I think Mr. Haas can explain it --

7 MR. HAAS: Marks and Garner are  
8 the owners --

9 Q -- better than I can. He --

10 MR. HAAS: -- of the operating  
11 rights of record. They have a mortgage that was held by  
12 MONCOR Bank of Hobbs, who is no longer a viable entity. It  
13 was transferred to the FDIC when the bank went into  
14 receivership. The bank, the FDIC later sold a package of  
15 assets, including this mortgage, to United Bank of Lea Coun-  
16 ty; however, in their transfer there was some question, a  
17 little bit of confusion as to whether or not they actually  
18 conveyed the note, promissory note, that represented the  
19 debt. So the bank is firmly convinced and it has given us  
20 assurances that they have the power to release the mortgage  
21 and the FDIC has agreed to provide further documentation to  
22 show that the note actually was transferred to United Bank  
23 of Lea County.

24 So it's really more of a cleaning up the  
25 record title. The title is actually in Marks and Garner

1 subject to this mortgage which the bank has agreed to re-  
2 lease as to 80 acres.

3 Q So if Marks and Garner gets it all  
4 cleaned up, do you intend to get that farmout from them?

5 A No, we're buying it. We're buying all  
6 the rights under that 40, down to 5200 feet.

7 Q Okay, if Marks and Garner --

8 A And we have a contract to that effect and  
9 the only thing holding us is this MONCOR thing.

10 Q Okay. Marks and Garner is aware of your  
11 proposed location? You have notified them of that?

12 A Yes, and they will issue us, to help with  
13 your problem, a waiver or whatever it needs. We had in mind  
14 that we would bring a waiver from them and, of course, then  
15 we'll -- we'll own the rest of it.

16 Q Okay, that would be helpful if you could  
17 provide that.

18 A Well, we have no problem with that.

19 Q Okay.

20 A And, actually, this monetary situation  
21 was the cause of the not hearing the case on March the 2nd.

22 We were ready but California wasn't  
23 ready.

24 Q Okay, you're going to dedicate Unit B to  
25 that well, aren't you?

1           A           Yes. Right.

2           Q           Is there a chance that the bottom hole  
3 location could get a lot closer to that -- to that section  
4 line there?

5           A           Well, we intend to drill a straight hole.

6           Q           Yeah.

7           A           That's part of your rules, that we drill  
8 a straight hole there.

9           Q           Do the wells in this area have a tendency  
10 to drift?

11          A           Most of the wells that I drill, I drill  
12 with cable tools, and we had no problems with it. We did  
13 drill one well, which is Amerada 3, with a rotary, and we  
14 had no problems. The only problem we had, nitrogen gas blew  
15 out in the salt section.

16                   I have one other thing that -- that I  
17 could show you that might help you visualize what we're say-  
18 ing, and I cannot make additional copies. It's just some-  
19 thing that I had in the field that I worked with, and I will  
20 tell you that it's probably 20 years old. I will bring it  
21 to you.

22                   It is a log that I kept on No. 23, which  
23 is in the center of the south row, one of the key wells, and  
24 this is the way I handled my business. I'll get the right  
25 side up. This is the original pay zone in the well. Then

1 we started the deepening process on 2-foot samples, 1-foot  
2 drilling (unclear), and you realize this is 10 feet, which  
3 is instead of usually being 100, this is 10 feet, here was  
4 the second pay zone, right here, that we're talking about.  
5 This is the one that -- this zone is the one that the 2-P  
6 produced from. This is the one that we believe is there and  
7 we think these are here and possibly maybe this far down.

8 But this is just something that I had  
9 and I did this on all the wells that I drilled to help me  
10 visualize what I was into.

11 But this, you realize, that this -- as  
12 the water evaporates off of the samples, the oil then stains  
13 the rock. That's where it gets its (unclear), and that's  
14 been 20 years so you can imagine evaporation and so forth  
15 and so on.

16 Q Okay. Do you have any idea about how  
17 much additional oil you might recover from this --

18 A We're anticipating that a well at this  
19 location will get about 125,000 barrels of oil.

20 Q And you testified that you believe that  
21 it would all come from the south part of the quarter -- the  
22 quarter quarter section.

23 A Yes.

24 Q And not drain the north end of the --

25 A Well, I'm firmly convinces of that in

1 view of the fact that we're trying to buy the acreage to the  
2 north, and would have to share with BTA on anything that  
3 crossed the line and I prefer not to do that and I don't --  
4 I'm positive it won't happen.

5 Q Okay.

6 MR. CATANACH: I think that's  
7 all I have of the witness.

8 MR. HAAS: Mr. Lamb, were these  
9 exhibits prepared by you or under your supervision?

10 A They were prepared by me.

11 MR. HAAS: Nothing further. We  
12 ask the introduction of Exhibits One through Four.

13 MR. CATANACH: Exhibits One  
14 through Four will be admitted as evidence.

15 Is there anything further in  
16 Case 9322?

17 If not, it will be taken under  
18 advisement.

19  
20 (Hearing concluded.)

21

22

23

24

25

## 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 (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. 9322,  
heard by me on March 16, 1988.  
David R. Cabanul, Examiner  
Oil Conservation Division



## NEW MEXICO OIL CONSERVATION COMMISSION

## EXAMINER HEARING

SANTA FE, NEW MEXICOHearing Date MARCH 16, 1988 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
Michael Cuban	Amoco	Denver
RICHARD BOTJER	Amoco	DENVER
Chad Dickerson	GPC	Alameda
Leslie Bentley	GPC	"
Bill Mulliken	Phillips Petrol	Odessa
Richard D Campbell	ARCO	Midland, TX
W.B. McCoy	Santa Fe Exploration	Santa Fe
Bill Hawkins	Amoco	Denver, CO
KENT LUND	Amoco	Denver, CO
Bruce Naher	Byram	Santa Fe
Paul W. Burchell	El Paso Natural Gas Co.	El Paso, TX
James Bruce	Hinkle Law Firm	SF
Charles Gray	Sun E & P	Dallas
Michael Morgenthau	Sun E & P	Midland, TX
Patrick Dougherty	Sun E & P	Dallas, TX
Bob Frank	Union Texas Pet	Farmington
Eugene Siefert	"	Alameda

## NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARINGSANTA FE, NEW MEXICOHearing Date MARCH 16, 1988 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
Ernst L. Pauella	Pauella & Snygar	SF
M.P. GADDIS, JR	TERRA RESOURCES	MIDLAND, TX
KEVIN PFISTER	" "	" "
ROD THOMPSON	" "	" "
JIM GRADY	MARSHALL PIPE & SUPPLY	Denver, CO
W. T. Kelleher	Kelleher Kelleher Akers Santa Fe	
JOHN CURRIE	PHILLIPS PETROLEUM	ODESSA, TX
RICK HALL	" "	" "
RICHARD CROOKAN	DUGAN PRODUCTION Corp	FARMINGTON, NM
JOHN ROE	" "	" "
Mike Haver	Wheeler Pipe & Supply	Albuquerque
Ray Law		
C. C. KENNEDY	IND	ALBU, N.M.