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2	STATE OF NEW MEXICO		
3	ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION		
4	STATE LAND OFFICE BLDG. SANTA FE, NEW MEXICO		
5	3 February 1982		
	EXAMINER HEARING		
6			
7	IN THE MATTER OF:		
8	Application of Grace Petroleum Cor-		
9	poration for a unit agreement, Lea CASE County, New Mexico. 7472		
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12	, ·		
13	BEFORE: Daniel S. Nutter		
14			
15	TRANSCRIPT OF HEARING		
16			
17	APPEARANCES		
18			
19	For the Oil Conservation W. Perry Pearce, Esq.		
20	Division: Legal Counsel to the Division		
-	State Land Office Bldg. Santa Fe, New Mexico 87501		
21			
22	For the Applicant: W. Thomas Kellahin, Esq.		
23	KELLAHIN & KELLAHIN		
24	500 Don Gaspar Santa Fe, New Mexico 87501		
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2	MR. NUTTER: We'll call next Case 7472.	
3	MR. PEARCE: Application of Grace Petro-	
4	leum Corporation for a unit agreement, Lea County, New Mexico	
5	MR. KELLAHIN: If the Examiner please,	
6	I'm Tom Kellahin, of Kellahin and Kellahin, Santa Fe, New	
7	Mexico, appearing on behalf of the applicant, and I have one	
8	witness.	
9	$\cdot$	
10	(Witness sworn.)	
11		
12	TODD WILSON	
13	being called as a witness and being duly sworn upon his oath	
14	testified as follows, to-wit:	
15		
16	DIRECT EXAMINATION	
17	BY MR. KELLAHIN:	
18	Q. Mr. Wilson, for purposes of the record,	
19	would you please state your name and occupation?	
20	A. My name is Todd Wilson. I'm a geologist	
21	for Rio Pecos Corporation.	
22	Q. Have you previously testified before the	
23	Division, Mr. Wilson?	
24	A. No, sir.	
25	Q. Would you describe for the Examiner when	

1 and where you obtained your geology degree? 2 I received a Bachelor of Arts degree 3 from the University of New Mexico in approximately 1973 and a Master of Science from Oklahoma State University in Still-5 water, Oklahoma, in 1975. Subsequent to graduation, Mr. Wilson, 7 have you been employed as a petroleum geologist doing business in New Mexico? I was initially employed by Cities Ser-10 vice for two years; did exploration work in Texas; went to 11 Texas Oil and Gas, and proceeded with exploration work in 12 Anadarko Basin in the Texas panhandle; and Holly Energy for 13 another year and worked in Texas; and proceeded with Mark D. 14 15 Wilson and worked for two years in New Mexico. All right, sir. Now you've been retained 16 Q. or employed by the applicant in this case, Grace Petroleum 17 Corporation, to prepare certain exploration geology for the 18 19 formation of their Buffalo-Deep East Unit? This unit was originally de-No, sir. 20 signed by myself for Rio Pecos Corporation. 21 All right, sir. So you did do the ex-22 0. ploration geology for this unit for a different operator? 23 24 Yes, that's correct. The proposed operator for the unit at

25

Q.

5 1 this point is Grace Petroleum Corporation? 2 Yes, sir. 3 A. 4 Q. All right, sir. MR. KELLAHIN: We tender Mr. Wilson as 5 an expert geologist. MR. NUTTER: Mr. Wilson is qualified. 7 Mr. Wilson, let's look first at your 8 0. 9 Exhibit Number One, which is your structure map of the Strawn and have you identify that map for us. 10 11 A. Okay. Exhibit One is a structure map 12 contoured on top of the Strawn shale. It is the most reliable 13 subsurface formation marker we have in this area above the 14 Devonian, to get an accurate interpretation for expected 15 Morrow structure. 16 Q. Let me ask you if that map shows an 17 outline of the Buffalo-Deep East Unit? 18 Yes, it does. The outline is in yellow. A. 19 All right, sir. And what are the pro-Q. 20 posed formations to be unitized by the unit? 21 The proposed formation for Federal, USGS A. 22 purposes is Morrow. The unit agreement provides for the 23 24 unitization of all formations below a particular subsurface 25 depth, does it not?

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2	A.	Yes, 4721 feet.
3		MR. NUTTER: From there below.
4		MR. KELLAHIN: From that point below,
5	and that would incl	ude the Morrow formation, which is one of
6	the principal forma	tions?
7	Α,	Yes, it is the primary objective.
8	Q.	Are there any other objectives for the
9	unit?	
10	A.	Yes, there are shallow objectives, in-
11	cluding Bone Spring	s, possible Wolfcamp, Strawn Sand, and
12	Devonian.	
13	Q.	Where do you propose to locate and
14	drill the first unit	well?
15	А.	The first unit well will be drilled
16	1980 from the east,	660 from the north, Township 19 South,
17	Range 33 East, in Se	ection 2.
18	Q.	Will the total depth of that well be
19	sufficient to penet	rate and test the Devonian formation?
20	A.	Yes.
21		MR. NUTTER: What was the location,
22	again?	
23	A.	1980 from the east, 660 from the north,
24	of Section 2, 19 So	uth, 33 East.
25	Q.	All right, sir, let's go to Exhibit Num-

at this point preliminary approval from the Commissioner of

Public Lands for the formation of this unit?

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1	9
2	on or before March 1st, 1982.
3	Q. What percentage of the lessees and
4	working interests within the unit area have committed their
5	interest to this unit?
6	A. All acreage owners have agreed to join
7	in the unit.
8	Q. And who will be the unit operator?
9	A. Grace Petroleum.
10	Q. All right, sir, let's turn to Exhibit
11	Number Four and have you identify that one for me.
12	A. Exhibit Number Four is a letter from
13	the State Land Office giving preliminary approval of the unit
14	Q. All right, sir. In your opinion, Mr.
15	Wilson, will approval of this application be in the best in-
16	terest of conservation, the prevention of waste, and the pro-
17	tection of correlative rights?
18	A. Yes, sir.
19	MR. KELLAHIN: We move the introduction
20	of Exhibits One, Two, Three, and Four.
21	MR. NUTTER: Exhibits One through Four
22	will be admitted in evidence.
23	MR. KELLAHIN: That concludes our exam-
24	ination of Mr. Wilson.

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## CROSS EXAMINATION

BY MR. NUTTER:

Mr. Wilson, looking at the ownership map Q. and -- or at the unit map and also Exhibit B to the unit agreement, I don't see this Rio Pecos on here. How do they enter the picture?

A. Okay. I work for Rio Pecos Corporation out of Midland, Texas. We are a family-owned corporation, and I do exploration work in Texas for the organization.

I developed this particular prospect and we propose the unit and have gotten all the participants to agree to join the unit.

Now I guess for Federal purposes, we listed Grace Petroleum as operator, since we will carry no operation in this well. We will just have standard override royalty.

And Rio Pecos is not a working interest Q. owner, then.

A. No, sir, we have no working interest in this well.

And the working interest ownership is Q. as shown on Exhibit B, being Gulf, Huber, Amoco, and Conoco, and Grace.

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2	Grace is going to participate 100 per-	
3	cent with their working interest.	
<b>4</b> °	Amoco is going to participate 100 per-	
5	cent with their working interest to the base of the Morrow	
6	formation and to farmout the Devonian rights to Rio Pecos	
7	Corporation.	
8	Q. But you don't intend for this initial	
9	well to go to the Devonian?	
10	A. Yes, I do.	
11	Q. Oh, it's going to the Devonian?	
12	A. As a secondary objective.	
13	Q. So the initial well will not only be a	
14	Morrow test, it will also be a Devonian test, also?	
15	A. This in large part will depend upon how	
16	our structural position is at the time we reach the top of	
17	the MIssissippian formation.	
18	Q. I see. And then the Gulf and Huber in-	
19	terests will come in they're farmed out right now to Rio	
20	Pecos, and they'll come in on a after payout on the well?	
21	A. Yes, for half, 50 percent.	
22	Q. Okay. I understand now.	
23	And the initial well, then, is going to	
24	be in the northwest quarter of the northeast quarter of	
25	Section 2?	

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SALLY W. BOYD, C.S.R.

## CERTIFICATE

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.

Sacry W. Boyl COR

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the Die and the Conservation Division

Oil Conservation Division