STATE OF NEW MEXICO 1 ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION 2 STATE LAND OFFICE BLDG. SANTA FE, NEW MEXICO 3 19 September 1984 4 EXAMINER HEARING 5 6 7 IN THE MATTER OF: 8 Application of Sun Exploration and CASE Produciton Company for an unortho-8311 9 dox location, Lea County, New Mexico. 10 11 BEFORE: Michael E. Stogner, Examiner 12 13 TRANSCRIPT OF HEARING 14 15 16 APPEARANCES 17 18 For the Oil Conservation Jeff Taylor 19 Division: Attorney at Law Legal Counsel to the Division 20 State Land Office Bldg. Santa Fe, New Mexico 87501 21 22 For the Applicant: 23 24 25

2 1 2 MR. STOGNER: We'll call next 3 Case Number 8311, which is the application of Sun 4 Exploration and Production Company for an unorthodox 5 location, Lea County, New Mexico. 6 This case was also heard on August 7 22nd, 1984, and due to an advertisement error at that time 8 it was subsequently readvertised for today. 9 will now call We for any appearances or additional testimony at this time. 10 It appears that there is none. 11 The case will be taken under advisement. 12 13 (Hearing concluded.) 14 15 16 17 18 19 20 21 22 23 24 25

CERTIFICATE I, SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the Oil Con-servation Division was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability. Sally W. Boyd CSR\_ 83/1 Oil Conservation Ser diar Vision 

STATE OF NEW MEXICO 1 ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION 2 STATE LAND OFFICE BLDG. SANTA FE, NEW MEXICO 3 22 August 1984 4 EXAMINER HEARING 5 6 7 8 IN THE MATTER OF: 9 Application of Sun Exploration and CASE Production Company for an unorthodox 8311 oil well location, Lea County, New 10 Mexico. 11 12 BEFORE: Michael E. Stogner, Examiner 13 14 TRANSCRIPT OF HEARING 15 16 17 APPEARANCES 18 19 For the Oil Conservation W. Perry Pearce 20 Division: Attorney at Law Oil Conservation Commission 21 State Land Office Bldg. Santa Fe, New Mexico 87501 22 For the Applicant: W. Thomas Kellahin Attorney at Law 23 KELLAHIN & KELLAHIN P. O. Box 2265 24 Santa Fe, New Mexico 87501 25

 $\gamma$ INDEX NAT SUBRAMANIAM Direct Examination by Mr. Kellahin 4 Cross Examination by Mr. Stogner 10 EXHIBITS Sun Exhibit One, Structure Map Sun Exhibit Two, Cross Section 

3 1 2 MR. STOGNER: We will row call 3 Case 8311. 4 PEARCE: MR. That case is on 5 the application of Sun Exploration and Production Company 6 for an unorthodox oil well location, Lea County, New Mexico. 7 MR. KELLAHIN: If the Examiner 8 please, I'm Tom Kellahin of Santa Fe, New Mexico, appearing 9 of the applicant and I have one witness on behalf t.o be 10 sworn. MR. PEARCE: Are there other 11 appearances in this matter? 12 13 (Witness sworn.) 14 15 MR. KELLAHIN: Mr. Examiner, we 16 have an error in the application. We would like to present 17 our testimony and have the case readvertised for the docket 18 of September 19th, with a notation in the call of that case that evidence has been presented and without objection it 19 might be approved. 20 The change is in the location. 21 location should be 2630 from the north line and 1625 The 22 from the east line. That moves it into the southwest of the 23 northeast quarter, which is shown in the advertisement. 24 The primary oil objective is 25 the Crossroads Devonian Pool but we would also seek approval

Ą 1 drill to a total depth of the Granite and potentially to 2 have an unorthodox location not only in the Devonian but the 3 Montoya, the Simpson, and the Granite Wash. 4 STOGNER: Mr. Kellahin. MR. 5 would you please repeat the location figures that will be 6 readvertised for September 19th, 1984? 7 KELLAHIN: It will be an MR. 8 unorthodox oil well location, 2630 from the north line and 9 1625 from the east line of Section 27, 9 South, 36 East. MR. STOGNER: That's 2630 feet 10 from the north line and 1625 from the east line. 11 MR. KELLAHIN: Yes, sir. 12 MR. STOGNER: Thank you, Mr. 13 Kellahin. 14 15 NAT SUBRAMANIAM, 16 a witness and being duly sworn upon his being called as 17 oath, testified as follows, to-wit: 18 DIRECT EXAMINATION 19 BY MR. KELLAHIN: 20 Mr. Subramaniam, would you please state 0 21 your name and occupation for the Examiner? 22 My name is Natarajan Subramaniam. Α I'm a 23 geologist with Sun Exploration and Production Company in 24 Dallas, Texas. I'm a geologist. 25 Mr. Subramaniam, have you previously tes-Q

5 1 tified as a geologist on behalf of your company before the 2 Oil Conservation Division? 3 А Yes, I have. 4 And pursuant to your presentation today 0 5 have you prepared certain geologic exhibits for considera-6 tion? 7 А Yes, I have. 8 tender Mr. MR. KELLAHIN: We Subramaniam as an expert petroleum geologist. 9 MR. STOGNER: He is so quali-10 fied. 11 Let me direct your attention to the exhi-0 12 bit that's marked as Number One, Mr. Subramaniam, and have 13 you first of all generally identify what this exhibit is. 14 The exhibit depicts parts of Township 9 А 15 South, Range 36 East, in Lea County, New Mexico. The cen-16 tral attention of the exhibit focuses on the Section 27, 17 which is the better part of the Crossroads Devonian Field. All right, what is indicated by the yel-0 18 low area in the east half of Section 27? 19 That east half is the Sawyer lease, which А 20 is under lease to Sun Exploration and Production Company. 21 Is the working interest and royalty own-Ο 22 ership for the east half of Section 27 common throughout 23 that half section? 24 Yes, it is. А 25 Would you identify for us the proposed Q

6 1 unorthodox location? 2 The proposed unorthodox location will be А 3 2630 feet from the north line and 1625 feet from the east 4 line of Section 27 in Township 9 South, Range 36 East, Lea 5 County, New Mexico, which will put it in the southwest of 6 the northeast quarter of the said section. 7 What have you drawn on this exhibit? 0 8 What is this? 9 The exhibit depicts a structure map drawn Δ on the top of the Devonian formation, which underlies the 10 Woodford shale. 11 top of the Devonian similar The the to 12 in the area is generally accepted to be to the base one of 13 Woodford shale and the subsea elevations of such a surthe 14 face has been mapped and is depicted on this exhibit. 15 Are the wells that you've shown on this 0 16 exhibit Devonian oil wells? 17 All of them are, yes. А All right, sir, would you identify for us 18 Ο four wells that surround the proposed unorthodox locathe 19 tion and explain to us why you're seeking a location at this 20 point in the structure of the Devonian. 21 The proposed location is surrounded by А 22 Wells No. 2, 3, 7, and 9 of Sun Exploration and Production 23 Company in the Sawyer lease. 24 Presently the status of Well No. 9 is a 25 plug and abandonment.

7 1 The No. 3 is under production presently, 2 making 70 barrels of oil per day. 3 Well No. 7 is making presently at 94 bar-4 rels of oil per day. 5 the Well No. 2 is making 51 barrels And 6 of oil per day. 7 The reason for the location is to effec-8 tively drain the undrained reserves which still are existent under the Well No. 9 location. 9 The Well No. 9 was tried to be re-entered 10 back in 1979; was found to have a casing leak and could not 11 be effectively recompleted; had high water cut in that well 12 and hence was commercially nonproducable. 13 What was the cumulative production on the Q 14 No. 9 Well up to the time it experienced mechanical diffi-15 culties? 16 А 470,000 barrels of oil, whereas the17 wells, No. 3 had made 3-1/2 million barrels; Well No. 2 --Well No. 2 had made 3.1 million barrels; and Well No. 7 has 18 made 1.2 million barrels. 19 When did the Well No. 9 last produce oil 0 20 from the Devonian? 21 In 1979. Α 22 0 Where do you anticipate the oil/water 23 contact to be in this structure, Mr. Subramaniam? 24 А It will be at -7950. The old oil/water 25 contact was mapped at -8050 but due to the depletion of the

8 1 reservoir, and since the Crossroads reservoir is a very 2 strong water drive reservoir, the water encroachment upward 3 is expected to be around -7950. 4 For purposes of drilling a well in the Q 5 Crossroads Devonian Pool, what is a standard location? 6 It's a 40-acre spacing with allowable Α 7 wells drilled on 80 acres. 8 All right, sir, and where would a stand-Ο 9 ard location be, then, within that area? It would be 330 feet from the guarter 10 А quarter of either side of the -- from the south line of the 11 northeast guarter and the west line of -- the east line of, 12 excuse me, of the southwest of the northeast quarter. 13 And why have you not proposed a standard,  $\cap$ 14 orthodox location? 15 А The reason for that is based on geologi-16 cal structure. We would -- the proposed location is optimum 17 for not only being very high up on the structure but also to be -- to avoid the oil/water contact, which would make the 18 well produce more water than oil. 19 In your opinion, Mr. Ο Subramaniam, would 20 approval of this application violate anyone's correlative 21 rights? 22 Not that I know. А 23 A11 right, sir, and would it prevent 0 24 waste by allowing Sun to recover oil out of the Devonian 25 that might not otherwise be produced?

1 9 I agree with you on that. A 2 All right, sir, let's go to Exhibit Num-Q 3 ber Two and have you identify that for us. 4 Exhibit Number Two is a generalized cross А 5 section which runs south from Township 8 South, Range 37 6 through Township 10 South, Range 36 East. Township 8 East, 7 South, Range 37 East is in Roosevelt County, while 20 South, 8 36 East is in Lea County. 9 The cross section runs through the Crossroads Devonian Field to depict as to how the geolgical for-10 mations would be in the subsurface. 11 there any wells in the Crossroads Q Are 12 Field, Mr. Subramaniam, that produce or have the capacity to 13 produce out of the Montoya or the Simpson or the Granite 14 Wash? 15 None of the wells have been drilled Α No. 16 deeper than the Devonian. 17 right, and why do you propose All to Q 18 drill this well to that depth? The structure on the Crossroads Devonian А 19 Field depicts a geological high and we would like to take a 20 look at both the Montoya, at Montoya, Simpson, and Granite 21 Wash, which we expect a wedge out of the Simpson on top of 22 the Crossroads structure and have porosity both in the Gra-23 nite Wash and the Montoya, which we would like to test for 24 potential for producing oil. 25 And if any of those formations or pools Q

1 10 2 produce oil, then your well location would be an unorthodox well location for any of those fields. 3 Α Yes. 4 0 All right, sir. Were Exhibits One and 5 Two prepared by you? 6 А Yes, they were. 7 MR. KELLAHIN: Mr. Examiner, we 8 move the introduction of Exhibits One and Two. 9 MR. STOGNER: Exhibits One and 10 Two will be admitted into evidence. MR. KELLAHIN: That concludes 11 our examination of this witness. 12 13 CROSS EXAMINATION 14 BY MR. STOGNER: 15 Q Mr. Subramaniam, on your Exhibit Number 16 Two, the Shell No. 2 Well up north from your proposed well, 17 you show that penetrating the Granite Wash but it did not 18 produce, is that right? Yes, you're -- that's correct. The well А 19 was drill stem tested and recovered 8300 feet of salt water 20 with a flowing pressure, tubing pressure of 4925 pounds. 21 0 In what formation? 22 Both the Montoya and the Granite Wash. А 23 It was a single drill stem test run all the way from the top 24 of the Montoya to the bottom of the Granite Wash. 25 How about the Ralph Lowe --Q

1 11 The Ralph Lowe was А never tested, even 2 it was drilled down to the Granite, to the Granite though 3 Wash. 4 Do you know if while they were drilling, 0 5 if they showed any kicks? 6 А Yes, they had, by electric log they had 7 porosity both in the Montoya as well as the Granite Wash. 8 It is a surprise to me as to why they were never tested. 9 Is that well, the Ralph Lowe Well No. 1, 0 is that still producing in the Devonian? 10 Yes, it is producing from the Devonian. А 11 What will be the name of this well? Q 12 А This will be U. D. Sawyer No. 11. 13 Mr. Subramaniam, as you drill deeper down 0 14 the Granite Wash, you're expecting to hit oil and not to 15 gas, is that right? 16 Α Yes. 17 0 If you hit oil in any of those formations, the Montoya, Simpson, or Granite Wash, would that 40-18 acre spacing? 19 Yes, it would be. А 20 0 This will be a second well on the -- that 21 40-acre proration unit in the Devonian, is that not right? 22 Yes, you're correct. Α 23 And that would be second well to the Q U. 24 D. Sawyer No. 3, is that right? 25 Yes, you're correct. А

1 12 MR. STOGNER: I have no further 2 questions of Mr. Subramaniam at this time. 3 Are there any other questions 4 of this witness? If not, he may be excused. 5 Mr. Kellahin, do you have any-6 thing further in Case Number 8311 this morning? 7 MR. KELLAHIN: No, sir. 8 MR. SUBRAMANIAM: Thank you, 9 Mr. Examiner. MR. STOGNER: You're welcome, 10 Mr. Subramaniam. 11 there anything further Is in 12 Case Number 8311 at this time? 13 If not, this case will be con-14 tinued and readvertised for the Division Hearing scheduled 15 for September 19th, 1984. 16 17 (Hearing concluded.) 18 19 20 21 22 23 24 25

CERTIFICATE I, SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the Oil Con-servation Division was reported by me; that the said tran-script is a full, true, and correct record of the hearing, prepared by me to the best of my ability. Solly W. Boyd CGR Oil Conservation Division