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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
CASE 10052

EXAMINER HEARING

IN THE MATTER OF:

Application of Shell Western E & P, Inc., for
Amendment of Division Order Nos. R-8539
and R-8541, as Amended, Lea County,
New Mexico

TRANSCRIPT OF PROCEEDINGS

BEFORE: DAVID R. CATANACH, EXAMINER

STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO

August 22, 1990

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1 EXAMINER CATANACH: At this time we'll call
2 10052.

3 MR. STOVALL: Application of Shell Western
4 E & P, Inc., for an amendment of Division Order Nos.
5 R-8539 and R-8541 as amended, Lea County, New Mexico.

6 EXAMINER CATANACH: Are there appearances
7 in this case?

8 MR. PEARCE: May it please the Examiner,
9 I'm W. Perry Pearce of the Law Firm of Montgomery &
10 Andrews, appearing in this matter on behalf of Shell
11 Western E & P, Inc., and I have three witnesses who
12 need to be sworn.

13 MR. PADILLA: Mr. Examiner, I'm Ernest L.
14 Padilla of Santa Fe, New Mexico, for John H. Hendrix
15 Corporation. I have no witnesses.

16 MR. KELLAHIN: Mr. Examiner, I'm Tom
17 Kellahin of the Santa Fe Law Firm of Kellahin,
18 Kellahin & Aubrey, appearing on behalf of J. R. Cone
19 and Jim Cone. I have no witnesses to present.

20 EXAMINER CATANACH: Any other appearances?
21 Will the witnesses please stand to be sworn
22 in.

23 (Thereupon, the witnesses were sworn.)

24 MR. PEARCE: Thank you, Mr. Examiner.
25 Before I call my first witness, if I may, I would like

1 to take just a moment to introduce this case and
2 describe what we're doing.

3 As you may recall, in November of 1987,
4 Shell Western appeared before the Division and asked
5 for the creation of a new Blinebry-Tubb-Drinkard Pool.
6 That Pool was approved by the Division in Order No.
7 8539 and was named the North Eunice Blinebry-Tubb-
8 Drinkard oil and gas pool.

9 At the same time, in a consolidated
10 hearing, the Division approved statutory unitization
11 of an area that was the same as the pool boundaries,
12 and approved a waterflood covering that same area.

13 The order, as is customary, required Shell
14 Western to appear before the Division within three
15 years to discuss why the special pool rules should not
16 lapse and general pool rules should not go into
17 effect.

18 We're appearing before you today to have
19 that three-year rule review, to request that special
20 pool rules be made permanent after some amendments
21 that result from information that we've gained during
22 the almost three years of waterflood, unit and pool
23 operation.

24 When we appeared before you in 1987, we
25 indicated that the available production information

1 and geological information seemed to indicate that the
2 gross Blinebry-Tubb-Drinkard interval was composed of
3 separate oil and gas zones. Based on that
4 description, the present pool rules provide for oil
5 wells and gas wells in the pool area.

6 As I indicated, we've done extensive study
7 during this almost three-year period, and after
8 collecting that data and analyzing it, Shell Western
9 is now ready to demonstrate that gas was originally
10 distributed in the form of gas caps rather than
11 separate zones, that those gas caps are now largely
12 depleted and that almost all of the gas currently
13 being produced in the pool area is coming from the oil
14 column.

15 That indicates to us that the retention of
16 a separate gas well classification and the imposition
17 of the natural gas prorationing system on that gas
18 production is not necessary and, in fact, is not
19 appropriate.

20 As part of our case today, we will present
21 data supporting the conclusion to the Division, we
22 will attempt to answer any questions you have, and at
23 the conclusion of the case we have a proposed form of
24 order which contains new special pool rules.

25 We'll demonstrate that the changes we're

1 requesting will operate to prevent a waste of
2 resources by assisting in a more efficient operation
3 of the pool and the associated waterflood, and we'll
4 indicate that it will operate to protect the
5 correlative rights of interest owners in the pool and
6 interest owners offsetting the pool.

7 With that introduction, if I may, I would
8 like to call my first witness, Ms. Lisa Corder.

9 LISA CORDER

10 the witness herein, after having been first duly sworn
11 upon her oath, was examined and testified as follows:

12 EXAMINATION

13 BY MR. PEARCE:

14 Q. For the record, would you please state your
15 name and place of residence?

16 A. My name is Lisa Corder, and I live in
17 Houston, Texas.

18 Q. By whom are you employed?

19 A. Shell Western Exploration Production.

20 Q. And in what capacity?

21 A. I'm a geological engineer in the Western
22 Division Production.

23 Q. Have you appeared before the Division
24 previously and had your credentials as an expert in
25 the field of petroleum geology made a matter of

1 record?

2 A. Yes, I have.

3 Q. Are you familiar with the application filed
4 by Shell Western today?

5 A. Yes, I am.

6 MR. PEARCE: Mr. Examiner, At this time I
7 would ask that Ms. Corder be qualified as an expert in
8 the field of petroleum geology.

9 EXAMINER CATANACH: She is so qualified.

10 Q. Ms. Corder, at this time I would like for
11 you to look at the exhibits--I have passed out copies
12 to the Examiner and the other parties in this
13 case--and discuss those for the Examiner and those in
14 attendance, please.

15 A. Okay. As indicated on the Exhibit 1, the
16 North Eunice Blinebry-Tubb-Drinkard Oil and Gas Pool
17 lies within the Penrose Skelly trend, which parallels
18 the western edge of the Central Basin Platform.
19 Drinkard production in the area was discovered in
20 1944, and most of the drilling activity occurred
21 between 1948 and 1958, when the field was developed on
22 40-acre spacing.

23 As shown on Exhibit 2, the North Eunice
24 Blinebry-Tubb-Drinkard Oil and Gas Pool is situated on
25 the northeast end of the north/northwest,

1 south/southeast trending anticline, about one mile
2 north of the town of Eunice.

3 I would like to ask the Examiners at this
4 time to note that the North Eunice
5 Blinebry-Tubb-Drinkard Oil and Gas Pool and the
6 Northeast Drinkard Unit may be used interchangeably by
7 the SWEPI witnesses throughout the rest of the
8 testimony, and also there may be occasion where the
9 Northeast Drinkard Unit is abbreviated NEDU, or
10 referred to simply as NEDU.

11 I would like to now direct your attention
12 to Exhibits 3 and 4. As indicated on these exhibits,
13 the North Eunice Blinebry-Tubb-Drinkard Oil and Gas
14 Pool and the Northeast Drinkard Unit became effective
15 in December of 1987. Water injection for secondary
16 recovery operations began in August of 1988.

17 Currently the pool is producing
18 approximately 560 barrels of oil a day, 11,600 Mcf of
19 gas a day, and 680 barrels of water per day.

20 As you can see on Exhibit 4, current
21 production is approximately 200 barrels of oil a day
22 above the 1987 forecast. That is basically the result
23 of an aggressive workover program to open all pay in
24 all of the producers.

25 Water injection currently averages about

1 25,400 barrels of water per day. Cumulative
2 protection is 28 million barrels of oil and 438 Bcf of
3 gas, and since unitization we've recovered 556,000
4 barrels of oil and 12 Bcf of gas.

5 Exhibit 5 is a map of the pool area. This
6 map outlines the status of all the Northeast Drinkard
7 Unit wells at mid-year 1990. Included on this map are
8 oil wells, pre-unit gas wells, post-unit gas wells,
9 observation wells, injectors, water source wells,
10 future water source wells, TA'd and shut in wells and
11 also plugged and abandoned wells. Of particular note
12 are the oil well and gas well classification.

13 Oil wells correspond to all those wells
14 open in oil zones, and gas wells correspond to those
15 wells open only in gas zones. So this sort of
16 nomenclature may or may not correspond to how the
17 State currently classifies a particular well.

18 This same exhibit will be used with slight
19 modifications later in the testimony by the reservoir
20 engineer.

21 As shown on Exhibit 6, the formations
22 within the area dip approximately one to two degrees
23 to the northeast. This particular map is contoured on
24 the Blinebry Marker, but the Tubb and the Drinkard
25 formations more or less follow this same general

1 structure. The structurally highest point within the
2 Unit is in the southwest corner, in Section 22. This
3 same structural interpretation will be displayed later
4 with the aid of a structural cross-section through the
5 field.

6 Exhibit 7 is a log from the Northeast
7 Drinkard Unit #221. Shown in black on the left-hand
8 side of this is the conventional gamma ray curve,
9 shown in yellow in the center track is the silt index
10 curve, shown in blue on the right-hand side is the
11 porosity curve.

12 The top of the Unit is defined by the NMOCD
13 Blinebry, and the bottom of the Unit is defined by the
14 top of the Abo formation. As indicated on the
15 left-hand side of this exhibit, the Blinebry has been
16 subdivided into five porosity zones that are
17 correlative across the Unit area. The Tubb has been
18 subdivided into four zones based on lithologic breaks,
19 and the Drinkard has been subdivided into five zones
20 based on lithology and porosity zonation.

21 The zonation shown on this exhibit is
22 consistent with our revised interpretation of the
23 geology of the pool, which I will go into in more
24 detail later in the testimony.

25 Limited core data, in combination with

1 production data, was used to develop the original
2 reservoir production description as presented in the
3 1987 unitization hearing. Since unitization, we've
4 acquired a much better understanding of the reservoir
5 with the aid of (1) more complete and detailed
6 production information by the working interest owners,
7 (2) more complete log data provided by the working
8 interest owners, and (3) a series of additional cased
9 whole log suites that have been run in many of the
10 wells in conjunction with the post-unitization
11 workover program.

12 One of the most significant results of the
13 detailed cased hole log program was the development of
14 a lithologic model over the entire vertical interval.
15 As I will demonstrate later in the testimony, that
16 revised lithologic model has had a significant impact
17 on the fluid distribution model.

18 I would like to direct your attention now
19 to Exhibit 8. This exhibits compares the vertical
20 distribution of lithology data that was available at
21 the time of unitization with the distribution of
22 lithology data that's available at the present.

23 Shown in red on the left-hand side of this
24 exhibit is a vertical distribution of lithology data
25 that was available at unitization. This was in the

1 form of actual core and covered only one-third of the
2 unitized interval. We had a little bit of core
3 coverage in the upper part of the Blinebry and then
4 the upper to middle part of the Drinkard Formation.

5 Since unitization, we have run detailed
6 cased hole logs in several wells over the entire
7 vertical interval, as shown in blue on the right-hand
8 side of this diagram. Those detailed cased hole logs
9 have been used to develop a lithologic model over the
10 entire vertical interval that's resulted in a more
11 detailed and accurate reservoir description.

12 As indicated on Exhibit 9, the detailed
13 cased hole log suites have been run in five key wells
14 located in strategic positions across the field. The
15 well in the northwest corner of this exhibit is
16 Northeast Drinkard Unit #108. We have actual core and
17 core data available over portions of the Blinebry and
18 Drinkard in that well, and they have been used to
19 calibrate the cased hole log suite.

20 Exhibit 10 shows simplified results of the
21 lithology data that was obtained from the detailed
22 cased hole logging of that well, which is Northeast
23 Drinkard Unit #108. The mineralogical log suite was
24 used to identify and approximate the relative
25 volumetric abundance of four main matrix components,

1 and those included limestone, dolomite, anhydrite and
2 silt.

3 The component that's most important to an
4 understanding of the fluid distribution is silt. The
5 silt, as we have defined it here is composed primarily
6 of quartz and potassium bearing feldspars and clays.
7 Silt, on this particular diagram, is indicated in
8 orange and spikes on that silt curve above the
9 background value indicate zones where there is
10 significant silt content. Those zones will be
11 referred throughout the rest of the testimony simply
12 as silts. Continuous silts are believed to constitute
13 reservoir seals, preventing the vertical migration of
14 fluid over geologic time.

15 The continuous silts that are present in
16 the North Eunice Blinbry-Tubb-Drinkard Oil and Gas
17 Pool are shown in yellow on Exhibit 11.

18 Q. At this time, Ms. Corder, I would ask you
19 to approach Exhibit 11 which we've hung on the wall.
20 The exhibit set contains smaller copies. If you would
21 just be careful to speak up as you discuss it.

22 A. Okay.

23 Q. Thank you.

24 A. Before I get into the details of this, I'm
25 just going to briefly summarize the main points that

1 I'm going to make with the aid of this exhibit
2 throughout the rest of the testimony.

3 The first point is that the silts within
4 this interval are confined to basically two packages;
5 secondly, that those silts acted as seals over
6 geologic time; third, that we've identified a gas/oil
7 contact within the Blinebry at a depth of minus 225;
8 that the upper part of the Tubb is actually a
9 continuation of the Blinebry hydrocarbon column; that
10 the remainder of the Tubb is generally gas productive
11 high on structure and oil productive across the rest
12 of the unit; and that a gas/oil contact was discovered
13 or identified within the Drinkard at a depth of minus
14 3025.

15 The overall result is that the original gas
16 bearing pore volume is currently believed to be much
17 less than that which was presented at the 1987
18 unitization hearing.

19 Before I go into the details concerning the
20 lithology and the fluid distribution, I'm just going
21 to briefly summarize the cross-section construction.

22 This is a structural cross-section
23 constructed using logs that have been acquired since
24 unitization. Five of the six wells, excluding NEDU
25 910, have been logged with detailed cased hole log

1 suites and portions of those logs are what you see
2 displayed.

3 As indicated in the lower right-hand corner
4 of this exhibit, the cross-section generally runs from
5 north to south. Beginning in a downdip position at
6 NEDU 221, continues updip to NEDU 910 and slightly
7 downdip at NEDU 918.

8 The green curve on the left-hand side of
9 the logs is the conventional gamma ray. Shown shaded
10 in red next to the gamma ray is the silt indicator
11 curve, and shown in blue on the right-hand side of
12 each of these logs is the porosity curve.

13 Pay corresponds to those intervals that are
14 shaded blue but do not have a significant silt
15 content. Also Noted on the left-hand side of this
16 exhibit is formation tops, NMOCD Blinebry NMOCD Tubb,
17 the Drinkard, and the top of the Abo formation. We've
18 shown between NEDU #108 and NDU #407 the subzone
19 nomenclature, and that nomenclature is consistent with
20 that which was described and presented on Exhibit 7.

21 I'm now going to summarize in detail the
22 lithologic model over the entire vertical interval and
23 I'll emphasize the position of the silts and their
24 control on fluid distribution.

25 The 75-foot interval from the NMOCD

1 Blinebry to the Blinebry Marker is a silty interval
2 that forms the upper seal to the Blinebry hydrocarbon
3 column. The interval from the Blinebry Marker to the
4 NMOCD Tubb basically consists of dolomite and various
5 amounts of nodular pore filling and replacement
6 anhydrite. There are a few discontinuous silt
7 stringers that are present within this interval.

8 Correlative porosity zones corresponding to
9 the Blinebry subzones are correlative across the unit
10 area. Within this interval there are no continuous
11 barriers other than variations within porosity.

12 The 100-foot interval from the NMOCD
13 Tubb to the Tubb Marker, which is commonly referred to
14 as Tubb I Upper, is very similar in lithology to the
15 overlying Blinebry. There are no lithologic breaks
16 that separate Blinebry V from the Tubb I Upper. And,
17 as I will mention again later in the testimony, we now
18 feel that that Tubb I Upper is actually a continuation
19 of the Blinebry oil column.

20 The Tubb Marker is the first silt of the
21 Tubb silt package and it's correlative or continuous
22 across the unit area. Three other silts of varying
23 thicknesses are also continuous across the unit area.
24 They are separated by relatively clean intervals of
25 dolomite that do have a little bit of porosity

1 development. The lower part of the Tubb, referred to
2 as Tubb III, has very little, if any, porosity
3 development.

4 There's no lithologic break separating Tubb
5 III from the Drinkard I. The Drinkard I is basically
6 dolomite with some anhydrite in the form of pore
7 filling replacement and nodular anhydrite. The
8 porosity within the Drinkard I is relatively low as
9 indicated by NEDU #704. Drinkard II through V
10 consists of interbedded stringers of limestone and
11 dolomite, and most of the porosity within that
12 interval appears to be developed within the limestone
13 units. Locally those porous units are correlative.
14 Again, within the Drinkard, there are no continuous
15 barriers other than variations in porosity.

16 Using detailed original completion
17 information provided by working interest owners, we've
18 superimposed or revised the fluid distribution model
19 on top of this lithology model, and I'll now summarize
20 that fluid distribution model.

21 Based on original completion information
22 we've identified an original gas/oil contact within
23 the Blinebry at minus 2225. This differs from the
24 original reservoir description or fluid distribution
25 for the Blinebry at the 1987 unitization hearing.

1 At that time Blinebry I and II were
2 believed to essentially be gas-bearing across the
3 entire unit area. The change in the fluid
4 distribution for the Blinebry is a result of detailed
5 analysis of all available data, including data that's
6 been acquired since unitization.

7 Given the gas/oil contact is at minus 2225
8 for the Blinebry, the downdip portions of Blinebry I
9 are oil-bearing, and Blinebry II is oil-bearing across
10 most of the unit area. Only the southwestern corner
11 of the unit falls within the Blinebry II gas wedge.

12 So the overall result of the change in the
13 fluid distribution is that the original gas-bearing
14 pore volume is currently believed to be much less than
15 that which was presented in the 1987 hearing.

16 The Tubb fluid distribution is also
17 different from that which was presented at the 1987
18 hearing. At that time the entire interval from the
19 NMOCD Tubb to the top of the Drinkard was believed to
20 be more or less discrete pods of oil and gas
21 distributed more or less randomly across the unit
22 area.

23 Based on lithologic data that we've
24 acquired since unitization, we do not see any
25 lithologic break separating Blinebry V from the Tubb I

1 Upper. 1988 selective zone tests of Tubb I Upper
2 indicates that the zone is oil-bearing across the
3 entire unit area, and we now believe that that
4 interval, the Tubb I Upper, is actually a continuation
5 of the Blinebry oil column.

6 This, again, results in a substantial
7 reduction of the original gas-bearing pore volume from
8 that which was presented at the 1987 hearing. Again,
9 at that time, we thought the Tubb I Upper was
10 predominantly gas-bearing.

11 Tubb I Lower and Tubb II generally appear
12 to be gas-bearing, high on structure and oil-bearing
13 across the rest of the structure. Data does not
14 support a single gas/oil contact for those zones, but
15 it does support the existence of a transition from gas
16 to oil about at the mid-structure of the pool area.

17 A very thick, tight and largely
18 nonproductive interval, referred to as the Tubb III,
19 separates the upper zones of the Tubb from the
20 Drinkard. Based on original completion information,
21 we've identified an original gas/oil contact within
22 the Drinkard at a depth of minus 3025. As a result,
23 Drinkard I is partially gas-bearing in the
24 southwestern corner of the Unit. However, the pore
25 volume associated with that gas cap is relatively

1 small or very small due to the fact that there is very
2 little porosity development in Drinkard I, as
3 evidenced by NEDU #704.

4 The remainder of the Drinkard, including
5 all of the downdip portions of Drinkard I, all of
6 Drinkard II, III, IV and V are completely oil-bearing
7 across the entire unit area.

8 So, to summarize the fluid distribution
9 model, the changes that we've seen have resulted in a
10 substantial reduction of the original gas-bearing pore
11 volume from that which was presented at the 1987
12 hearing.

13 Blinebry I was found to be oil-bearing in
14 the downdip portions of the unit; Blinebry II was
15 oil-bearing across most of the unit area; Tubb I Upper
16 is oil-bearing across the entire unit area and is now
17 considered to be a continuation of Blinebry oil column
18 and not predominantly gas-bearing as original
19 thought.

20 The rest of the Tubb is generally
21 gas-bearing high on structure, and oil-bearing in the
22 downdip portions of the pool area. A small gas cap is
23 identified within the Drinkard, but again the pore
24 volume associated with that gas cap is very small.
25 The remainder of the Drinkard is completely

1 oil-bearing.

2 So again, the overall result of the revised
3 lithology model and fluid distribution model is that
4 the original gas-bearing pore volume is currently
5 believed to be much less than that which was presented
6 at the 1987 unitization hearing.

7 As the reservoir engineer will demonstrate,
8 the intervals that were gas-bearing are now depleted
9 and are contributing very little to the current gas
10 production from the unit.

11 Q. Is there anything else you want to point
12 out right now?

13 A. No.

14 MR. PEARCE: Mr. Examiner, that's all the
15 questions I didn't have of this witness at this time.
16 She's available for questions, if you have any.

17 EXAMINATION

18 BY EXAMINER CATANACH:

19 Q. Ms. Corder, you've come to the conclusion
20 that the only real gas-bearing zones are high on
21 structure, and those would be mostly in the southeast
22 parts of the units?

23 A. That's right.

24 Q. Basically, what would that area consist of,
25 the gas-bearing portion?

1 A. It's basically going to be confined to
2 Sections 15, 22 and portions of 23, but given the
3 gas/oil contacts, it's going to vary a little bit for
4 each of the horizons, Blinebry I, Blinebry II, Tubb
5 and the Drinkard.

6 Q. You're saying the remainder of the unit,
7 there really isn't any recoverable gas or pore gas
8 volume?

9 A. Originally, there was a little bit of gas
10 in portions of the Tubb, like in Section 10 and
11 Section 3, although it was very spotty. Based on the
12 results that we've seen from recent completions--and
13 the reservoir engineer will go into that in a little
14 more detail--we're just not seeing any producible
15 volumes at the present time, so what gas was there is
16 now depleted. The majority of the gas at the time of
17 field discovery was in the updip portions of the unit
18 which I described as Sections 15, 22 and parts of 23.

19 Q. Now, there are some gas wells in Sections 3
20 and 4 and 10. Are those currently not producing?

21 A. The reservoir engineer is going to show
22 those.

23 EXAMINER CATANACH: I have no further
24 questions at this time.

25 Any other questions of this witness? She

1 may be excused.

2 WILLIAM R. LANCASTER

3 the witness herein, after having been first duly sworn
4 upon his oath, was examined and testified as follows:

5 EXAMINATION

6 BY MR. PEARCE:

7 Q. For the record, would you please state your
8 name and place of residence?

9 A. William R. Lancaster, Houston, Texas.

10 Q. Mr. Lancaster, by whom are you employed?

11 A. Shell Western Exploration and Production.

12 Q. In what capacity, sir?

13 A. As a reservoir engineer.

14 Q. Mr. Lancaster, have you appeared before the
15 Division and had your qualifications as an expert in
16 the field of reservoir engineering accepted and made a
17 matter of record?

18 A. Yes.

19 Q. Are you familiar with the application filed
20 by Shell Western under consideration today?

21 A. Yes, I am.

22 MR. PEARCE: Mr. Examiner, at this time I
23 would ask Mr. Lancaster be recognized as an expert in
24 the field of reservoir engineering.

25 EXAMINER CATANACH: He is so qualified.

1 Q. Mr. Lancaster, you have some information.
2 Would you please discuss that for the Examiner?

3 A. In this portion of the testimony, I would
4 like to cover how, as operator of the Drinkard unit,
5 Shell Western has changed their concept as to the
6 makeup of the gas reserves and how this has related to
7 the need for gas zone injection.

8 As illustrated by the geologist, there is a
9 revised description and considerably less pore volume
10 of the free gas than was originally thought, but we do
11 not anticipate any change in the initial estimate of
12 54 billion cubic feet of gas that was given when we
13 formed the unit.

14 The basis for this statement is our
15 observed performance of the unit and tests that we've
16 made on different zones that have if confirmed (1)
17 that the gas zones are largely depleted and have a
18 bottom hole pressure of something in the range of 250
19 psi and (2) that some 95 percent of the gas is coming
20 from wells that are completed in the oil column.

21 Now, to demonstrate what we mean when we
22 say the gas zones are depleted, I would like to call
23 your attention to Exhibit 12. That is a plot of the
24 pressure as given in the Drinkard Unit versus the
25 ultimate recovery that you would receive from a gas

1 zone.

2 On the Y axis we have the Drinkard pressure
3 that would range from 0 to 2400 pounds, and on the X
4 axis is the recovery of ultimate, from 0 to 100
5 percent, assuming an abandonment pressure of 100 psi.

6 As you can see on this plot, at 250 psi
7 we've recovered some 95 percent of the ultimate oil.
8 Now, one of the things that we found in order to
9 confirm what we had seen here, that were these zones
10 really depleted, we went in and tested eight wells.
11 These eight wells are shown on Exhibit 13, their
12 location.

13 This is the same exhibit as was shown on 5,
14 except that we've included in the lower right-hand
15 corner a tabulation of the wells that we've tested,
16 the zones, and the rates and the bottom hole pressures
17 that we observed.

18 These wells were scattered across the unit,
19 and we've selected four Blinebry Zone 1 and four Tubb
20 to test the completions. The northernmost well, 201,
21 was a Blinebry well that we were unable to establish
22 production in even though we spent extensive time and
23 money trying to bring it in. Its average bottom hole
24 pressure, that we measured later after an extended
25 shut-in period was only 135 pounds.

1 The test rates that you can see range from
2 20 to 72 Mcf per day and really are uneconomical.
3 Several of the wells, I might point out, you talked
4 about the gas wells in Sections 3--or 2 and 10, these
5 wells, although we tested them as gas wells, the gas
6 zones actually produced as oil wells, produced with
7 rather low gas/oil ratios.

8 These rates, which average probably some 33
9 Mcf per day, are essentially uneconomical and we can't
10 really afford to make any additional recompletions at
11 this rate. The pipelines feel the same way. In fact,
12 the pipelines refused to hook up the last three wells
13 we had, and the only way we were able to test them was
14 to receive permission from the Commission to test them
15 through our unit facilities rather than have the
16 pipelines hook up to them.

17 What we've seen here where we've seen these
18 low rates is really consistent with what we've seen in
19 the field in our observations, in that when we would
20 recomplete wells, squeeze off the gas zones and
21 recomplete into the oil zones, we would see little or
22 no change in the gas rate of the producing well. Now,
23 given this sort of production and performance, I would
24 like to--

25 Q. Excuse me. Before we do that, Mr.

1 Lancaster, I want to back up, please, to Exhibit 12.
2 You indicated that this exhibit indicates that 95
3 percent of the gas has been recoverable gas from the
4 gas zone so far? Is that what it says?

5 A. Yes.

6 Q. I apologize for interrupting. Let's go to
7 14.

8 A. In Exhibit 14 we have two pie charts. The
9 upper pie chart is our gas production as of mid-1990
10 and the lower one is our gas reserves. Given the
11 production that we see in these seven wells that we
12 produced, plus the other three gas producers that are
13 completed in the gas zones only, the total gas
14 production from the gas wells in this field is about
15 five percent.

16 Given five percent of the gas production
17 we've assumed we have five percent of the reserves
18 remaining in the gas zones. Given this gas
19 production, and I would like to draw your attention to
20 Exhibit 15, which is a plot, a comparison of the plot
21 of the forecast of the gas production as given in 1987
22 and the current 1990 forecast.

23 There's two similarities and two
24 differences in these. The similarities are that we
25 have assumed or recommended--we base the reserves the

1 same in both cases, they're 54.7 Bcf of gas. The
2 total rate of production really hasn't changed very
3 much. Our total rate that we now forecast is about
4 equivalent to what they had forecast then.

5 The differences in what we see is in the
6 makeup of the gas. Where we see significant amounts
7 of the gas now coming from the oil column and only
8 minor from the gas zones, we've extended the life from
9 2018 to 2033 to tie into the oil forecasts that we're
10 going to show a little later.

11 Now, given the evidence that we've seen,
12 where we have gas caps instead of gas zones, where we
13 have indications that there's some communication by
14 similarities in pressures, there's a concern that
15 repressuring the oil column to 1,000 pounds or more
16 could result in displacing some of the secondary oil
17 into the gas cap. And, under this scenario, we could
18 lose at least a million barrels of the 15 million
19 barrels of secondary recovery. And, to prevent these
20 losses, we would propose to include the gas zones as
21 part of our injection.

22 We would anticipate no loss in gas reserves
23 as a result of this and conceivably could actually
24 have a slight increase in the gas reserves by
25 injecting water into a depleted gas zone.

1 So, in summation, I would like to say that
2 we see no current--because we've seen a change in the
3 makeup, we see no current change in the ultimate gas
4 recovery; that 95 percent of the gas we now believe is
5 coming from wells completed in the oil column; the gas
6 zones are largely depleted, which was confirmed with
7 the completion of eight wells, four completed in the
8 Tubb and four completed in the Blinebry.

9 Additional gas zones recompletion are
10 uneconomical, and based on this we would recommend
11 that the NMOCD eliminate the gas well classification
12 which would allow us to increase our operating
13 efficiency and to maximize the ultimate recovery of
14 gas and oil.

15 MR. PEARCE: Mr. Examiner, at this time Mr.
16 Lancaster has completed his discussion of the
17 reservoir engineering aspects of the case and he is
18 available for questioning on those.

19 If I may, after he has been questioned
20 about reservoir engineering, I would like to excuse
21 Mr. Lancaster, bring on our third witness, and then
22 subsequently bring Mr. Lancaster back to discuss unit
23 operations since formation of the unit and approval of
24 the waterflood. But reservoir engineering information
25 is now before you.

EXAMINATION

1

2 BY EXAMINER CATANACH:

3 Q. Mr. Lancaster, how would the injection of
4 water into these gas zones increase your gas
5 production?

6 A. It would be very negligible, but when you
7 have depleted gas and no more gas to recover,
8 injecting water could possibly move some water into
9 the drainage area of your gas well. Some gas.

10 Q. Do you propose this in the entire unit, to
11 inject water into these gas zones in the entire unit?

12 A. In selected wells, yes; not every well.

13 Q. You don't propose to exclude the southwest
14 structurally high gas zones?

15 A. Initially we probably would, yes, until we
16 get it completely drained.

17 Q. So you would continue to produce the gas in
18 the southwest quarter, that portion?

19 A. That we have, yes.

20 Q. Is most of the gas production from gas
21 wells coming from that southwest portion of that unit?

22 A. Yes, it is.

23 EXAMINER CATANACH: I believe that's all I
24 have of the witness at this time.

25 MR. STOVALL: I just have one probably

1 naive question.

2

EXAMINATION

3 BY MR. STOVALL:

4 Q. The wells that are identified as gas wells
5 at the present time, are they perforated in the oil
6 column?

7 A. No, they are completed.

8 Q. They're strictly in the gas?

9 A. Only in the gas column.

10 Q. Can they be? Are they drilled through to
11 the oil? Could they be converted to oil production
12 without any--

13 A. Some of them. I would have to look and
14 tell you which ones. Probably

15 Q. Do you have any intent to try to make them
16 into into oil wells?

17 A. No.

18 MR. STOVALL: That's all I need to know.

19 EXAMINER CATANACH: Mr. Pearce, why don't
20 we take a 10-minute break now.

21 (Thereupon, a recess was taken.)

22 EXAMINER CATANACH: Let's proceed, Mr.
23 Pearce.

24 MR. PEARCE: Thank, you, Mr. Examiner.

25

JOE D. RAMEY

1 the witness herein, after having been first duly sworn
2 upon his oath, was examined and testified as follows:

3 EXAMINATION

4 BY MR. PEARCE:

5 Q. For the record, sir, would you please state
6 your name and place of residence?

7 A. Joe D. Ramey, Hobbs, New Mexico.

8 Q. Mr. Ramey, have you been retained by Shell
9 Western E & P, Inc. to testify in regard to the matter
10 under consideration today?

11 A. Yes, I have.

12 Q. And have you previously appeared before the
13 Division or one of its Examiners and had your
14 credentials accepted as an expert in the field of oil
15 and gas regulatory matters?

16 A. Yes, I have.

17 MR. PEARCE: Mr. Examiner, at this time I
18 would ask that Mr. Ramey be so accepted.

19 EXAMINER CATANACH: He is so accepted.

20 Q. At this time, Mr. Ramey, would you describe
21 for us briefly the purpose of your testimony today?

22 A. The purpose of my testimony is to
23 illustrate the differences in casinghead allowables
24 under the present rules and the proposed new rules.

25 MR. PEARCE: Mr. Examiner, at this time I

1 would like to briefly skip over Exhibit 16 and we'll
2 return to that exhibit when Mr. Lancaster returns.

3 Q. Mr. Ramey, at this time I would like for
4 you to address your attention to Exhibit No. 17,
5 please, and describe that exhibit for the Examiner and
6 those in attendance?

7 A. This exhibit illustrates the allowables or
8 the top casinghead gas allowables or gas allowables in
9 the North Eunice Blinebry-Tubb-Drinkard Pool.

10 The first three lines are the current
11 allowables for a 40-acre North Eunice oil well, which
12 is 107 barrels per day times the limiting gas/oil
13 ratio of 6,000 cubic feet per barrel. The Blinebry
14 gas well, that's the average daily allowable based on
15 the last year's production for allowables for a
16 160-acre unit, and the same with the Tubb.

17 Under the heading "Potential Gas Allowables
18 Mcf Per Day for a 160-Acre Tract," under the current
19 rules a fully developed 160-acre tract would have four
20 North Eunice Blinebry-Tubb-Drinkard oil wells, one
21 Blinebry gas well and one Tubb gas wells, which would
22 give you a daily gas allowable of 3468 Mcf.

23 Under the current rules, the fully
24 developed tract would only go down to four net North
25 Eunice Blinebry-Tubb-Drinkard oil wells.

1 Q. That's if the gas well classification is
2 dropped from the pool rules, is that correct?

3 A. Yes, that's right, and then the gas wells
4 would turn out to be second wells on a proration unit,
5 and the allowable would be 2568 Mcf per day.

6 Q. After determining what the allowable for an
7 average 160-acre tract would be, under the current
8 rules and then current rules without a gas well
9 classification, have you attempted to determine the
10 average producing capability of certain 160-acre
11 tracts within the unit area?

12 A. Yes, I have, and that's illustrated on
13 Exhibit 18. There are nine tracts listed which
14 encompass what we consider the higher gas producing
15 area of the pool. They are in the southwest portion
16 of the pool. Each square illustrated is a 160-acre
17 tract. And, as you can see, the farthest north
18 160-acre tract is the highest gas-producing tract, and
19 it makes around 1300 Mcf per day.

20 Q. As I understand it, once again this is the
21 area of highest gas productivity in the unit area?

22 A. Yes, it is. This is approximately
23 one-third of the 160-acre units, and it produces about
24 two-thirds of the gas that is being produced currently
25 from the pools.

1 Q. Let's look at Exhibits 17 and 18 together.
2 As I understand the information you've presented, the
3 highest 160-acre gas-producing tract now currently can
4 produce about 1300 Mcf a day, with an average current
5 allowable of perhaps 3468 Mcf, and if you subtract out
6 the gas wells, that allowable would be about 2500, is
7 that correct?

8 A. That is correct.

9 Q. Mr. Ramey, when you look at the average
10 allowables which would be available to wells within
11 the North Eunice Blinbry-Tubb-Drinkard Oil and Gas
12 Pool and you compare that with the 160-acre tract's
13 producing ability, do you believe that it is necessary
14 to have controls on the gas production within the unit
15 area?

16 A. No, I don't think that's necessary at all.
17 I think we've shown today that what we have at this
18 time in the pool is essentially a solution gas
19 reservoir, and so we have a waterflood in a solution
20 gas reservoir at this time.

21 And I would, you know, like to throw
22 something out for the Examiner's consideration. If
23 you'll refer to Rule 701(F)(3), it says, "Allowables
24 in waterfloods are equal to the ability to produce,
25 and they are not subject to the depth bracket

1 allowable." So the Examiner might consider treating
2 this waterflood as any other waterflood is treated in
3 the state.

4 Q. Mr. Ramey, do you believe that the
5 elimination of the gas well classification from the
6 rules governing the North Eunice Pool and allowing
7 that pool to be regulated under normal waterflood
8 rules is in the best interest of the prevention of
9 waste and the protection of correlative rights?

10 A. Yes.

11 Q. Mr. Ramey, do you have anything further at
12 this time?

13 A. I think not. I think just to add a little
14 something, these are current gas rates and we have,
15 you know, every indication is that these gas rates
16 will decline as the injection volume increases and we
17 start realizing fill-up. I think the gas volumes will
18 decline, so I don't think there will be any additional
19 gas or additional gas volumes produced on a daily
20 basis or a monthly basis.

21 MR. PEARCE: Mr. Examiner, I have nothing
22 further of this witness at this time. He's available
23 for questioning.

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EXAMINATION

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BY EXAMINER CATANACH:

Q. Mr. Ramey, on Exhibit 18, where's the gas coming from on these tracts? Are they from gas wells or does that also include oil wells?

A. There are gas wells on those tracts. I think the tract, the 1300 tract has four oil wells or four North Eunice Blinebry-Tubb-Drinkard wells and a Tubb gas well and a Blinebry gas well.

Q. So most of these tracts do contain some oil wells that are producing gas?

A. Yes. There are four oil wells on each of these tracts.

Q. There are? In addition to--

A. Or three wells and an injection well, but basically four North Eunice Blinebry-Tubb-Drinkard wells on each of the tracts.

Q. And each of the tracts also has a gas well?

A. No, I don't think--not each of them.

MR. PEARCE: No.

EXAMINER CATANACH: That's all right. I can get that from the other exhibit here.

EXAMINATION

BY MR. STOVALL:

Q. Mr. Ramey, let me clarify. Exhibit 18, the

1 squares drawn with the numbers in them are sections,
2 160-acre tracts?

3 A. Yes, they're 160-acre tracts.

4 Q. The four 160-acre tracts, 100 in the
5 northwest, 200 in the northeast, 1100 in the southeast
6 and 1000 southwest, is the southwestmost section of
7 the unit, is that correct? I don't see the number on
8 the exhibit?

9 A. All of Section 22, would it be the west
10 half of Section 23, and all but the northeast quarter
11 of Section 15 is what the area encompasses. It's
12 essentially the area that Ms. Corder outlined in her
13 testimony.

14 If you'll look up in the upper right-hand
15 corner of the exhibit, there's a small unit outlined
16 with the 160-acre tracts outlined in them.

17 MR. STOVALL: I just wanted to be sure my
18 interpretation of that was correct.

19 EXAMINER CATANACH: Mr. Ramey, did you give
20 a percentage of the amount of gas that's being
21 produced from this area right here?

22 THE WITNESS: Yes, about two-thirds of the
23 gas comes from this approximately one-third of the
24 unit.

25 MR. STOVALL: Approximately how much of the

1 gas coming from this area delineated comes from the
2 gas wells? Do you have that information?

3 MR. PEARCE: Counselor, I think when we get
4 Mr. Lancaster back on, he may have detailed production
5 records from each of those wells and we can probably
6 figure that out with him if you'll hold off on that
7 question for a couple of minutes.

8 MR. STOVALL: I can do that.

9 EXAMINER CATANACH: Any further questions?
10 The witness may be excused.

11 MR. PEARCE: Mr. Lancaster, if you would
12 return, please.

13 WILLIAM L. LANCASTER

14 the witness herein, after having been previously duly
15 sworn upon his oath, was examined and testified
16 further as follows:

17 EXAMINATION

18 BY MR. PEARCE:

19 Q. Before we go, Mr. Lancaster, to the second
20 part of your testimony, I would ask you to look at the
21 previous exhibits that Ms. Corder introduced, and it
22 may be that 13 is the best exhibit to use. We were
23 having some questions from the Examiner and Counsel
24 about relative production in the study area. Can you
25 address those for us?

1 A. Yes. The gas production from the gas wells
2 primarily comes from this area. There are two gas
3 producers listed that are not included in this area,
4 and they're 305 and 405, that make 70 Mcf a day.

5 Q. Where are the wells you just mentioned?

6 A. They're up here in Section 2 and 15--2 and
7 10. I beg your pardon. 201 is not producing.

8 So what you really see in Exhibit 18 is
9 that the 1300, the 160 acres with 1300 Mcf a day has
10 two gas wells, one of which is very marginal.

11 160 acres south of that with 1000 Mcf a day
12 has four wells and no gas wells. The two leases south
13 of that have three oil wells and one gas well each.
14 And the gas wells make maybe 150 Mcf a day each.

15 EXAMINATION

16 BY MR. STOVALL:

17 Q. In each of those areas?

18 A. No, just the two southern wells.

19 Q. When you're saying the two, down in Section
20 22?

21 A. The west half of Section 22, yes.

22 Q. Okay. It appears to me there's a gas well
23 in the northwest quarter, a gas well in the southwest
24 quarter and a gas well in the northeast quarter, is
25 that correct, of Section 22?

1 A. Yes. 806 is essentially shut in. 804 and
2 902 are the two gas wells.

3 Q. And those each make about 150 Mcf?

4 A. Approximately.

5 Q. So they're making their proportionate share
6 of the gas, approximately, is what you're saying, is
7 that correct? The oil wells are making as much or
8 more gas than those wells?

9 A. The oil wells make as much or more gas than
10 the gas wells do.

11 Q. Is that true in Section 15 as well, where
12 it looks like there's four gas wells that appear in
13 the area of study in Section 15, two in the northwest
14 and two in the southeast?

15 A. Essentially the oil wells probably make the
16 majority of the production. And then, from there,
17 north, we have literally no gas production from the
18 gas.

19 Q. Let me make sure I understand your concern
20 on why you're seeking the rule changes. One is that
21 by classifying these as gas wells, they're subject to
22 proration and limitations on production, is that
23 correct? Is that one of your concerns?

24 A. Our concern here is that--well, we have
25 several concerns. One is that we have to treat them

1 separately and produce them through the pipeline and
2 this is a problem. So, we would like to produce them
3 through the unit facilities and just kind of put them
4 in with the unit. And accounting for them and keeping
5 them separate is a very definite burden. The few gas
6 wells we have, we would just like to put in with the
7 rest of the oil wells and produce them until they
8 deplete, and then abandon them.

9 MR. PEARCE: If I may clarify, under the
10 previous order there was a requirement that the gas
11 wells be squeezed so that they are only open in the
12 gas zones. We're before you because, as shown by
13 Exhibit 13, when Shell did that to eight wells, it got
14 very marginal gas producers.

15 Shell is being forced to do extensive
16 workover on a number of wells, and the previous order
17 required us to keep, I believe, the number was, 22 gas
18 wells in the unit area. In fact, the last three
19 wells, as the previous witness mentioned, the last
20 three wells that were drilled, the pipeline was not
21 willing to lay line to connect them, they were
22 producing so little gas.

23 So, we're in a situation in which the
24 present order requires us to produce gas wells that
25 are not even marginally economic, and the cost of

1 doing that, plus the administrative burden of
2 maintaining separate gas well records and
3 classification, we believe, is unnecessary.

4 MR. STOVALL: Referring to the eight wells,
5 Mr. Pearce, those are the eight on Exhibit 13 that are
6 blocked in red?

7 MR. PEARCE: That is correct.

8 Q. (BY MR. STOVALL) And what would you
9 propose to do with those wells if the relief you're
10 seeking in this hearing is granted?

11 A. We would basically produce them to their
12 economic limit, or produce them until-- If any one of
13 them had a mechanical failure, it would be abandoned
14 because we just could not afford to work it over.

15 Q. I think you told me before, there would be
16 no intent to put them in the oil column or turn them
17 into oil wells, if you eliminate that classification?

18 A. Right.

19 MR. STOVALL: Would it be possible to amend
20 the order or get an exception to rules to allow the
21 gas from gas wells to go through the unit operation?
22 What would cause a problem as far as seeking that
23 relief?

24 MR. PEARCE: Well, the present order, as I
25 mentioned, requires us to maintain a set number of gas

1 wells in the unit so that we have a problem of system
2 that the gas can go through, we have a problem of
3 converting wells with uneconomic workovers, we have a
4 problem of dual administration through the Hobbs
5 office, with marginal wells being subject to the gas
6 prorating system.

7 The witness has indicated that their
8 intention is to produce these wells to their economic
9 limit and eventually there just won't be any straight
10 gas wells in this area because Shell has no intention
11 of drilling additional gas wells.

12 Q. (BY MR. STOVALL) Is there any allowable
13 problem with respect to the oil wells in the unit,
14 based on a GOR or anything of that nature?

15 A. No. The average production here is around,
16 like we said, 560 barrels of oil with 11,600 Mcf per
17 barrel of gas. The problem is having to separate the
18 gas in our work, day-to-day work, separate and
19 accounting separate and keeping it separate from the
20 oil in just some of the wells, having to squeeze it
21 off. And this is a very expensive operation,
22 something that we would rather not have to do.

23 MR. STOVALL: I don't have any further
24 questions at this time.

25 MR. PEARCE: All right.

EXAMINATION

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BY MR. PEARCE:

Q. At this point, Mr. Lancaster, let's go back and I would ask you to pick out Exhibit 16.

MR. PEARCE: In this part of our testimony, Mr. Examiner, we want to have Mr. Lancaster provide an overview of unit and waterflood operations since formation.

A. One of the requirements in the original pool orders were that after three years we would come before you and show cause why the pool rules should be made permanent. That's what we're doing in this portion of the testimony, is fulfilling that requirement.

What we will do is show that the waterflood in our opinion is performing satisfactorily and we would recommend that the pool rules, with slight modifications, be made permanent.

To date we have expended some \$18.4 million or 92 percent of the total \$20 million that will be spent to install this waterflood as initially recommended. The facilities are completed and most of the remaining expenditures will be for well work.

Again, as stated earlier, our production is about 560 barrels of oil a day and our gas is 11,600

1 Mcf a day. Our injection at 25,400 barrels a day is
2 the one thing that's less than forecast. However, we
3 intend to add a source well and three co-op wells
4 offsetting the Cone acreage later this year, and by
5 the end of the year we would hope to have injection up
6 to 35,000 barrels a day.

7 Profile survey work has shown that we put
8 about 60 percent of the water into the Blinebry, five
9 percent into the Tubb, and 35 percent into the
10 Drinkard, and we think this is satisfactory for an
11 effective waterflood.

12 We've run a large number of bottom hole
13 pressures, and we've observed a normal range of values
14 and an average reservoir pressure of something less
15 than 250 psi. We've also observed relatively little
16 vertical or horizontal variation in these pressures.

17 I would like to draw your attention to
18 Exhibit 16, which is the current forecast of the oil
19 production for this pool. Like the gas forecast,
20 there are several similarities and differences; the
21 similarity being that the reserves used in this
22 forecast were the same as those predicted back in
23 1987, of a little over a million barrels of remaining
24 primary and 15 million barrels of secondary oil.

25 The difference is in the time required to

1 reach maximum production or fill-up. Given the fact
2 that we now envision most of the gas coming out of the
3 oil column, our fill-up requirements are significantly
4 higher and will require a longer period of time. So,
5 instead of, say, six years, we now anticipate
6 something like 11 years to fill up the reservoir and
7 the corresponding lengthening of the life from 2018 to
8 2033.

9 Q. Anything further, Mr. Lancaster?

10 A. That's all I have.

11 Q. Mr. Lancaster, you've studied the
12 operations of the pool, the unit and the waterflood.

13 Do you believe that the continuation of the
14 North Eunice Blinbry-Tubb-Drinkard Pool and the
15 continuation of waterflood operations in this area are
16 in the best interests of conservation of natural
17 resources?

18 A. Yes, I do.

19 MR. PEARCE: Mr. Examiner, I have nothing
20 further of this witness at this time. He's
21 available.

22 EXAMINATION

23 BY EXAMINER CATANACH:

24 Q. Mr. Lancaster, Shell doesn't plan to inject
25 into the zones that were previously thought to be gas,

1 is that correct? They don't plan to actively inject
2 into those zones that were thought to be gas caps--

3 A. Not into what we anticipate to be gas
4 caps. Now, into zones that we have reinterpreted to
5 have oil, like the downdip portion of Blinebry II and
6 the downdip of the Tubb, yes, we would probably
7 actively inject into those.

8 Q. That would not include or would that
9 include the southwest portion of the unit?

10 A. Not immediately, no.

11 Q. You would deplete the gas out of those
12 zones and then maybe go with injection?

13 A. Yes. And it could be 10 years from now.
14 It wouldn't be in the next immediate future at all.

15 EXAMINER CATANACH: I believe that's all I
16 have of the witness.

17 MR. PEARCE: A couple of additional matters
18 at this time, Mr. Examiner, if I may. I would like to
19 bring the Examiner's attention to what we have marked
20 as Exhibit No. 19. That's is an Affidavit of service
21 with an attached list of people receiving notice of
22 this case; and also to what we've marked as Exhibit
23 No. 20, which is a draft order in this matter adopting
24 new pool rules which have the effect of eliminating
25 the gas well classification, returning the waterflood

1 to normal waterflood operational and regulatory
2 procedures, and have the effect of conforming the
3 waterflood order itself to these changes of gas/oil
4 classification elimination.

5 If you could, I would ask you to turn to
6 page 4 of the draft order, Exhibit No. 20, and focus
7 your attention for a minute on proposed Rule No. 5.
8 The last part of that proposed rule has been added to
9 a previously existing North Eunice rule after
10 discussions of this matter with offset operators.

11 In addition to that, this morning we have
12 been asked to add another phrase at the end of that
13 proposed rule. The last part of that presently reads
14 that Shell will seek permission from such office, and
15 that's the Hobbs's office, before perforating the
16 gas-bearing intervals of the Blinebry Zones I and II
17 and any additional producing well.

18 To that we have been asked this morning to
19 add a phrase that says "after giving notice to offset
20 operators." As I say, we've been asked by an offset
21 operator to include that provision. Shell has no
22 objection to that. I would ask you to amend the
23 exhibit to show the addition of that phrase.

24 At this time, Mr. Examiner, I would ask
25 that Shell Western Exhibits 1 through 20 be admitted

1 into this record.

2 EXAMINER CATANACH: Exhibits 1 through 20
3 are hereby admitted.

4 MR. PEARCE: Thank you. Mr. Examiner, if I
5 may very briefly, Shell has appeared before you today
6 seeking some changes to the present rules for the
7 North Eunice Blinebry-Tubb-Drinkard Oil and Gas Pool.
8 We appear because after almost three years of
9 operation in this area we have gained a better
10 technical petroleum engineering and geological
11 understanding of the reservoir, we have examined
12 available cores and core data, we have collected and
13 analyzed detailed cased hole log suites, we've
14 reviewed detailed original completion data, and we've
15 conducted numerous bottom hole pressure surveys and
16 zonal production surveys.

17 This data has been summarized for you today
18 and demonstrates that a small amount of remaining gas
19 reserves can be produced from nearly depleted gas caps
20 but that approximately 95 percent of gas production
21 from the North Eunice Blinebry-Tubb-Drinkard Pool is
22 being produced from the oil column.

23 Based on this information, we are
24 requesting that the temporary pool rules eliminate the
25 minimum number of gas well provision and that the gas

1 prorationing restrictions on production from this pool
2 be eliminated.

3 We've demonstrated that such elimination
4 will not adversely affect ultimate recovery; that, in
5 fact, it may increase the efficiency and therefore the
6 ultimate recovery from the pool, will therefore
7 prevent waste, and we're of the opinion that it will
8 not impair correlative rights of any interest owners
9 in the pool or surrounding the pool.

10 Our Exhibit No. 20, as I've said, is a
11 proposed order with new rules which have the effect of
12 eliminating that gas well classification, and the
13 witnesses have testified for you that that elimination
14 will be in the best interests of the prevention of
15 waste and the protection of correlative rights.

16 We, therefore, recommend that the draft
17 order be reviewed and that the proposed Rule 5, as we
18 have suggested the amendment, and the other special
19 pool rules be adopted. Thank you, sir.

20 MR. STOVALL: Mr. Pearce, do we have the
21 return receipt cards on your--

22 MR. PEARCE: I do not have them. We will
23 get them for you.

24 MR. LANCASTER: I have them.

25 MR. PEARCE: You have them with you?

1 MR. LANCASTER: Yes.

2 MR. PEARCE: I will copy them immediately
3 after the hearing and put them in the case file.

4 EXAMINER CATANACH: Mr. Pearce, if I may, I
5 have two questions for Ms. Corder.

6 MR. PEARCE: Certainly. Ms. Corder, can
7 you come back please?

8 LISA CORDER

9 the witness herein, after having been previously duly
10 sworn upon her oath, was examined and testified
11 further as follows:

12 EXAMINATION

13 BY EXAMINER CATANACH:

14 Q. Ms. Corder, Mr. Lancaster has testified
15 that Shell may inject into some of those previously
16 bearing gas zones.

17 Have you looked at any of the acreage
18 surrounding the units, and do you have an opinion as
19 to whether that might have any detrimental effect to
20 any other operators outside of the unit?

21 A. I have not went and looked in detail at the
22 logs from wells surrounding the unit area, but based
23 on the fact or just assuming there's similarities
24 between our unit area and the offsetting area, the
25 porosity stringers themselves are continuous locally

1 but they're not continuous in such a degree that I
2 think it's really going to impair the offsetting
3 operators. Especially the fact that we don't plan
4 injecting along the lease lines until we get some sort
5 of co-op agreement with those offsetting operators.

6 So, if we inject into those gas caps, we're
7 going to be well away from the lease line unless we've
8 gotten approval from the offsetting operators to do
9 so.

10 EXAMINER CATANACH: Okay. That's all I
11 have.

12 Is there anything further in this case?

13 MR. PEARCE: Nothing further, Mr. Examiner.

14 EXAMINER CATANACH: Case 10052 will be
15 taken under advisement.

16 MR. PEARCE: Thank you.

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