CASE 3479: Application of GULF OIL CORP. for an exception to RULE 8 of ORDER R-1638 & Rule 301 CASE MO.

APPlication, Transcripts, SMALL Exh. bits ETC.

### GOVERNOR JACK M. CAMPBELL

### State of New Mexico

## Bil Conservation Commission



LAND COMMISSIONER GUYTON B. HAYS MEMBER

P. O. BOX 2088 SANTA FE

November 9, 1966

STATE GEOLOGIST A. L. PORTER, JR. SECRETARY - DIRECTOR

Mr. Bill Kastler Gulf Oil Corporation Post Office Box 1938 Roswell, New Mexico

3479 Re: Case No. R-3148 order No. Applicant:

GULF OIL CORPORATION

OTHER

Enclosed herewith are two copies of the above-referenced Commission order recently entered in the subject case.

Very truly yours,

A. L. PORTER, Jr. Secretary-Director

ir/ Carbon copy of order also sent to: Hobbs OCC x Artesia OCC\_ Aztec OCC \_\_

### OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION CONGLISSION OF MEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE No. 3479 Order No. R-3148

APPLICATION OF GULF OIL CORPORATION FOR AN EXCEPTION TO RULE 8 OF ORDER NO. R-1638 AND TO RULE 301, SAN JUAN COUNTY, NEW MEXICO:

### ORDER OF THE COMMISSION

### BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on November 2, 1966, at Santa Pe, New Mexico, before Examiner Blvis A. Uts.

NOW, on this 9th day of November, 1966, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

### FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Gulf Oil Corporation, successor operator of The British-American Oil Producing Company's West Bisti-Lower Gallup Sand Unit, seeks an exception to Rule 8 of Order No. R-1638 and to Rule 301 of the Commission Rules and Regulations to discontinue the monthly and annual gas-oil ratio tests in its West Bisti Pressure Maintenance Project in the Bisti-Lower Gallup Oil Pool, San Juan County, New Mexico.
- (3) That the applicant further seeks an exception to Rule 8 of said Order No. R-1638 to file each month Form C-120 in lieu of the Pressure Maintenance Project Operator's Report now prescribed by the Commission.

- (4) That the necessity for monthly gas-oil ratio testing no longer exists in the subject area due to the decreased gas-oil ratios in the subject pool.
- (5) That the filing of Form C-120 in lieu of the Pressure Maintenance Project Operator's Report will relieve the unit operator from unnecessary operating expenses and will provide the Commission sufficient information to assure that the owner of each property in the Bisti-Lower Gallup Oil Pool will receive its just and equitable share of the oil and gas in the pool.

### IT IS THEREFORE ORDERED:

- (1) That the applicant, Gulf Oil Corporation, is hereby granted authority to discontinue the monthly gas-oil ratio tests required by Rule 8 of Order No. R-1638 for its West Bisti Pressure Maintenance Project in the Bisti-Lower Gallup Oil Pool, San Juan County, New Mexico.
- (2) That the applicant is hereby granted an exception to Rule 8 of Order No. R-1638 to file Form C-120 in lieu of Pressure Maintenance Project Operator's Report.
- (3) That Form C-120 shall be submitted in accordance with Rule 1120 of the Commission Rules and Regulations.
- (4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DOME at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO

QIL CONSERVATION COMMISSION

DACK-M. CAMPBELL, Chairman

GUYTON B. HAYS. Member

A. L. PORTER, Jr., Member & Secretary



### SKELLY OIL COMPANY

### TULSA, OKLAHOMA 74102

### PRODUCTION DEPARTMENT

C. L. BLACKSHER, VICE PRESIDENT

W. P. WHITMORE, MGR. PRODUCTION
W. D. CARSON, MGR. TECHNICAL SERVICES
ROBERT G. HILTZ, MGR. JOINT OPERATIONS
GEORGE W. SELINGER, MGR. CONSERVATION

October 26, 1966

Re: Application of Gulf for Exception to Rule 8 of Order R-1638 and to Statewide Rule 301 to Permit Discontinuance of Individual Gas/Oil Ratio Tests and in Lieu thereof a Unitwide Test in its West Bisti-Lower Gallup Sand Unit, San Juan County, New Mexico.

Hearing - November 2, 1966

Mr. A. L. Forter, Jr., Secretary-Director Oil Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Porter:

As interested participant in the above Unit, we support applicant

in its proposals.

Yours very truly,

GWS:br

### DOCKET: EXAMINER HEARING - WEDNESDAY - NOVEMBER 2, 1966

9 A.M. - OIL CONSERVATION COMMISSION CONFERENCE ROOM, STATE LAND OFFICE BUILDING - SANTA FE, NEW MEXICO

The following cases will be heard before Elvis A. Utz, Examiner, or Daniel S. Nutter, Alternate Examiner:

- CASE 3479: Application of Gulf Oil Corporation for an exception to Rule 8 of Order No. R-1638 and to Rule 301, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks an exception to Rule 8 of Order No. R-1638 and to Rule 301 of the Commission rules and regulations to permit discontinuance of individual gas-oil ratio tests in its West Bisti-Lower Gallup Sand Unit, Bisti-Lower Gallup Pool, San Juan County, New Mexico. Applicant proposes to report gas production and ratios on a unit-wide basis rather than individual well GOR data.
- CASE 3480: Application of Tidewater Oil Company for a capacity allowable, Lea County, New Mexico. Applicant, in the above-styled cause, seeks the amendment of Order No. R-3097 which permitted its GO State "J" Well No. 1 located in Unit H of Section 7, Township 17 South, Range 33 East, Lea County, New Mexico, which directly offsets the Malmar Unit Waterflood Project, to be produced at capacity for a period not to exceed 90 days from date of said order. Applicant seeks additional time in which to produce said well at capacity and the establishment of an administrative procedure for further extensions.

### CASE 3336 (Reopened)

In the matter of Case No. 3336 being reopened pursuant to the provisions of Order No. R-3005, which order established 80-acre spacing units for the East Hightower-Upper Pennsylvanian Pool, Lea County, New Mexico, for a period of one year. All interested parties may appear and show cause why said pool should not be developed on 40-acre spacing units.

CASE 3481: Application of Sinclair Oil & Gas Company for a non-standard gas proration unit and an unorthodox location, Lea County, New Mexico. Applicant, in the above-styled cause, seeks approval of a 160-acre non-standard gas proration unit comprising the NW/4 of Section 7, Township 22 South, Range 36 East, Jalmat Gas Pool, Lea County, New Mexico, to be dedicated to its State 157 "B" Well No. 1 located at an unorthodox location for said pool 330 feet from the North line and 2310 feet from the West line of said Section 7.

-2Docket No. 27-66
November 2, 1966 Examiner Hearing

- CASE 3482: Application of Sinclair Oil & Gas Company for a special gas well test, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks authority to produce and flare up to three million cubic feet of gas per day, for a maximum of 30 days, from its Hackberry Hills Unit Well No. 4 located in Unit F of Section 22, Township 22 South, Range 26 East, Eddy County, New Mexico, as a reservoir limit test to determine the economic feasibility of a pipeline connection to said well.
- CASE 3483: Application of H. S. Moss for salt water disposal, Lea County, New Mexico. Applicant, in the above-styled cause, seeks authority to dispose of produced salt water in the Wolfcamp formation in the interval from 9751 to 9850 feet in its D. P. Peck Well No. 1 located in Unit C of Section 26, Township 12 South, Range 37 East, Gladiola Field, Lea County, New Mexico.
- CASE 3484: Application of Phillips Petroleum Company for a pilot water-flood project, Lea County, New Mexico. Applicant, in the above-styled cause, seeks authority to institute a pilot water-flood project by the injection of water into the Grayburg-San Andres formation through its Santa Fe Well No. 14 located in Unit P of Section 20, Township 17 South, Range 35 East, Vacuum Field, Lea County, New Mexico.
- CASE 3485: Application of Phillips Petroleum Company for a waterflood project, Lea County, New Mexico. Applicant, in the above-styled cause, seeks authority to institute a waterflood project by the injection of water into the Grayburg-San Andres formation through three injection wells located in Sections 8, and 9, Township 17 South, Range 33 East, Vacuum Field, Lea County, New Mexico.
- CASE 3486: Application of Shenandoah Oil Corporation for a waterflood project, Lea County, New Mexico. Applicant, in the above-styled cause, seeks authority to institute a waterflood project: by the injection of water into the Grayburg-San Andres formation through four injection wells located in Sections 7, 8 and 16, Township 17 South, Range 33 East, Vacuum Field, Lea County, New Mexico.
- CASE 3487: Application of Amerada Petroleum Corporation for a unit agreement, Lea County, New Mexico. Applicant, in the above-styled cause, seeks approval of its State "SN" Unit Area comprising 692 acres, more or less, of State land in Sections 3 and 4, Township 15 South, Range 33 East, Lea County, New Mexico.

-3Docket No. 27-66
November 2, 1966 Examiner Hearing

CASE 3488. Application of Amerada Petroleum Corporation for a waterflood expansion, Lea County, New Mexico. Applicant, in the above-tyled cause, seeks authority to expand its Saunders SB Water-frood Project by the injection of water into the Permo-Pennsylvanian zone through its Texaco-State "AQ" Well No. 2 located in Unit E of Section 3, Township 15 South, Range 33 East, Saunders Permo-Pennsylvanian Pool, Lea County, New Mexico.

CASE 3489: Application of William A. and Edward R. Hudson for a waterflood expansion, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks authority to expand their Puckett A Water-flood Project by the injection of water into the Grayburg-San Andres formation through their Puckett A Well No. 30 to be drilled at an unorthodox location 1345 feet from the North line and 25 feet from the West line of Section 24, Township 17 South, Range 31 East, Maljamar Pool, Eddy County, New Mexico.

CASE 3490: Application of Sunray DX Oil Company for pool redelineation, Roosevelt County, New Mexico. Applicant, in the above-styled cause, seeks the redelineation of the Todd-San Andres Pool, Roosevelt County, New Mexico, into two separate pools: The Todd Upper-San Andres Gas Pool comprising that portion of the San Andres formation above the anhydrite bed found at 4200 feet in the Franklin, Aston and Fair Mark Federal Well No. 1 located in Unit M of Section 26, Township 7 South, Range 35 East, and the Todd Lower-San Andres Pool comprising that portion of the San Andres formation below said anhydrite bed, said Todd Lower-San Andres Pool to be governed by the existing rules for the present Todd-San Andres Pool. Also to be considered at said hearing will be such matters as the effective date of the aforesaid redelineation, the period of time in which to effect dual completion of the affected wells, the distribution of the affected wells' accumulated status in the present pool (overproduction and underproduction) to each of the new pools, and such other pertinent matters as may relate to the aforesaid pool redelineation. Also to be considered will be special pool rules for the proposed Todd Upper-San Andres Gas Pool, including 320-acre spacing for wells located therein.

Mulf Oil Corporation

ROSWELL PRODUCTION DISTACT

W. B. Hopkins
DISTRICT NANAGER

M. I. Taylor

OISTRICT PRODUCTION
MANAGER F. O. Martiack

MANAGER

September 26, 1966 😕

P. O Drawer 1938 Roswell, New Mexico 88201

10 3479

Oil Conservation Commission State of New Mexico Post Office Box 2008 Santa Fe, New Mexico S7501

Attention: Mr. A. L. Porter, Jr.

Gentlemen:

Gulf Oil Corporation respectfully requests that an Examiner Hearing be set to consider its application for reclassification of the West Bisti-Lower Gallup Sand Unit Pressure Maintenance Project to a Waterflood Project, or in the alternative, applicant will request exception to Rula 8 of Order R-1638 in Case No. 1867 to eliminate the requirement for monthly gas-oil ratio tests. Applicant further requests an exception to Rule 301 to vaive the requirement for annual gas-oil ratio tests and we propose to report the gas production and gas-oil ratio on a Unit basis.

In support of this application, the following facts are submitted:

- (1) Applicant is the successor operator of the West Bisti-Lower Gallup Sand Unit, Bisti-Lower Gallup Pool, San Juan County, New Mexico, having recently succeeded The British-American Oil Producing Company.
- (2) Present facts and circumstances appear to warrant reclassification as a waterflood project and applicant desires to operate the Unit under Rule 701, Injection of Fluids Into Reservoirs, and report the monthly production on Form C-120 as provided in Rule 704, Records and Reports.
- (3) The existing requirement for monthly gas-oil ratio tests on each producing well under the conditions now existing results in an unnecessary expense and serves no purpose for operation of this Unit.
- (4) This application is in the interest of prevention of waste and protection of correlative rights.

Respectfully submitted, GULF OIL CORPORATION

JHH: ers

cc: New Mexico Oil Conservation Commission 1000 Rio Brazos Road Aztec, New Mexico 87410

DOCKET MAILED

Date 10 31-66

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1120 SIMMS BLDG. . P. O. I.OX 1092 . PHONE 243-4691 . AIBUQUERQUE, NEW MEXICO

BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
November 2, 1966

### EXAMINER HEARING

IN THE MATTER OF:
Case No. 3479. Application of
Gulf Oil Corporation for an
exception to Rule 8 of Order
No. R-1638 and to Rule 301.
San Juan County, New Mexico

Case No. 3479

BEFORE: Elvis A. Utz, Examiner



TRANSCRIPT OF HEARING

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SANTA FE , NEW MEXICO	
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SANTA FE,	NEW MEXICO

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NEW MEXICO OIL CONSERVATION COMMISSION

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EXAMINER HEARING
SANTA FE NEW MEXICO

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### NEW MEXICO OIL CONSERVATION COMMISSION

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SANTA FE , NEW MEXICO

### REGISTER

HEARING DATE	NOVEMBER 2, 1966 TIME	: 9 A.M.
NAME:	REPRESENTING:	LOCATION:
Fred A. Watson Ralph Gray	William A. a Edward R. Huckon	Artesia, N. Mex.
Roger L. Copple	Franklin, Aston + Fair Inc	Roswell, N. Mex.
John H Hoover	D A.	Roswell, h.m.
Bill Kasten	• •	. 11

MR. UTZ: Case 3479.

MR. HATCH: Case 3479. Application of Gulf Oil Corporation for an exception to Rule 8 of Order No. R-1638 and to Rule 301, San Juan County, New Mexico.

MR. KASTLER: Mr. Examiner, please. I am Bill Kastler from Roswell, New Mexico and attorney for Gulf Oil Corporation and our principal witness today is Mr. John H. Hoover.

MR. UTZ: You want to swear the witness?

(Whereupon the witness was sworn)

MR. UTZ: I presume that there are no other appearances since there is no one else here.

JOHN H. HOOVER, called by the applicant, having been first duly sworn, was examined and testified as follows:

### DIRECT EXAMINATION

BY MR. KASTLER:

- Q Mr. Hoover, will you please state your full name, your position with Gulf Oil Corporation and where you are situated?
- A John Hoover, District Production Engineer with Gulf Oil Corporation, Roswell, New Mexico.
- Q As a District Production Engineer, have you previously appeared before the New Mexico Oil Conservation Commission and stated your qualifications and given expert testimony?

A Yes, I have.



And are you thoroughly familiar with the oil factors involved in Case No. 3479, which is Gulf's application here?

MR. KASTLER: Mr. Examiner, are the witnesses Yes, sir. I am. qualifications satisfactory?

MR. UTZ: Yes, they are.

(By MR. KASTLER:) Will you please state what Gulf Q is seeking in this case?

The West Bisti-Lower Gallup Sand Unit as shown on Exhibit Number "1", is now operated by Gulf Oil Corporation having recently set restrictions on the oil producing company. This unit is classified as a pressure maintenance project, however, it is actually water flood. We desire to operate the unit under the state-wide rule 701 as a water flood and the reason for this, is we desire to eliminate the requirement for taking the monthly and annual gas-oil ratio test as an exception to state-wide Rule 301 and also to eliminate the filing of the pressure maintenance project operator's monthly report. We desire to report the monthly projection injection volume on the Form C 120. We feel that the pressure maintenance report serves no real purpose at this stage of the operations and it is a time-consuming report to prepare. We also feel that the gas production from the unit is so low that the taking of gasoil ratio tests are unnecessary for the unit operations and is



an unnecessary expense.

Q Is it true that a secondary recovery project classified as a water flood and operating under such rules would not require the gas-oil ratio tests, or the pressure maintenance project operators monthly report?

A Yes. That is correct. The commission can and does waive the gas-oil ratio tests for water flood projects where circumstances justify and the reporting of the production for a water flood project is on Form C 120.

Q The advertisement of this crase does not provide for a reclassification as a water flood. Do you have any comment in connection with this?

A Gulf's application did ask for the reclassification to the water flood, however it is true it was not advertised as such. We desire the water flood classification, however, if this is not acceptable, in my opinion the Commission could grant the relief requested for these reasons. First, the case is advertised for the elimination of the monthly and annual gas-oil ratio tests. Two, Rule 8 of Order R-1638 which is the order that approved this pressure maintenance project, provides that the reporting shall be on the pressure maintenance project operators monthly report, on a form prescribed by the Commission. If the Commission agrees with our proposal they could prescribe Form C 120 as the form in lieu of the pressure



1120

maintenance report.

What information is shown on Gulf's Exhibit Number "2"?

A Exhibit Number "2" are the performance curves for the West Besti Unit and the solid line near the upper middle is the oil production and it may be noted there that, this is plotted by months and by years, that this production is on a steady decline. The -- actually the production at the stage it is now could be classified in the stripper stage which would justify water flood classification. The average daily unit production for September, was eight hundred and sixty-seven barrels of oil per day. We have twenty-eight producing wells and dividing the production by the twenty-eight wells, gives us an average of thirty-one barrels per day per producing well. We have fifteen shut-in wells and if we divided the -- again the daily production by the producing, and the shut-in wells then we would come up with an average of twenty barrels per day. We also have twenty injection wells and again, dividing the eight hundred and sixty-seven by the total number of unit wells, being sixty-three, gives us an average production of thirteen and three-quarters barrels per day per well. If we divide the production of eight hundred and sixty-seven by forty-eight which is the number of producing and injection wells, the average production would be eighteen barrels per day per well. So, these wells are well down in their pro-



ducing capacity. Also shown on this Exhibit "2" which is pertinent to this case, is the lower curve which is plotted with the open circles and this is the average yas-oil ratio for the unit. And it may be noted there that for the years 1963 through September of '66 that the average gas-oil ratio for the unit has been between two and three hundred cubic feet per barrel. The limiting gas-oil ratio for this pool is two thousand cubic feet per barrel.

In view of the ratios averaging less than three hundred, we feel it is justification for the discontinuation of the gas-oil ratio testing.

During September of this year, the unit produced five thousand eight hundred and thirteen MCF of gas.

For the entire month?

For the entire month, yes. This averages one hundred and ninety-four MCF per day and I would like to point out that the top allowable in the West Bisti is a hundred and forty barrels and with a two thousand ratio, the maximum gas limit that an eighty acre proration unit could produce would be two hundred and eighty MCF per day. So, therefore, our entire unit produces, doesn't even produce close to what the top gas allowable would be for eighty acres. We feel that this is further justification that the gas-oil ratio testing is not needed.



243-6691 PHONE 256-

What is Exhibit Number "3" and what does it show? Q

Exhibit Number "3" is a reproduced copy of the Α pressure maintenance project operators monthly report. This is the report that was submitted in October and I only present it here just to show the form that is now required. I would like to point out one thing though on -- under column seven which is the twenty-four hour gas production in cubic feet that you get on the gas-oil ratio testing; that our ratios run down in the very low range, our maximum being on the second page for Well 127, only being forty-three thousand cubic feet. That is the maximum of any of our producing wells and that compares again with two hundred and eighty thousand which would be the maximum gas limit.

Now, what is Exhibit Number "4" and please state Q what its purpose is?

Exhibit Number "4" is a Form C 120 which we had A prepared to show how we would report the September production in lieu of the pressure maintenance report. This information is posted from the C 115 and this Form C 120 shows the monthly water injected, accumulative injection and injecting pressure by wells, and it also shows on the supplemental sheet the monthly oil, gas and water production by wells. We have shown on the last sheet of the supplemental sheet under the gas-oil ratio a total -- a total gas-oil ratio of two hundred and twenty-



DEPOSITIONS,

SPECIALIZING IN:

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seven cubic feet per barrel. This was obtained by dividing the gas production of five thousand eight hundred and thirteen MCF by the oil produced, and we don't normally report that gasoil ratio, however, we would do so if the Commission feels it necessary. It is so small that it means practically nothing.

Q Will you please explain your reasons for the Form C 120 in lieu of the pressure maintenance form?

A The pressure maintenance form requires approximately six hours to assemble and enter the information on the form.

Even after the form is prepared, it serves no purpose for operating the unit. The C 120 data are taken from the C 115 and can be posted to the prepared form in twenty minutes or a saving of approximately five and a half hours per month.

Rule 8 of Order R-1638 stipulates that the pressure maintenance form is due three days after the Northwest Unit allowable has been set. The C 115 is not printed and mailed at this time. Therefore, it is necessary to manually process the gauge ticket, to fill in the data required on this form.

Q You don't take separate gauges, just manually process this ticket?

A Yes, and by using the Form C 115 to prepare this C 120, we are able to utilize machine work instead of manual work.

Q What time, or how much time is required for the gas-



oil ratio tests which could be saved by doing away with these tests?

A We estimate that the pumper time for the gas-oil ratio test portion only, to be twenty-one hours per month.

The well tester time to calculate the charts, arrive at gas-oil ratio and make the reports is ten hours per month.

Q A total of thirty-one, therefore can you estimate a saving of approximately thirty-six and a half hours a month, that is thirty-one by this --

A Yes. Yes, that is thirty-six and a half hours per month which is the total for the preparing of the form, the doing of the gas-oil ratio testing and the calculating of the gas-oil ratios.

Q If the Commission should agree that the gas-oil ratio tests are not necessary here for the reasons you have stated and they would then eliminate this requirement would tests then ever be taken?

A We would still continue to take fluid tests on each well that -- at intervals that appear necessary. We feel that fluid tests are necessary for operational purposes such as keeping track of the production from each well to maintain the maximum production, to allocate production and then to indicate when possible remedial work is needed.

Q The Commission prepares a monthly oil proration



schedule which shows daily allowables for each well in the West Bisti Unit. Now suppose the pressure maintenance report is discontinued, how would you propose that the daily allowable then be shown?

A Well, the production as shown on Exhibit "2" is steadily declining and is going to go down, no where else but down. So, we would propose that we just leave the allowables for each well the same as now reported on the schedule until the production and allowable get too far out of balance.

If the Commission feels that it is advisable to do then, then the Form C 120 shows the wells monthly production, and the daily average for each well could be readily obtained. The Form C 115 can also be used since it shows the days produced.

The third method would set the allowable on a unit basis at some figure above the current production and adjust from time to time as necessary.

Rule 9 of Order R-1638 states that the Commission shall, upon review of the report, and after any adjustments deemed necessary, calculate the allowable for each well in the project and so forth.

As an example of how this allowable is set now, for September the assigned allowable was eight hundred and ninety-six barrels per day which was taken from the pressure mainten-



SPECIALIZING IN: DEPOSITIONS, HEARINGS, STATEMENTS, EXPERT TESTIMONY, DAILY COPY,

ance report. The net transfer allowable was two thousand eight hundred and sixty-seven barrels per day, making available allowable of three thousand seven hundred and sixty-three barrels per day. As we previously stated the average production for September was eight hundred and sixty-seven barrels per day, so it can be seen that the allowable for the unit presents very little problem.

Q Mr. Hoover, do you have anything else to add to this case?

A I would like to summarize our request. First we would like to reclassify the secondary recovery or secondary recovery project as a water flood, so that monthly and annual gas-oil ratio testing may be discontinued and the report of production may be made on Form C 120 instead of the present pressure maintenance project operators report.

Second, if the water flood classification is not acceptable, then we would propose that Rule 8 of Order R-1638 be revised to eliminate the requirement for the pressure maintenance report and the time element for submitting the report and authorize the discontinuance of the monthly and annual gasoil ratio tests. We would propose that Rule 8 of Order R-1638 be revised to read that "Each month the project operator shall report the amount of oil produced, the volume of fluid injected and the injection pressure on Form C 120."



SIMMS BLDG. • P.O. BOX 1092 • PHONE 243-6091 • ALBUQUERQUE, NEW MEXICO FIRST NATIONAL BANK EAST • PHONE 256-1294 • ALBUQUERQUE, NEW MEXICO We do ask that if the Commission would agree with us on this, we would appreciate being informed as soon as possible so that we can change this reporting in gas-oil testing for the month of November. The pressure maintenance report will be due three days after the state-wide hearing which would be on September -- November the 16th, which would make our report due on the 19th. So, we would like to, if possible, if this will meet with your approval, to be able to discontinue it this month.

Q Mr. Hoover, were Exhibits "1" through "4" prepared by you or at your direction or under your supervision?

A Exhibits "1", "2" and "4" were prepared by me or at my direction, however Exhibit number "3" is a reproduced copy of the pressure maintenance report which was sent to the Commission.

MR. KASTLER: At this time I would like to move that Exhibits "1" through "4" be offered and received into the evidence.

MR. UTZ: Without objection, Exhibits "l" through "4" will be entered into the record in this case.

MR. KASTLER: That concludes my case. The applicant rests.

### CROSS EXAMINATION

BY MR. UTZ:



STATE MEMIS. EXPERT TESTIMONY, DAILY COPY, CONVENTION ALBUQUERQUE, NEW MEXICO
ALBUQUERQUE, NEW MEXICO PHONE 256-1 BOX 10

243-6691

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Mr. Hoover, we are aware of the fact that you would Q like to make this conversion as soon as possible, however, it would appear that the cleanest way to do it would be to convert this thing, from a pressure maintenance to a water flood in which case it doesn't appear that advertisement will allow it. Now we could re-advertise the case, properly, and call it for a well -- whenever the next examiner hearing is, I guess it's already advertised isn't it?

MR. HATCH: I'm not sure on that.

(By MR. UTZ:) Well the next examiner hearing, whenever it will be.

Well Mr. Examiner, we -- the reason for reclassifying it as a water flood is because it accomplishes everything that we would like to do, such as eliminates gas-oil ratio testing, it allows us to use the Form C 120 and it does get the unit back to classification of more nearly what it is, however, our main objective is to eliminate the pressure maintenance report, and to allow -- and the testing, and of course our -- I really hate to see it advertised for eliminating the monthly testing, an exception to Rule 301 which is the annual testing, and if the Commission, without having to reclassify it as a water flood, could just revise the existing rule to eliminate the pressure maintenance project, why we would entertain that motion rather than to have another hearing.



this as a reclassified project to classify it as a water flood
and I feel that even under your state-wide rules where there is
and I feel that even under your state-wide rules where there is
a pressure maintenance project and it is defined as such, that
there is a stage beyond which it can't any longer fit the
definition of the pressure maintenance project and I think it
automatically lapses into secondary recovery project without
automatically lapses into secondary recovery project without
the need to declare it. And I think here, if you would order
the relief which we are seeking, namely the relief from
the relief which we are seeking, namely the relief from
the monthly form C 120 and, further if you were to relieve us
from the oil testing or the gas-oil ratio tests by an order
from the oil testing or the gas-oil ratio tests by an order
entered after this hearing, that we would have all of the
content of the reclassification.
The property of the reclassification of the relief that we would need regardless of the reclassification.

The property of the project to classify it as a water flood
that a pressure maintenance report and I think it
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in this project in all of the injection wells shown on Exhibit

Number "l"?

A Yes, water only and, I don't believe, well I'm not sure, this goes way back, but I question whether we have ever injected any gas. I think it's been strictly --

MR. KASTLER: It would have been B.A. and we don't have direct knowledge, but we don't think -- their order doesn't provide for the injection of any gas. Rule 704 states that -- or the first sentence "The operator of an injection project for



secondary recovery or pressure maintenance shall keep accurate records and shall report monthly to the Commission the amount of oil produced and the volume of fluids injected and the injection pressures on the Form C 120," so really we've only got a special rule which is R-1638 that provides that we should make this other report in lieu of C 120, and I think if that were adjusted appropriately, we would be in clover.

A Actually, Mr. Examiner --

MR. KASTLER: Without need for re-advertising, we raise no objection to it except that it is time-consuming.

MR. UTZ: Except that you want to quit right now making out your injection report.

MR. KASTLER: That's right. We want to quit right now and we don't want to come back and meet any possible adversary at the next hearing.

WITNESS: I might point out about quitting right now. Of course, this October report that we sent in, that was prepared in October. It covers September's production, average production and the Commission uses that to set the November allowable, which they have already done. So the November allowable is set from this report, so the next report, which would be due November the, roughly the 19th, would set the December allowable, so that it is thirty days down the line and the allowables that are set, with some corrections, there were



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some corrections to be made on the proration schedule which the Commission did send us a supplemental. Actually the allowable that they have set for November is more than adequate.

(By Mr. Utz) Well, you have no need for a water Q flood allowable or a project allowable at this time, do you?

No, we don't and I believe, in talking A to one of the Commissions district representatives I asked him particularly on a water flood where the production, of course, if it's going up and you have got to keep up with your allowable, why the operators make sure that they notify the Commission well in advance so to get enough to cover it, I said "Well what happens if it's going down?" He said, "Of course if it gets wasy out of balance, we'll notify you." He informed me that he periodically checks even a water flood and adjusts the allowable which comes out on the oil proration schedule, adjusts that periodically, maybe takes two months average and reduces it proportionally to keep it within producing range. So what we are asking for here now would be handled by the Commission just exactly as they are doing now for the water flood.

MR. KASTLER: This project has never peaked out as building up a peak of any kind, but being a maintenance project you started to maintain your production at one level and since that time it has dwindled so there is no way you



IMS BLDG. • P.O. BOX 1092 • PHONE 243-6691 • AIBUQUEROUE, NEW MEXICO ST NATIONAL BANK EAST • PHONE 256-1294 • AIBUQUERQUE, NEW MEXICO could increase the water projection and increase production, is there?

THE WITNESS: No, sir. The only thing we can do right now is lower the ameno work acid which will kick just a little bit to maintain a little less drop. The curve, you can see is a steady decline kind and follows all the way through even from the time the fluid was injected. It hasn't --

Q That is July of '60?

A Yes, sir. The injection looks like it started sometime around October, September or October and it arrested the decline, but it would kick like some water floods. So our relief that we are asking for is to eliminate the gas-oil ratio testing, both monthly and annually and the pressure maintenance report, and as far as reclassification, if that is a serious problem, we will forget that.

MR. KASTLER: For get the testing?

THE WITNESS: No, forget the reclassification.

MR. KASTLER: Oh, all right, we want relief from the testing, that is thirty-one of the thirty-six and a half hours.

WITNESS: The testing and the report.

MR. UTZ: We will take the case under advisement and will have to work out the manner in which we accomplish what you are requesting here.

WITNESS: Mr. Examiner, I would like to just point



out one thing, that the requirement of the pressure maintenance report under that Rule 8 of the order, states that " You should send this in three days after the allowable has been set with the data record thereon which is requested." Well that is the only place in the order which requires the gas-oil ratio testing monthly because that is part of the data that goes on there, so that is the reason it is not spelled out in the orders that you have to take them, it's just that you have to furnish this information why you have to take it, and that

Amendment of Rule 8 would suit us to Rule 8 --MR. KASTLER:

Yes, it would. If it will eliminate the a "T", wouldn't it? pressure maintenance report, that will automatically eliminate the necessity for the --

MR. KASTELR: Do you have that before you Mr. Utz?

MR. UTZ: No, I don't.

MR. KASTLER: This hearing was before you in 1960 and Rule 8 is this one right here and as John says, it is the only one in which this -- what?

WITNESS: This report, and it says " The report has to be filed with the information requested thereon." Well, it requests the data of the tests, twenty-four hour production, gas production, so it requests those --



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SPECIALIZING IN: DEPOSITIONS, HEARINGS, STATE MENTS. EXPERT TESTIMONY, DAILY COPY, CONVENTIONS

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(Whereupon an off the record discussion was held)
MR. UTZ: Well, we'll take the case under

advisement. The hearing is adjourned.



1120 SIMMS BLDG. • P.O. BOX 1092 • PHONE 243-669) • ALBUQUERQUE, NEW MEXICO 1203 FIRST NATIONAL BANK EAST • PHONE 256-1794 • ALBUQUERQUE, NEW MEXICO

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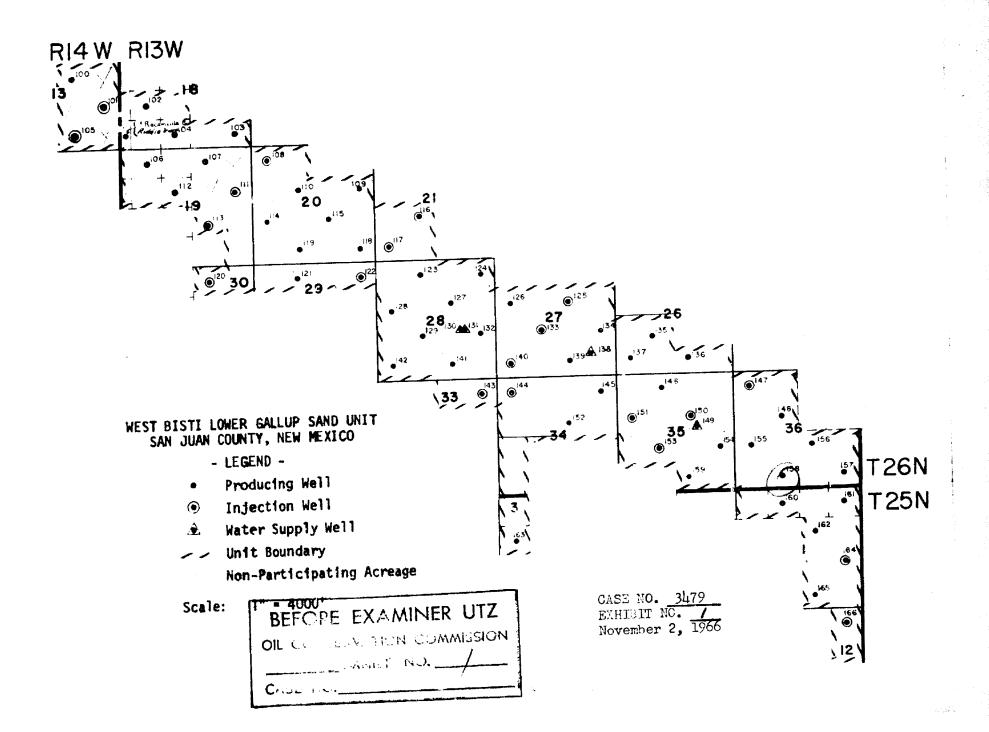
I, JERRY POTTS, Court Reporter, do hereby certify that the foregoing and attached transcript of proceedings before the New Mexico Oil Conservation Commission Examiner at Santa Fe, New Mexico, is a true and correct record to the best of my knowledge, skill and ability.

Court Reporter



I do hereby certify that the foregoing is a complete record of the proceedings in the Estation hearing of Case No 3 x 29 board by me on 1966

New Mexico Oil Conservation Commission



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