

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

14 September 1988

EXAMINER HEARING

IN THE MATTER OF:

Application of Murphy Operating Corp- CASE  
oration for a unit agreement, Chaves 9477  
and Roosevelt Counties, New Mexico,  
and  
Application of Murphy Operating Corp- 9478  
oration for a waterflood project,  
Chaves and Roosevelt Counties, New  
Mexico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division: Robert G. Stovall  
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## I N D E X

## ANN MURPHY EZZELL

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1 MR. CATANACH: Call the next  
2 case, 9477.

3 MR. STOVALL: Application of  
4 Murphy Operating Corporation for a unit agreement, Chaves  
5 and Roosevelt Counties, New Mexico.

6 MR. CATANACH: Are there ap-  
7 pearances in this case?

8 MR. EZZELL: Yes, sir, Calder  
9 Ezzell with the Hinkle Law Firm, representing the appli-  
10 cant.

11 I would move that we consoli-  
12 date Cases 9477 and 9478.

13 MR. CATANACH: At this time  
14 we'll call Case 9478.

15 MR. STOVALL: Application of  
16 Murphy Operating Corporation for a waterflood project,  
17 Chaves and Roosevelt Counties, New Mexico.

18 MR. CATANACH: Are there any  
19 other appearances in these cases?

20 MR. EZZELL: I have two  
21 witnesses to swear.

22 MR. CATANACH: Okay. Will  
23 the witnesses please stand and be sworn in?  
24

25 (Witnesses sworn.)

1 ANN MURPHY EZZELL,  
2 being called as a witness and being duly sworn upon her  
3 oath, testified as follows, to-wit:  
4

5 DIRECT EXAMINATION

6 BY MR. EZZELL:

7 Q Will you state your name and place of  
8 residence, please?

9 A Ann Murphy Ezzell, Roswell, New Mexico.

10 Q Who is your employer and what is your  
11 occupation?

12 A My employer is Murphy Operating Corpor-  
13 ation. I'm the Chairman and Chief Executive Officer. I  
14 act as the Corporate Attorney and Petroleum Engineer.

15 Q And have you previously testified be-  
16 fore the Commission and have your qualifications as an ex-  
17 pert in the field of law and petroleum engineering been  
18 accepted as a matter of record?

19 A Yes, they have.

20 Q Are you familiar with Murphy Operating  
21 Corporation's applications in the consolidated cases 9477  
22 and 9478?

23 A Yes, I am.

24 Q What does Murphy seek by these applica-  
25 tions?

1           A           We seek approval of our Haley Chaveroo  
2 San Andres Unit and authority to institute a waterflood  
3 project in that project.

4           Q           How did you become familiar with the  
5 facts concerning these applications?

6           A           I personally prepared or supervised the  
7 preparation of the exhibits that were previously submitted  
8 to the OCD in connection with this hearing.

9                       MR. EZZELL: Mr. Chairman,  
10 are the witness' qualifications acceptable?

11                      MR. CATANACH: They are.

12                      MR. EZZELL: Mr. Chairman,  
13 the applications in these cases were filed in triplicate  
14 with the OCD along with four copies of all supplemental  
15 data. All of this data, as you know, is contained in  
16 Files 1 through Four, which were submitted to the  
17 Division.

18                      In order to facilitate loca-  
19 ting specific exhibits from which testimony will be given,  
20 we propose to introduce Files 1 through 4 as Exhibits One  
21 through Four. Then during testimony we will refer to the  
22 exhibit and divider number in reference to the specific  
23 exhibit from which testimony is being given.

24           Q           Mrs. Ezzell, I direct your attention to  
25 Applicant's Exhibit Number One, which is the black file

1 folder number one, specifically referring you to One-A and  
2 One-E and ask you to identify them.

3 A Exhibit One-A is a map of the unit  
4 area, the proposed unit area, that delineates the unit  
5 outline and also provides tract numbers. All of the  
6 leases are state lands. There are four leases, and the  
7 unit area as proposed consists of 1840 acres.

8 Q Okay, and what is Exhibit One-E?

9 A Exhibit One-E is a map of the vicinity  
10 of the unit area. It delineates in a black outline the  
11 unit boundary; in a yellow outline a 2-mile perimeter  
12 around the unit boundary, and the area of review wells are  
13 delineated by a red circle, a half mile radius around each  
14 proposed injector.

15 Q Okay, what is the proposed unit area  
16 initially developed?

17 A The initial well in this field was  
18 drilled over 20 years ago and all the wells are about that  
19 same vintage.

20 Q Okay, what is the current status of  
21 production from the wells located in your proposed unit?

22 A The production at this time is margin-  
23 ally economical.

24 Q Would you consider that the wells that  
25 are still producing within your proposed unit would pro-

1 properly be classified as stripper wells?

2 A Yes, I would.

3 Q What are the unitized formations for  
4 your proposed unit?

5 A If I may paraphrase from the unit  
6 agreement, it is that subsurface portion of the unit area  
7 known as the San Andres formation, with a vertical limit  
8 the interval 4158 to 4470 as measured on the compensated  
9 formation density log in the Murphy Operating Corporation  
10 (unclear) Well No. 15, which was drilled March 23rd, 1966,  
11 and it's located 990 feet from the south line and 1980  
12 feet from the east line of Section 34, Township 7 South,  
13 Range 33 East.

14 Q Okay, I now refer you to Exhibit One-B  
15 and ask you to identify that.

16 A Exhibit One-B is a schedule of owner-  
17 ship and unit participation factors. The exhibit lists by  
18 tract number, the lease name, and the description of the  
19 lease; of course the serial number and lease date, the  
20 lessee of record, the basic royalty and the percentage  
21 which in all cases is the State of New Mexico 12-1/2 per-  
22 cent.

23 An additional column for the overriding  
24 royalty owners and there are no overriding royalty owners,  
25 and then the working interest owners and their respective

1 working interest percentages together with the unit par-  
2 ticipation factors allocated to each tract.

3 Q How were you able to determine who were  
4 the working interest owners and the royalty owners in the  
5 proposed unit area?

6 A By title examinations based on ab-  
7 stracts and physical examination of the records in the  
8 county and also the State Land Office records, all of  
9 which was done by title examiners from the Hinkle Law  
10 Firm.

11 Q I now refer you to Exhibits One-C and  
12 One-D, and ask you to identify them.

13 A Exhibit One-C is the unit agreement for  
14 the Haley Chaveroo San Andres Unit.

15 Exhibit One-D is the unit operating  
16 agreement for said unit.

17 Q Are you familiar with the provisions of  
18 these agreements?

19 A Yes, I am.

20 Q Who is designated as unit operator?

21 A Murphy Operating Corporation.

22 Q How many working interest owners own an  
23 interest in the proposed unit?

24 A There are two working interest owners,  
25 Murphy Operating Corporation and American Energy Capital



1 Corporation.

2 Q And how many of the working interest  
3 owners have executed the unit agreement and unit operating  
4 agreement?

5 A These agreements have been executed by  
6 100 percent of the parties, both parties.

7 Q Okay, so there was voluntary joinder in  
8 the unit by 100 percent of the working interest owners?

9 A That's correct.

10 Q The unit is comprised of 100 percent  
11 State of New Mexico oil and gas leases and there are no  
12 overriding royalty interests?

13 A Yes.

14 Q Are there any owners of record of any  
15 of the leases within the proposed unit who are not a party  
16 to your unit agreement or unit operating agreement?

17 A Yes. Sun Operating, a limited partner-  
18 ship is a lessee of record.

19 Q Okay, a lessee of record in what has  
20 been identified as Tract 3 on the maps, although they own  
21 no rights, or no operating rights in the unitized  
22 interval, is that correct?

23 A That's correct.

24 Q Have they ratified the unit?

25 A Yes, they have.

1           Q           I hand you what is marked as Exhibit  
2 Five, which is a cover letter from you with a copy of the  
3 ratification attached. That is a ratification sent to you  
4 by Sun?

5           A           That's correct.

6           Q           And that was forwarded by you to the  
7 State Land Office and the Oil Conservation Division?

8           A           Yes. Three originals of this document  
9 were provided to each office.

10          Q           Okay. Does the unit agreement use a  
11 formula for the allocation of unit production and costs to  
12 the various tracts?

13          A           Yes, it does.

14          Q           What is that formula?

15          A           The formula is based upon 80 percent of  
16 primary production to be through January 1, 1988. In ad-  
17 dition there is a 20 percent factor for usable wells with-  
18 in the unit area.

19          Q           Okay. Do you feel that this formula  
20 represents a fair and equitable division of production  
21 among the royalty owners and working interest owners?

22          A           I do.

23          Q           Has this formula been accepted by all  
24 of the working interest owners?

25          A           It has.

1 Q Does your unit agreement further con-  
2 tain provisions for operations, voting procedures, remov-  
3 al of operator, which have been agreed upon by all the the  
4 owners?

5 A It does.

6 Q Does the unit agreement and unit oper-  
7 ating agreement contain a system for credits and charges  
8 for existing equipment?

9 A Yes, it does.

10 Q Do you feel that system is fair and  
11 equitable?

12 A I do.

13 Q Do you have a proposed unit well num-  
14 bering system for your unit?

15 A Yes, we have provided in the documen-  
16 tation a redesignation of well numbers consistent with  
17 guidelines provided to us by the State Land Office, where-  
18 by a well name is changed to coincide with the section  
19 number, being the first number, and then a unit number for  
20 the location of a well consistent with the A through P  
21 designations.

22 Q So Units A through P would be given  
23 corresponding numbers 1 through 16.

24 A That's correct.

25 Q Has the State Land Office designated

1 your proposed unit as a logical unit for secondary re-  
2 covery and have they given preliminary approval to your  
3 unit and the unit agreement and operating agreements?

4 A Yes, they have.

5 Q I hand you what has been marked as  
6 Exhibit Six and ask you to identify that.

7 A This letter was prepared on August  
8 29th, 1988, and grants preliminary approval by the State  
9 Land Office. It is signed by Floyd (unclear) as Director  
10 on behalf of W. R. Humphries, Commissioner of Public  
11 Lands.

12 Q This preliminary approval, is it condi-  
13 tioned on any occurrence?

14 A Yes. There were three requirements.  
15 Two have to date been fulfilled.

16 They asked for copies of the Exhibit B,  
17 setting out the tract participation; also a ratification  
18 from the lessee of record and working interest owners.

19 These items have been complied with and  
20 the final pending item is the order of the New Mexico Oil  
21 Conservation Division, and that approval awaits the out-  
22 come of this hearing.

23 Q Okay. To whom was notice of your ap-  
24 plication furnished?

25 A Notice was given to offset operators

1 within one-half mile of the unit boundary, in addition to  
2 also the surface owner of lands that any proposed injector  
3 is located, and all of the surface is owned by the State  
4 of New Mexico.

5 Q Okay. I have given you what has been  
6 marked Exhibit Seven, the first page of which is a list of  
7 all the owners whom you've identified as being offset  
8 operators within one-half mile of the unit boundary and  
9 the State Land Office for the state lands.

10 Have all of these individuals received  
11 the required notice?

12 A Yes, they have.

13 Q How was that notice sent to them?

14 A It was sent certified, return receipt  
15 requested and we received in a timely manner the return  
16 receipt.

17 Q In each and every case was the notice  
18 received by the person to whom it was addressed at least  
19 20 days prior to this hearing?

20 A Yes.

21 Q And the second page to Exhibit Seven  
22 shows the xeroxed copies, second and third page, shows the  
23 xeroxed copies of each of those return receipts showing  
24 the timely delivery of the notice.

25 A Yes, it does.

1           Q           Mrs. Ezzell, in your opinion will the  
2 approval of the application in these cases promote the  
3 conservation of oil or gas and the better utilization of  
4 reservoir energy?

5           A           It's my opinion that it would.

6           Q           In your opinion would the proposed unit  
7 agreement and unit operating agreement be in all respects  
8 for the best interest of the state and will the state and  
9 each beneficiary of the lands involved receive its fair  
10 share of the recoverable oil or gas in place under the  
11 land affected?

12          A           It will.

13          Q           In your opinion is unitized management  
14 necessary to conduct a secondary recovery operation?

15          A           Yes.

16          Q           Does your proposed plan have a reason-  
17 able expectation of increasing recoveries from the field?

18          A           It does.

19          Q           Would the granting of these applica-  
20 tions be in the interest of conservation and the protec-  
21 tion (sic) of waste, and the protection of the correlative  
22 rights of all parties involved?

23          A           Yes.

24          Q           Was Exhibit One, parts A through E,  
25 prepared by you or under your direct supervision?

1           A           They were.

2           Q           Were Exhibits Five, Six and Seven  
3 either prepared by you or received by you through the U.  
4 S. Mail?

5           A           Yes.

6                       MR. EZZELL: Mr. Chairman, I  
7 now offer Exhibits One, parts A through E, inclusive, and  
8 Exhibits Five, Six and Seven into evidence, and have no  
9 further questions of this witness.

10                      MR. CATANACH: Exhibit One,  
11 parts A through E, and Exhibits Five through Seven will be  
12 admitted as evidence.

13                      MR. EZZELL: Call Mr. Bert  
14 Murphy.

15  
16                      BERT MURPHY,  
17 being called as a witness and being duly sworn upon his  
18 oath, testified as follows, to-wit:

19  
20                      DIRECT EXAMINATION

21 BY MR. EZZELL:

22           Q           Would you state your name, residence,  
23 and occupation, please?

24           A           I'm Bertram H. Murphy, Roswell, New  
25 Mexico. I'm an independent oil producer and a Registered

1 Professional Engineer, petroleum, in Texas and New Mexico.

2 Q Have you testified previously before  
3 this Commission on unitization and waterflood matters and  
4 had your qualifications as an expert engineer and geolo-  
5 gist accepted as a matter of record?

6 A Yes, and I have also been accepted as  
7 an expert in hydrology and groundwater by the State En-  
8 gineer.

9 Q Are you familiar with the San Andres  
10 formation and the area in Roosevelt and Chaves Counties  
11 that is the subject matter of these applications?

12 A Yes.

13 Q What does Murphy Operating Corporation  
14 seek by its applications today?

15 A Unitization and approval of the water-  
16 flood, the proposed Haley San Andres Unit.

17 Q How did you become familiar with the  
18 specifics of the proposed unit?

19 A I am an officer and chief engineer for  
20 the applicant, Murphy Operating Corporation, and have ex-  
21 perience in San Andres waterfloods as a consultant for a  
22 third parties as well as for my own account.

23 MR. EZZELL: Mr. Chairman,  
24 are the witness' qualifications as an expert in the fields  
25 of petroleum engineering and geology acceptable?



1 MR. CATANACH: They are.

2 Q Mr. Murphy, I refer you to Exhibit  
3 Four, which is the black file number -- marked Number 4,  
4 which also contains the exhibit -- the map you see on the  
5 right on the wall.

6 Would you identify those exhibits?  
7 I'll get out of your way if you need to talk from them.

8 A This is a field map that also shows the  
9 plan of operation for the proposed unit.

10 We have outlined in yellow the proposed  
11 unit. We have circles, half circles around the ultimate  
12 total number of injection wells. We have the status of  
13 the existing wells to the -- to the legend here on the --  
14 on the thing.

15 Our intention is to commence immediate-  
16 ly with gravity into these four wells which are -- well,  
17 they're not marked on there, but the 34-6, 34-14, 33-8 and  
18 33-16.

19 33-16 is currently a salt water dispo-  
20 sal well. As soon as the plant is built, which we antici-  
21 pate will take 60 to 90 days, we'll then convert these  
22 three wells to injection and have a double 5-spot pattern  
23 with inside producers and with the pattern affecting out-  
24 side peripheral wells.

25 Q Okay. Mr. Murphy, could you briefly

1 describe the history of the Chaveroo Field in general and  
2 the proposed unit area specifically?

3 A The Chaveroo Field was discovered in  
4 March of '65 with the Champlin Petroleum and Warren Amer-  
5 ican No. 1 Hondo State.

6 The field has 425 wells with cumulative  
7 production to January 1, 1988, of a little -- of almost  
8 23-million barrels of oil; almost 34-million MCF of gas;  
9 and approximately 27-million barrels of water.

10 The field produces from the San Andres  
11 formation in the porous intervals of 1, 2 and 3 on the  
12 P-log, which we'll get to in a minute. Specifically the  
13 proposed Haley Chaveroo San Andres Unit has 44 wells, two  
14 of which have been permanently plugged and abandoned.  
15 These wells have produced over 3-million barrels, approxi-  
16 mately 3,075,000 barrels of oil to January 1st, 1988. The  
17 average for the unit area is just over 73,000 barrels per  
18 well, while the field average for the entire Chaveroo  
19 Field was approximately 54,000 barrels a well.

20 Q So the wells in your proposed unit on  
21 an average have a -- they are a slightly better recovery  
22 rate than the average well in the field?

23 A In my judgement they are superior, the  
24 superior area in the field.

25 Q Have all of the wells in your proposed

1 unit area reached an advanced stage of depletion so that  
2 they could properly be classified as stripper wells?

3 A They have.

4 Q Have you done any work or an estimate on  
5 remaining underground reserves in the unit area?

6 A We have. We have graphed and studied  
7 the decline curves on all the wells in the -- in the area  
8 of review.

9 Q In your expert opinion has the primary  
10 production decreased to a point where the field is at or  
11 reaching its economic limit?

12 A It is.

13 Q You say you calculated remaining primary  
14 by the decline curve method on the existing wells?

15 A That's correct.

16 Q Do you have an estimate of potential for  
17 secondary reserves?

18 A We do from analogy to other San Andres  
19 waterfloods in the Northwest Shelf Area, which starts in  
20 the (not clearly understood) land area in Texas and goes  
21 clear to the Cado and beyond in the -- in New Mexico.  
22 There are many San Andres waterfloods in this area and  
23 we've made a detailed study of those floods and found that  
24 by analogy you can expect approximately one barrel recovery  
25 for each barrel of primary recovery. So we would estimate

1 the potential of the secondary in this unit to be something  
2 in excess of 3-million barrels.

3 Q Mr. Murphy, I refer you now to the File  
4 numbered Exhibit Number Three. I'd ask you to briefly ex-  
5 plain its contents and would encourage the Examiner to in-  
6 terrupt with any questions they have as we go through.

7 A Attachment A is an engineering and geo-  
8 logic report prepared by me August 1st, 1988.

9 It briefs the history and reservoir and  
10 performance characteristics of the San Andres regional  
11 area, regional geology, stratigraphy, porous zones, struc-  
12 tural influences, and reservoir characteristics, and it has  
13 a section on the Chaveroo Field stating when the field was  
14 discovered and giving the performance and reservoir and  
15 geologic characteristics of the field.

16 It also has a section on propose Haley  
17 San Andres Unit and does the same same thing; in summary, a  
18 review of the technical data and proposed operational plans  
19 indicate that the unit is similar or superior to the rest  
20 of the Chaveroo San Andres Field and is typical or superior  
21 to numerous other San Andres fields in the Northwest San  
22 Andres Trend that have been waterflooded successfully. The  
23 proposed operational plan appears to be sound. Unitization  
24 and waterflooding of the unit should protect correlative  
25 rights, promote conservation and prove beneficial for the

1 interest owners and the county, state and federal --  
2 county, state and federal treasuries.

3 The -- on the right side are the exhi-  
4 bits supporting this report.

5 Exhibit Roman Numeral VIII-A is a loca-  
6 tion map showing the location of the Chaveroo Field on the  
7 common line between Chaves and Roosevelt County.

8 Roman Numeral VIII-B is a copy of the  
9 Roswell Geologic Society Symposium with their attached  
10 structure map, isopach map, and a type log. This report  
11 was prepared by them in 1966 over a year after the discov-  
12 ery of the field.

13 Our studies from data developed since  
14 that time indicate that their conclusions were generally  
15 average and correct in their discussions with regard to the  
16 pay zone, the type of trap, reservoir data, completion  
17 methods, the horizontal -- deepest horizons penetrated, and  
18 the production from the field.

19 Exhibit Roman Numeral VIII-C is a tabu-  
20 lation and summary of geologic data for wells within the  
21 proposed unit area. It here shows the operator and lease  
22 as --

23 Q Excuse me, you need to be on VIII-C, the  
24 core data?

25 A Oh, core data, yes, sorry. VIII-C, we

1 had -- we were able to find core data on one well in the  
2 unit and on two wells in the area of review. We've in-  
3 cluded that data, which further supports the reservoir  
4 information given by the Roswell Geologic Society.

5 Q Okay.

6 A All right, now VIII-D?

7 Q Right.

8 A VIII-D is a tabular summary of geologic  
9 data for wells within the proposed unit area. It shows the  
10 operator and lease as they were carried prior to our re-  
11 designation of the wells. It shows the original well and  
12 unit and then the redesignated well number, the elevations  
13 for both ground and Kelly bushing and the tops of the P-1,  
14 P-2 and the thickness of the P-1 to the P-3.

15 Q Okay, at this time we have some addi-  
16 tional data supplementing that was requested by the Oil  
17 Conservation Division. I have marked that as Exhibit  
18 Eight. Would you briefly explain what this supplemental  
19 data shows?

20 A This information gives in more detail  
21 the well information in the proposed Haley Unit area. It  
22 gives the unit under the new designation, the current well  
23 status, the proposed well status, the casing record,  
24 drilling date and completion date, TD, perforations, and  
25 completion.

1 Q And it shows (unclear) casing program,  
2 cement tops --

3 A That's correct. It shows the -- for  
4 both the surface pipe and the long string.

5 It also gives that information for the  
6 area of review.

7 Q So between this Exhibit VIII and Exhibit  
8 Three, Roman Numeral VIII-D, we have a tabulated summary  
9 for all wells both within the unit and outside the unit but  
10 within the area of review?

11 A That's correct.

12 Q Okay. I now refer you to Exhibit VIII-E  
13 and ask you to identify that. It is on the wall right here  
14 behind me.

15 A Exhibit VIII-E, or attachment VIII-E to  
16 Exhibit Three, is a structure map of the San Andres on a  
17 correlation point picked above the first porosity. It also  
18 has a marker well, or a type well, that shows a electric  
19 log -- electric log showing the first, second and third  
20 sub-sections of porosity in the San Andres formation.

21 Here we have a structure map prepared by  
22 us which is in addition to the map prepared by the Roswell  
23 Geologic Society but which conforms very closely with it.

24 It shows the influence of structure,  
25 local structure, on reserve accumulation and the perfor-

1 mance of the unit area and area of review.

2 Q You've identified as your unit interval  
3 in the marker well between the depths of 4158 and 4470.  
4 How was that interval identified?

5 A It was identified by a field study that  
6 indicated that in the Chaveroo Field there's production  
7 from all three of those porosity zones.

8 Q Known as the P-1, P-2 and P-3?

9 A P-3, yes.

10 Q Okay. What are Exhibits Three F and G,  
11 which are right here?

12 A These exhibits are an east/west cross  
13 section --

14 Q F is your isopach.

15 A Okay. Three, Roman Numeral VIII-F, is  
16 an isopach map. This information is a net -- is a net pay  
17 map or net porosity map based on net porosity of greater  
18 than 4 percent in the first and second porosity intervals.

19 The major producer of oil in here is the  
20 second porosity interval with some production from the  
21 first and a very small amount of production possibly from  
22 the third.

23 This map is -- conforms with the Roswell  
24 Geologic Society's work as previously submitted.

25 We looked at a gross pay map and found



1 from the study that was done our geologic section, that was  
2 insufficient difference in the gross pay to make a gross  
3 isopach map significant.

4 This is a north/south cross section  
5 through Section 34 and Section 3 in the unit and it demon-  
6 strates the continuity of producing intervals in the poro-  
7 sity intervals across the unit area, demonstrating that the  
8 injection of water should move oil from the injection wells  
9 to the producing wells.

10 The other cross section is a similar  
11 cross section that goes east and west across the Sections  
12 33 and 34 and we won't hold that up unless you gentlemen  
13 just want us to for some purpose.

14 MR. CATANACH: I don't think  
15 that will be necessary.

16 Q Mr. Murphy, the structure map that we've  
17 looked at along with the porosity isopach, combined with  
18 your cross sections indicating the presence of the unitized  
19 interval, in your opinion does -- does this indicate that  
20 these -- the data we have looked at indicate that the uni-  
21 tized formation has a continuity over the unitized area and  
22 is essentially uniform throughout your entire unitized  
23 area?

24 A Yes, essentially uniform. It's very  
25 typical of the successful San Andres waterfloods in the

1 Northwestern Shelf Area. There's not -- in the San Andres  
2 you never have complete -- complete uniformity of -- across  
3 the various wells but you have sufficient that it's -- that  
4 they waterflood successfully.

5 Q Okay. I direct you back now to the file  
6 folder, I believe we're at Three, Roman Numeral VIII-H now?

7 A Yes, that's correct.

8 Q Referring you to Three, VIII-H, are you  
9 familiar with the formula for allotting of the tract parti-  
10 cipation factors?

11 A Yes, I am. I developed the tract parti-  
12 cipation factors based on the cumulative oil recovery to 1  
13 January 1988, and based on 80 percent of the formula and 20  
14 percent of the formula being usable wells.

15 We also looked at a number of other  
16 types of formulas and found insignificant differences in  
17 the tract participation and feel that this is the most fair  
18 and optimum formula for this unit.

19 Q And your reserves studies have indicated  
20 that any additional production on primary is minimal and  
21 therefor would not affect the fairness of the formula used?

22 A Yes, it's less than, probably, half of  
23 one percent of what's been produced in there.

24 Q And Exhibit Three, Roman Numeral VIII-H,  
25 shows the effect of the tract participation formula on each

1 tract in the -- in the proposed unit?

2 A That's correct.

3 Q Okay. And it also shows initial pri-  
4 mary to date, to 1-1-88, for each of the -- each of the  
5 wells and each of the tracts.

6 A And shows usable wells.

7 Q Okay, and that is the formula that was  
8 approved by 100 percent of the working interest owners?

9 A That is correct.

10 Q Okay, I now refer you to Exhibit Three,  
11 Roman Numeral VIII-I, A and B, your decline curves, I be-  
12 lieve.

13 A Yes, These are the decline curves for  
14 the area of review wells and they support the -- the unit  
15 formula.

16 Q And these were also the primary data and  
17 the decline curves from which you did your reserve calcula-  
18 tions?

19 A Yes. These are the curves that I looked  
20 at to be sure that we didn't have anything significant in  
21 the way of remaining primary, or what have you, that had  
22 been put into the consideration of the unit formula.

23 Q Mr. Murphy, (not understood) how would  
24 the proposed waterflood be initiated? Again I might refer  
25 you to Exhibit Four, your plan of operation and the Exhibit

1 Four map, if you wish to use it.

2 Q As we pointed out before, we plan a  
3 5-spot pattern which is the -- universally the most promi-  
4 nant pattern in flooding the San Andres formation.

5 We will start out with four initial  
6 wells which we will inject the produced water into. Those  
7 have been named in the testimony. One of them is currently  
8 a salt water disposal well. We will be producing into  
9 those, or injecting into those produced water. We will im-  
10 mediately start to build an injection plan and as soon as  
11 that plan is completed we will commence injection into the  
12 seven wells that will make up the initial part of this --  
13 of this project.

14 Q And your injection plant location is  
15 shown on the map here?

16 A That's the tentative location for the  
17 plant, yes. We also show the fresh water supply lines  
18 coming in from the north there.

19 Q Mr. Murphy, what steps will be necessary  
20 to convert wells to injection wells on your proposed unit?

21 A We'll remove the present producing  
22 equipment. Plastic coat, or coat the tubing and run it  
23 back into the well; after we've checked it for total depth  
24 and clean up, clean perforations and so on, we'll run it  
25 back into the injection wells and set the packer immediate-

1 ly above the upper perforation in the -- in most cases in  
2 the first porosity.

3 We will then fill the annulus with an  
4 inert liquid and put the -- a pressure gauge or other  
5 device on the annulus wellhead so that we can monitor any  
6 possible leakage.

7 Q Are there any open hole completions  
8 among the wells which are scheduled for conversion to in-  
9 jection?

10 A No, sir.

11 Q Okay. Mr. Murphy, I refer you now to  
12 Exhibit Two, which is the black file folder numbered 2, and  
13 ask you to explain this exhibit, please, sir.

14 A Exhibit Two is the supplemental data re-  
15 quired by Form C-108.

16 On the left we have a summary of the --  
17 an outline of the exhibits shown on the right.

18 Exhibit -- Exhibit Two, Roman Numeral  
19 attachment III is well data in both tabular and schematic  
20 form for each well proposed for injection. Do you want to  
21 discuss that or shall we just go on through?

22 Q Go ahead. Go ahead and briefly discuss  
23 that, the schematic, at least.

24 A This shows the pertinent well data of  
25 perforations, completions, and so on for these wells and

1 has a schematic showing the proposed method of -- of  
2 re-working and completing, recompleting the injection  
3 wells.

4 Q Okay, on your schematic you have sub-  
5 mitted a typical schematic rather than a schematic for each  
6 individual well. At least as far as your initial seven  
7 wells is concerned -- are concerned, is that schematic  
8 accurate with respect to each of those wells?

9 A With one exception. The salt water  
10 disposal well had -- which is the well in 33-16, had per-  
11 forations in the fourth porosity in the San Andres, which  
12 to our knowledge or to the knowledge of the people that  
13 studied -- the other people that studies the Chaveroo  
14 Field, it does not have any hydrocarbons commercially.

15 Q And that fourth porosity would be out-  
16 side your unitized interval --

17 A It would be outside our unit. The evi-  
18 dence in the Hobbs office of the OCC indicates that these  
19 perforations have been squeezed off and we will run an in-  
20 jection profile to be sure that's the case and if they have  
21 not been, then we will squeeze off those perforations so  
22 that this typical schematic, then, will apply to all of the  
23 injection wells in the unit.

24 Q Are you ready for (not clearly  
25 understood) I believe this is.

1           A           Attachment 5 of Exhibit Two is an area  
2 of review map and well name redesignation chart. I think  
3 this exhibit was alluded to earlier in the testimony, and  
4 the redesignation map just changes the well numbers to  
5 conform with the guidelines of the OCC.

6           Q           And Two-6, A, please.

7           A           Attachment 6-A is a tabulation of well  
8 data for wells within the unit area. This tabulation shows  
9 the tract, operating lease, the original well number and  
10 unit, the new unit well, its status, completion date, ele-  
11 vation datum, total depth or plugged back total depth, cas-  
12 ing record, completion interval, initial treatment, and  
13 initial potential with remarks.

14                   It also, in the unit area shows a cumu-  
15 lative oil production at January 1st, '88, and the usable  
16 wells.

17           Q           Okay. And Exhibit 6-B shows exactly  
18 the same data for wells outside the proposed unit but with-  
19 in the area of review?

20           A           With the exception of it does not have  
21 cumulative or usable wells.

22           Q           And this data together with the data  
23 we've just submitted on Exhibit A gives the Commission and  
24 the Examiner all of the -- both the geological data and the  
25 physical data as to type of completion, where the cement

1 tops are, where intermediate casing or long string has been  
2 set and cemented, as well as the types of acid and frac  
3 jobs used to complete the wells?

4 A It does.

5 Q Then I refer you to Roman Numeral VI-C  
6 in File 2.

7 A Which is the schematic well diagram of a  
8 P & A'd well within the area of review.

9 On the top of that first sheet of that  
10 exhibit is a -- shows the P & A'd wells in the area of  
11 review and lists them. The following information is well  
12 by well schematic of how the wells were -- were abandoned.

13 Q Okay, have you done a water sample or  
14 chemical analysis of the water that you plan to inject in  
15 your flood?

16 A We have. We had the Permian Treating  
17 Chemical, Inc., take samples and to a compatibility test on  
18 the fresh water and the produced water. They concluded  
19 that the water could be injected separately or commingled  
20 with -- and would be very compatible.

21 Q And that is, that report is shown on  
22 Exhibit Roman Numeral VII-4?

23 A That's correct.

24 Q And that analysis is based upon a test  
25 of both produced water from your proposed unit and the pro-



1       duced water that you intend to --

2               A               It also conforms with the experience of  
3       other operators in the San Andres and utilizing -- utiliz-  
4       ing this fresh water source and the produced water.

5               Q               Okay. What is Exhibit Roman Numeral X?

6               A               Have we done -- have we done VIII?

7               Q               Yeah, VIII was --

8               A               Okay.

9               Q               -- the other maps from --

10              A              This is well logs for the proposed in-  
11       jection wells. It shows in most cases gamma ray neutron  
12       type of logs with the perforations or completion imposed on  
13       the -- on the log.

14              Q              Okay. Is there any fresh water source  
15       in your proposed unit area?

16              A              We've tried to find any significant  
17       fresh water in the unit area or the area of review. We re-  
18       quested that the State of New Mexico State Engineer's Of-  
19       fice Water Division give us any information that they might  
20       have and we've included a letter from them saying that they  
21       find no water in that area.

22                              It also is not in a declared water  
23       basin, so there's essentially no water in the -- fresh  
24       water in the -- in the area.

25              Q              And that letter is Exhibit Two Roman

1 Numeral XI?

2 A That's correct.

3 Q The only other exhibit in File Two is a  
4 list of the persons to whom notice was sent, which has also  
5 been admitted definitely under the new exhibit with the  
6 return receipts, so --

7 You briefly hit on it earlier, but  
8 specifically what steps will be taken in the injection  
9 wells to confine the injected water to the unitized forma-  
10 tion?

11 A We'll confine the injection through a  
12 coated tubing and confine it by a packer set just above the  
13 upper perforations of the -- of the injected interval, and  
14 confine it below by a plugback TD or the TD of the well.

15 Q In your opinion will the completion of  
16 the injection wells in the manner shown on your schematics  
17 and the exhibits submitted confine the injected water to  
18 the unitized interval?

19 A Yes, it will.

20 Q In your opinion, again, are the proposed  
21 injection wells shown on the map and that you've testified  
22 on, are they located so as to obtain the most efficient  
23 sweep and recover the greatest amount of oil that would not  
24 be recovered through primary?

25 A In our best judgment at this time, that

1 is the -- that's the optimum pattern, the 5-spot pattern;  
2 however, we'd like to request the possibility of adminis-  
3 trative approval of a change in pattern should our initial  
4 injection indicate zones of preferential -- zones of perm-  
5 eability or fracture zones that would need to be handled in  
6 some different pattern.

7 Q You say that you will be studying the  
8 results from your initial seven wells. What -- what pro-  
9 cedures will you specifically follow after you institute  
10 your injection process?

11 A Well, we will of course put all of the  
12 significant producing wells back into a good producing  
13 capability. That will be the inside producers and the  
14 surrounding producers that can be affected in any way by  
15 the injection.

16 We'll also run injection profiles peri-  
17 odically where we can determine where the injected water is  
18 going in the -- in the unitized interval and we'll run a  
19 pressure rate test or step pressure test to be sure that  
20 we're not exceeding the formation breakdown pressure.

21 Q Okay. Do you have any specific guide-  
22 lines or specific plan as to the amount of pressure you  
23 will use on initial injection?

24 A We don't expect to exceed the guidelines  
25 and the regulation of the Commission, which is .2 psi per

1 foot of depth. If we find that it's -- that it would be to  
2 the benefit of the unit to do that, we would like to come  
3 back for administrative hearing to increase that pressure.

4 Q What quantity of water do you anticipate  
5 will be injected initially?

6 A We believe from the study of waste water  
7 disposal and other water injection in the Chaveroo Field,  
8 and based on the quality of the reservoir that we're water-  
9 flooding, that we can inject approximately 600 barrels per  
10 well per day; therefore with 7 wells we would start out  
11 with probably in a very short time 4,200 barrels a day  
12 total and we would eventually, when all of the wells were  
13 -- 24 wells were on, we'll probably get a peak injection of  
14 13,800 barrels.

15 Q What is your water source, Mr. Murphy?

16 A The water source is a fresh water source  
17 for the Chaveroo Field which we believe to be a -- a buried  
18 stream bed connected to the Ogallala formation further to  
19 the east. These wells have been acquired by -- by contract  
20 and by other appropriate legal means from the surface  
21 owners in the area and they have been tested and used --  
22 utilized in agriculture for many years and indicate a open  
23 -- a daily rate and quantity of water sufficient to water-  
24 flood the unit and other units, for that matter.

25 Q Do you contemplate injecting produced

1 water, as well?

2 A We do. We will inject any produced --  
3 any water produced on the unit will be reinjected.

4 Q Will your waterflood be an open or  
5 closed system?

6 A It will be a closed system. We'll also  
7 provide for individual wellhead filters to take out any --  
8 any solids that might affect the injectivity.

9 Q Are you requesting a project allowable  
10 for your project?

11 A We're requesting the capacity allowable  
12 under Rule 701.

13 Q So that the allowable will be based on  
14 the ability of the wells to produce rather than the depth  
15 bracket allowable?

16 A Yes.

17 Q Okay. In your opinion is unitized man-  
18 agement necessary to conduct secondary recovery operations?

19 A It is. The location of the wells and  
20 the reservoir conditions dictate that to do all of the  
21 things that you wish to do in a secondary recovery project,  
22 that you need to unitize this area.

23 Q And your plan, therefore, has an expect-  
24 tation of increased ultimate recoveries, producing oil that  
25 could not be produced through conventional primary means?

1           A           It does. As outlined before, we would  
2 expect to produce perhaps as much as an additional 3-mil-  
3 lion barrels of oil from the unit area that would not have  
4 been produced otherwise.

5           Q           In your opinion will the proposed unit  
6 agreement and unit operating agreement be in the best in-  
7 terest of the state and will each beneficiary of the land  
8 involved receive its fair share of the recoverable oil and  
9 gas in place?

10          A           They will and it will.

11          Q           Will the granting of these applications  
12 prevent waste and be in the interest of conservation and  
13 protection of correlative rights of all parties involved?

14          A           Yes.

15          Q           Were the exhibits in File folders Two,  
16 Three and Four, as well as Exhibit Eight, prepared by you  
17 or under your direct supervision?

18          A           They were.

19                   MR. EZZELL: I'd like to offer  
20 Exhibits Two, Three and Four in their entirety and Exhibit  
21 Eight into evidence, please.

22                   MR. CATANACH: Exhibits Two,  
23 Three and Four and Exhibit Number Eight will be admitted  
24 into evidence.

25                   MR. EZZELL: I have nothing

1 further from this witness.

3 CROSS EXAMINATION

4 BY MR. CATANACH:

5 Q I just have a few questions.

6 Mr. Murphy, as I understand it, you're  
7 initially requesting approval for four injection wells, is  
8 that correct?

9 A No, sir, we're requesting approval for  
10 -- for all of the injection wells, for all of the --

11 Q How many?

12 A I believe there's 24, 23?

13 Q 23?

14 A 23.

15 Q As I understand it, your initially just  
16 going to use 4?

17 A This is -- we planned this in a progres-  
18 sive way. We can start immediately to inject the produced  
19 water into 4 of the wells while we're building a plant,  
20 which will take 60 to 90 days, and then we will immediately  
21 go ahead and recomplete 3 more wells which will give us a  
22 5-spot. As soon as we're sure there's not going to be any  
23 bypassing through fractures or something, we'll expand out  
24 into a full injection over the entire unit.

25 Q The proposed injection Well 33-16,

1 that's a disposal well at this time?

2 A That's correct.

3 Q Do you know by what authorization that  
4 is -- that was approved for disposal?

5 A No, sir, I don't.

6 Q We're going to have to reclassify that  
7 well, probably, If you could maybe find that for me.

8 MR. EZZELL: I'll be able to  
9 do that quicker, that was an old Chevron well.

10 MR. CATANACH: Texaco well.

11 MR. EZZELL: I mean Texaco  
12 well.

13 Q And your Exhibit Number Four -- no,  
14 sorry, Exhibit Number Two, the area of review wells --

15 A Yes, sir.

16 Q -- inside and outside the unit area, do  
17 those wells represent all the wells that exist within a  
18 one-half mile radius of all your proposed injection wells?

19 A To the best of our ability, they do,  
20 sir, and the additional fact, we have a few in there which  
21 probably technically don't fall in the area of review.  
22 What we did was just -- we took a half mile from the unit  
23 line and took all of the wells that -- all of the data that  
24 we could find on the wells from that area.

25 Q In Exhibit Number Eight, the supplement-



1 al information, what is that exactly, Mr. Murphy?

2 A That was information that I believe was  
3 requested by -- was it by the Land Office or by the OCC?

4 MR. EZZELL: By the Commis-  
5 sion.

6 A By the Commission. I think the reason  
7 for that, probably, primarily, was that they wanted addi-  
8 tional information on the casing records because we had not  
9 originally included the information on the surface pipe and  
10 so --

11 Q Now, do these, the surface pipe and the  
12 tops of cement on the long string, what do you mean?

13 A Well, that was -- the main reason for  
14 that was the top of the cement on the long string and the  
15 -- and the condition and information on the surface pipe.

16 Q Okay, do the wells on Exhibit Number  
17 Eight represent all the wells within the area of review?

18 A It only -- it only has the initial 7.

19 Q The initial 7.

20 MR. EZZELL: That would be  
21 these initial 7 injection wells.

22 Q I see.

23 A It looks like it has --

24 MR. EZZELL: Prior to convert-  
25 ing any other --

1                   A            There's more than 7 here --

2                               MR. EZZELL: No, within a half  
3 mile --

4                   A            Within a half mile --

5                               MR. STOVALL: Gentlemen, whoa,  
6 whoa, whoa, let's go off the record if you would like to  
7 discuss it amongst yourselves first.

8  
9                   (Thereupon a discussion was had off the record.)

10  
11                   Q           Mr. Murphy, you've got some water analy-  
12 ses, Exhibit Number 7-4, or whatever it is?

13                   A            Uh-huh, that's in File Folder Number  
14 Two?

15                   Q            Right. You've got some fresh water  
16 analyses. Where exactly did that fresh water analysis come  
17 from, or fresh water come from?

18                   A            It came from the fresh water supply  
19 wells that are located at the end of that pipeline, which  
20 is several miles north of the Chaveroo Field and the loca-  
21 tion is given on the analysis, and in this case they're  
22 called the Moore, because Moore is the surface owner there  
23 and the one with which we contracted for the water.

24                   Q            Do you know what depth those fresh water  
25 wells are producing from ?

1           A           Yes, they're shallow. They're probably  
2 none of them are any deeper than 4-or-500 feet. They're  
3 probably Ogallala, although there's no studies in the area  
4 and there's no declared basin in here just because it is an  
5 area of very, very sparse water reserves.

6           Q           Okay, and you actually have contacted  
7 the State Engineer and he has determined that there is no  
8 Ogallala water in -- within the unit area?

9           A           Yes, sir. He has none in his records  
10 and there is no surface evidence of anything but minor  
11 windmill water.

12          Q           So there may be some present but not in  
13 substantial quantities.

14          A           That's correct. There's probably, any-  
15 where out there you could get a few gallons a minute any-  
16 where up on the Llano Estacado there.

17          Q           Do you have listed somewhere the pro-  
18 posed perforations in all your proposed injection wells?

19          A           We have listed the -- the existing per-  
20 forations in the schematics and in the tabular information  
21 that we've submitted.

22                       We have not yet determined, and will  
23 probably not determine until we get it back into the wells,  
24 whether we will open up additional intervals in the unit-  
25 ized interval. I would expect we would open some of those

1 intervals as we study the wells and as we run, maybe, sup-  
2 plemental electric logs, and so on in our recompletions and  
3 workovers.

4 Q Okay, but for right now you plan on  
5 using the current perforations that are open?

6 A We do unless there's evidence that de-  
7 velops during the recompletion or workover that indicates  
8 it would improve the flood to open additional zones.

9 What we were -- what we are looking at  
10 is the best judgment of the people that originally drilled  
11 and completed the wells, which is probably very good. We  
12 probably won't -- we will probably not open the very much,  
13 but we could if in running a log or looking at the later  
14 injection profiles, we could find that we need to perforate  
15 additional sub-intervals in the -- in the interval of the  
16 unitization there.

17 Q I see. You've identified three zones  
18 within the San Andres, the P-1, P-2 and P-3. Are those all  
19 about equally productive?

20 A No, sir, the second porosity is by far  
21 the most prolific. The upper zone carries, usually, some  
22 oil and perhaps more gas than the second porosity, and the  
23 third porosity normally does not produce in many parts of  
24 the field but it does in certain areas produce a small  
25 amount of oil.

1           Q           But you do plan to waterflood all three  
2 zones.

3           A           Yes, sir. We feel that we need to do  
4 that because it will not be economic to come back, leave  
5 one and come back and get it later, so anything, in our  
6 judgment and from the records and from the information we  
7 can develop as we -- as we redevelop the unit, indicates  
8 that it has recoverable commercial reserves, we'll open up.

9                       MR. CATANACH: That's all the  
10 questions we have of this witness at this time. He may be  
11 excused.

12                      Mr. Ezzell, could you submit a  
13 rough draft order on the waterflood?

14                      MR. EZZELL: Be happy to.

15                      MR. CATANACH: That way we can  
16 get everything straight and you're going to submit addi-  
17 tional information --

18                      MR. EZZELL: We'll work that  
19 up for you for all wells.

20                      MR. CATANACH: Okay. Okay, do  
21 we have anything further in this -- in these two cases?

22                      If not, they will be taken un-  
23 der advisement, and we'll leave the record open until we  
24 receive the additional information.

25                      (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. 9477, 9478  
heard by me on September 14 1988.

David R. Catanzel, Examiner  
Oil Conservation Division

## NEW MEXICO OIL CONSERVATION COMMISSION

## EXAMINER HEARING

SANTA FE, NEW MEXICO

Hearing Date SEPTEMBER 14, 1988 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
W. T. Kelleherin	Kelleher, Kelleher & Co.	El Paso
Clad Diddleon	Diddleon, Fish & Wordinger	Artesia
Greg Nelson	TXO Prod. Corp.	Midland TX
John P. Sullivan	TXO Prod. Corp.	Midland, TX
R. J. Quance	Kerr-McGee Corp.	Oklahoma City
VISITOR K. BOANGIA	Union Texas Petroleum	Houston, TX
E. R. Manning	El Paso Natural Gas.	El Paso, TX
Calder Ezzell	Hinkle Law Firm	Rowell
Ann Murphy Ezzell	Murphy Operating Corp.	"
Bert H. Murphy	"	"
Mark B. Murphy	"	"
Reilly Sullivan	American Energy Corp.	Houston, TX.
RICHARD CORCORAN	DUGAN PRODUCTION Corp.	FARMINGTON, NM
John Roe	"	"
Bruce Hahn	Bozmann	Santa Fe
VICTOR LYON	OCD	Santa Fe
Ron Bartel	BLM	Santa Fe
Patrick Tower	SANTA FE ENERGY	MIDLAND
Curt Anderson	"	"

## NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARINGSANTA FE, NEW MEXICOHearing Date SEPTEMBER 14, 1988 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
William F. San Buell Setzer Robert C. Leibrock Cowan Kopf Edsel Neff	Campbell Truck American Oil Co. American Oil Co. Hinkle Law Firm Robert Enfield	Santa Fe Midland, TX Midland, TX Santa Fe Roswell