

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

BEFORE THE  
NEW MEXICO OIL CONSERVATION COMMISSION  
Santa Fe, New Mexico  
October 8, 1975

EXAMINER HEARING

-----  
IN THE MATTER OF: )

Application of Llano, Inc. for a unit )  
agreement, Lea and Eddy Counties, )  
New Mexico. )

CASE  
5563

Application of Llano, Inc. for a )  
pressure maintenance project, Lea and )  
Eddy Counties, New Mexico. )

CASE  
5564

-----  
BEFORE: Richard L. Stamets, Examiner.

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the New Mexico Oil Conservation Commission: William F. Carr, Esq.  
Legal Counsel for the Commission  
State Land Office Building  
Santa Fe, New Mexico

For the Applicant: Clarence Hinkle, Esq.  
HINKLE, BONDURANT, COX & EATON  
Attorneys at Law  
Hinkle Building  
Roswell, New Mexico

sid morrison reporting service  
General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

I N D E X

1		
2		<u>Page</u>
3	<u>G. W. EDWARDS</u>	
4	Direct Examination by Mr. Hinkle	3
5	Cross Examination by Mr. Stamets	28

EXHIBIT INDEX

6			
7			<u>Page</u>
8		<u>Offered</u>	<u>Admitted</u>
9	Exhibit No. 1, Land & Tract Plat	27	27
10	Exhibit No. 2, Well Plat	27	27
11	Exhibit No. 3, Plat	27	27
12	Exhibit No. 4, Isopachous Map	27	27
13	Exhibit No. 5, Letter	27	27
14	Exhibit No. 6, Letter	27	27
15	Exhibit No. 7, Log	27	27
16	Exhibit No. 8, Diagram	27	27
17	Exhibit No. 9, Diagram	27	27
18	Exhibit No. 10, Log	27	27
19	Exhibit No. 11, Log	27	27
20	Exhibit No. 12, Time Curve	27	27
21	Exhibit No. 13, Tabulation	27	27
22	Exhibit No. 14, Calculation	27	27
23	Exhibit No. 15, Estimate	27	27
24	Exhibit No. 16, Estimate	27	27
25			

**sid morrish reporting service**

General Court Reporting Service  
 825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
 Phone (505) 982-9212

1 MR. STAMETS: We will call the next Case, 5563.

2 MR. CARR: Case 5563, application of Llano, Inc.  
3 for a unit agreement, Lea and Eddy Counties, New Mexico.

4 MR. HINKLE: Clarence Hinkle, Hinkle, Bondurant,  
5 Cox and Eaton appearing on behalf of Llano, Inc. We also  
6 have associated with us Don Maddox of Hobbs who is supposed  
7 to be here. He just stepped out and he will probably be  
8 here shortly. We have one witness and I believe sixteen  
9 exhibits.

10 MR. STAMETS: Any other appearances in this Case?

11 (THEREUPON, the witness was duly sworn.)

12 MR. HINKLE: Mr. Examiner, Jerry Losee who was  
13 here earlier asked me whether or not Case 5563 was a forced  
14 pooling for unitization, a forced unitization, and I told  
15 him it wasn't and I would like to let the record show that  
16 there is no intention from this application for forced  
17 unitization.

18 We would like to call the next Case too because  
19 our exhibits overlap, and we would like to have these cases  
20 consolidated for purposes of testimony.

21 MR. STAMETS: Is there any objection to the  
22 consolidation of these two Cases?

23 Will you call Case 5564, please?

24 MR. CARR: Case 5564, application of Llano, Inc.  
25 for a pressure maintenance project, Lea and Eddy Counties,

1 New Mexico.

2 MR. STAMETS: These two Cases will be consolidated  
3 for purpose of testimony.

4 G. W. EDWARDS

5 called as a witness, having been first duly sworn, was  
6 examined and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. HINKLE:

9 Q. State your name, your address and by whom you are  
10 employed.

11 A. My name is G. W. Edwards; I live in Hobbs, New  
12 Mexico; and I'm employed by Llano, Incorporated in Hobbs.

13 Q. What is your position with Llano?

14 A. Executive Vice President.

15 Q. Have you ever testified before the Oil Conservation  
16 Commission?

17 A. No, sir.

18 Q. Are you a geologist and a petroleum engineer?

19 A. A geological engineer and a registered professional  
20 engineer.

21 Q. State briefly your educational background and your  
22 qualifications and experiences as a geologist and a  
23 petroleum engineer, or an engineer?

24 A. In 1950 I graduated from the St. Louis University  
25 with a degree in geological engineering. Shortly thereafter

**sid morrish reporting service**  
General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 I took a position with the Bureau of Mines as a mineral  
2 specialist. In 1951 I went to the Federal Power Commission  
3 in Washington, D.C. as a reservoir engineer and gas geologist  
4 in the Division of Gas Certificates. In 1953 I was employed  
5 by Phillips Petroleum Company as a reservoir engineer. Sub-  
6 sequent to that time I became a reservoir engineer in the  
7 Economics Department. In 1963 I was assistant manager of  
8 the Reservoir Engineering Division and Economics Department.  
9 As a result of departmental consolidations, in 1968 I became  
10 director of the Reservoir Engineering Division for the  
11 Western Region in the Exploration and Production Department.  
12 In 1971 I became director of the Reservoir Engineering  
13 Division in the Southwestern Region of the Natural Gas  
14 Resources. In 1975, June the second, I became employed with  
15 Llano, Incorporated in Hobbs as Executive Vice President.

16 I have testified in Texas before the Federal Power  
17 Commission and the Security Exchange Commission.

18 Q. Have you made a study of the Lusk Strawn Pool area?

19 A. Yes, sir, I have.

20 MR. HINKLE: Are the qualifications of the witness  
21 acceptable?

22 MR. STAMETS: They are.

23 Q. (Mr. Hinkle continuing.) Are you familiar with  
24 the applications of Llano in these Cases?

25 A. Yes, sir.

1 Q. What is Llano seeking to accomplish?

2 A. In the Case of 5563, Llano is seeking approval for  
3 the unit agreement covering the Lusk Strawn Pool comprising  
4 twenty thousand, eight hundred and sixty-three point eighty-  
5 eight acres of Federal and State lands located in Lea and  
6 Eddy Counties, New Mexico.

7 Q. What about Case 5564?

8 A. In Case 5564 Llano is requesting approval of a  
9 pressure maintenance project which will be coextensive with  
10 the proposed unit area, an authority to institute a pressure  
11 maintenance project by injection of gas, initially into  
12 two wells. The applicant has further requested rules  
13 covering the project and administrative approval for  
14 expansion of the project, including conversion of additional  
15 wells for the injection of gas.

16 Q. Have you prepared or has there been prepared  
17 under your direction, certain exhibits for introduction in  
18 this Case?

19 A. Yes, sir.

20 Q. Are those the ones that have been marked one  
21 through sixteen?

22 A. Yes, sir.

23 Q. Refer to Exhibit One and explain what this is  
24 and what it shows?

25 A. Exhibit One is a land plat and a tract plat,

**sid morrison reporting service**  
General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 outlining the proposed unit area, which consists of the  
2 twenty thousand, eight hundred and sixty-three point eighty-  
3 eight acres.

4 It further defines those lands which are Federal  
5 lands and State lands. The Federal lands being eighteen  
6 thousand, five hundred and sixty-one point six acres, or  
7 eighty-nine point oh six one percent of the total unit area.

8 The State lands, which are the blue-shaded area,  
9 accumulate to two thousand, two hundred and eighty-two point  
10 twenty-eight acres or ten point nine three nine percent of  
11 the proposed unitized land.

12 The blue line on the extreme periphery of it is  
13 the proposed unit area.

14 This map also shows the interior units which are  
15 the Plains Unit the Lusk Deep Unit and a portion of the Big  
16 Eddy Unit in the southwest.

17 It shows the tract designations.

18 Q The tract designations are the ones referred to  
19 in the unit agreement?

20 A Yes, sir.

21 It further indicates the leasehold of record and  
22 it shows those tracts in which Llano has operational rights  
23 in the Strawn.

24 Q Now refer to Exhibit Two and explain what this  
25 shows?

**sid morrison reporting service**  
*General Court Reporting Service*  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1           A.     Exhibit Two is termed a general well plat which  
2 again shows the confines of the proposed unit area. The  
3 shaded area to the southwest is the Big Eddy Unit. The  
4 wells that are indicated on there, some three hundred in  
5 number, are in compliance with the Commission Rule 701 to  
6 show wells in the area and it shows all wells, irrespective  
7 of formation and completion. It is color coded in such a  
8 way that the producing formations from the Yates on through  
9 the Morrow gas zone are identified. The legend also shows  
10 the well status symbol with respect to producing wells,  
11 shut in, plugged, dry, junked or abandoned, et cetera.

12           Q.     Are there any further comments with respect to  
13 this exhibit?

14           A.     No, sir.

15           Q.     Refer to Exhibit Three and explain what that is?

16           A.     Exhibit Three is a plat, again showing the unit  
17 outline as proposed. The Big Eddy Unit is in the cross hatched  
18 area. This map is made to show several things, one being  
19 that the preceding exhibit showed all of the wells irrespec-  
20 tive of completion depth, depth drilled, productive status  
21 and so on, and this map is intended to screen out all wells,  
22 except those which penetrate into the Strawn. In general  
23 it shows Strawn completions and Morrow completions and  
24 dry holes which were of sufficient depth to have drilled  
25 to the base of the Strawn.

1           On the interior of the unit boundary it shows the  
2 zero line of the productive limits, estimated productive  
3 limits of the Strawn Reef reservoir.

4           It shows in the northern portion in the east half  
5 of Section 6, of Township 18, Range 32 East, the two proposed  
6 injection wells, and in the orange arrow they are identified.  
7 The orange button shows possible future injection wells which  
8 we are not proposing for conversion at this time.

9           In addition to these factors, the heavy dark line  
10 which traverses the map from the southwest to the northeast  
11 is Llano's twelve-inch pipe line.

12           The square rectangle shaded in dark in Section 20  
13 is the proposed Llano compression installation.

14           The round button shaded dark is the remote absorber  
15 which will process the gas and this remote absorber will be  
16 operated by Phillips Petroleum Company under a processing  
17 agreement which is being established.

18           From the Llano compression station going north,  
19 the dark dashed line is the line which will carry the  
20 injection volume from the compression plant to the two  
21 proposed wells.

22           We proposed to inject crestal positions which are  
23 high on the structure and produce the oil volumes from the  
24 lower structure wells until such time as we experience high  
25 gas-oil ratios or break through then the wells will be, of

**sid morrison reporting service**

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 course, shut in or converted to injection wells.

2 In cases where we do not have additional wells  
3 or the pattern is not as we would like to have it for maximum  
4 efficiency, we will inject into a given well and withdraw  
5 from the same well and process the gas through the remote  
6 absorber of Phillips Petroleum Company.

7 Our plan of operation will ultimately go to sixty  
8 million a day and in these two wells the injectors that are  
9 proposed here and designated by the orange arrow, we propose  
10 to inject eight to ten million initially. Ultimately the  
11 injection well will accumulate to approximately three  
12 hundred and forty-five billion feet.

13 Q What is the source of your gas?

14 A The source of the gas will be extraneous gas which  
15 Llano has under contract or will contract at the appropriate  
16 time to begin injection.

17 Q Any further comments with respect to Exhibit Three?

18 A No, sir.

19 Q Refer to Exhibit Four and explain that.

20 A Exhibit Four is an isopachous map of the producing  
21 reservoir known as the Strawn Reef.

22 The wells colored in red are Lusk Strawn wells.  
23 Those which have an additional circle around the red button  
24 are currently producing wells.

25 The exterior of the unit boundary is also defined

1 on this map.

2           The Lusk Strawn Reef reservoir lies on the north-  
3 western shelf of the Delaware Basin. The reef itself is  
4 defined by oil-water contacts on the east, the southeast,  
5 the southwest and generally to the south. It is defined  
6 by pinch outs of porosity on the north and the northwest.  
7 The reef is currently producing four hundred and thirty  
8 barrels of oil a day and approximately two and a half million  
9 feet of gas and about two hundred and fifty barrels of water  
10 a day from the southernmost extreme wells.

11           Q     Exhibit Four shows considerable acreage between  
12 the productive limits and the boundaries of the unit. Is  
13 there any provision for that acreage to participate under  
14 the unit agreement?

15           A     Yes, sir, the surface acreage will participate  
16 within the participation formula as five percent.

17           Q     Now, Exhibit Four also indicates that part of the  
18 Big Eddy area is productive from the Lusk Strawn, why was  
19 this acreage not included in the proposed unit agreement?

20           A     The Big Eddy Unit is a large unit, it has a  
21 multiplicity of owners, in the range of two hundred or so.  
22 We visited with the USGS and with their concurrence, we  
23 elected to in the interest of time to expedite the formation  
24 of the unit through the execution of a border protection  
25 agreement between the operators of the Big Eddy Unit and

1 Llano, Incorporated.

2 Q. Have you worked out an agreement, a border protection  
3 agreement with the Big Eddy Unit operator?

4 A. Yes, sir, we have and it has been executed.

5 Q. Essentially what does this provide?

6 A. There are three wells which we feel we can and  
7 may want to reenter, the 1, the 4 and the 5. And we, through  
8 this agreement, have operating rights with respect to the  
9 Strawn to produce or to inject or to monitor reservoir  
10 performance in any one of the three wells, and additionally  
11 the fourth well which is a dry hole on the south extreme  
12 of the productive limits.

13 MR. STAMETS: Would you please identify the wells  
14 you referred to as 1, 4 and 5?

15 A. Yes, sir, the Bass Sun Texas 1.

16 Q. (Mr. Hinkle continuing.) What section?

17 A. They are in Section 34. The 5 is in 34, the 1  
18 and the 5 are in Sections 27 of 19 South and 31 East.

19 MR. STAMETS: That is all of the wells in the Big  
20 Eddy Unit that are completed or were completed in the Lusk  
21 Strawn Pool?

22 A. Yes, sir.

23 MR. STAMETS: Okay, thank you.

24 A. And within the confines of the border protection  
25 agreement as defined in the agreement.

1 Q (Mr. Hinkle continuing.) Do you have any further  
2 comments with respect to Exhibit Four?

3 A No, sir.

4 Q Refer to Exhibit Five and explain what this is?

5 A Exhibit Five is a letter from the Department of  
6 the Interior, the Geological Survey, the pertinent portions  
7 being as follows: (Reading.) The application filed October  
8 23rd, 1973 requested the designation of the Lusk Strawn  
9 Deep Unit area embracing twenty thousand, eight hundred and  
10 sixty-three point eighty-eight acres in Lea and Eddy Counties,  
11 New Mexico, as logically subject to operations under the  
12 proposed unit area which embraces eighteen thousand, five  
13 hundred and eighty-one point six acres or eighty-nine percent  
14 of Federal lands and two thousand, two hundred and eighty-  
15 two point twenty-eight acres or ten point nine four percent  
16 of New Mexico State lands.

17 It further states: Unitization is for the  
18 purpose of conducting secondary recovery operations by  
19 injecting extraneous gas and will be limited to the Strawn  
20 zone of Pennsylvanian age as defined in Section 2-G of the  
21 unit agreement.

22 It continues: The land requested as outlined on  
23 your plat, marked Exhibit A, Lusk Strawn Deep Unit in Lea  
24 and Eddy Counties, New Mexico is hereby designated as a  
25 logical unit area. The designation of the Lusk Strawn Deep

1 Unit is granted provided the Lusk Deep and Plains Unit  
2 agreement which are wholly within the proposed unit area are  
3 amended to eliminate the Strawn zone.

4 The proposed form of unit agreement will be  
5 acceptable if modified as indicated. (End of reading.)

6 Q So there is attached to that letter, another  
7 letter, what does that indicate?

8 A The letter states: (Reading) Your letter of  
9 December 14th, 1973 requests preliminary approval for the  
10 text of two separately proposed amendments, one each for  
11 the Lusk Deep Unit and to the Plains Unit agreement, both  
12 in Lea County, New Mexico for the proposed form of consent  
13 and ratification to each such amendment.

14 The proposed amendments are proposed to eliminate  
15 the Strawn formation from both the Lusk Deep and the Plains  
16 Unit agreements while maintaining each such agreement with  
17 respect to all other formations.

18 The proposed amendments and form of consent and  
19 ratification are satisfactory with this office. (End of  
20 reading.)

21 Q Have you obtained these amendments?

22 A Yes, sir, we have.

23 Q They have been executed?

24 A Not entirely. The Lusk Deep Unit which requires  
25 an amendment by Gulf, Phillips and Kerr-McGee will be executed

1 simultaneously with the assignment of their properties to  
2 Llano.

3 The Plains Unit, the signing of the amendment  
4 will be conducted by Mobile and Clinton. Mobile has signed  
5 the amendment and Clinton has it under review.

6 Q. Now refer to Exhibit Six and explain this?

7 A. Exhibit Six is a letter from the Commissioner of  
8 Public Lands which in substance says: (Reading.) Your  
9 proposed agreement this date has been approved as to form  
10 and as to content. The certain minor changes -- (End of  
11 reading.)

12 Q. There is attached to this letter another letter  
13 under the date of January 11th, what does it show?

14 A. The letter of January 11th, 1974 also from the  
15 Commissioner of Public Lands withdraws the objections and  
16 recommendations as contained in the preceding letter of  
17 January 4th, 1974.

18 Q. Then the proposed form of unit agreement has been  
19 approved by the Commissioner of Public Lands?

20 A. Yes, sir.

21 Q. Now, three copies of the unit agreement were  
22 filed with your application. Are you familiar with that  
23 form?

24 A. Yes, sir.

25 Q. Who is designated as the operator?

1 A Llano, Incorporated is designated as the unit  
2 operator.

3 Q Is this the same form as has been previously  
4 approved by the USGS?

5 A Yes, sir.

6 Q And the Commissioner of Public Lands where Federal  
7 and State lands are involved?

8 A Yes, sir.

9 Q Does this form provide for a plan of operations?

10 A Yes, sir.

11 Q What does it essentially provide?

12 A This was Exhibit Six?

13 Q No, Section 12 of the unit agreement is the one  
14 that provides for the plan of operation.

15 A Section 12 of the unit agreement recognizes that  
16 the lands within the unit area are reasonably proven to be  
17 productive and unitized substances and the main object and  
18 purpose of the agreement is to formulate and to put into  
19 effect a secondary recovery project in order to effect the  
20 greatest economic recovery of unitized substance and in  
21 order to prevent waste. The agreement provides that the  
22 initial plan of operation will be filed with the supervisor  
23 and the commissioner concurrently with the filing of the  
24 agreement for final approval.

25 Q Does the unit agreement provide for a participating

1 formula?

2 A. Yes, sir.

3 Q. What is this formula?

4 A. The participation formula is based upon five  
5 percent surface acreage, twenty percent productive acreage,  
6 and seventy-five percent net acre feet.

7 Q. It is covered by section 13 of the unit agreement?

8 A. Yes, sir, it is.

9 Q. Do you consider this formula to be fair and  
10 equitable?

11 A. Yes, sir, I do.

12 Q. And calculated to protect correlative rights?

13 A. Yes, sir.

14 Q. Have you contacted, or has anyone in your organiza-  
15 tion contacted all of the working-interest owners or owners  
16 of leasehold within the proposed unit area?

17 A. Yes, sir, we have.

18 Q. And offered an opportunity to commit their acreage  
19 to the unit?

20 A. We've offered them an opportunity to commit their  
21 acreage to the unit or to sell it to Llano through purchase  
22 acquisition procedures.

23 Q. What percentage of the leasehold interest do you  
24 anticipate will be committed to the unit agreement?

25 A. We have what we think are sound commitments now,

**sid morrison reporting service**

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 ninety to eighty-nine percent and we think that ultimately  
2 we will have very nearly one hundred percent.

3 Q Now refer to Exhibit Seven and explain what this  
4 shows?

5 A Exhibit Seven is a type log and is the log  
6 which is referred to in the unit agreement. This log  
7 being a gamma ray sonic log on the El Paso Natural Gas  
8 Company Lusk Deep Number 2. It portrays the top of the  
9 Strawn and the top of the reef, the base of the reef, the  
10 unitized interval which is from eleven thousand and ninety-  
11 seven feet to eleven thousand, five hundred and four feet.

12 Q This section is specifically described in the  
13 unit agreement as section 2-G, is it not?

14 A Yes, sir.

15 Q Now refer to Exhibits Eight and Nine, together,  
16 and explain what these are and what they show?

17 A Exhibit Eight is a well diagram of the proposed  
18 injection well, which is the North 2 in the east half of  
19 Section 6, the Tenneco Oil Company Continental Federal A-1.  
20 This diagrammatic sketch shows where the thirteen and three-  
21 eighths casing is set, the eight and five-eighths, the top  
22 of the Strawn, the perforated interval, the volume of the  
23 cement in each case which is utilized, and it shows the size  
24 of the tubing, it shows the previous Wolfcamp perforations  
25 which had been perforated, but were also squeezed; and it

1 shows the packer arrangement; it shows the plugged total  
2 depth that exists now in the well bore.

3 Q Now refer to Exhibits Ten and Eleven, are these  
4 the logs of the two wells that you have just testified to?

5 A I just testified to Exhibit Eight, but Exhibit Nine  
6 which is another exhibit set out diagrammatically, the well  
7 bore arrangement, the testimony is essentially similar as  
8 to Exhibit Eight.

9 The Exhibits Ten and Eleven are merely the logs  
10 on these two well bores, which also have indicated on them  
11 the same information as contained in Exhibits Eight and Nine.

12 Q These are the two wells which are to be used  
13 initially for the injection of gas?

14 A Yes, sir.

15 Q When do you expect to begin injecting gas into these  
16 two wells?

17 A We think since we have the compression already  
18 in the yard and the line pipe also in stock that within  
19 sixty to ninety days after the effective date of the unit  
20 we can begin injection into two wells.

21 Q During that sixty to ninety days what will you  
22 be doing?

23 A We will at that time have the well records of  
24 all of the parties which are involved in the unit which we  
25 have acquired properties from. We will be reviewing these

1 well records, leading to the well work that will be required,  
2 the conversion of additional wells, the rearrangement of  
3 equipment in the field and shortly thereafter we will file  
4 for an administrative expansion of the project area into  
5 the southern and southwestern portion of the unit area.

6 Q Now you have referred to the request for administra-  
7 tive approval of additional injection wells, is that quite  
8 essential to your program?

9 A We feel that it is in order to expedite it. We,  
10 as soon as possible, want to increase our injection rate to  
11 sixty million cubic feet per day and we feel that the  
12 administrative provisions and procedures which are established  
13 by the Commission will move us in that direction in an  
14 orderly and rapid fashion.

15 Q Do you have an estimate of the time from the time  
16 you begin injecting into the two initial wells, how long it  
17 will be until you want administrative approval of additional  
18 wells?

19 A Within six months.

20 Q Refer to Exhibit Twelve and explain what this  
21 shows?

22 A Exhibit Twelve is a composite production time  
23 curve of the Lusk Strawn Deep Unit area which shows the oil  
24 production, the bottom hole pressure, the producing oil-gas  
25 ratio since the inception of production which was in late

**sid morrison reporting service**

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 1960 through July of 1975. It indicates that the current  
2 production rate from the reservoir is thirteen thousand, two  
3 hundred barrels of oil per month; it shows a gas-oil ratio  
4 of five thousand, seven hundred and an estimated current  
5 reservoir pressure in the range of seven hundred pounds.

6 Q. Refer to Exhibit Thirteen and explain this?

7 A. Exhibit Thirteen is a general data tabulation for  
8 the Lusk Strawn Deep Unit area, which shows the reservoir,  
9 the age, the average producing depth of eleven thousand,  
10 three hundred feet, the discovery date, the discovery well,  
11 the current wells which are known as Strawn wells, showing  
12 twenty-three producing, sixteen shut down, twenty-eight  
13 plugged and abandoned and twenty-seven dry and abandoned.  
14 It additionally shows the production rate of thirteen thousand,  
15 two hundred and sixty-eight barrels per month, accumulative  
16 production from the total reservoir and from the Lusk Strawn  
17 Deep Unit area, both being in excess of eighteen million  
18 barrels. It goes on to enumerate such items as that and  
19 includes fluid property composition, reservoir rock properties,  
20 and oil-water contacts which are described on the exhibit.

21 Q. Refer to Exhibit Fourteen and explain what this  
22 shows?

23 A. Exhibit Fourteen is a calculation of original oil  
24 in place by two methods, the material balance method, or  
25 based on performance, and volumetric method which is essentially

1 based upon geologic means. Under item one, the material  
2 balance, it shows the composite compressibility calculation  
3 for the reservoir system; it shows the calculation of the  
4 original oil in place in the absence of water influx which  
5 seems to be a valid supposition considering performance.  
6 The oil in place is estimated to be fifty-four point one  
7 million barrels by material balance methods and by the  
8 volumetric method the calculation for oil in place is  
9 estimated to be forty-four point two million barrels for the  
10 total reservoir which includes the Big Eddy Unit area and  
11 the Lusk Strawn Deep Unit area of forty-three million barrels.

12 I think that the fifty-four million barrels is  
13 the more reasonable figure in view of performance of the  
14 reservoir, having accumulated approximately eighteen and a  
15 half million barrels to date, and in my opinion the disparity  
16 between the two is probably in the porosity measurements  
17 since the reservoir not only has inter-crystalline porosity  
18 but has secondary porosity of vugular and fracture composi-  
19 tion.

20 Q. Now refer to Exhibit Fifteen and explain what  
21 this shows?

22 A. Exhibit Fifteen shows the estimated additional  
23 recovery that is anticipated by the project. These numbers  
24 are stated in thousands of barrels.

25 Once again the original oil in place was fifty-four

1 million, the accumulative production was approximately  
2 eighteen and a half which leaves the remaining oil in place  
3 of thirty-five point six million barrels remaining of sixty-  
4 five point nine percent.

5 The future remaining primary recovery from August  
6 the first of '75 is estimated to be four hundred and ninety-  
7 eight thousand barrels. We anticipate that the future  
8 pressure maintenance recovery of oil will be four million  
9 seven hundred and sixty-two thousand barrels.

10 The future recovery of natural gas liquids, this  
11 is a hundred percent from the unit, will be an additional  
12 three million, seven hundred and fifty-six thousand for  
13 a total future recovery of primary, secondary and natural  
14 gas liquids of slightly in excess of nine million barrels.

15 The project would then evidence an increase in  
16 recovery of fifteen point seven percent over continued  
17 depletion performance.

18 Q. Refer to Exhibit Sixteen and explain this exhibit?

19 A. Exhibit Sixteen is the estimated future production  
20 from the unitized area, cycling at an injection rate of  
21 sixty million a day and again the figures are in thousands  
22 of barrels, so we can see that over a span of sixteen years  
23 the crude oil recovery from the unit is expected to be  
24 five million, two hundred and sixty thousand barrels, and  
25 the natural gas liquids are five million, two hundred thousand

sid morrison reporting service

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 barrels.

2 It might be pointed out at this time that the  
3 first four years that these liquids which amount to a  
4 million, four hundred and forty-four thousand barrels are  
5 not attributable to the unit, but are extracted from the  
6 gas which is processed in the plant and the gas is the  
7 extraneous gas which is being purchased outside of the unit  
8 confines or unitized interval and will be injected into  
9 the formation.

10 The natural gas liquids which are attributable  
11 to the unit through the same time period amount to a million,  
12 six hundred and ninety thousand barrels on the assumption  
13 of forty-five percent of the plant production will be  
14 reassigned to the unit, so, therefore, the column four, oil  
15 and natural gas liquids to the unit, totalizes six million,  
16 nine hundred and fifty barrels.

17 At the bottom of the exhibit is tabulated the  
18 economics as we see them, which accrue to the unit, it gives  
19 an annual rate of return of fourteen percent, a pay-out  
20 period of four and a half years, returning the investment  
21 one and a half times.

22 Q Do you have any recommendations to make as to  
23 special pool rules which should be adopted?

24 A Yes, we do.

25 Q What are they?

1           A.     This is one of them, We only have two copies of  
2 these, I think.

3           Our recommendations for special rules and regula-  
4 tions for the Lusk Strawn Deep Unit pressure maintenance  
5 project in the unit area are, one, the rules and regulations  
6 of the Lusk Strawn Pool outside of the project area be  
7 retained as written in Order Number R-2175-B which is the  
8 one currently in effect.

9           Recommendation two, the initial project area of  
10 Llano, Incorporated, Lusk Strawn Deep Unit, consisting of  
11 one thousand, seven hundred and sixty acres shall be  
12 described as follows and the description is tabulated therein.

13           Q.     And that is the area where the two injection  
14 wells are?

15           A.     The area where the injection wells are located  
16 and approximately one mile south.

17           Recommendation three, the allowable for the project  
18 area shall be the sum of the allowables of the several wells  
19 within the project area, including those wells which are  
20 shut in, curtailed or used as injection wells. Allowables  
21 for all wells shall be determined as hereafter prescribed.

22           Recommendation four, injection, shut in, or  
23 curtailed wells may be transferred to producing wells in  
24 the interest of performance efficiencies.

25           And recommendation five, the allowable assigned to

1 any well on a one hundred and sixty acre proration unit shall  
2 be top allowable for the Lusk Strawn Pool.

3 Recommendation six, the allowable assigned to any  
4 well which is shut in or curtailed in accordance with  
5 recommendation four above, which allowable is to be transferred  
6 to any well or wells within the project area for production  
7 shall in no event be greater than its ability to produce  
8 during the test period described in recommendation seven  
9 below, nor will it be any greater than the top unit allowable  
10 for the pool during the month of transfer, whichever is  
11 less.

12 Recommendation seven, the allowable assigned to  
13 any well which is shut in or curtailed in accordance with  
14 recommendation four above, shall be determined by a twenty-  
15 four hour test at a stabilized production rate which shall  
16 be the final twenty-four hour period of a seventy-two hour  
17 test during which time the well shall be produced under  
18 constant conditions. The daily tolerance limitation set  
19 forth in Commission Rule 502-I-A and the limiting GOR, if  
20 any, shall be waived during the test periods.

21 The Lusk Strawn Deep Unit project operator shall  
22 notify all offset operators offsetting the well, as well  
23 as the Commission, of the exact time that such tests are to  
24 be conducted. The tests may be witnessed by representatives  
25 of the offset operators or by the Commission.

**sid morrison reporting service**

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 Recommendation eight, the allowable assigned to  
2 each producing well in the project area shall be equal to  
3 the well's ability to produce or the top unit allowable  
4 for the Lusk Strawn Pool, whichever is less, provided that  
5 any producing well or wells within the project area which  
6 evidence substantial response to gas injection will be  
7 permitted to produce up to the project allowable or any  
8 proportion thereof. Each producing well within the project  
9 area shall be exempt from the Lusk Strawn limiting gas-oil  
10 ratio, four thousand to one.

11 Recommendation nine, the conversion of additional  
12 producing or shut in wells to injection and the expansion  
13 of the project area will be by application and through the  
14 administrative approval procedures of the Commission.

15 Q In your opinion will the approval of these  
16 applications be in the interest of conservation and the  
17 prevention of waste and protect correlative rights?

18 A Yes, sir.

19 MR. HINKLE: We would like to offer Exhibits One  
20 through Sixteen.

21 MR. STAMETS: Is there any objection to the  
22 admission of any of these exhibits? They will be admitted.

23 MR. HINKLE: That's all of the direct.

24 MR. STAMETS: Any questions of the witness? I  
25 think at this time we will take about a fifteen minute recess.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

(THEREUPON, a short recess was taken.)

MR. STAMETS: The Hearing will please come to order.

CROSS EXAMINATION

BY MR. STAMETS:

Q Mr. Edwards, in your outline of the project area here, is that basically the two proration units that have injection wells on them and the offsetting proration units?

A Yes, sir, it is a little more than that.

Q Well, if you were to expand the project area, would you propose that that should be the way that it should be expanded, that it would be expanded to include any proration unit on which an injection well is located, plus the offsetting proration unit?

A At least that.

Q Now, you have proposed a formula here for determining the project allowable. At the present time are there any top allowable wells in that pool?

A No, sir, the top allowable is six hundred and five.

Q Is there any reason to limit the project allowable to less than the number of proration units in the project area times the top allowable?

A Is there any reason to limit it to less than?

Q Yes, in other words, the formula that you proposed here, you get the top allowable for an injection well, but

**sid morrison reporting service**  
General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 any other well in the project area would only receive an  
2 allowable up to its ability to produce.

3 A. Right.

4 Q. And is there any reason to limit it to that  
5 volume?

6 A. No, only that each well has to be tested in order  
7 to get a future allowable.

8 My proposal is written in such a way that it allows  
9 me some flexibility because we do not know the condition  
10 of all of the bore holes and I don't know in the future  
11 which exactly will be producers and which ones will be  
12 injectors. I'm trying to allow for an ample allowable, plus  
13 the fact that I have a limited number of wells to work with,  
14 and that is going to be further reduced by the number of  
15 wells that will be observation wells or injection wells.  
16 And then in addition to that, ultimately, you see, we will  
17 have a cycling project, so I have to make provisions in there  
18 if I'm going to put sixty million a day into the ground,  
19 which we propose to do ultimately, I have to have a way to  
20 get sixty million back out.

21 Q. Let me explain what I was referring to there. Let's  
22 assume that you've got a four-well project for the time  
23 being, and under your formula you could get a top allowable  
24 say for one injection well, then that the other three wells  
25 had combined producing capacity of five hundred barrels a

**sid morrison reporting service**

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 day, you would have something in excess of eleven hundred  
2 barrels. I was asking, is there any reason to limit the  
3 allowable from the project to less than four times this  
4 six hundred barrels a day?

5 A. No, sir.

6 Q. Which would be more than you would have requested  
7 here, but still would be no more than the wells would be  
8 allowed under primary conditions?

9 A. That's right.

10 Q. On Exhibit Number Sixteen, column two, if I  
11 understand this correctly, now you would allocate forty-five  
12 percent of the plant-produced liquids for the first four  
13 years?

14 A. No, sir. Column two represents one hundred percent  
15 of the production from the plant. During the first four  
16 years, which are designated by footnote five. This will be  
17 the period of time when gas is coming in from extraneous  
18 sources and will be going into the reservoir at the rate of  
19 approximately sixty million a day. The unit wouldn't share  
20 in that gas because it is an outside gas volume. This is  
21 the total plant production entirely in column two, the first  
22 four years being the pressure build-up time when we are  
23 trying to get up to an operating pressure of four thousand  
24 pounds.

25 Q. Would the produced gas from the field be going

1 through the plant during this period of time?

2 A. Yes, sir.

3 Q. And would any allocation of those liquids go to  
4 the unit during this period of time?

5 A. Yes, a small percentage would be. The field right  
6 now is only producing about two million a day from the  
7 Strawn.

8 Q. In actuality then, in column three would there be  
9 a small volume?

10 A. In column three there would be a very small number  
11 there, which would be forty-five percent of the liquids  
12 extracted from whatever the indigenous gas volume was.

13 Q. You are looking at a four year fill up program  
14 and then you would be siphoning gas from the reservoir?

15 A. Right.

16 Q. Referring to Exhibits Eight and Nine, you show  
17 the annular space filled with inhibited fluid on the two  
18 injectors and a pressure gauge on the surface, is this the  
19 method you propose to use to determine leakage?

20 A. Yes, sir.

21 Q. Is the tubing treated in any way, or is there any  
22 necessity to treat it for corrosion?

23 A. We've considered that, but the extraneous gas  
24 is sweet gas and the reservoir gas and the reservoir fluids  
25 are not sour.

sid morrison reporting service

General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1 Q Now, earlier in the testimony you indicated that  
2 you would be injecting high on the structure and producing  
3 low on the structure, and I would presume that initially you  
4 are referring to your project area?

5 A In any event that would be the case. Initially  
6 we would be referring to the project area.

7 Q Okay. Referring to the Big Eddy Unit, will the  
8 production from those wells commingle with the unit production,  
9 totally allocated to the Big Eddy; you talk about a border  
10 protection agreement and I would like just a brief descrip-  
11 tion of how that works?

12 A The Big Eddy border protection agreement permits  
13 the Big Eddy Unit to share in the same proportion the liquid  
14 and gas production from the unit, as though it had been in  
15 the unit.

16 Q As if this were a single lease?

17 A Yes, sir. That is in the event that we do not  
18 produce the well. If we produce the wells then it shares in  
19 proportion, the production is allocated back to the lease  
20 in the respective cases and they have an override on it and  
21 we have the balance.

22 Q What will your injection pressures be?

23 A A maximum of forty-five hundred pounds.

24 Q And what reservoir pressure do you intend to  
25 build back up to?

**sid morrison reporting service**  
General Court Reporting Service  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

1           A.     We intend to operate at four thousand to forty-two  
2 hundred pounds, which is essentially the saturation pressure  
3 initially. The initial bubble point was four one seven three  
4 so somewhere right in that range.

5           MR. STAMETS: Are there any other questions of  
6 this witness?

7           MR. HINKLE: Mr. Examiner, we have the original  
8 logs, the logs that were marked exhibits are just Xerox  
9 copies. If you would like to have the full log of the two  
10 injection wells we have them here, and we also have another  
11 copy of the recommended special pool rules if you would like  
12 to have those.

13          MR. STAMETS: We have two copies of the rules  
14 at this time.

15          MR. HINKLE: Would you like to have those originals?

16          MR. STAMETS: No, I believe those logs in the  
17 Commission's files and the exhibits that were presented  
18 should be sufficient.

19          MR. HINKLE: That is all we have.

20          MR. STAMETS: The witness may be excused. Anything  
21 further in this Case? We will take the case under advisement.

22                 I would like to announce that Case 5551 will be  
23 heard as the last case today before Examiner Nutter.

24  
25

**sid morrish reporting service**  
*General Court Reporting Service*  
825 Calle Mejia, No. 122, Santa Fe, New Mexico 87501  
Phone (505) 982-9212

