



1 MR. STAMETS: The hearing will come to order,  
2 please. We will call next Case 5032: Application of  
3 Anadarko Production Company for a waterflood project, Eddy  
4 County, New Mexico.

5 MR. KELLAHIN: Tom Kellahin, of Kellahin and Fox,  
6 Santa Fe, appearing on behalf of the Applicant, Anadarko  
7 Production Company. I have one witness to be sworn.

8 MR. STAMETS: Are there any other appearances in  
9 this case?

10 (No response)

11 \* \* \* \*

12 DANIEL KERNAGHAN,

13 was called as a witness, and after being duly sworn according  
14 to law, testified as follows:

15 DIRECT EXAMINATION

16 BY MR. KELLAHIN:

17 Q Will you please state your name, by whom you are employed,  
18 and in what capacity?

19 A Daniel Kernaghan, and I am employed by Anadarko Production  
20 Company as a division evaluation engineer.

21 Q Have you previously testified before the Commission?

22 A No.

23 Q Will you state briefly your educational and employment  
24 background?

25 A I graduated from the Colorado School of Mines with a

1 degree in petroleum engineering in 1957. Since that  
2 time, I have worked as a petroleum engineer for Atlantic  
3 Refining Company, Sinclair Oil Company, and Anadarko.

4 Q Are you familiar with the Burnham Grayburg-San Andres  
5 unit?

6 A Yes.

7 Q Have you made a study of the feasibility of a waterflood  
8 project for this unit?

9 A Yes, sir.

10 MR. KELLAHIN: Are the witness's qualifications  
11 acceptable?

12 MR. STAMETS: Yes.

13 Q (By Mr. Kellahin) Will you state briefly what Anadarko  
14 seeks by way of this application?

15 A Anadarko seeks authority to institute a waterflood  
16 project in its Burnham GSA Unit Area by the injection  
17 of water into the Grayburg-San Andres formation through  
18 six wells in Section 2, Township 17 South, Range 30  
19 East, Square Lake Pool, Eddy County, New Mexico.

20 These six wells are colored-- circled and colored  
21 in red on Exhibit One. Our unit is outlined in green  
22 on this exhibit. This is one hundred percent Anadarko  
23 working interest, and all State acreage.

24 Q This is New Mexico State land?

25 A Yes.

1 Q Will you please refer to what has been marked as  
2 Applicant's Exhibit Two and identify it, please, and  
3 state what information it contains?

4 A This is a map of the area that shows a little clearer  
5 the surrounding injection projects than does Exhibit One.  
6 The injection wells are marked with a circle and an  
7 arrow. You can see that we are bounded on the west by  
8 Anadarko's Federal "KK" Project and further to the west  
9 by our Federal "Q" and Federal "JJ". We are bounded  
10 in the southwest by our Federal "R".

11 All of these are approved projects, and are active  
12 at this time. Immediately to the north is an abandoned  
13 hole on the J. C. Thompson lease.

14 Q Of your six proposed injection wells, are these all  
15 former production wells?

16 A Yes.

17 Q What formation are they producing from?

18 A From the Grayburg and San Andres.

19 Q What is your proposed injection formation?

20 A The Grayburg and Lovington zones.

21 Q Will you please refer to what has been marked as  
22 Applicant's Exhibit Three-A through Three-F, and let's  
23 take Three-A first, and will you describe in general  
24 terms what information this exhibit contains?

25 A These exhibits contain the current or proposed completions

1 of our injection wells.

2 Q Are all these schematics identical?

3 A No, they are not. They vary somewhat from well to well.

4 In five of the six cases, there is a liner running

5 essentially through the zones perforated.

6 Q Do all of the schematics reflect the perforations that  
7 presently exist in each well?

8 A Yes.

9 Q Is the data contained on each schematic indicative of  
10 the proposed manner in which each particular injection  
11 well will be completed?

12 A Yes.

13 Q Does each schematic show the size of the tubing and the  
14 setting depth and the amount of cement to be used?

15 A Yes.

16 Q Do all the schematics indicate a pressure gauge at the  
17 surface?

18 A They do.

19 Q Do all the schematics show the setting for the packer  
20 and the depth for the packer?

21 A They show either the current setting or how they will  
22 be set.

23 Q And will all of the annulus of each injection well be  
24 filled with inert liquid?

25 A Yes.

- 1 Q Do you intend to use coated tubing or plastic-lined  
2 tubing?
- 3 A No, we don't. This plan is also serving the other  
4 projects to the west, and we are inhibiting this water.
- 5 Q Will the means of protection from corrosion be adequate  
6 in the offsetting waterflood projects?
- 7 A Yes. If this runs into problems, we will take alternate  
8 steps.
- 9 Q In the event you discover some problems with your casing,  
10 what, in that event, do you intend to do?
- 11 A We will run plastic-coated tubing. It is the general  
12 practice in most of our flood projects to use plastic-  
13 coated tubing.
- 14 Q Will you please refer to what has been marked as  
15 Applicant's Exhibit Four-A through Four-F and identify  
16 what this exhibit is?
- 17 A These are sections of the logs of the injection wells  
18 showing the pay intervals and the area above.
- 19 Q The perforations are not on the logs?
- 20 A No, they are not on the logs. They are schematics. The  
21 zones are identified in a general fashion on the logs,  
22 the pay zones.
- 23 Q What has been the primary recovery for the unit area  
24 up to this time?
- 25 A About 640,000 barrels.

1 Q What do you anticipate will be the secondary recovery  
2 by way of waterflood?

3 A About 500,000 barrels.

4 Q Let's refer now to Exhibits Five-A through Five-J. On  
5 these, have you supplied some production data for the  
6 unit?

7 A Exhibits Five-A through Five-J are graphs of the wells  
8 or the groups of wells within the unit. The exhibits  
9 contain production history, yearly production since  
10 inception.

11 Q What is your current rate of production on each of your  
12 proposed injection wells?

13 A The current rate of production from each of the injection  
14 wells?

15 Q Yes, sir.

16 A Do you want the total?

17 Q Yes.

18 A One-one is making about 4 barrels a day. One-three is  
19 making about 15. Two-two is shut in, and is completed  
20 as an injection well already. Four-one is making about  
21 5 barrels a day. Five-one is shut in, and is currently  
22 completed as an injection well. Four-two is shut in.  
23 These wells have all been recently stimulated and field  
24 work has been completed with the exception of running  
25 the injection tubing into the three wells that are

1 producing. But all of the wells have had liner work  
2 done on them, and they have been stimulated and cleaned  
3 out, and production is up considerably from what it was  
4 last year.

5 Q In your opinion, Mr. Kernaghan, has production declined  
6 to such a point that your recommendation would be the  
7 institution of secondary recovery by waterflood?

8 A Yes, it is. Most of the wells are shut in, and the  
9 majority of them were shut in prior to the time we did  
10 this work.

11 Q Will this proposed waterflood result in recovery of  
12 oil which would otherwise not be recovered?

13 A Yes.

14 Q Would waterflood adversely affect the correlative rights  
15 of others?

16 A No, I don't believe it will. We have been negotiating  
17 for cooperation along our lease lines, and we are close  
18 to that point.

19 Q Please refer to Exhibit Six, and identify this, please.

20 A Exhibit Six is our water contract with Double Eagle  
21 covering the water supply for the project.

22 Q What is your anticipated volume of injected water?

23 A About 2,400 barrels, or 400 barrels a day per well.

24 Q Do you anticipate injecting the water under pressure?

25 A Yes, under 1800 to 200 pounds of pressure.

1 Q What do you anticipate the life of this particular  
2 project will be?

3 A The life of this project will be approximately eight  
4 to ten years.

5 Q Do you anticipate the re-injection of any produced water?

6 A Yes, we do. We are currently commingling the produced  
7 water and injecting a mixture.

8 Q Were Exhibits One through Six either prepared by you  
9 directly or compiled under your direction and supervision?

10 A Yes, they were.

11 MR. KELLAHIN: We move for the introduction of  
12 Applicant's Exhibits One through Six, and all their parts.

13 MR. STAMETS: Without objection, Applicant's Exhibits  
14 One through Six will be admitted into evidence.

15 (Whereupon Applicant's Exhibits One through Six  
16 were admitted in evidence.)

17 MR. KELLAHIN: I have no further questions on  
18 direct examination.

19 \* \* \* \*

20 CROSS EXAMINATION

21 BY MR. STAMETS:

22 Q Mr. Kernaghan, is it your opinion that all of the  
23 injection wells will be sufficiently cased and cemented  
24 to adequately protect the formations from the 1800 to  
25 200 pound injection pressure?

1 A Yes, sir. I feel that we have gone to quite a bit of  
2 pains here to get them protected. We even pulled the  
3 liner on one well and replaced it with a longer liner  
4 at considerable expense.

5 All the wells have the new liner within them, with  
6 the exception of one well that had casing all the way  
7 into the Lovington anyway.

8 Q Have you personally been to the oil field in this area  
9 and inspected any of Anadarko's installations in the  
10 area?

11 A I've been there, but I'm not an authority on that.

12 Q So you couldn't tell me whether Anadarko is using  
13 pressure gauges on injection wells, and whether these  
14 pressure gauges are working?

15 A No, sir.

16 Q You have had experience with pressure gauges on injection  
17 wells for a long period of time, have you not?

18 A Yes, sir.

19 Q In your experience, have you found that these gauges  
20 continue to operate satisfactorily over long periods  
21 of time?

22 A Not if they are left on the well.

23 Q Does Anadarko use a pressure gauge that is portable?

24 A It is my understanding that we do. This would be, I  
25 feel, a generally accepted practice of good operations.

1 Q Do you know how often Anadarko's policy is for their  
2 pumpers to take pressure on the annular space in these  
3 wells?

4 A No, I don't.

5 Q Would you furnish that information to the Examiner?

6 A Yes, I will. Would a letter from our superintendent  
7 be satisfactory?

8 Q Yes. In your opinion, is there a more foolproof, easy-  
9 to-see, attention-attracting method of determining  
10 leakage in the annular space?

11 A If the well heads are above ground, if the head is  
12 visible, the space can be left open through a nipple,  
13 and water flow would show up in that manner.

14 Q Would such a flow be a tremendous volume in a short  
15 period of time, or would you expect just a slow leakage  
16 to occur?

17 A I would anticipate significant volume.

18 Q So you would be pumping out quite a volume of water?

19 A Yes, although the wells are visited every day.

20 Q So there would be problems in leaving the annular space  
21 open as well?

22 A In some cases, there would be.

23 Q Do you suppose there would be any reasonable way to  
24 rig a well so that if a leak occurred in the annular  
25 space that injection would be shut off to that well?

1 A I don't think it would be an insurmountable task to  
2 require a valve of some sort that would be actuated  
3 by pressure at the surface. However, I am not an  
4 authority on the expense of such a device.

5 Q You you have any information to furnish the Commission  
6 along that line, it would be certainly appreciated at  
7 the same time you supply the information on your actual  
8 field policy.

9 A Yes, we will be glad to do that.

10 Q I understand from your testimony that there is a central  
11 plant you intend to use that is already in operation?

12 A That's right.

13 MR. STAMETS: Are there any questions of this witness?

14 (No response)

15 MR. STAMETS: If not, the witness may be excused.

16 (Witness excused.)

17 MR. STAMETS: Do you have anything further to offer  
18 in this case?

19 MR. KELLAHIN: Nothing further.

20 MR. STAMETS: Are there any other appearances or  
21 any statements in Case 5032?

22 (No response)

23 MR. STAMETS: The case will be taken under advisement.

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25I N D E XWITNESSPAGE

DANIEL KERNAGHAN

Direct Examination by Mr. Kellahin

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Cross Examination by Mr. Stamets

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Applicant's #1

Map

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Applicant's #2

Map

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Applicant's #3A-F

Schematics

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Applicant's #4A-F

Sections of logs

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Applicant's #5A-J

Production history

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Applicant's #6

Water contract

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