

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BLDG.
SANTA FE, NEW MEXICO
25 June 1980

EXAMINER HEARING

IN THE MATTER OF:

Application of Benson-Montin-Greer)
Drilling Corporation for a unit) CASE
agreement, Rio Arriba County, New) 6943
Mexico.)
)

BEFORE: Richard L. Stamets

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation Division: Ernest L. Padilla, Esq.
Legal Counsel to the Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

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MR. STAMETS: Call next Case 6943.

MR. PADILLA: Application of Benson-Montin-
Greer Drilling Corporation for a unit agreement, Rio Arriba
County, New Mexico.

MR. STAMETS: At the request of the
applicant this case will be continued to the July 9th Examiner
Hearing.

(Hearing concluded.)

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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 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 C.S.R.

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I do hereby certify that the foregoing is a correct record of the proceedings in the Frontier hearing of Case No. 6943 heard by me on 6-25 1980.

Richard P. Stumm, Examiner
Oil Conservation Division

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I N D E X

ALBERT R. GREER

Direct Examination by Mr. Kellahin 3

Cross Examination by Mr. Nutter 35

E X H I B I T S

Applicant Exhibit One, Packet of Exhibits 4

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1 MR. NUTTER: We'll call next Case Number
2 6943.

3 MR. PADILLA: Application of Benson-Montin-
4 Greer Drilling Corporation for a unit agreement, Rio Arriba
5 County, New Mexico.

6 MR. NUTTER: We'll also at this time call
7 Case Number 6944.

8 MR. PADILLA: Application of Benson-Montin-
9 Greer Drilling Corporation for a pressure maintenance project,
10 Rio Arriba County, New Mexico.

11 MR. KELLAHIN: I'm Tom Kellahin, of Santa
12 Fe, New Mexico, appearing on behalf of the applicant in Cases
13 6943 and 6944, and I have one witness to be sworn.

14 MR. NUTTER: For purpose of testimony,
15 Cases 5943 and 6944 will be consolidated.

16
17 (Witness sworn.)

18
19 ALBERT R. GREER
20 being called as a witness and having been duly sworn upon his
21 oath, testified as follows, to-wit:

22
23 DIRECT EXAMINATION

24 BY MR. KELLAHIN:

25 Q. Would you please state your name and occu-

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1 pation?

2 A. Albert R. Greer, G-R-E-E-R. I'm an offi-
3 cer and petroleum engineer for Benson-Montin-Greer Drilling
4 Corp.

5 Q. Mr. Greer, have you previously testified
6 before the Division as a petroleum engineer and had your
7 qualifications accepted and made a matter of record?

8 A. Yes, sir.

9 Q. And as a petroleum engineer have you made
10 a study of and are you familiar with the facts surrounding
11 these two applications?

12 A. Yes, sir.

13 MR. KELLAHIN: We tender Mr. Greer as an
14 expert petroleum engineer.

15 MR. NUTTER: Mr. Greer is an expert pet-
16 roleum engineer.

17 Q. Mr. Greer, I have taken the packet of
18 exhibits that you have presented today and marked it as Ex-
19 hibit One, and I would like for you to commence your testi-
20 mony by referring to each of the parts within Exhibit Number
21 One and if we could start with what is labeled the location
22 plat, and have you first identify for me your proposed unit
23 area.

24 A. Well, the unit area is shown on this
25 location plat outlined in red. It's within the East Puerto

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1 Chiquito Mancos Pool, which is outlined in green on this plat.

2 Q. Could you describe generally for us what
3 types of acreages are involved in the unit?

4 A. Yes, sir, there are Indian lands, Federal
5 lands, and fee lands.

6 Q. The advertisement indicates that there is
7 some 9769 acres, more or less, to be dedicated to the unit.

8 A. Yes, sir.

9 Q. What is to be the unitized formation?

10 A. The Mancos formation.

11 Q. Is this unit being organized for purposes
12 of primary recovery, secondary recovery, or tertiary recovery?

13 A. It's principally for secondary and ter-
14 tiary recovery.

15 Q. Have the working interests agreed as to
16 a form of unit agreement for this particular unit?

17 A. Yes, sir, 99.7 percent of the working
18 interest owners of leased lands have agreed to it.

19 Q. Does the proposed -- has the proposed
20 unit agreement been submitted to the USGS and to the State
21 Land Commission, State of New Mexico?

22 A. The agreement about as it appears here
23 was submitted to the USGS two years ago. There are some
24 changes in it that they have not yet reviewed.

25 We have not submitted it to the Land

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1 Commissioner.

2 Q. Would you summarize generally what has
3 been the history of this particular formation and your efforts
4 to bring about a voluntary unit for secondary recovery?

5 A. Yes, sir. It's a fractured shale forma-
6 tion. Produced initially oil, under saturated oil, and is
7 under, to the best of our ability, we make it operate with
8 gravity drainage completion, which means that we produce the
9 down dip wells and as the up dip wells reach high gas/oil
10 ratios we shut them in. And this is a procedure that we can
11 carry out only to a certain limit, and that limit is when the
12 down dip producers commence making gas, then we're forced
13 either to produce high gas/oil ratio wells or shut the pro-
14 perties in.

15 Accordingly, we commenced some fifteen
16 years ago trying to get the area unitized. The Indian tribe,
17 the Jicarilla Tribe, was reluctant to unitize and we put off
18 unitization as long as we could then, because of the Indians,
19 until we reached a point which we now have, that we can delay
20 no longer. We're either going to have to shut the wells in
21 or produce high gas/oil ratio wells, and when we do, we'll
22 dissipate the energy from the secondary gas cap that's formed
23 and the net of it is that -- that we just must unitize soon
24 or we are going to lose a substantial -- otherwise recoverable
25 reserves.

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1 So in our efforts to unitize, we managed
2 finally a year ago to bring to the attention of the Indians
3 the amount of royalty that they would lose if we did not unit-
4 ize, and it's a substantial difference, and when we finally
5 got their attorneys to recognize it, then they agreed to
6 unitize, and after considerable negotiation we reached trade
7 terms, an increase in their royalty, net profits, and one
8 thing and another, and we now have an agreement whereby we
9 can unitize.

10 Q In your opinion, Mr. Greer, does the pro-
11 posed unit area constitute a logical configuration by which
12 the unit and the unit operator will have substantial and ef-
13 fective control of the unitized formation?

14 A Yes.

15 Q In addition to the preparation of a pro-
16 posed unit agreement, have you proposed a unit operating
17 agreement?

18 A Yes.

19 Q If you'll commence with the unit agreement
20 and simply go through and indicate for us some of the import-
21 ant points in summary to familiarize the Examiner with that
22 agreement, perhaps commencing with an explanation of why you've
23 indicated in the unit agreement the green shading at various
24 pages.

25 A Well, we've indicated in green shading

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1 the words where the Oil Conservation Division is given author-
2 ity in the unit agreement.

3 I thought two years ago that we had fur-
4 nished a copy to the Division for review, but in checking my
5 files, I find that we did not. So we've made this agreement
6 conform to one we have recently submitted on another area to
7 the department, or to the Division, and I believe that we
8 have the same authorities here as in the one recently approved.

9 On page one of the unit agreement we set
10 out where the Oil Conservation Division has the authority to
11 take part in these agreements.

12 On page two the Division is defined as
13 we use in the agreement here.

14 Page four the Division is given authority
15 in expansion of the unit agreement -- in expansion of the
16 unit area.

17 Carried over onto page five it shows again.

18 On page six the Division is given author-
19 ity under approval of the plan of operations, which carries
20 over to page seven.

21 On page ten regarding allocation of uni-
22 tized substances, which carries over to page eleven.

23 Also, on page eleven under Section 15,
24 authority regarding what gas might be royalty-free if out-
25 side gas is brought in for injection.

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1 On page fourteen the approval of the unit
2 agreement, the effective date, and the term of the agreement.

3 On page fifteen perhaps one of the more
4 important sections, Section 23, regarding rate of prospecting,
5 development, and production, the Division is given equal
6 authority with the USGS regarding approvals of rate of pro-
7 specting and development; in addition, what both the USGS
8 and the Division determine must be within the limits fixed
9 by the Division regarding the quantity and the rate of pro-
10 duction.

11 On page seventeen authority regarding
12 subsequent joinder of additional parties who might want to
13 come in at a later time.

14 Those are the authorities granted to the
15 Division. Then there are a few particular items that we
16 should call to the attention now.

17 One is on page seven regarding tract
18 participations. The participation formula is 10 percent
19 acreage; 22-1/2 percent structural position weighting factor,
20 and that we'll go into in detail a little bit later; 67-1/2
21 percent production.

22 Q. Do you have subsequent exhibits to indi-
23 cate how those numbers were derived?

24 A. Right. They're explained here in the
25 language of this particular section, but later on it's easier

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1 to understand from the exhibits.

2 Q On page eight there is indicated a special
3 agreement with the Jicarilla Tribe. Would you identify that
4 for us?

5 A Yes, sir. About the center of the page
6 eight is spelled out briefly one of the terms that we agreed
7 to with the Jicarilla Tribe, and that is after we have deter-
8 mined the Tribe's equity as to the various leases, I think
9 there's five or six of them, the Tribe wanted the equity re-
10 allocated on a different basis than the basic formula. We
11 agreed to do this. This affects only the Indians and the
12 working interest owners.

13 Q Will that have an adverse effect in any
14 way upon any of the other working interest or royalty owners
15 in the unit?

16 A No, sir, it doesn't affect their equity
17 at all.

18 MR. NUTTER: Well now, it would the other
19 working interest owners, wouldn't it?

20 A The other working interest owners who are
21 parties and own interest over these leases are affected, and
22 they have all agreed to this trade.

23 MR. NUTTER: So in other words, this is
24 changing the participation for the Indians probably to a
25 higher rate, but it's carved out of working interest and not

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1 out of any other royalty owners?

2 A. That is exactly right.

3 MR. NUTTER: Okay.

4 Q. I believe on page nine there is a need
5 for an explanation on some of these undrilled acreage. Do
6 you have any open acreage involved here?

7 A. Yes, sir, there's some unleased Federal
8 acreage and a little bit of unleased fee acreage. The bottom
9 paragraph on page nine sets out how the unleased Federal
10 acreage will be handled, which essentially is that when it's
11 put up for sale the successful bidder will be obligated to
12 join the unit agreement, unless there's some reason of the
13 equities that it should not.

14 Q. Back on page six under plan of operation,
15 you've set forth a number of different substances that might
16 be used for secondary and tertiary recovery.

17 You might summarize for us, if you would,
18 the anticipated substances that could be used.

19 A. Yes, sir. We are thinking about not only
20 water flooding and gas injection, but tertiary methods, which
21 can include caustics, polymers, and chemicals, which we
22 identify in the first paragraph of Section 10.

23 Q. I believe that covers most of the signi-
24 ficant points in the unit agreement, Mr. Greer.

25 MR. NUTTER: Mr. Greer, before you get

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1 too far off on that, now that portion, wherever that section
2 was, I lost it --

3 A. It's page six.

4 MR. NUTTER: No, the part about the lands
5 that would be leased after the effective date of the unit.

6 Now how are you going to bind those parties
7 that pick up these leases after the effective date? Will the
8 government put the clause in the lease that they must join
9 the unit?

10 A. This will be part of the -- when the leases
11 are advertised for sale --

12 MR. NUTTER: That they're subject to this
13 binder?

14 A. -- they'll be subject to that, yes, sir.

15 MR. NUTTER: And they take the leases
16 under that binder?

17 A. Right, uh-huh.

18 MR. NUTTER: I see. Okay.

19 A. The same as is in an exploratory unit.
20 The main difference here, of course, is that this is unusual
21 for a secondary unit because ordinarily you already have --

22 MR. NUTTER: You already have the lands
23 leased.

24 A. -- the lands leased, right. So we do have
25 that unusual provision here.

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MR. NUTTER: Okay.

Q If you'll turn to the unit operating agreement now, Mr. Greer.

A I think the only unusual thing here is on page eight, commences on page eight, the investment adjustment of intangible drilling and non-removable downhole equipment. Here again, for the problem of bringing in parties who have not paid for wells now and do not have any investment, if they buy a new lease, as for instance the Federal leases, then they'll be required to pay a share of the cost of the previously drilled wells. We have an investment adjustment for the surface equipment, which is more or less standard in any unitization, but the problem of the intangible drilling costs, which often is taken care of in a unitization by each man drilling his own well, you have here a situation where there will be leases with no wells on them, and so that these outside parties, then, would be required to pay a share of the intangible drilling costs.

We've estimated that as the cost -- what it would cost to drill wells at this time, but the well costs are depreciated at the rate of 1/2 percent a month for 50 months, which means we'll take 75 percent of the estimated cost of the wells at this point, and that's the figure that will be used for the investment adjustment of the intangible drilling costs.

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1 Then for the costs of chemicals, we've
2 added those in, and the reason for that is that depending on
3 the plan of -- that we use for our tertiary recovery process,
4 we could inject a substantial amount of the chemicals the
5 first few months, or perhaps the first year. If, for instance,
6 we spend \$1,000,000 on chemicals the first year, and then the
7 lands come up for sale, the parties who come in at that time
8 will get the benefit of the chemicals, which may take some
9 20 years to do their work through the reservoir, so they
10 again are obligated, or we feel they're obligated, to pay
11 their share of the chemical cost. We depreciate the chemical
12 cost over a 25-year period, assuming that in 25 years that
13 we dissipate them.

14 Q Now in your discussion on page seven of
15 the unit agreement you indicated a formula for the determin-
16 ation of tract participation.

17 A Yes.

18 Q I'd like you to go to those lettered at-
19 tachments to the exhibit, which will explain to us how you
20 determined the tract participation.

21 A All right, sir. I might say in passing,
22 if you looked at the different exhibits, A, B, C, D, and E,
23 they are simply exhibits A to the unit agreement, B to the
24 unit agreement, C to the unit agreement, D to the unit agree-
25 ment, and E is Exhibit E to the unit operating agreement.

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1 factor, and --

2 Q It might be helpful, Mr. Greer, if you
3 could identify for us one of the plats of the area, and so
4 you could summarize how you took into consideration the struc-
5 tural position of weighted acreage factor.

6 A Under Section L, there is first a plat
7 which shows the zones that are producing in the two areas,
8 East Puerto Chiquito and West Puerto Chiquito. We call them
9 Zones A, B, and C.

10 In this particular area only Zones A and
11 B produce, the yellow and green colored ones on the plat.

12 The next map after that is a structural
13 contour map that shows my interpretation of the fluid content
14 of the reservoir now and also identifies the wells we plan
15 as producing wells, injection wells, and both gas injection
16 wells and water injection wells.

17 The area colored in yellow is area which
18 is pretty much gas saturated now because of depletion or
19 drainage down dip from these wells.

20 The area colored in red is essentially
21 gas-free oil saturated.

22 And the area colored in green is princi-
23 pally water.

24 The water/oil contact is shown halfway
25 between the 3800 and 4000 foot contour interval, where the

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red meets the green.

The 6000 foot interval which we give zero weighting on the structure position rating factor is over on the righthand side of the map.

And I think perhaps we should go right straight to the structural position weighting factor map. I believe that map is listed under -- in the index under H, but I think under most of these exhibits it's under G. It's a foldout plat similar to your structure contour map that we just looked at.

MR. KELLAHIN: It's under H.

A. If you look at the upper righthand part of the map, Section 9, the structural contours are given a rating factor, starting there with 3, moving southwest you can follow them up, 4, 5, 6, 7, 8, 9, 10, at which point we drop from there to the next contour down to the oil/water contact, we give that a weighting factor of 5, and then zero on the next contour, the 3600 foot contour interval.

And the weight --

MR. NUTTER: Anything below that gets zero because it's in the water.

A. Then the way we get those back to tract factors, we probably ought to take just a minute to look at that. If you can find the yellow, green, and blue sheets that are either in that same section or the section just

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1 ahead of it. They're identified as Exhibit C, Part III,
2 Schedules I, II, and III. The gold colored one is the first
3 one.

4 For instance, there the first line, the
5 northeast quarter of Section 4, if you look at Section 4, which
6 is about the center of the map on the righthand side, go to
7 the northeast corner of that quarter section is given a rating
8 of 0.7; the northwest quarter, 1.2; the southwest quarter, 0.7;
9 the southeast quarter, zero; the arithmetic 4-point average
10 is .65.

11 So that gives the structure position
12 weighting factor for that northeast quarter.

13 Then we go to Schedule II, which is the
14 green colored sheets --

15 MR. NUTTER: Now you -- in other words,
16 you've taken the northeast quarter of Section 4 and divided
17 that into the four 40-acre tracts, and given each of those
18 40's a value, is that it?

19 A. Well, we give the corner a value.

20 MR. NUTTER: You base this on the corner
21 points?

22 A. Corner point, uh-huh.

23 MR. NUTTER: I see.

24 A. It's not quite as accurate, of course,
25 as if we had planimetered, but it's a lot easier for somebody

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1 else checking the thing to come up with the same numbers.

2 MR. NUTTER: But every quarter section has
3 four points that you've taken measurements on.

4 A. Right. And then we just take the arith-
5 metic average. That's shown on the gold colored sheets.

6 Then on the green sheets we come again to
7 the northeast quarter of 4, that's the first one that's listed.
8 Under Column (4) is that weighting factor we just talked about.
9 Under Column (3) is the number of acres in each tract. For
10 instance in the northeast of 4 there are three tracts, 3, 14,
11 and 26. We take the acreage in each one of them, multiple
12 it by the weighting factor, and in Column (5) we have then
13 the structural position weighting factor for that tract in
14 that quarter section

15 As you can see down on line about 6 and
16 8, Tract 3 appears again and then again further down.

17 Then we summarize all those on the blue
18 sheets, the Schedule III.

19 We go to each tract, find each one of its
20 parts in each quarter section, sum them up, and then that is
21 the structure position weighting factor for each tract.

22 Then we go with that and perhaps we should
23 now look under Section C to see how it's all put together.

24 If you'll look at the last sheet of Section
25 C, page five, you can see, for instance, for Tract 25, it's

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1 160 acres; its structural position weighting factor of 762.25;
2 and its 1976-77 production, which is the year we used for
3 production, 160 barrels. If you take weighting factors for
4 each one and come up with a total and -- and that's the total
5 participation for each such tract.

6 Then we should take a quick look at the
7 redistribution to the reallocation to the Indian tracts.
8 That starts on page three, Tract 17, on the righthand side
9 the equity factor for Tract 17 would be .163783. By our
10 special allocation it's given a rating factor about five times,
11 or an equity factor about five times what it otherwise would
12 have.

13 The next tract is reduced from 64 to 44
14 percent.

15 MR. NUTTER: How did you get them to take
16 a reduction on that?

17 A. Well, it had to come from somewhere.
18 They didn't mind giving up 25 percent royalty for 50 percent
19 net profits.

20 Then we might look quickly at the -- at
21 the acreage -- the distribution of production to the tracts
22 is fairly simple, based on the communitized acreage within
23 each tract.

24 Under Section J there are some notes re-
25 garding surveying, which we don't need to go into detail,

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1 but need to be a part of the record.

2 The first two pages explain some of the
3 guidelines we used for allocating acreage to tracts.

4 The third sheet is a plat, which shows
5 the problem we have of the homestead entry surveys right down
6 the middle of the unit. That particular tract you can see
7 where we had the little survey problems to work with.

8 Following that are some survey notes, the
9 balancing of the angles, the calculating of the areas, and
10 the plats themselves.

11 Now, under Section K we show a plat, or
12 we have a plat which shows the lands and the wells within
13 two mile arcs of the proposed injection wells. The color
14 coding here, the triangular wells marked in red are those
15 planned for gas injection; those in blue, the two center ones
16 will be converted wells to water injection; the north and
17 south blue triangles would be new water injection wells.

18 All of the land within those arcs that
19 has no color means that it's leased by Benson-Montin-Greer
20 Drilling Corp., or SNB Drilling Company, both of whom are
21 parties to the unit agreement.

22 Lands colored are lands either unleased
23 or owned by other parties.

24 Those in yellow are Federal lands that
25 are not leased.

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1 Those in blue are fee lands that are not
2 leased.

3 Those in orange are owned by operators
4 who have not yet committed to the unit agreement.

5 MR. NUTTER: In other words, what was that
6 last?

7 A. The two little tracts colored in orange.

8 MR. NUTTER: Yeah, those are the only
9 lands that are leased that are not committed?

10 A. Yes.

11 MR. NUTTER: By the working interest.

12 A. By the working interest, and we're nego-
13 tiating on those and I feel that we probably will get them.
14 It represents about 3/10ths of 1 percent of the working in-
15 terest.

16 MR. NUTTER: How about all this open
17 government land? Will it be put up for lease within the near
18 future?

19 A. Well, we presume, and the discussions
20 we've had with the USGS representative, is that once the unit
21 is effective, then depending on their paper process, why,
22 they will have the lands put up for sale, and how long that
23 will take, we don't know, but by virtue of the way we have
24 our operating agreement structured, we feel we do not have to
25 wait on the sale in order to proceed. We can go ahead and

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1 get to work and of course the quicker they have the sale, why,
2 the better, but we can move ahead and when the parties come
3 in they can pay their share. If we're still drilling, well,
4 they can pay their share then; if not, they'll just have to
5 reimburse those who have paid.

6 MR. NUTTER: Well now, to put it bluntly,
7 Mr. Greer, by the time you have placed a value on all these
8 wells and all these improvements that you've got in here, and
9 you're making those people buy these prospective leases, pay
10 for those improvements, this puts them in a pretty bad dis-
11 advantage trying to buy into the unit, doesn't it?

12 A. Oh, I don't know. It's -- I'd say it's
13 not like finding a bird's nest on the ground, but --

14 MR. NUTTER: But doesn't it put you in
15 a better position to bid on the leases if they're put up for
16 competitive bidding?

17 A. Oh, I presume that's true in any instance
18 where one already has an investment in a property and a new
19 man comes in and wants to buy into it, and he hasn't paid
20 anything, why, yeah.

21 MR. NUTTER: Well, you've already had a
22 certain amount of use out of some of those wells.

23 A. Yes, we've had some use out of them, no
24 question about that. But also we feel that it's not fair to
25 us just to give them an interest. In round numbers we're

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1 talking about \$4-1/2 million worth of wells and we're talking
2 about \$50 million worth of oil.

3 So they're certainly obligated to pay
4 some.

5 MR. NUTTER: What's the total amount of
6 acreage that's not leased today?

7 A. I don't have the acreage amount. The
8 equity amount of about 5 percent.

9 MR. NUTTER: About 5 percent of the total
10 unit.

11 A. Right.

12 MR. NUTTER: Go ahead, I'm sorry.

13 Q. In your opinion, Mr. Greer, is the pro-
14 posed method of participation fair and equitable for all the
15 parties?

16 A. I believe so. The -- we tried a number
17 of different formulas, and in the end we come up with just
18 about the same.

19 Oh, one thing before we leave this plat,
20 we've outlined one little tract in green in the southwest
21 quarter of Section 9. The ownership there is just a little
22 indefinite. We think we have some leases on part of the in-
23 terest but that's a fee tract. Three or four estates are in-
24 volved; a number of people.

25 MR. NUTTER: Is that that old T. D. Burns

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1 estate?

2 A. Right. So there is a question there as
3 to what -- just what the status of that is.

4 Q. Would you identify for us now, Mr. Greer,
5 those exhibits and information that establishes the -- your
6 anticipated recovery from the institution of the secondary
7 and tertiary projects?

8 A. Yes, sir. We might take a quick look at
9 the laboratory analysis we've had on the tertiary work.
10 That's under Section M.

11 The significant information is on Table
12 4. The pages are not numbered; it's Table 4, in which three
13 runs were made with different kinds of chemical injectants.

14 The first column is with straight sodium
15 hydroxide, 3 percent solution. The second and third ones
16 were with the same sodium hydroxide but with polymers added.

17 I've underlined the waterflood recovery
18 in red under the oil recovery section, and the tertiary oil
19 recovery underlined in red.

20 For instance, under column 1 --

21 MR. NUTTER: You don't have any underlining
22 on mine, Mr. Greer. Where do we underline?

23 A. The one I might call attention to, the
24 first red underline under Column 1 shows 48 cc recovered from
25 this particular core, which incidentally, these are radial

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1 floods, a special type of core analysis, I think really is
2 pretty representative of what might be expected. The problem
3 is, of course, we had to use Berea cores. We didn't have a
4 formation core to use.

5 Recovered 48 cc by waterflood. Now that's
6 both primary and a waterflood recovery.

7 Then the tertiary recovery is 30 cc in
8 addition to that, which in terms of percent of the initial
9 recovery is about 62 percent.

10 There's a little higher recovery in runs
11 two and three with the polymers added, but that increases the
12 viscosity of the water and it's my feeling that we would be
13 better with a low viscosity water than a high viscosity where
14 we're trying to float the oil on top of the water, and so
15 we're thinking about straight -- straight caustic.

16 Now although this shows a 62 percent in-
17 crease, I've assumed maybe a 3/4ths efficiency factor and the
18 number I've used is about 46 percent that we might hopefully
19 expect to pick up of tertiary recovery in addition to the
20 waterflood recovery.

21 The graphs of the laboratory tests, which
22 we might look at the first one, shows how -- how the oil cut
23 drops off as the core is flooded, to about 2 or 3 tenths of
24 a percent of pore volume, the water cut drops real low.

25 Then on the second graph you can see how,

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1 again after 2 or 3 tenths of pore volume is injected, the oil
2 cut picks up.

3 Then there are some photographs at the
4 end of that section where they took pictures of the test tubes
5 which they gathered at every 5-hundredths of a pore volume
6 that was flooded.

7 The upper lefthand photo, the dark color
8 you can see is the oil that's recovered, and where it's light,
9 that's water, and you can see that after six or eight test
10 tubes, or about 3-tenths of a pore volume, that the oil cut
11 drops to a very small amount.

12 Then they start the tertiary chemicals in
13 and on the lower lefthand photograph you can see how initially
14 the oil cut is small but it increases with -- with the flood.

15 We were surprised that this oil would
16 respond as well as it did to caustic, but it appears to be
17 that it could be quite helpful.

18 That's the basic information that we deal
19 with for the expected increase through tertiary methods.

20 Now, by unitizing the -- perhaps the most
21 important thing we can do is save dissipating the gas. By
22 picking up the produced gas and re-injecting it, we can main-
23 tain the reservoir pressure, keep the viscosity low, and we
24 think we can do two things: We can let the gravity drainage
25 process continue through the high capacity fracture system.

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1 We found that we ran tests in the West Puerto Chiquito Pool,
2 just a few miles away, the same formation. We concluded that
3 the reservoir is made up of blocks, kind of like a jigsaw
4 puzzle, tight blocks with high capacity fracture system in
5 between.

6 Initially we drained the high capacity
7 fracture system, the gas and -- nearest to the well bores,
8 and we produce high volumes of gas. There still, we think,
9 is oil left in the tight blocks, and one of the questions is
10 how do we best recover that. If we go ahead and blow the
11 pressure down that, as soon as the gas in the high capacity
12 system reaches the down dip producers, we're looking only at
13 solution gas drive recovery in the tight blocks; whereas, if
14 we can continue to maintain the pressure for a long time, we
15 think we can get part of the oil out of those tight blocks
16 by gravity drainage and sweep them with the gas on down the
17 high capacity system to the producers.

18 Now this is just a theory but we think it
19 has a little bit of substance to it through one of the tests
20 we have run in West Puerto Chiquito Pool, and that's shown in
21 this yellow graph under Section O.

22 In West Puerto Chiquito the same as in
23 East Puerto Chiquito, as soon as wells reach a high gas/oil
24 ratio, and by high we mean like, oh, four or five times their
25 solution ratio, in West Puerto Chiquito when the ratio reached

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1 about 2000-to-1 we shut the wells in. With the exception of
2 this particular well, the C-34, when the gas in the high cap-
3 acity system reached this well we went ahead and produced it
4 to see what would happen if the gas/oil ratio would just go
5 out of sight or if it would level off somewhere if we might
6 pick up producer oil, and it appears, in this well, at least,
7 when the ratio reached about 10,000-to-1 it leveled off.

8 In 1974 this particular well had produced
9 about 300,000 barrels of oil and in six years since then
10 even that high gas/oil ratio, it's produced another 150,000
11 barrels of oil. I think a good part of that could have come
12 from drainage of tight rocks in support of this theory that
13 we think the reservoir is made up of these tight rocks and
14 high capacity system.

15 If, for instance, this well would continue
16 on as it's indicated here for 20 years, it's already gone
17 6, why it would produce another 400,000 barrels of oil beyond
18 the time at which it produced 300,000. That would be over
19 half as much would come out of perhaps the tight rocks as
20 compared to the high capacity system.

21 And just from some of the theoretical
22 analyses we made earlier we felt like that could be as much
23 as half of the oil in the tight rocks, half in the high capa-
24 city fracture system.

25 MR. NUTTER: Now, Mr. Greer, are you

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1 talking about the oil that's in the matrix itself or are you
2 talking about in tiny fractures?

3 A. I'm really talking about -- by blocks I
4 mean substantial areal segments of the reservoir. If you
5 can think of it as a jigsaw puzzle and a block being like 30
6 to 70 acres big. That's about the size that we measured
7 through our interference tests and pressure tests in West
8 Chiquito, and the behavior of the wells is such that -- that
9 you've drilled a well that's in, say, a 40-acre tight block,
10 and if it's surrounded by high capacity system, just like
11 the ocean around it, then this is how the reservoir has be-
12 haved, and I believe that's the way it actually is.

13 And so when I speak of a tight block, I'm
14 speaking of a large segment of the reservoir, 30, 40, 50 acres.
15 It drains, and oil seeps out slowly into the high capacity
16 system. If we're cycling gas, we've got a chance of picking
17 that up, if we don't let the pressure drop. Presumably,
18 when the oil drains through the high capacity system it left
19 a thin film of oil on the sides. Additional oil could fall
20 and flow along those -- that same film, if we haven't destroyed
21 the film. Now, if you let the pressure deplete, gas will
22 come out of solution, that oil on the -- that thin film of
23 oil will no longer be a film. It will be dried up and there
24 is nothing left to get the oil out of the tight blocks and
25 it just stops right there.

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1 So by holding the pressure up and sweeping
2 gas through it, we feel we can pick up additional oil. The
3 amount could be all the way up to as much as 100 percent of
4 what we've already produced. The estimate that I've made
5 here is that realistically we might hope for 10 percent, and
6 that's what I put in my estimate. I hope I'm conservative.

7 I feel that we'll get maybe 10 percent
8 more from the high capacity system that still is above the
9 lowest producing wells.

10 Then below the lowest producing wells we
11 have oil that I call basement oil, that exists from that
12 structure position down to the water/oil contact. That oil
13 we hope to get by injecting water down dip in the water zone
14 with tertiary chemicals in it, and float the oil above that.
15 I've estimated maybe 15 percent of what we've already produced
16 can be recovered that way.

17 And then I feel that the tertiary chemi-
18 cals should work on a minimum of the oil that's left in the
19 high capacity system and where we move the water up through
20 the basement oil now.

21 So when you add all those together, they
22 are itemized here on the first white sheet under Section O,
23 300,000 barrels -- the wells have produced about 3,000,000
24 so far. 10 percent would be 300,000 barrels from the high
25 capacity system; another 10 percent from the tight rocks,

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1 totalling 600,000 we can get from reserving the pressure and
2 gas injection; pick up 400,000 from waterflood, and another
3 400,000 by tertiary, and we figure 300,000 the tertiary, a
4 direct result of the chemicals and then another 100,000 bar-
5 rels because of drilling additional wells. We'll drill ad-
6 ditional wells because of the front end tertiary incentive
7 program that the Department of Energy has introduced, which
8 lets us release this \$6.00 oil to \$40.00 if we take the in-
9 crease in income and put it into a tertiary project.

10 Then we -- the analysis in terms of cost
11 to institute the secondary and tertiary methods is shown on
12 page two, summarized at the bottom.

13 For gas injection we estimate it will
14 cost us \$400,000 to institute that system. We'll pick up,
15 hopefully, 535,000 barrels at .34 cents a barrel.

16 And we might take a look at the graph at
17 the end of this section to see how we've estimated -- or how
18 these look.

19 You can see that the present rate of de-
20 cline is 25 percent a year, the way the wells have been pro-
21 duced now. We've had to shut wells in in order to preserve
22 the gas and I've shown here for the middle of 1980 that if
23 we put all wells on production now, the ones that have been
24 shut in, we would increase the rate from roughly 40,000 bar-
25 rels a year to 80,000 barrels a year, but I would expect a

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1 very high rate of decline from there, like 75 percent a year.
2 That's shown on the lefthand side of the yellow colored area.

3 If, however, we save that gas through a
4 gas gathering, gas injection system, then we can stretch out to
5 the righthand side of the yellow colored area, about 12 percent
6 a year, and pick up that additional volume of oil.

7 The green shaded area shows what I think
8 we'll get from waterflooding, and then the pink is the in-
9 crease by the tertiary chemicals.

10 Then those costs shown on page two at the
11 center of the page amounts to about \$1.30 a barrel for gas
12 injection for the additional oil recovery, \$1.60 a barrel for
13 waterflooding, and about \$10.00 a barrel for the extra oil
14 that I expect to get from tertiary.

15 Under Section P we just show the plan of
16 operation, which we will submit when we present the agreement
17 for approval, which simply is just what we've discussed.

18 Perhaps we should mention, there's a form-
19 ation water analysis under the section where the -- regarding
20 the tertiary chemical laboratory data.

21 As to injected water, we're not sure what
22 we'll use. We have the right to use one of the wells shown
23 on the plat in Section 13 to get Dakota water for injection.
24 We've still not run enough tests to know if that's what we
25 want to inject or not, primarily because of how it reacts

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1 with the tertiary chemicals.

2 So that's one of the points not yet de-
3 finitely decided.

4 As to wells within a half mile radius of
5 the injection wells, there are none within a half mile radius
6 of the water injection wells, and the gas injection wells,
7 we're not certain yet which ones we'll use. We have a little
8 bit of a problem there in that we want to inject gas into
9 one zone and one well and the second zone in another well.
10 In order to know which wells we can do that, we're going to
11 have to go in and work on them and then come back and submit
12 the details of the completion of those wells and the wells
13 that are within a half mile radius of them.

14 Q Mr. Greer, are you familiar with Division
15 Memo 3-77, with regards to limitation on injection pressure
16 into injection wells?

17 A Yes, sir.

18 Q And will any of your proposed wells ex-
19 ceed that pressure limitation factor, 0.2 psi per foot of
20 depth?

21 A No, sir, in fact we think the water will
22 probably go in on vacuum. I'm estimating 400 pounds surface
23 pressure for the -- the gas injection wells. The existing
24 pressure in the secondary gas cap now is about 150 to 175
25 pounds.

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Q Was Exhibit One and all its attachments prepared by you or compiled under your direction and supervision?

A. Yes, sir.

Q In your opinion will approval of these applications be in the best interests of conservation, the prevention of waste, and the protection of correlative rights?

A. Yes, sir.

MR. KELLAHIN: That concludes our examination. We move the introduction of Exhibit One.

MR. NUTTER: Exhibit One will be admitted in evidence.

CROSS EXAMINATION

BY MR. NUTTER:

Q Mr. Greer, now to consolidate all of your testimony, first of all, you're seeking approval of the East Puerto Chiquito Mancos Unit Area, and that's in Case Number 6943.

A. Yes, sir.

Q And then second, in Case Number 6944, you're asking for approval for a pressure maintenance project in that unit area?

A. Yes, sir.

Q Okay. Now, the project would be by the

1 injection of what?

2 A. We'll inject gas in the up dip gas in-
3 jection wells, and we'll inject water with some alkali metal
4 as a tertiary recovery process. The alkali metal we're
5 thinking of now is either sodium hydroxide or sodium carbonate.
6 The test runs so far have indicated the oil responds better
7 to sodium hydroxide than to sodium carbonate.

8 Q. Now would this tertiary process be begun
9 at the beginning of the injection program or would you have
10 a straight water injection program down dip and a gas in-
11 jection program up dip carried out first and later on the
12 chemical injections?

13 A. We're thinking about starting the chemi-
14 cals right away for the reason that -- let's see, if you'll
15 refer to the colored plat, contoured plat, under Section L,
16 the water/oil contact is not -- not absolutely -- we don't
17 know exactly where it is. We think it's approximately between
18 the 3800 and 4000 foot contour interval, but wherever it is
19 there, there's going to be a substantial amount of water
20 move up ahead of anything we inject in the injection wells,
21 the water injection wells, so that in a sense we are going
22 to have a waterflood first, followed by a chemical flood,
23 even if we start the chemicals immediately, because we don't
24 plan on starting water in any of the oil saturated area. We
25 just plan on putting water and the chemicals only in the

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1 water zone below the oil.

2 Q Well now, what has been going out here
3 up to date? Have you been injecting gas?

4 A No, sir. No, all we've done is shut in --
5 just shut in high ratio wells?

6 A -- high ratio wells, yes.

7 Q So, actually, we're going from a primary
8 production into a tertiary production, and then where's the
9 secondary? That's what --

10 A Actually, the secondary will come ahead
11 of the -- the secondary waterflood will come ahead of the
12 tertiary, just because we've got that fresh water band, and
13 there's probably -- there may a half a million remaining
14 barrels of water there that's going to move up to the oil zone
15 before the tertiary chemicals hit.

16 But if we inject water first and flood it
17 out completely and then go to tertiary chemicals, I'm afraid
18 then that economics might not justify it, because we might
19 have to wait then for this half a million barrels of water to
20 move through before we see any response.

21 Q Before the chemicals would get to it.

22 A Right, and that could take several years.

23 We feel that we have to inject the water real slow. We've
24 had very good luck in West Puerto Chiquito with gravity seg-
25regation in this fractured formation by the difference in

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1 gravity -- or the density of the gas and the oil.

2 Q I see.

3 A We think we'll have the same thing working
4 in our favor here, the difference in the density of the water
5 and the oil, but we know that we must move it real slow.

6 Q Would it be fair and would it upset your
7 cost estimates or your profit estimates if we called it a com-
8 bination secondary-tertiary recovery program?

9 A Oh, no problem at all, because in a sense
10 it's just all going to be going on concurrently.

11 Q But that doesn't affect you as far as
12 DOE prices and incentives on tertiary recovery?

13 A No, sir, we --

14 Q If we call it a combination secondary-
15 tertiary recovery pressure maintenance project.

16 A Right. There are so many questions with
17 the Department of Energy regulations, you know, all we can do
18 is make an educated guess as --

19 Q Just hope you come out right.

20 A --to what it's going to be, and five years
21 from now when the auditing is all done, we'll find out whether
22 we guessed right or not.

23 Incidentally, we've asked for an exception
24 to their rules on determining of base production control level
25 under unitization. Their rules are such now, which is just

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1 as hard to understand, but then a lot of their rules are hard
2 to understand, we suffer a -- having a higher BPCL by unitizing
3 than if you take the properties individually.

4 When we asked for our exception we found
5 that there had been one other exception asked for. That was
6 by Shell and for the Hobbs Pool for the same thing. So we're
7 hoping, of course, they're going to rule favorably on Shell's
8 application and so they probably will on ours.

9 Q Okay, now, Mr. Kellahin in filing his
10 application stated that you propose to convert the following
11 existing wells to injection wells, and then he listed five
12 wells, and he also proposed to drill new injection wells at
13 the following locations, and gave us two.

14 Now, could you be specific and tell us
15 which of those are gas injection wells and which are water
16 injection wells?

17 A Yes, sir. If you'd look again under
18 Section L at that plat, and we'll identify them.

19 Q Is that same colored plat?

20 A Yes, sir, the same colored plat.

21 On the lefthand side is a row of blue
22 colored wells. The two center ones, marked H-25 and S-6 are
23 existing wells that we will convert to water injection wells.

24 The new two wells we want to drill --

25 Q You're going too fast for me, Mr. Greer.

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1 A. Oh, okay.

2 Q. 25 and --

3 A. H-25, that's at Unit H in Section 25.

4 Q. All right.

5 A. And then the F-6 is Unit F in Section 6.

6 Q. Oh, you call that S-6 on this.

7 A. Oh.

8 Q. It's F-6, Section 6.

9 A. Right, uh-huh.

10 Q. That's a water injection well.

11 A. Yes.

12 Q. Okay, and then?

13 A. Then Section 19, up in the lefthand cor-
14 ner, somewhere in that northwest quarter we want to drill an
15 water injection well.

16 Q. Do you have the 40-acre tract picked out
17 yet for that?

18 A. No, no, sir, we do not. We do not.

19 Q. Could you make that determination and
20 let me know a 40-acre tract for it?

21 A. Okay.

22 Q. And I can just specify a Unit D, or E,
23 or F, or whatever it is, if you'll just give me a 40.

24 A. Okay. One of our problems there, you
25 know, is the Indian land. It's pretty country up there and

1 we have to be careful just where we locate it.

2 Q. Yes.

3 A. Okay, the same thing would be true in
4 Section 7, the northeast quarter there.

5 Q. Section 7, right.

6 A. Then the proposed gas injection wells are
7 those colored in red.

8 Q. And those three are already drilled.
9 That's G-29, C-2, and G-4, is that correct?

10 A. Right, uh-huh, and our plan there is to
11 go in and test these wells. First we need to pressure test
12 the casing and then we need to see if we can get the bottom
13 and which are the ones -- I think one of them only goes to
14 the first zone, and we need to -- I hope to have them in shape
15 that we can inject in one zone in one well and another zone
16 in the other well.

17 If we can't get enough gas in that at
18 400 pounds pressure, we may need to convert some additional
19 wells, which we presume we can come back to ask for that if
20 need be.

21 Q. I think the project rules would probably
22 specify additional wells be drilled and converted to injection.

23 A. I see.

24 Q. Now, did you have any special rules for
25 the operation of the project that you were proposing?

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1 A. Well --

2 Q. As far as production limitations or allow-
3 able transfers, or credits on high GOR's, anything like that?

4 A. Nothing special. We will, of course, want
5 to produce the most efficient wells with the higher rates,
6 and --

7 Q. Will you be continuing to shut in high
8 GOR wells?

9 A. My plan is to operate within the limits
10 of our compressor, and what we disgned -- what we designed
11 it for is on the assumption that we'll be producing from 100
12 to 300 barrels a day, and we can handle up to about 3,000,000
13 feet of gas with the compressor, which means we could go to
14 a gas/oil ratio average of 10,000-to-1 at 300 barrels a day,
15 or 30,000-to-1 when we get down to 100 barrels a day, and
16 depending on how much of that gas we have to use either for
17 gas lift or if we have to operate a little bit higher pressure
18 than I'm estimating, then we have those limitations, but
19 within those limitations, we just produce all the wells all
20 the time.

21 Q. It won't be so critical to shut them in
22 now if you're re-injecting gas.

23 A. No, as long as we re-inject gas, then I
24 think the cycling can't do anything but help.

25 Q. Will you be stiffening this gas or running

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1 it through any kind of a plant?

2 A. Well, we thought about it. It's really
3 a small volume and I'm sure as time goes on we're going to
4 want to be thinking about it.

5 The issues, of course, are that we're
6 dealing with a high capacity fracture system, the gas is, al-
7 though it will be work going through that system, whether it
8 would get exposed to a big enough area of the reservoir to
9 pick up additional hydrocarbons, liquid hydrocarbons, we
10 don't know, but the odds are we'll be thinking about it.

11 In round numbers I think we'll be cycling
12 a core volume every six or eight months in the gas zone,
13 whereas it will probably take 20 years to cycle a core volume
14 of water.

15 Q. Okay, now what about the configuration or
16 the construction of the injection wells? You said you plan
17 to test these injection wells before you ever use them to be
18 sure that the casing and cementing programs are intact.

19 A. Right.

20 Q. Then what will you be doing, going down
21 tubing?

22 A. Yes. Our plan will be to -- we'll have
23 the casing cemented into the Mancos and then we'll set tubing
24 on a packer with the packer fluid in the annulus, and of
25 course we'd like oil for that packer fluid, and dealing with

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1 \$6.00 oil we might just as well use it as packer fluid, ex-
2 cept of course, a little bit of additional energy we give the
3 country, why, we probably should go to a water with treated
4 water and give the government that oil.

5 But that would be the plan.

6 Q. Now, how about the -- how about these two
7 wells that have already been drilled, are they drilled down
8 into the Mancos and cemented through the Mancos?

9 A. The --

10 Q. Or will you have to recement them?

11 A. The 6 has a liner set -- it's just about
12 where we want it, and it is drilled -- has been drilled into
13 an open hole with cable tools into the Zone A, and it has a
14 good capacity, like 10 or 20 barrels an hour. It will be a --
15 I think we have a dandy injection well in that zone.

16 The H-25 just north of it has been -- has
17 been drilled to both zones; has 7-inch casing set into the
18 Mancos. We will clean it out and run a 5-inch liner through
19 both zones and probably inject in only the lower zone, if we
20 can get satisfactory injection rate in it.

21 Q. Then how about the two injection wells
22 you propose to drill?

23 A. The other two, I have hopes that we can
24 run liners, cement liners, to both zones and figure out a way
25 that we can inject, either control injection into each zone,

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1 or at least be in shape where we can alternate injection in
2 one zone and the other, depending on what it looks like we
3 should do.

4 Q Now, you're going to using some rather
5 toxic chemicals here, Mr. Greer. Have you made investigation
6 as to methods and means of handling this so that it won't be
7 contaminating any fresh water supplies, and so forth?

8 A Yes, sir, we have. In fact, we visited
9 one of Gulf's operations in the North _____ Field here
10 two or three weeks ago, and by the way, they were most kind
11 to take us out and show us everything, and I was impressed,
12 of course, by the problem of handling these caustics, and
13 we'll be taking every precaution to -- to protect not only
14 the fresh water zones but our people in handling them. They
15 are dangerous.

16 Q And all injection would be through tubing
17 and the annulus would be loaded.

18 A Right, yes, sir.

19 Q With the oil.

20 Would the injection into those three gas
21 injection wells be through tubing, too?

22 A Yes, sir. Yes, sir, it would.

23 MR NUTTER: Are there any further ques-
24 tions of Mr. Greer? He may be excused.

25 Do you have anything further, Mr. Kellahin?

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MR. KELLAHIN: No, sir.

MR. NUTTER: Does anyone have anything they wish to offer in Cases 6944 and 6943?

We'll take the cases under advisement.

(Hearing concluded.)

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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 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 C.S.R.

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I do hereby certify that the foregoing is a complete record of the proceedings in the above hearing of Case No. 6943-6944 heard by me on 7/9 1980.
[Signature], Examiner
Oil Conservation Division