

CASE 1778: Application of OLSEN OILS, for exception of overproduction shutin provisions of R-52C, as emended by Order R-967, for 4 wells in Jalmat.

Case Mo. 1778 Replication, Transcript, Smill Exhibits Etc.

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El Paso Natural Gas Company

H. F. STEEN VICE PRESIDENT AND MANAGER OF PIPS LINE OPERATIONS

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El Paso, Texas

October 0, 1959

New Mexico Gil Conservation Commission 107 Mabry Hall, Capitol Building Santa Fe, New Mexico

Gentlemen:

# In re: Cases 1778 and 1779

In Case 1776 Olsen Oils, Int., isked for an exception to the overproduction shut-in provisions of Order R-520 for four wells located in Lea County, New Mexico. In Case 17.9 Jal Oil Company makes similar application for seven wells located in Lea County, New Mexico. Other operators have filed similar applications which have been heard by the Commission.

As purchaser from a large majority of the wells mentioned in the various applications this Company urges the Commission to approve exceptions which will prevent that many gas wells in southeastern New Mexico which have been produced for a number of years will continue to produce substantial quantities of gas if these wells can be operated without extensive shut-ins. Since the operators were operating in accordance with the Commislated, it is hoped the Commission will not penalize the operators by shutting in wells which may result in themproduced under the most efficient operating conditions. While the quantities of gas are small in comparison to the entire pool, the quantities are substantial to the operators and the cumulative effect of abandoning a numentire pool.

The Company is sure that the Commission will give every reasonable consideration to the operators

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IN THE MATCH OF THE HEARING CALLED ON THE OTH CONSERVATION CORRADS TOR OF HE CLATCOPPON THE PURPOSE OF CONSIDERING:

> CAGE NO. 1778 Urder No. R-1518

APPLICATION OF OLJEN OILS, INC. FOR AN ORDER PERMITTING FOUR OVERPRODUCED GAS MELLS IN THE JALMAT GAS FOOL, LEA COUNTY, NEW MEXICO TO COMPENSATE FOR SUCH OVERPRODUCTION AT A LESS OR RATE THAN CONPLETE ONUT-IN TH EXCEPTION TO ORDER NOS. R-SEC AND R-967

#### ORDER OF THE CALLISTON

#### BY THE COMPLET ION:

This cause came on for hearing at 9 piclock A.A. or october 7, 1959, at Santa Fe, New Mexico, before Clvis A. Utz, Examiner daly appointed by the Bil Conservation Sommission of New Mexico, hereinafter referred to as the "Commission," in accordance with Rule 1213 of the Commission Rules and Regulations.

NOW, on this <u>the</u> day of <u>the second</u>, 1959, the Commission, a quorum being present, having considered the application, the evidence adduced, and the recommendations of the Examiner, Elvis 1. Utz, 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 original application is Case 1770 was for the consideration of four wells, but that applicant requested at the hearing that two of the four wells we dismissed from further consideration.

(3) that the following-described gas wells in the Jalmat Gas Pool, Lea County, New Lexico, are more than six times overproduced and are therefore subject to complete shut-in under the provisions of traces Nos. R-520 and R-967:

S. N. Cooper Woll M. 1, SA/4 WE/8 of Section 25, Township 24 South, Mange 55 dast, Wars -2-Case No. 1776 Order Ho. 4-1516

> ainningham Well No. 3, NE/4 SE/4 of Section 50, Policki, 20 Sento, Range 37 Cast, M.M.

(4) That due to extreme liquid problems, the applicant seeks an order permitting the overproduction to be made up at a lesser rate that complete shut-in in order to preclude permanent injury to the subject wells.

(5) that the applicant should be permitted to produce each of the subject wells at a monthly rate equal to seventyfive percent of the cell's current monthly allowable or at a monthly rate equal to seventy-five percent of the cell's average monthly allowable for the precoding six month proration period, whichever is greater.

(d) That the cartailed rate of production to compensate for overproduction as hereinably prescribed should be adequate to prevent permanent injury to the well or producing formation.

(7) That an administrative procedure should be established wherely the becretary-Director of the Complexision may authorize the operator to compensate for overproduction at a lesser rate than that provided in this offer again a satisfactory showing that the rate preservice merein would result in permenent damage to one well add/or producing formation.

(6) That the secretary-Director should be authorized to order that tests be note to netermine whether the subject wells may be produced at a lesser rate than that prescribed by this order without permanent injury to the well and/or producing formation and, if the test results so indicate, the Secretary-Director should be authorized to order the production rate curtailed selow that herein prescribed.

(9) That any tests made to determine the minimum safe flow rate should be mitnessed by a representative of the Commission.

#### IT IS THEREFORE GREERED:

(1) That the operator we and the same is hereby authorized to compensate for the overproduction of the followingdescribed gas wells in the Jahat Gas Pool, Lea County, New mexico, by producing each of them at a monthly rate equal to seventy-five percent of the mell's current monthly allowable or at a monthly rate equal to seventy-five percent of the well's average monthly allowable for the proceeding six-month provation period, whichever is greater: -5-Case So. 1773 Order No. 1-1513

> S. R. Doper ell d. 1. 52/4 JE/4 of Section 23, Township 24 South, Range 36 Last, Mark

finningham cell No. 3, GE/4 GE/4 of Section 50, Township 25 would, Lange by Lest, M.C.

PROVIDED HEREVER. That an administrative procedure be and the same is hereby established wherein the becretary-Director is authorized to set the percentage of curtailment at a lesser rate when that benain prescribed upon a satisfactory showing by the operator that the rate for compensating for overproduction as set forth in this order would result in permanent lamage to the well and/or producing fornation.

PROVIDED FURTIER, That the secretary-Director be and the same is hereby authorized to order that tests be made to determine whether the subject cells may be produced at a lesser rate than that prescribed by this order without permanent injury to the cell and/or producing formation, and, if the test results so indicate, the secretary-Director is hereby authorized to order the production rate curtailed below that rate herebe preserviced.

<u>PROVIDED FURTHER</u>, That any tests made to determine the minimum safe flow rate shall be writnessed by a representative of the Commission.

(2) That the effective date of this order is dovember 1, 1959.

DONE at Lanta Fo, Haw here on the day and year hereinabove designated.

STATE OF NO CONCLUS VIL CONSERVATION COMMISSION

John BURHOUCHE, Charman

venna

LURRAY E. LURGAN, Jember



. . . . alm., St., Spacer a secretary

### OIL CONSERVATION COMMISSION P. O. BOX 871 SANTA FE, NEW MEXICO

October 30, 1959

Mr. W. D. Girand Box 1445 Hobbs, New Mexico

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Dear Mr. Girand

On behalf of your clients, Olsen Oils, Inc. and Jal Oil Company, we enclose two copies of Order No. R-1518 in Case 1778 and two copies of Order R-1519 in Case 1779 issued by the Oil Conservation Commission on October 30, 1959.

Very truly yours,

A. L. PORTER, Jr. Secretary-Director

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Enclosures: (4)

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING ROBBS, NEW MEXICO

September 16, 1959.

TELEPHONE: EXPRESS 3-9115 Post Office Box 1445

Oil Conservation Commission, State Capitol, Santa Fe, New Mexico.

Attention: Mr. A. L. Porter.

RE: JAL ØIL COMPANY WATKINS NO. 2, NE/4 NE/4 SECTION 35, TOWNSHIP 24 SOUTH, RANGE 36 EAST, JALMAT POOL.

Gentlemen:

I am enclosing original and two copies of Application of Jal Oil Company for a relief from sout in action on the part of the Commission covering the above captioned well. This Application seeks exception to the protation Order covering gas production in the Jalmat Pool.

Please advise the case number assigned to this Application, and if possible, applicant would like to have this case set for the October 7th examiner hearing since the cases heretofore filed by this operator have been postponed to the October 7th hearing date.

Very truly yours,

GIRAND & STOUT,

BY:

G/dk Encl. cc: Oil Conservation Commission, Hobbs, New Mexico. Attention: Mr. Randall Montgomery.

> Jal Oil Company, Box 1744, Midland, Texas.

W. D. GIRAND LOWELL STOUT ROBERT F PYATT

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## BEFORE THE OTH CONSERVATION COMMISSION,

STATE OF NAMEENTOO.

APPLICATION OF JAL OIL COLPANY FOR AN ) EXCEPTION TO RULE 10, ORDER GO. K-907 ) FOR THE ASSIGNMENT OF EITEIMUE ALLOWABLE ) TO TTS MATKINS GO. 2, LOCATED IN THE ) NE/4 NE/4 SECTION 35, TOWNSHIP 24 SOUTH, ) RANGE 36 EAST, JALMAT GAS POOL, AND FOR ) RELIEF FROM A THREATENED SHOT IN. )

CESI NO.

COMES NOW the Jal Oll Company, a New Mexico corporation, with principal office in Jat, Lea County, New Mexico, and files this its Application for an exception to Aule 15, Order No. K-557 and for the Commission to assign a minimum allowable to its watkins No. 2 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Watkins No. 2 located in the Wil/4 Ni/4 Section 35, Township 24 South, Kange 30 East, in the Jalmat Gas Pool.

2. That the Matkins No. 2 has previously been designated as a marginal gas well and has been operated under said classification.

3. applicant would show that the Watkins No. 2 is a flowing well. However, whenever the well is shut in, water accumulates in such quanticles as to will the well. The operator is required to swap off the water before production can be obtained. It is applicant's opinion that prolonged shut is periods will result in a killing of the well and making it incapable of producing gas. It is antheipated that when the present encroachment of the water, that the applicant will be required to resort to mechanical methods in order to continue the production of gas from this well. Each and every time the well is shut in the operator runs the risk of losing the well to the encroaching water.

4. Applicant would show that after the **classification** of said well as a marginal well the 31 Paso Ratural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the 31 Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep From over-producing. J. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the latking No. 2 well and that if applicant is required to shut in said well for any period of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

b. Applicant stares that unless it is allowed to continually produce gas from said well, that the encroaching water will Kill said well. That in this connection applicant in the past has been able to swab the well back to life after periods of shut down. However, applicant feels that this is very hazardous and should be avoided, if possible, do prevent a waste of the gas attributable to this well and in order to protect the correlative rights of the operator.

7. Applicant would further show the Commission that on January 25, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pool. That on July 1, 1958, the Jalmat Gas Pool protation formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the net protation formula. That, thereafter, in the month of June, 1959, the Johanission reclassified approximately 115 gas wells, including applicant's and advised applicant that said datkins No. 2 was no longer a marginal gas well and had over-produced more than six times its allowable. Thereafter, by Memo No. 13-55, the Commission notified all operators that unless Applications were filed scening relief from this Commission, all of the 118 gas wells would be shut in as of September 1, 1959. That Great No. 4-907 provides under Rule o-C as follows:

> "The Commission may assign minimum allowables in order to prevent the premature abandonment of wells."

The Order further provides, under Rule 10:

"The Commission way allow over-production to be made up at a lesser rate than would be the case if the well ware completely shut in upon a showing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

8. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce the Watkins No. 2 in sufficient amount to avoid the encrodorment of water and the killing of the well.

(2) That the Commission fix a minimum allowable for the Watkins No. 2 gas well located in the Jalmat Gas Pool as provided by Rule 6 of Order No. 957.

(3) And, in the alternative that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas constantly from said well.

GIRAND & STOUT,

BY

(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, MEW MEXICO.

#### BEFORE THE OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN EXCEPTION TO RULE 10 OF ORDER NO. R-907 AND FOR THE ASSIGNMENT OF MINIMUM ALLOWABLE TO ITS EVA OWENS NO. 1 GAS WELL LOCATED TH THE SW/4 OF SECTION 21, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT GAS POOL, AND FOR RELIEF FROM A THREATENED SHUT IN.

CASE NO.

COMES NOW the Jal Oil Company, a New Hoxico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Eva Owens No. 1 and for cause would snow:

1. Applicant is the owner and operator of the gas well known as the Eva Owens No. 1 located in the SW/4 of Section 21, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

2. That the Eva Owens No. 1 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large

quantities of water and production is obtained by the use of a free floating piston and without this method of production being used, the wall would be incapable of producing gas due to the encroachment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

4. Applicant would show that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Eva Owens No. 1 well and that if applicant is required to shut in said well for any period of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

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6. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Eva Owens No. 1 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seaking relief from this

Commission, all of the He wells would be shut in as or September 1, 1952. That Greer no. R-307 provides under Rule o-d as follows:

> The commission may assign minimum allowables in order to prevent the predature abandonment of valls."

The Green Eurider provides, under Kule 10:

The commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stabilize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of bas that will be produced under such production method.

6. The Commission being charged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared polloy, the Coundission should enter an Order covering applicant's twa Owens Ro. 1 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong and its interpretation of the meaning and intent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard tixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, evaluens No. 1, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WALREFORE, applicant prays:

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(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobos Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable
for the Eva Owens No. 1 gas well located in the Jalmat Gas
Pool as provided by Rule c of Order R-907.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

(ATTONNEY'S FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, NEW MEXICO.

### BEFORE T. J. OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN EXCEPTION TO RULE IJ OF ORDER NO. R-907 AND FOR THE ASSIGNMENT OF MINIMUM ALLOWABLE TO ITS DYER #3 GAS WELL LOCATED IN THE SELNED OF SECTION 31, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT GAS POOL, AND FOR RELIEF FROM A THREATENED SHUT IN.

CASE NO.

COMES NOW the Jai Oli Company, a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-907 and for the Commission to assign a minimum allowable to its Dyer #3 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Dyer #3 located in the SE4NE4 of Section 31, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

2. That the Dyer  $\frac{1}{2}3$  has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large quantities of water and production is obtained by the use of a free floating piscon and without this method of production being used, the well would be incapable of producing gas due to the encroadment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

4. Applicant would snow coat after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

6. Applicant would further show the Commission that on January 29, 1958, the Commission entered its under No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Dyer #3 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission, all of the 118 wells would be shut in as of September 1, 1959. That Order No. R-967 provides under Rule 6-C as follows:

"The Commission may assign minimum allowables in order to prevent the premature abandonment of wells".

The Order Larther provides, under Rule 10:

The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well.

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stabilize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

6. The Commission being charged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In fight of its declared policy, the Commission should enter an Order covering applicant's Dyer #3 well autnorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 5, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, Dyer #3, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable for the Dyer #3 gas well located in the Jaimat Gas Pool as provided by Rule 0 of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the metnods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

(ATTORNEYS FOR APPLICANT)

G/bc

W. D. GIRAND LOWELL STOUT ROBERT F. PYATT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

August 27, 1959.

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TELEPHONE: EXPRESE 3-9116 Post Office Box 1445

Oil Conservation Commission, Santa Fe, New Maxico.

Attention: Mr. A. L. Porter.

IN RE: JAL OIL COMPANY - JENKINS #2 GAS WELL, NE45W% OF SECTION 29, TOWNSHIP 25 SOUTH, RANGE 37 EAST.

Gentlemen:

Enclosed you will find original and two copies of Application of Jal Oil Company for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very cruly yours,

GIRAND & STOUT,

ΒY

G/bc Encls.

cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Jal Oil Company, 2. O. Box 1744, Midland, Texas.

#### BEFORE THE OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN ) EXCEPTION TO RULE 10 OF ORDER NO. R-957) AND FOR THE ASSIGNMENT OF MINIMUM ) ALLOWABLE TO ITS JENKINS #2 GAS WELL ) LOCATED IN THE NEZSWE OF SECTION 29, ) TOWNSHIP 25 SOUTH, RANGE 37 LAST, ) JALMAT GAS POOL, AND FOR RELIEF FROM ) A THREATENED SHUT IN. )

CASE NO.

COMES NOW the Jal Oil Company, a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Jenkins #2 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Jenkins #2 located in the NE<sub>4</sub>SW<sub>4</sub> of Succion 29, Township 25 South, Range 37 East, in the Jalmar Gas Pool.

2. That the Jenkins #2 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large quantities of water and production is obtained by the use of a pump jack and without this method of production being used, the well would be incapable of producing gas due to the encroachment of the water.

4. Applicant would show that after the classification of said well as a marginal well, the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso Line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. Buring recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the Jankins #2 gas well and that if applicant is required to shut in said well for any period of time, the encroacament of the water will destroy the well and require the applicant to prematurely abandon.

J. Epplicant would furener snow the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Urger has been under attack of the Courts in the State of New Maxico by many operators within the affected gas pools. That on July 1, 1958, the Jalmar Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Jenkins #2 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission, all of the 118 wells would be shut in as of September 1, 1959. That Order No. R-yo7 provides under Rule b-C as follows:

The Commission may assign minimum allowables in order to prevent the premature abandonment of wells.

The Order further provides, under Rule 10:

The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well.

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being charged with the conservation of oil and gas the the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's Jenkins #2 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary Loc this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quotea Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. Applicant believes am so states to the Commission that the methods employed by it in the producing of gas from its well, Jenkins #2, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable for the Jenkins #2 Gas Well located in the Jalmat Gas Pool as provided by Rule 6 of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & (ATTORNEYS FOR APPLICANT)

G/bc

Sec. 1

#### DOCKET: EXAMINER REARING SEPTEMBER 50, 1959

Oil Conservation Commission - 9 a.m., Mabry Hall, State Capitol, Santa Fe, New Metrice

The following cases will be heard before Daniel S. Nutter, Examiner. or A. L. Porter, Jr., Secretary-Director.

#### CONTINUED CASE

CASE 1739: Application of Shell Oil Company for approval of a unit agreemnt. Applicant, in the prove-scyled cause, seeks an order approving its Hersnaw Deep Unit Agreement comprising 4824 acres, more or less, of Federal and State lands in Township 14 South, Ranges 30 and 31 East, Eddy County, New Mexico.

#### NE - CASES

CASE 1760: Application of The Atlantic Refining Company for an accomatic custody transfer system and for permission to produce more than 16 wells into a common tank battery. Applicant, in the above-styled cause, seeks an order authorizing it to install an automatic custody transfer system to handle the production from all Herseshbe-Galler oil wells on its Navajo "B" Lease comprising certain accesse it Township 31 North, Range 16 West, San Juan County, New Mexico.

1

- CASE 1761: Application of Stanton Oil Company, Lta., by a pilot water flood project. Applicant, in the above-styled cause, seers an order authorizing it to institute a pilot water flood project in the Tonkey Track Pool in Eddy County, New Mexico, by the injection of water into the Queen formation through four wells located it Section 34, Township 18 South, Range 29 East.
- CASE 1762: Application of Newmont Oil Company for an indication water injection well location. Applicant, in the above-styled radset seeks an order authorizing is to reopen and utilize for water injection a well located on an uporthodox location at a point 1620 feet from the North line and 1020 feet from the West line of Section 32, Township 16 South, Range 31 East, Square Lake Pool, Eddy County, New Mexico.
- CASE 1763: Application of Southwestern Hydrocarbon Company for an order abolishing the Sawyer-San Andres and South Sawyer-San Andres <u>Oil</u> Pools in Lea County, New Mexico, and creating the Sawyer-San Andres <u>Gas</u> Pool; or in the alternative for an order extending the horizontal limits of the South Sawyer-San Andres Oil Pool to include the NE/4 of Section 6, the N/2 of Section 5 and the NW/4 of Section 4, Township 10 South, Range 38 East, Lea County, New Mexico, and removing all gas-oil ratio limitations for wells in said pool; or in the alternative for an order combining the Sawyer-San Andres and the South Sawyer-San Andres Oil Pools, as well as the intervening arreage, and removing all gas-oil ratio limitations for such pool.
- CASE 1764: Application of Standard Gil Company of Texas for an unorthodox gas well location. Applicant, in the above-styled cause, seeks an order authorizing an unorthodox gas well location in the Atoka-Pennsylvanina Gas Pool, at a point 1850 feet from the South line and 1650 feet from the East line of Section 14, Township 18 South, Range 26 East, Eddy County, New Mexico.
Docket No. 33-59 -2-

- CASE 1765: Application of The Ohio Oil Company for a salt water disposal welk. Applicant, in the above-styled cause, seeks an order authorizing the disposal of produced salt water into the Lower San Andres formation through its State B-4286 "A" Well No. 2, located in Unit F, Section 2, Township 17 South, Range 36 East, Lea County, New Mexico. The proposed injection interval is from 5725 feet to 5968 feet.
- CASE 1766: Application of Northwest Production Corporation for an oil-oil dual completion. Applicant, in the above-styled cause, seeks an order authorizing the dual completion of its "S" Well No. 16-2, located in the SW/4 SW/4 of Section 2, Township 24 North, Range 4 West, Rio Atriba County, New Mexico, in such a mannet as to produce oil from an undesignated Gallup oil pool and to produce oil from an undesignated Dakota oil pool through parallel strings of tubing.
- CASE 1767: Application of El Paso Namural Gas Products Company for permission to produce more than 16 weeks in a common tank battery. Applicant, in the above-styled cause, seeks an order authorizing the production of a maximum of 35 wells in the Horseshoe-Gallup Oil Pool into a common tank battery. Said wells are located on applicant's Horseshoe Ute Lease comprising portions of Sections 27, 28, 33 and 34, Township 31 North, Range 16 West, San Juan County. New Mexico.
- <u>CASE 1768</u>: Application of T. F. Hodge for the rededication of acreage assigned to three oil wells in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order rededicating the acreage assigned to three oil wells on his Mary E. Wills Lease, Section 33, Township 26 South, Range 37 East, Jalmat Gas Pool, Lea County, New Mexico. Applicant proposes to dedicate 40 acres to each of the three wells; said 40-acre units not to comprise a quarterquarter section or legal subdivision.
- CASE 1769: Application of Pan American Petroleum Corporation for approval of a unit agreement. Applicant, in the above-styled cause, seeks an order approving its Northeast Hogback Unit Agreement, comprising 10,572 acres, more or less, in Township 30 North, Range 16 West, San Juan County, New Mexico.
- CASE 1770: Application of Pan American Petroleum Corporation for approval of a lease automatic custody transfer system. Applicant, in the above-styled cause, seeks an order authorizing the automatic custody transfer of oil produced from its Lois Wengerd Lease in Sections 23 and 24, Township 12 South, Range 37 East, Gladiola-Devonian Pool, Lea County, New Mexico.
- CASE 1771: Application of Pan American Petroleum Corporation for approval of a lease automatic custody transfer system. Applicant, in the above-styled cause, seeks an order authorizing the automatic custody transfer of oil produced from its USA Malco Refinery "F" Lease, Section 1, Township 18 South, Range 27 East, Empire-Abo Pool, Eddy County, New Mexico.
- CASE 1772: Application of Pan American Petroleum Corporation for approval of an automatic custody transfer system for four state leases in the Empire-Abo Pool, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks an order amending Order No. R-1292 to provide for automatic custody transfer of cil commingled thereunder.

Docket No. 33-59

CASE 1773: Application of Pan American Petroleum Corporation for approval of two automatic custody transfer systems for seven federal leases in the umpire-Abo Pool, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks an order amending Order No. R-1399 to provide for automatic custody transfer of oil produced into the two commingled tank batteries authorized therein.

- CASE 1774: Application of Continental Oil Company for a non-standard gas unit. Applicant, in the above-styled cause, seeks the establishment of a 160-acre nonstandard gas unit in an undesignated Tubb gas pool consisting of the E/2 NW/4 and the W/2 NE/4 of Section 15, Township 20 South, Range 37 East, Lea County, New Mexico, asid wit to be dedicated to the applicant's Britt B-15 No. 10 Well, located in the SW/4 NE/4 of said Section 15.
- CASE 1775: Application of Continental Oil Company for a non-standard gas unit. Applicant, in the above-styled cause, seeks the establishment of a 160-acre nonstandard gas unit in an undesignated Tubb gas pool consisting of the E/2 SE/4 of Section 15 and the W/2 SW/4 of Section 14, all in Township 20 South, Range 37 East, Lea County, New Mexico, said unit to be dedicated to the applicant's SEMU Well No. 70, located in the NW/4 SW/4 of said Section 15.

CASE 1776: Application of Continental Gil Company for an exception to the overproduction shut-in provisions of Order R-520, as amended by Order R-967, for nine wells in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order allowing the following-described wells in the Jalmat Gas Pool to compensate for their overproduced status without being completely shut-in in order to prevent possible waste: Ascarate D-24 Well No. 1, Unit J, Section 24, T-25-S, R-36-E, Danciger A-8 Well No. 2, Unit P, Section 8, T-23-S, R-36-E, Jack A-20 Well No. 4, Unit G, Section 20, T-24-S, R-37-E, Jack A-29 Well No. 3, Unit H, Section 29, T-24-S, R-37-E, Meyer A-29 Well No. 1, Unit O, Section 29, T-22-S, R-36-E, Meyer B-28 Well No. 1, Unit E, Section 28, T-22-S, R-36-E, State A-32 Well No. 4, Unit F, Section 32, T-22-S, R-36-E, Stevens A-34 Well No. 1, Unit E, Section 34, T-23-S, R-36-E, Wells B-1 Well No. 1, Unit A, Section 1, T-25-S, R-36-E, all in Lea County, New Mexico.

CASE 1777: Application of El Paso Natural Gas Company for an exception to the overproduction shut-in provisions of Order R-520, as amended by Order R-967, for two wells in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order allowing its E. J. Wells Lease Well No. 13, Unit L, Section 5, and its Wells B-4 Lease Well No. 1, Unit D, Section 4, both in Township 25 South, Range 37 East, Jalmat Gas Pool, Lea County, New Mexico, to compensate for their overproduced status without being completely shut-in in order to prevent possible waste.

CASE 1778: Application of Olsen Oils, Inc., for an exception to the overproduction shut-in provisions of Order R-520, as amended by Order R-967, for four wells in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order allowing the following-described wells in the Jalmat Gas Pool to compensate for their overproduced status without being completely shut-in in order to prevent possible waste: Cooper B Well No. 2, NE/4 NW/4 of Section 14, T-24-S, R-36-E, Myers B Well No. 1, SE/4 NW/4 of Section 13, T-24-S, R-36-E, S. R. Cooper Well No. 1, SE/4 NW/4 of Section 23, T-24-S, R-36-E, Winningham Well No. 3, NE/4 SE/4 of Section 30, T-25-S, R-37-E, all in Lea County, New Mexico.

Docket	No.	33-59	
-4-			

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CASE 1779:	Application of Jal Oil Company for an exception to the overproduction shut-
	in provisions of Order R-520, as amended by Order R-967, for four wells in
٠ <u>.</u>	the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order
	allowing the following-described wells in the Jalmat Gas Pool to compensate
	for their overproduced status without being completely shut-in in order to
	prevent possible weste:
	Legal Well No. 2, NE/4 SE/4 of Section 21,
	Dyer Well No. 3, SE/4 NE/4 of Section 31,
н. П	Jenkins Well No. 2, NE/4/SN/4 of Section 29,
ζ.	
1	Ropollo Well No. 1, SN/4 NN/4 of Section 28,
	all in Township 25 South, Range 37 East, Lea County, New Mexico.

CASE 1780: Application of Husky Oil Company for an exception to the overproduction shut-in provisions of Order R-520, as amended by Order R-967, for one well in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order allowing its Montecito Woolworth Well No. 2, Unit M, Section 33, Township 24 South, Range 37 East, Jalmat Gas Pool, Lea County, New Mexico, to compensate for its overproduced status without being completely shut-in in order to prevent possible waste.

CASE 1781: Application of Texaco, Inc. for permission to continue producing an overproduced Jalmat gas well at a lesser rate. Applicant, in the above-styled cause, seeks an order authorizing it to produce its C. C. Fristoe (b) NCT-4 Well No. 2, Unit M, Section 31, Township 24 South, Range 37 East, Jalmat Gas Pool, Lea County, New Mexico, at a maximum rate of 2500 MCF per month for lease use until over production has been compensated for. W. D. GIRAND LOWELL STOUT ROBERT F PYATT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

TELEPHONE: Express 3-9116 Post Office Box 1445

August 27, 1959.

Oil Conservation Commission, Santa Fe, New Maxico.

Attention: Mr. B. L. Porter.

IN RE: JAL OIL COMPANY - LEGAL #2 GAS WELL LOCATED IN THE NELSES OF SECTION 21, TOWNSHIP 35 SOUTH, RANGE 37 EAST.

Gentlemen:

G/bc

We are enclosing herewith original and two copies of Application of Jal Oil Company for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT,

BY:

Encls. cc: Oil Conservation Commission, Hobbs, New Maxico. (Attention: Mr. Randall Montgomery) Jal Oil Company, 2. O. Box 1744, Midland, Texas. BEFORE THE OIL CONSERVATION COMMISSION,

### STATE OF NEW MEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN ) EXCEPTION TO RULE 10 OF ORDER NO. R-957 ) AND FOR THE ASSIGNMENT OF MINIMUM ) ALLOWABLE TO ITS LEGAL #2 GAS WELL ) LOCATED IN THE NEWSEL OF SECTION 21, ) TOWNSHIP 35 SOUTH, RANGE 37 EAST, ) JALMAT GAS POOL AND FOR RELIEF FROM ) A THREATENED SHUT IN. )

Case NO.\_\_\_\_

COMES NOW the Jal Oil Company, a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Legal #2 and for cause would snow:

 Applicant is the owner and operator of the gas well known as the Legal #2 located in the NE43E4 of Section 21, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

2. That the Legal #2 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large quantities of water and production is obtained by the use of a free floating piston and without this method of production being used, the well would be incapable of producing gas due to the encroachment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to life the continuous increasing flow of water and produce gas from said well.

4. Applicant would show that after the classification of said well as a marginal well the El Paso Latural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Legal #2 well and that if applicant is required to shut in said well for any period of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

6. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised application that said Legal #2 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this

Commission, all of the flo wells would be shut in as of September 1, 1959. That Graer No. R-907 provides under Rule o-C as follows:

> The Commission may assign minimum allowables in order to prevent the premature abandonment of wells.

The Order further provides, under Rule 10:

"The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a showing at public nearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. hpplicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being enarged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's Legal #2 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, Legal #2, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced pased on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable
 for the Legal #2 gas well located in the Jalmat Gas
 Pool as provided by Rule 6 of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas chrough the methods presently employed to such an extent as to maintain said well as a gas well.

GIR NO & STOUL

(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, MEN MEXICO.

G/bc

GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

W. D. GIRAND

t

Suptember 10, 1959.

TELEPHONE: Express 3-9116 Post Office Box 144\*

542479

Oil Conservation Commission, State Capitol, Santa Fe, New Mexico.

Attention: Mr. A. L. Porter.

RE: JAL OIL COMPANY, EVA OWENS NO. 1, SW/4 SECTION 21, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT POOL.

Gentlemen:

I am enclosing original and two copies of Application of Jal Oil Company for a relief from shut in action on the part of the Commission covering the above captioned well. This Application seeks exception to the provation Order covering gas production in the Jalmat Pool.

Please advise the case number assigned to this Application, and if possible, applicant would like to have this case set for the October 7th examiner hearing since the cases heretofore filed by this operator have been postponed to the October 7th hearing date.

Very truly yours,

GIRAND & STOUT,

During

G/dk Encl.

cc: Oil Conservation Commission, Hobbs, New Mexico. Attention: Mr. Randall Montgomery.

> Jal Oíl Company, Box 1744, Midland, Texas.

GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

W. D. GIRAND LOWELL STOUT

September 16, 1959.

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Oil Conservation Commission, State Capitol Building, Santa Fe, New Mexico.

Attention: Mr. S. L. Porter.

KE: JAL OLL COMPANY APPLICATIONS COVERING LEGAL NO. 2, JENKINS NO. 2, APOLLO NO. 1, AND DYER NO. 3.

Gentlemen:

The above cases have been set for examiner hearing on September 30, 1959. The applicant respectfully requests that these Applications be re-set for the examiner hearing set for October 7, 1959. In connection with this request the writer advises that a prior commitment requires the write op in Amarillo, Texas, on October 1st and that the case set for October 1st involves many parties other than the applicant's attorney and numerous witnesses have been notified and their plans made for attendance at that time. It will be impossible to obtain a continuance of the Amarillo case without a delay of several months, resulting in considerable expense.

The writer is filing three additional cases on benalf of the Jal Oil Company which should be considered along with the existing cases pending.

Please consider this letter a request for a continuance of the above cases until October 7, 1959.

Very cruly yours,

GIRAND & STOUT,

cc: Oil Conservation Lommission, N Hobbs, New Maxico. (Attention: Mr. Randall Montgomery)

) Jal Oil Company, Box 1744, Hobbs, New Muxico.

G/dk

W. D. GIRAND

GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBDS: NEW MEXICO

September 10, 1959.

Oil Conservation Commission, State Capitol, Santa Fe, New Mexico.

Attention: Mr. a. L. Porter.

RE: JAL OIL COMPANY JENKINS NO. 1, SW/4 SECTION 29, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT 2001.

C. 19

EXPRESS 3-9116

ORT OFFICE BOX 1

Gentlemen:

I am enclosing original and two copies of Application of Jal Oil Company for a relief from shut in action on the part of the Commission covering the above captioned well. This Application seeks exception to the protation Order covering gas production in the Jalmat Pool.

Please advise the case number assigned to this Application, and if possible, applicant would like to have this case set for the October 7th examiner hearing since the cases heretofore filed by this operator have been postponed to the October 7th hearing date.

Very truly yours,

GIRAND & STOUT,

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G/dk Encl. cc: Oi

cc: Oil Conservation Commission, Hobbs, New Mexico. Attention: Mr. Randall Montgomery.

> Jal Oil Company, Box 1744, Midland, Texas.

## DEFORE THE OIL CONSERVATION CORRESSION.

STATE OF NEW HEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN EXCEPTION TO KULE 10 OF ORDER NO. R-957 FOR THE ASSIGNMENT OF MINIMUM ALLOWABLE TO ITS JENKINS NO. 1 GAS WELL LUCATED IN THE SW/4 OF SECTION 25, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT ) GAS POOL, AND FOR RELIEF FROM A THREATENED SHUT IN.

CASE 1.0.

)

COMES NOW the Jal Oil Company, a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Jenkins No. 1 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Jenkins No. 1 located in the SW/4 of Section 29, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

2. That the Jenkins No. 1 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large

quantities of water and production is obtained by the use of a free floating piscon and without this method of production being used, the well would be incapable of producing gas due to the encroachment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

A.

4. Applicant would show that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Jenkins ko. I well and that if applicant is required to shut in said well for any puriod of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

6. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool provation formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Jenkins No. 1 was no longer a marginal gas well and had overproduced more than six times its allowable. Increafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seaking relief from this

Commission, all of the 118 wells would be shut in as of September 1, 1959. That Green No. R-967 provides under Rule o-C as follows:

> "The Commission may assign minimum allowables in order to prevent the premature abandonment of wells."

The Order Further provides, under Rule 10:

"The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a showing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stabilize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of ges that will be produced under such production method.

8. The Countission being charbed with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's Jenkins No. 1 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its guoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period wnereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard

fixed allocables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, Jenkins No. 1, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and vater and to establish vitchin said period insofar as it is capable of doing so, the minimum amount or vater required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granding anto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced pased on production reports should it be determined that the water is encroaching at a preasor rate than is established through the 120 day testing period.

(3) That the Commission with a minimum allowable
 for the Jankins No. 1 gas well located in the Jalmat Gas
 Pool as provided by Rule 6 of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

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(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, NEW MEXICO. W. D. GIRAND LOWELL STOUT ROBERT F PYATT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO • 3

August 27, 1959.

TELEPHONE: CAPPERS 3-9116 Post Office Box 1445

Oil Conservation Commission, Santa Fe, New Mexico.

Attention: Mr. A. L. Porter.

IN RE: JAL OIL COMPANY - ROPOLLO #1 GAS WELL LOCATED IN THE SW2NW2 OF SECTION 28, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT POOL.

Gentlemen:

We are enclosing herewith original and two copies of Application of Jal 011 Company for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT,

BY

G/bc Encls.

cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Jal Oil Company, P. O. Box 1744, Midland, Texas.

# BEFORE THE OIL CONSERVATION COMMISSION,

#### STATE OF NEW MEXICO.

APPLICATION OF JAL OIL COMPANY FOR AN ) EXCEPTION TO RULE 10 OF ORDER NO. R-957) AND FOR THE ASSIGNMENT OF MINIMUM ) ALLOWABLE TO ITS ROPOLLO #1 GAS WELL ) LOCATED IN THE SWENWE OF SECTION 28, ) TOWNSHIP 25 SOUTH, RANGE 37 EAST, ) JALMAT GAS POOL, AND FOR RELIEF FROM ) A THREATENED SHUT IN. )

CASE NO.

COMES NOW the Jal Oil Company, a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Ropollo #1 and for cause would show:

 Applicant is the owner and operator of the gas well known as the Ropollo #1 located in the SW<sup>1</sup><sub>2</sub>NW<sup>1</sup><sub>4</sub> of Section 28, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

 That the Ropollo #1 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas trom said well, the operator is required to produce large

quantities of water and production is obtained by the use of a pump jack and without this method of production being used, the well would be incapable of producing gas que to the encroacement of the water.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the Ropollo #1 gas well and that if applicant is required to shut in said well for any period of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

6. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Muxico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Ropollo #1 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission, all of the 118 wells would be shut in as of September 1, 1959. That Order No. R-967 provides under Rule 6-C as follows:

The Commission may assign minimum allowables in order to prevent the premature abandonment of wells.

The Urder further provides, under Rule 10:

"The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being charged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's Ropollo #1 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and incent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, nas seen fit in the nancling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, Ropollo #1, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater rate than is astablished through the 120 day testing period.

(3) That the Commission fix a minimum allowable
for the Ropollo %1 gas well located in the Jalmat Gas
Pool as provided by Rule o of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

BY (ATTORNEYS FOR APPL ICANT)

G/bc

BEFORE THE CIL CONSERVATION COMMISSION SANTA FE, HEN MENICO

IN THE MATTER OF: CASES 1776, 1770

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TRA SCRIPT OF HEARING

SEPTEMBER 30, 1959

	DEPON TAB OTI CONSELVATION COMMISSION SIMPTA PLI, REM MUNICO DEPTEMBE POIL RENO	
	<b> </b>	i
I. · ·	THE MATTER OF:	
CASI	E 1. 3 Application of Clsen Oils, Inc., For an exception to the overproduction shuthin provisions of Order 3-520, as amended by Order 3-657, for four wells in the Jalmar Gas Pool. Applicant, in the above-stated cause, seeks an order allowing the following-described wells in the Jalmar Gas Pool to compensate for their over-produced status without being completely shuthin in order to prevent possible waste: Geoper B Well Mo. 2, TE/h TM/W of Section 14, T-24-S. P-36-N. Myers B Well Mo. 7. SE/h TM/k of Section 13, T-24-S, D-36-E, S. P. Cooper Well Mo. 1, SE/h TE/4 of Section 23, T-24-S. R-36-D. Minningham Well Mo. 3, TE/A SE/h or Section 30, T-25-S, R-37-4, all in Tea County, New Mexico.	
CAS	E 1779 Application of Jal Oil Company for an exception: to the overproduction shut-in provisions of Order E-520, as amended by Order E-967, for four wells in the Jalmat Gas Pool. Applicant, in the above-styled cause, seeks an order al- lowing the following-described wells in the Jalmat Gas Pool to compensate for their over- produced status without being completely shut- in in order to prevent possible waste: Legal Well No. 2, NE/4 SE/6 of Section 21, Dyer Well No. 3, SE/4 NE/4 of Section 31, Jenkins Well No. 1, SU/4 SE/6 of Section 23, all in Township 25 South, Eange 37 East, Lea County, New Mexico.	
	;	1999 - 1995 - 199
BEF	ORE:	
	Daniel S. Mutter, Examiner.	
	TRANSCRIPT OF PROCREDINGS	
	DEARMURA - MELAR & ASSOCIATES Dearailtean Burgeras Alburguero El Nera Markop Phone Chopel 3-8691	

MR. NUTTER: The hearing will come to order, please. The next cases on the doctet will be cases Nos. 1778 and 1974.

MR. PAYME: Mr. Examiner, Bob Girand, attorney for -do you want me to go shead and read it? Bob Girand, attorney for Olsen Oil Company and Jal Oil Company, has requested that these cases be continued until October the 7th. We knew this sometime in advance, and they have been advertised within more than ten days prior to the October /th hearing.

MR. NUTTER: Cases Nos. 1770 and 1779 will be heard by the Examiner at the Examiner Hearing on October 7th, 1950.

> DEARMORY MEAR & Associates Contra (194 Pois 2000) ALBUQUERCIE MEN MEXICO Phone Chapel 36691

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STAPA OF BY MALION ) Not STAPA OF STANDARD

I, J. A. Trujillo. Motary Fublic in and for the County of Bernalillo, State of New Mexico, do hereby certify that the forsgoing and attached Transcript of Proceedings before the New Mexico Oil Conservation Commission was reported by me in Stenotype and reduced to typewritten transcript by me, and that the same is a true and correct record to the best of my knowledge, shill and ability.

WITNESS my Hand and Seal this, the day of Monte of New Mexico.

My Commission Expires:

October 5, 1967

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I do hereby cortify that the foregoing is a complete indexed of the propertings in the ist includening of tase No. 1778-1779 heard of the on. 9-30, 19 19.

NOTARY PUBLIC

Examiner Examiner

DEARMLEY METER & Aboot Ates Othera, Law Progenes Albudgerous New Mexico Phone Chapel 3-6691 GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE PARK PURCHING HOBBS, NEW MEXICO

W D GIRAND LOWELL STOUT

September 10, 1939.

TELEPHONE: EXPRESS 3-9116 Post Oprice Box 1445

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Oil Conservation Commission, State Capitol Building, Santa Fe, New Mexico.

Attention: Mr. A. L. Porter.

RE: OLSEN OIL COMPANY, WINNINGHAM NO. 3, COODER D NO. 2, S. R. COOPER NO. 1, AND MILLION COOPER NO. 1,

Gentlemen:

The above cases have been set for examiner hearing on September 30, 1959. The applicant respectfully requests that these Applications be re-set for the examiner meaning set for October 7, 1959. In connection with this request the writer advises that a prior commitment requires the writer be in Amarillo, Texas, on October 1st and that the case set for October 1st involves many parties other than the applicant's attorney and numerous witnesses have been notified and their plans made for attendance at that time. It will be impossible to obtain a continuance of the Amarillo case without a delay of several months, resulting in considerable expense.

Please consider this latter a request for a continuance of the above cases until October 7, 1959.

Very truly yours,

GIRANE & STOUT,

BY: Marine

G/dk

PAR 2 A

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Oil Conservation Commission, Hobbs, New Mexico. Attention: Ar. Randall Hontgomery.

Olsen Oils, Inc., 2808 Liberty Bank Building, Oklahoma City, Oklanoma. W. D. GIRAND LOWELL STOUT ROBERT F. PYATT CIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

TELEPHONE: EXPRESS 3-0116 Post Office Box 1445

Lugust 27, 1959.

Oil Conservation Commission, Santa Fe, New Mexico.

Attention: Mr. A. L. Porter.

IN RE: OLSEN OILS, INC. - COOPER B #2 GAS WELL, NEZNWA OF SECTION 14, TOWNSHIP 24 SOUTH, RANGE 36 EAST, JALMAT GAS POOL.

Gentlemen:

Enclosed you will find original and two copies of Application of Olsen Oils, Inc. for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

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GIRAND & STOUT,

BY: Mire

G/bc Encls.

cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Olsen Oils, Inc., 2808 Liberty Bank Building, Oklahoma City, Oklahoma.

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## BEFORE THE OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF OLSEN OILS, INC. FOR AN EXCEPTION TO RULE 10 OF ORDER NO. R-967 AND FOR THE ASSIGNMENT OF MINIMUM ALLOWABLE TO ITS COOPER B #2 GAS WELL LOCATED IN THE NE $\frac{1}{2}$ NW $\frac{1}{2}$  OF SECTION 14, TOWNSHIP 24 SOUTH, RANGE 36 EAST, JALMAT GAS POOL AND FOR RELIEF FROM A THREATENED SHUT IN.

And the second states

CASE NO.\_\_\_\_

COMES NOW the Olsen Oils, Inc., a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Cooper B #2 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Cooper B #2 located in the NE4NW4 of Section 14, Township 24 South, Range 36 East, in the Jalmat Gas Pool.

2. That the Cooper B #2 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large
quantities of water and production is obtained by the use of a free floating piston and without this method of production being used, the well would be incapable of producing gas due to the encroachment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

4. Applicant would snow that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line Gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jaimat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Cooper B  $\frac{1}{2}$  well and coat if applicant is required to solut in said well for any period of time, the encroachment or the water will destroy the well and require the applicant to prematurely abandon.

U. Applicant would further snow the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New H xico by many operators within the affected gas pools. That on July 1, 1953, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Cooper B #2 was no longer a marginal gas well and had over-produced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission,

all of the 118 wells would be shut in as of September 1, 1959. That Order No. R-967 provides under Rule o-C as follows:

> "The Commission may assign minimum allowables in order to prevent the premature abandonment of wells."

The Order further provides, under Rule 10:

The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the domaission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being energies with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission snould enter an Order covering applicant's Cooper B #2 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

5. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard fixed allowables where production was hade by secondary recovery methods. Applicant believes and so states to the Commission char the methods employed by it in the producing of gas from ics well, Cooper B#2, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced pased on production reports should it pe determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(5) That the Commission fix a minimum allowable for the Cooper B  $\frac{1}{2}$  as well located in the Jalmac das fool as provided by Rule 6 of Order K-567.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445. HOBBS, NEW MEXICO.

W. D. GIRAND LOWELL STOUT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOEBS, NEW MEXICO



August 27, 1939.

Oil Conservation Commission, Santa Fe, New Maxico.

Attention: Mr. A. L. Porter.

IN RE: OLSEN OILS, INC. - MYERS B #1 GAS WELL LOCATED IN THE SEENWE OF SECTION 13, TOWNSHIP 24 SOUTH, RANGE 36 EAST.

Gentlemen:

Enclosed you will find original and two copies of Application of Olsen Oils, Inc. for relief from snut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT,

BY

G/bc Encls.

cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Olsen Oils, Inc., 2808 Liberty Bank Building, Oklahoma City, Oklahoma. BEFORE THE OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF OLSEN OILS, INC. FOR AN ) EXCEPTION TO RULE 1J OF ORDER NO. R-967 ) AND FOR THE ASSIGNMENT OF MINIMUM ) ALLOWABLE TO ITS MYERS B #1 GAS WELL ) LOCATED IN THE SEGNAG OF SECTION 13, ) TOWNSHIP 24 SOUTH, RANGE 50 EAST, ) JALMAT GAS POOL AND FOR RELIEF FROM ) A THREATENED SHUT IN. )

CASE NO.

COMES NOW the Olsen Oils, Inc., a New Mexico corporation, with principal office in Jal, Lea Councy, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its Myers B #1 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Myers B #1 located in the SE4NW4 of Section 13, Township 24 South, Range 30 East, in the Jalmat Gas Pool.

2. That the Myers B #1 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large

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quantities of water and production is obtained by the use of a free floating piston and without this method or production being used, the well would be incapable of producing gas due to the encroachment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

4. Applicant would snow that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool was so reduced the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Myers B w1 well and that if applicant is required to shut in said well for any period or time, the encroachment of the water will destroy the well and require applicant to prematurely abandon.

o. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092-A in Case No. 1327. That said Order has been under attack in the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Myers B #1 was no longer a marginal gas well and had over-produced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission,

all of the 118 wells would be shut in as of September 1, 1959. That Green Wells X-207 provides under Rule 6-C as follows:

> The Commission may assign minimum allowables in order to prevent the premature abandonment of wells.

The urgan Earther provides, under Rule 10:

The Commission may allow over-production to be made up at a resser rate than would be the case if the well were completely shut in upon a snowing at public hearing after due notice that complete shut in of the well would result in material damage to the well.

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stabilize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that in the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. npplicant will advise the Commission as soon as possible the total flow or jas that will be produced under such production method.

8. The Commission being charged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's Myers B #1 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the handling of production of oil to disregard Fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well Myers B #1 is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producers of the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

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(3) That the Commission fix a minimum allowable for the Myers B #1 gas well located in the Jalmat Gas Pool as provided by Rule 6 of Order R-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

(ATTORNEY'S FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, NEW MEXICO.

G/bc

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W. D. GIRAND LOWELL STOUT ROBERT F. PYATT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO

mugust 27, 1959.

TELEPHONE-Express 3-0116 Poby Office Box 1443

Oil Conservation Commission, Santa Fe, New Maxico.

Attention: Mr. A. L. Porter.

IN RE: OLSEN OILS, INC. S. R. COOPER #1 GAS WELL SEXNEX OF SECTION 23, TOWNSHIP 24 SOUTH, RANGE 36 EAST.

Gentlemen:

Enclosed you will find original and two copies of Application of Olsen Oils, Inc. for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT,

BY

G/bc Encls. cc: Oil Conservation Commission, Hobbs, New Maxico. (Attention: Mr. Randall Montgomery) Olsen Oils, Inc., 2808 Liberty Bank Bldg., Oklahoma City, Oklahoma.

## BEFORE THE OIL CONSERVATION COMMISSION,

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NO.

STATE OF NEW MEXICO.

APPLICATION OF OLSEN OILS, INC. FOR AN EXCEPTION TO RULE 10 OF ORDER NO. R-967 AND FOR THE ASSIGNMENT OF MINIMUM ALLOWABLE TO ITS S. R. COOPER #1 GAS WELL LOCATED IN THE SEQNED OF SECTION 23, TOWNSHIP 24 SOUTH, RANGE 36 EAST, JALMAT GAS POOL AND FOR RELIEF FROM A THREATENED SHUT IN.

COMES NOW the Olsen Oils, Inc., a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-967 and for the Commission to assign a minimum allowable to its 5. R. Cooper #1 and for cause would snow:

1. Applicant is the owner and operator of the gas well known as the S. R. Cooper #1 located in the SEGNEG of Section 23, Township 24 South, Range 30 East, in the Jaimat Gas Pool.

2. That the S. R. Cooper in has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the operator is required to produce large

quantities of water and production is obtained by the use of a free floating piston and without this method of production being used, the well would be incapable of producing gas due to the encrodonment of the water. That with the continued build up of water, it is anticipated that the operator will have to install a pump jack in the immediate future in order to lift the continuous increasing flow of water and produce gas from said well.

4. Applicant would show that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the overproduction. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool were so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

5. R. Cooper #1 well and that if applicant is required to shut in said well for any period of time, the encroachment of the water will destroy the well and require the applicant to prematurely abandon.

6. Applicant would further snow the Commission that on January 29, 1958, the Commission entered its Order No. 1092 A in Case No. 1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said S. R. Cooper #1 was no longer a marginal gas well and had overproduced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this

Commission, all of the 118 wells would be snut in as of September 1, 1959. That Order No. R-967 provides under Rule 5-C as follows:

> The Commission may assign minimum allowables in order to prevent the premature abandonment of wells."

The Order further provides, under Rule 10:

"The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a showing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the encroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at this time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the killing of the well and yet allow its continued production. Applicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being charged with the conservation of oil and gas and the protection of correlative rights acopted the rules and regulations above quoted to insure relief to an operator situaced as the applicant. In light of its declared policy, the Commission should enter an Order covering applicant's S. R. Cooper #1 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 6, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing the methods presently being employed.

9. The Commission, on numerous occasions, has seen fit in the mandling of production of oil to disregard fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods employed by it in the producing of gas from its well, S. R. Cooper #1, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hoobs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced based on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable for the 3. K. Cooper  $\hat{\pi}$  I gas well located in the Jalmat Gas Pool as provided by Rule 6 of Order K-967.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT

BY

(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, NEW MEXICO.

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\*P was taken from R. Olsen Winningham No. 3 well could not be shut-in due to water logging off well bore.

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El Paso Manual Clas Company

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Jer oli Grapany F. O. Box 1744 Midland, Texas

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Yours very trusy,

IL PASO NATURAL CAS COMPANY

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Jul D

J. W. Baulch, Jr. Gas Production Engineer

JWB, Jr;bjc cc: Js! Jil Company - Jal, N. N. E. A. Scearce P. N. Scodruff Central Pile File

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Jalmat Yates Lea Jal Oil Company November 10-14, 1958 Watkins El Paso Natural Gas Company · · <u>· 2</u> . st. 36 35 15.5# 24 ----**B** 5 1/2 1 2 2 3 3 4 4 4 5 1/2 2869 4.7# · · · 2942 2954 2869 1894 .660 Assumed X Single .... 14 . . . . . . . . . . here and have a 11-10-58 8:00 11-11-58 8:00 24 256.2 13.56 Flg. <u>Ц</u>п 1.500 85 . . . . . . . . . 256.2 43.56 105.64 13.99 •9535 .9768 1.022 1,406 11-12-58 24 723.2 728.2 745.2 11-11-58 8:00 8:00 11-13-58 376.2 584.2 <u>48</u> 712.2 11-14-58 72 633.2 - · . \_. . Pw Measured. 747.2 tela And and a second s . . . . ... .. 58L.2 ------ jola F<sub>W</sub> 584.2 2- <sup>1</sup>W 10 .2182 .35 .1 .9259 .7818 747.2 · c- 597.8 1,320 .3888 .819 1.7818 9.966564-10 •925**9** 9,972652-10 El Paso Natural Gas Company P. O. Box 1384 - Jal, New Mexico 3.117985 A rest J. B. Murray 13.120637 1320 n an g Ar an garan an ar an ar

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El Paso Natural Gas Company P. C. Box 1384 - Jal, New Mexico El Paso Natural Gas Company El Paso Natural Gas Company 650.3

\* The TBG. pressure on this well did not have any pressure on 72 hour shut-in.

W. D. GIRAND LOWELL STOUT ROBERT F PYATT

e t

GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO



August 27, 1959.

Oll Conservation Commission, Santa Fe, New Mexico.

(1, ×, 1) (

Attention: Mr. A. L. Porter.

IN RE: JAL OIL COMPANY - DYER #3 GAS WELL, LOCATED IN THE SEXNEX OF SECTION 31, TOWNSHIP 25 SOUTH, RANGE 37 EAST, JALMAT GAS POOL.

Gentlemen:

We are enclosing nerewith original and two copies of Application of Jal Oil Company for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT.

BY:

G/bc Encls. cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Jal Oil Company, 2. O. Box 1744, Midland, Texas.

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PH:DNE CH 3-6691

DEARNLEY-MEIER REPORTING SERVICE, Inc.

ALBUQUERQUE, NEW MEXICO

(Continued of state 1)



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unthero de 11 % . ., leýs defas dus estas Texnesicas destr, letos de astr, dibi Texnes, New Marine.

FEFULE:

JE. Sivis st. Tr. Clines Rogard

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e.M. INTR: Correction 1776. Option tick of close Cils, Inc., for an exception to the even-one better shut-is recylsions of Order 2-520, was mented by Green K-W ", for four sells in the Jalmet Gas Fool:

12. 1124.0: It the Contributor, places, st this time my name is and has then for some time, d. Javid Girned. For appearing on behalf of the Unrelievet, Olten Clid, Reportorated. At this time we would like to disting the two wells, Scoper P Well Morters 2 in the NE NW of the Section 14, Textslip & South, Marrie of Bolt, and the Myero I Well Durley 1 Lemons is for July and South A. S. Bection 13, Tourssin & Unst., energy 2005.



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ALBUQUERQUE, NEW MEXICO

IR. 172: Porture tomesed of vester jubits borner, Case 1779 and 1779 will be obtablic test.

MR. MRAND: Signate structure low visit dive introcelled.

IT. PATRO: Dr., The sure tracers and such .

IR. SIRIUD: 100, in the second second run, is react to the Notice on the Low L well Transmin, there are a second which was not discovered early around to untilly the letticular and resubvertise, and the Section is whole to be dection k1, when in truth and in fact the well is located in Section 31. The the Watkins Well Number 2 DE/A ND/A of Dection 35, and it is shown in the advertisement of Section 25. I making these errors to be insignificant in light all of the other listifying working in the application, because report in the truck of Parilies with the error could locate fact 1 well 1 when in the section Well to write the error could locate fact 1 well 1 when it well to write well



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(Ne reprose.)

MR. CMZ: The splits is the the states.

IR. STELUP: In. encoder, Theorem the Statement; 1
would like to have them such to be perceiver.

(Witnesses swort.)

TR. MAND: I as 10 like to call Un. Ject. Mr. Examiner, it will be noncoperny for these cases to be but as well by well, to a certain extent, sotil we get a rather des-reconing and over-all bicture, and we will other testimony at this time is regard to the Winnischer Well Example.

MR. UTC: All mint, dir.

JCHN W. WBDT, chitrens coller by the or behalf of the Applicant, being first all shown, ass exemited ind testified

# DEARNLEY-MEIER REPORTING SERVICE, Inc. Albuquerque, new mexico



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		de la, las Maxier.
	12	In, mast, have you and the time to testify inders the
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	A	Tikryo.
	~5	la cret en portugi
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		The or three edensions, I welless.
	a's	Ta the Commission setlation with Dr. accuts testilying
lin	that eag	pacity?
		12. UTZ: Tes, Lin, untis Petroy.
	ેસ્ટ	(By Fr. Girand) - Dr. West, The Lander you there on
ex	hibit ile	entified as Szhilit Norther 1, will you state what that
ex	hibit rea	presents?
	Å	That's a map of most of the Southeast of Les County,
		; it has Township 25 John, Rende 37 Best in total, and
pa	ert of the	e surrounding townships.
	j.	You are familiar with the upplications filed by the
	sen Cils	Company, Incommentat, and Jol (11 Company?

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entral to constitue the base 12. S. S. S. S. and the second 11 A. 1 11 -The tag of this routbers to PHUNE CH 3-6691 Clear UID, al the prime of the late of the let . . . . Theliethan en character trene -- I believe treg · · · · · . يعدى بروا فدهرك and the second representation of a subarrander. • ..... r is shift of all or r is the diff of l of l domary and . circles in mer? Car, Nord the sambet will new tea Cliger will welld, aller cheles selle and the del Cit Communells, is •, • • " state cottre . colmentals representation to your Excitit 1, will you 1 (Sectors) is the sector of the sector of the sector 2 . The sector 2NEW MEXICO  $\Delta$  ,  $\Delta$  all iterations (P1) littler of the lensing to the A2/2 of the DM/4 of westion HC, Toxon is 25 Jours, seare 37 East. ALBUQUERQUE 40 YOU KEOW AND YOUR OLD TRADATED WATCHE OF BOT THES. is in the Jalmath Les 1007? A leg, is, iv the - Now, st build thread on the liter of a liter the excitits trye them identifies, or them to receive the company of origination



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DEAR VLEY-MEIER REPORTING SERVICE, Inc.

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M. 233: Lifeot eljection, it will be recepted. (1990). (1990). Direction part estention to the exbitit contribution two comes, memori Scalatz 2, will per state work tart exait to mereoperta?

A well, the grade represents the line product that way, that all back reactions that is presidential on the line that the taking the reading the Similarian Aureor 3; and the about grade is the monthly production down in graph for the years the last part of 1958 and the first part of 1954. It is from graphically by the month, and then with the readence if was have out in the average pressure and everage production for the two years, this information all being taken from i months of the El Paso Natural Gas Company in Jal.

Jo I understand your costinory, the solid line is the production line, is that correct?

A That is correct.

2 Ind your broken line is the operating pressure of the line?

a Chet is correct.

low, you have attached to that memorialit, some on
 less in the sature of a lessna; could you evolvin to the Examinent



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	• 85	No, it was off at that time.
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		Coucher the Star, Nerby 2
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		TR. HRAD: We would take to offer Bootbit Number 2.
		MR. ETZ: Without objection, it will be accomted.
		'R. GIRAND: VILL per star lowerst fills fibe, wirf
I wow]	ld like	e to call Mr. Wetach.
		ale victor d'anna
DEW	E Y V	FATUET, switteau multan is the childbalf of the
	Appl :	least, inving leasers viewal, storm, and exercise sta
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BY MR.	. GIRAN	<u>ND:</u>
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	A	Dewey Wetwor.
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	ar Ser S	Cluber Cils, Cheermanna.
	સુ	dou long baya you been schlapet og tues?
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ALBUQUERQUE, NEW MEXICO



PAGE entere des provincies de la classe el pr · . n ac Meder y Joh (1) Doge the 4 Tr. Attact, here you tertified todore the side Jonastin-PHONE CH 3-6691 tion formisation in the ready DEARNLEY-MEIER REPORTING SERVICE, Inc. The Wildow Congression 2 1 As engineer. TR. ITAKY: Is the domenission satisfied with Dr. Wetson's qualifications? (Palir. Sidual) is close that the new personal spec 5 the Clsen Cils Conjury? i, y Geologist and Antimeor. A. Mr. Watson, I diment your ottention to the Applicant's د. Exhibit Number 1, and eak you if you are familiar with the well designated as the Winnington Aurtan 3, located in the DS of the 3E -- NE of the SE of Section 30-25-37? ALBUQUERQUE, NEW MEXICO Tes, sir, Low. â Just what has been your association with that well? ÷ Well, when I went to weak for flach Cills Doameny originally in 1950, the well that then willes and I have been associated with it all except short a year bud a leald since thet time. i i lutera cua lasti ann**,** veritas era cusolute control



PAGE nyer the operation of the second of , but to comment? Y.S., - 195. , **A** , Figs, and that is like or throughly produced at all these since job over terraloy. By the company? PHONE CH 3-6691 For, sir, except for triel vericus whenever that 11 2 soul vis. New, 718 Mie well die in meent moeths?  $\dot{\sim}$ lene, cirt. At the time the cell disk, how yes it being operad? the wood energy is the the transfer in the light inter-And which conversely is the Hermitian transform 2Χ, Well, the FL Frac live one surr, and also it was shat à. in at the time for test. saraîber Box du le certes, sore jes ette te irint the well hack? No, sin, we could not. 4 Did you even owner the writion the well at that time? 4 Yes, sir, we did; not continuously, but for about tes ŝ. ALBUQUERQUE, NEW MEXICO Hays. And were unable to kring the well back with that method? It would not continue on Now; it flowed for a few ŝ hours and then died. In your opinion, or (your knowledge of the well, what 2 caused the well to He?

Inc.

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PAGE 12 Second Contractor Second For, sit the conterprise to competite their method of a, reoducing and from this continuits reply Yes, sir, troy life 11 PHONE CH 3-6691 Wait week the firsted they note, and now were they 10 arnived st? The leadership out that the terretional pure link and Å pure the Cluid up. Disneasing just tonact, the enclose the company this Jalmat fool where they in the consolement of writer by the use of pump jecks, florting platens, a litter chart mechanical devices, do you know who instituted that three of precuation processes? Well, sir, one licent clobes are out on the Winningher à Number 3 by myself in 1955. And then in repard to the so of the pump jack for the removal of water? The pump jack was incoalled up Mr. Olsen in 1953 at the Repollo, originally. Since you have been in business, out of school, has Q, your practice and your train been primarily consumed within the Southeastern portion of New Mexico? Tes, 15 Mag. and you are familiar with the Jahost Pool? с. Ц ċ. Yes, die. legel incriber Health A, and the liger Recelle well



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ALBUQUERQUE, NEW MEXICO

the Nettle	elt und war otherstel to commodured in this cover?
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ت <b>ب</b>	Nov, now to see the Winstein home Number 3 Look profes-
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સ	and And the been more than electronously up ortil the Sta
ol Crtober,	19591
Å	Yes, sir.
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A Yes, sir, i labort to according toth line it a serwe have developed a cycle on bases will be they are drilled; originally, they and very little opter and there were a veried of three or four years the fluit increases to where the vell would have to be blown down on such as if for the first piston installation on the Winniecker Number 3 accelficably was installed, it flowed four years are each to be an of the other wells that are in the area that the from what so know of the other wells that are in the area that to encounter the the vell would comstant in the other memory. Then, the track will dome shout in the other memory, it is include thinks, and part on the period, on a baser time is 1 There there thinks, and place a sum frequency of the calls that are proved to be the set of the other of the other of part on the period, on a baser time is 1 There there thinks, and place a sum frequency of the calls that are one of the other of the other of the other of the other of parts of the period, on a baser time is 1 There there of the other other of the other of the other of the other of the other other of the other of the other of the other other of the other other of the other ot

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this application; and going shead a little bit on one of Olsen -one of the Jal Oil Company wells, the Repollo Number 1, the pump jack was installed on it in 1953, and at the present time, under the same operating conditions that it has operated under in those six years, there is no production out of it as of now. It may be that that's a little longer, or a little shorter, but I would say that's a pretty good indication of how long these wells will pump.

Now, our water problems in these other wells may not be quite as acute as they were in the Repollo originally, but I think that that will give us all an idea of what is going to happen in the future as far as all of these wells are concerned.

Q Well now, in regard to the Repollo well, since you made that comparison, the Repollo well stopped producing in January, I believe, and became logged up in January, is that correct?

A I believe it is.

Q Of this year?

A Yes, sir; started its downhill climb in December.

Q Now, since that time, have you essentially attempted to obtain production from that well?

A Yes, sir, it has been pumped in the same manner it was before; in fact, last week the pump was removed in order to check to see if it was still in good operation.

Q. Other than that, it has been a continuous operation?
A. Run continuously, yes, sir.

Q And after employing those methods, you have not been



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able to produce any gas into the El Paso line? A That is correct. Now, is that a low pressure line? It is not considered a low pressure, it is a 70-pound A PHONE CH 3-6691 line, which is the lowest pressure on their intermediate and high pressure gathering system. It is an intermediate line --0 Yes, sir. -- to which it is connected. Do you feel that the Q experience that you have had in regard to the Repollo well would be a pattern that could be anticipated reasonably for all these wells that have water encroachment? Yes, sir, I definitely do. A Q 111 ask you this: Has the Winningham Number 3 up to the present time responded in a like manner, or acted in a like manner, to the Repollo well during its course of decline? A Yes, sir, it has. It has followed the same pattern. I would like to say the Winningham didn't have as much water to ALBUQUERQUE, NEW MEXICO begin with as the Repollo did, but production has continuously dropped, and the pressure has dropped at the same time. Well, the characteristics, the producing character-Q istics are compatible? A Yes, sir. And it is your opinion that it is only a matter of a Q short period of time until the well has exhausted itself --



Ś

Å Yes, sir. Q -- through the methods employed? Right, it is just a matter of time. A Q Now, is it also your opinion that in the event the Commission should see fit to shut this well in, that the reservoir gas attributable to the Winningham Number 3 would be lost to the operator? A Yes, sir. Q 'Does that by any stroke of the imagination imply that this reservoir would be available to any other operator in the area? A I do not think it would, no, sir; I think it would be lost completely. It would then constitute a waste of that reservoir, Q whatever it might be? A Right. Q Now, do you have any production records in regard to the Repollo Well during the period of time it was allowed to pro-

duce, as to the amount of gas after your pump jack was installed until January of this year?

A Well, when it first, when it first started the pump jack up, it was flowing at the rate of 800,000 cubic feet a day, and it has continuously gone downhill from that point.

Q Would you estimate that the production from that well has been in the neighborhood of one billion cubic feet?



Yes, sir, since 1953, it has been in the neighborhood A of one billion. There is one other point I would like to point out. This is a well, if you will look at Exhibit Number 1, it is in the Section 31, 25, 37.

> Q 38, isn't it?

No, sir, this is the Covington Federal Number 2 that I'm referring to, it is not on our application at all. This well, just to go back on a little history, R. Olsen purchased that well from Jerry Covington, I believe he got it from him.

### MR. UTZ: Which well was this?

NW of the SW/4 of Section 31. It has "Jal Oil" written right below it. That well was purchased by R. Olsen from Jerry Covington, and we went in and we worked it at considerable expense and had a pump jack installed on that well as he did the Repollo Number 1; and at the time that I'm speaking of, it was producing approximately half a million cubic feet of gas into the intermediate El Paso line, and due to State regulations for testing a well, El Paso went out and shut the well in for a period of less than 72 hours, they were taking a 72-hour shut-in pressure on it, they shut the pump jack down and were testing the well, and Mr. Olsen found out that they shut it in, contacted them, and started it up, and as of this day there has not been any comparable amount of gas produced in that well as to what it was before. We went in after I went to work for the Jal Oil Company, went back in and reworked the well, it cost about \$16,000.00, and at the

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present time the production is 3 to 8 barrels of oil per day, plus a very small amount of casing head gas, with no indication of the pressures that we originally had. Now that's, I mean, that is what can happen if they are shut in. Q During that period of time, and in your capacity as

an employee of Jal Oil Company and the Olsen Oils Company, Incorporated, Olsen Oils, Incorporated, do you recalloccasions where exemptions have been given the company in regard to the Repollo Well, allowing it to produce for as much as one-year period at a time?

A Yes, sir, they are.

Q Without limitation?

A Right, there are.

Q I believe that would be recognized by the prior secretary, Mr. Macey, is that true?

A Yes, sir, that's correct.

Q Was there also an opinion expressed by one of the Commission engineers, Mr. Stanley?

A Yes, sir, it is.

Q At this time for the purpose of the record, we would like to introduce Exhibits 4, 5 and 6, being copies of letters written by the Oil Conservation Commission, or its agents and representatives, and the original copies of these letters should be in the Commission files; since all of these were not addressed to the applicant, we have no way of establishing or verifying the





particular exhibits, however, they were furnished to us out of the files of the El Paso Natural Gas Company.

MR. UTZ: Without objection, Exhibits 4, 5, and 6 will be accepted into the record.

MR. GIRAND: I might state to the Commission, the purpose of that evidence is to show the recognition of the problem of the producers on the part of the Commission back as early as 1955, when they were having trouble with the Repollo well.

Referring to Exhibit Number 7, which was July 27, 1957, this letter deals with two wells that are involved in the hearing here, the Ebo Owens Number 1, and the Jenkins Number 2. Ebo Owens was shut in by regulation, and the Jenkins was not producing because of the fact it was logged up, plugged; it goes, Mr. Examiner, to the overall condition existing down there among the wells that are producing water, or fluid.

Your April 22nd letter, being Exhibit Number 8, covers the Ebo Owens Number 1 and the Watkins Number 2, which are both involved in this hearing, as one of the consolidated cases.

The Exhibit Number 9 deals with a recognition of the condition of the Dyer Number 3, the Legal Number 2, the Jenkins Number 1, the Repollo Number 1, in the Jalmat Gas Pool, and in which the purchaser, the common purchaser to which these wells are connected, suggested some exemption be obtained from the Commission, some relief, to keep these wells from logging up because of the encroachment of fluid.

ALBUQUERQUE, NEW MEXICO



MR. UTZ: I note we have reference to Jenkins Number 2; again I would like to clarify that again. Do we have a Jenkins Number 2, or --MR. GIRAND: No, sir, it is withdrawn, but we intend to use a chart on it, if the Examiner please, for the basis of comparison. MR. UTZ: Is there a Jenkins Number 2 well in the Jalmat Pool? MR. GIRAND: No, it is in the Langley-Mattix, but it is simply cited from the standpoint of water, and when it gets in on the gas, it has the same characteristics, that's what they tell We would like to offer at this time Exhibits 4 through 9. me. MR. UTZ: Without objection, Exhibits 4 through 9 will be accepted. MR. GIRAND: Did I offer Exhibit 3? MR. PAYNE: I do not think so. MR. GIRAND: I would like to include Exhibit 3 in our offer. MR. UTZ: It will be accepted. Are you about through with the Winningham and the Legal, and are going to others? MR. GIRAND: I'm going to the L. R. Cooper. MR. UTZ: I would like to ask a few questions. MR. GIRAND: I have no desire to encumber the record, but we have copies of the minimum contract test on the Winningham Number 3 for years '57, '58 and '59. Now, those are a matter of





record in the Commission docket, and if we can just refer to them by reference, tend to show the operation and the result of the text made. Off the record.

MR. UTZ: Off the record.

(Discussion off the record.)

Q (By Mr. Girand) Mr. Watson, I'll ask you whether or not the El Paso Natural Gas furnished you certain copies of their records down at the Jal office pertaining to the Winningham Number 3 well?

A Yes, sir, they did.

Q And they are actual records on that particular well that they maintained?

A Right.

Q I hand you here what has been identified as Applicant's Exhibit Number 10. Would you explain to the Commission what that exhibit represents?

A This is a minimum contract test taken by El Paso periodically on all wells that they are tied into for their contract pumps. They are used for their records to show them how the well is progressing, whether they are decreasing or what have you on their gas production; and it is taken very similar to the deliverability test required by the Commission, it is a similar test.

Q Now, I hand you here what has been marked as Applicant's Exhibit Number 11, and ask you if that is a similar report



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for the year 1958? What was the Exhibit 10 report for, what year? A 1957. ۵ And Exhibit 11 is a report for the year 1958? Yes, sir, it is. A PHONE CH 3-6691 And the same answer would be given to the same ques-Q tions if I interrogated you in regard to Exhibit 11? A Yes, sir. Q I hand you what has been identified as Applicant's Exhibit Number 12. This is --A Q Go ahead, what does that exhibit represent? A This is a minimum contract test as of 1-16-59. Q Now, if you were asked the same questions in regard to that exhibit, that you have been for exhibits 10 and 11, would your answers be the same? Yes, sir, they would. A Now, I hand you here what has been identified as Q Applicant's Exhibit Number 13, and ask you to state what that NEW MEXICO exhibit represents? Well, this is actually a deliverability test, required A ALBUQUERQUE, by the Commission. It was run in March of '58. And that is a report that is actually filed with the Q Commission, or a copy of that report? A Yes, sir. Now, this is El Paso's form, and it is on 122-C, I believe, is it not?

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What year does that cover? Q MR. UTZ: Yes, sir, this is, I would call it 122-C. (By Mr. Girand) What year does that cover? Q That is 1959, March 1959. Å PHONE (CH 3-6691 Now, is the same information reflected on that report 0 as is reflected on Exhibit 12? It is not identical, no, but similar. I do not know A exactly what the difference is. Q Well, based upon your experience in the field, is the information that appears on Exhibit Number 13, is it acquired from the information, and acquired and shown on Exhibit Number 12? MR. UTZ: If counsel will permit, I believe I can clarify that. MR. GIRAND: If the Examiner knows, I'm satisfied; I wouldn't know. MR. UTZ: If Exhibit Number 12 is calculated deliverability on a 100-pound deliverability pressure, and 13 is 80 percent of shut-in pressure? ALBUQUERQUE, NEW MEXICO A Yes, sir. MR. GIRAND: At this time we would like to offer Exhibits 10 through 13. A There is one other thing on those tests that it will show; there is no doubt in this case that there is fluid intrusion at shut-in pressures most of the time from 24 to 72 hours decrease,

rather than increase, on those tests.



**S** 

Q (By Mr. Girand) Mr. Watson, I hand you here a copy of an exhibit identified as Applicant's Exhibit Number 14; will you advise the Commission what that exhibit represents?

A This is a letter from El Paso Natural Gas Company's Jal office to Olsen Oils in Jal, pertaining to the Winningham Number 3, and it states that:

"Gentlemen: We are unable to produce your Winningham 3 within 30-25-37, in the Jalmat for the following reasons: 'logged off'. When this situation is corrected and the well is ready to be produced, please contact this office."

And then in remarks it says:

"This will confirm Mr. Stanke's telephone conversation with your office May 15th, 1959. Mr. Stanke advised your office that the above well was found apparently logged off with fluid and would need to be unloaded before normal production could be resumed. Thank you for your cooperation."

Q Now, after that notification, did the company get that well back on production?

A May '59, yes, it was.

Q Then I hand you here what has been marked Applicant's Exhibit Number 15, identify what that exhibit represents.

A This is a letter almost identical to the other one, except that it is July 24th, 1959; the other one was in April, I believe, was it not?

Q May.

A May. And it's Winningham Number 3, and it is unable to be produced on account of being logged off.

Q Then during the interval between May the 20th, 1959, when you received this notice as shown by Exhibit 14, and the



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notification you received on July 29th --

A 24th?

Q -- 29th, I believe -- 24th, which is shown on Exhibit 15, the Winningham Number 3 had logged off again, is that correct?

A Yes, sir, it had and the only explanation for it is excess line pressure, I mean, the pressure went up on their line.

Q The pressure went up on their line. Now, at that time you were producing the Winningham Number 3 with the floating piston operation, were you not?

A Yes, sir, it was.

Q And you have now determined that you cannot produce that well in that manner?

A We cannot.

MR. GIRAND: We would like to introduce Exhibits 14 and 15 to show the frequency of the interval in which the water was encroaching on that particular well.

MR. UTZ: Without objection, they will be received. Q (By Mr. Girand) N<sub>o</sub>w, basing your answer on your knowledge of the Jalmat Gas Pool, and in particular the location of the Winningham Number 3, can you state whether or not you have an opinion as to whether or not gas reserves still underlie the land allocated to the Winningham Number 3 Well?

A Yes, sir, I think there are some reserves under it.
Q And is it the company's thought in the matter that
those reserves are of such an extent that it would be worthwhile



of going to the expense in an attempt to produce it? A Yes, from the experience we have had on the Repollo Well, it is justified to go ahead with the extra expenditure. Now, basing your answer on your experience and quali-Q CH 3-6691 fications, do you believe that the Winningham Number 3 can be produced at a lesser rate than the rate inaugurated by you in September of 1959 when you installed the pump job? I do not think it can be brought down any better A satisfactorily, no, sir. Any curtailment of that production, in your opinion, Û would result in loss of reservoir? Yes. sir. A MR. GIRAND: I believe that's all we have to offer on the Winningham Number 3. MR. UTZ: Mr. Watson, the rates you just spoke of, is that the rate shown on the Exhibit Number 3? Yes, sir. A MR. UTZ: Now which rate are you speaking of, the MEXICO 608.9, or the 557.7? NEV A I was thinking of the 557.7 figure. ALBUQUERQUE, MR. UTZ: That would be roughly 1700 MCF a month? Yes, sir, it would. A MR. UTZ: That rate is substantially below your average allowable for the past year. is it not? A You mean the average montly allowable?

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PHONE CH 3-6691	MR. UTZ: Yes, sir.
	À Yes, sir.
	MR. UTZ: It is also well below the average rate for
	the average allowable for the past six months, is it not?
	A I believe it is, yes, sir.
	MR. UTZ: That rate is also substantially below the
	rate that you have produced the well over the last year, is it not?
	A I would have to have the figures to answer that ques-
	tion as far as I do not have them in front of me.
	MR.UTZ: You do not have any of the allowable pro-
	duction figures available to you?
	A Not right this minute, no, sir.
	MR. UTZ: Are you familiar with them, if I stated you
	a figure that would be close, would you recognize it?
	A I believe I could.
	MR. UTZ: According to your calculation, Commission
	records the average allowable for the past year was 5896; there-
	fore, your request will be substantially below that?
	A 5896 represents what figure now?
	MR. UTZ: The average allowable forthe past twelve
I	months.
	A Fer month?
	MR. UTZ: Yes, sir.
	MR. GIRAND: If the Commission please, I have some
	figures here that have been presented by the home office on that,



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	which if the Commission will allow Mr. Watson to refer to			
	A These were prepared in the Oklahoma City office, is			
	that correct?			
PHONE CH 3-6691	MR. GIRAND: If he may refer to the memorandum, it			
	has the figures that the office determined.			
PHONE	MR. UTZ: Well, all I'm trying to establish is that			
	your requested rate is substantially below your previous allowable,			
	which would enable you to make up your over-production at a			
	reasonable rate?			
	A That 557.7 MCF would be per day; do I understand			
	your question, 5,896,000 MCF per month?			
	MR. UTZ: Yes, sir.			
	A That figure of 557.7			
	MR. UTZ: Is a daily figure.			
	A is a daily figure, yes, sir.			
	MR. UTZ: Monthly figure, using that daily figure,			
	would be roughly 18,000 MCF per month, would it not?			
0	A Right, would be 18,000, I believe; figuring it on a			
MEXICO	30-day month, it would be about 16,000.			
ALBUQUERQUE, NEW	MR. GIRAND: Mr. Examiner, may I ask a question or			
	two?			
ALBU	MR. UTZ: Yes, sir.			
	QUESTIONS BY MR. GIRAND:			
	Q In that connection, Mr. Watson, the well has to be			
	produced based on the amount of water it is making, is that correct?			

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A I think that is very evident from this chart that we presented, Exhibit Number 3, and it dropped from a producing rate after the pump jack was set down, from 557.7 MCF per day, to approximately 155.1 MCF per day, and it still showed a decline; so I would think that from that information that if it is shut down, it is going to go clear to zero and not produce at all.

Q The productivity of the well is contingent upon the happening of the two things: One removing all of the water, and the water that the line pressure has to buck, is that correct?

A Yes, sir, that is correct.

Q So at this time, or at any given time, producing the well under the methods that you propose to produce it, can you arrive at any particular allowable that the well should be tied to?

A No, sir, I do not think so. I mean, the water has to be removed, we know that.

Q And the speed in which it is encroaching on the well, leaves it undetermined as to how much water you have to produce from day to day?

A That is right.

Q By the same token, you have no control over the line pressures, so the variation in the line pressure can have quite a marked affect on the amount of gas the well is capable of producing into the line?

A Yes, sir; even though this well, if it was put back in the 250-pound line, the gas production would be very little,



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would be considerably less than what it is at 70 to 100-pounds. Q This application, Mr. Watons, is not an intent and attempt to ignore the allowable rules of the Commission, it is based entirely on a conservation matter to prevent waste and protect correlative rights, is that correct?

A Yes, sir, it is, in my opinion.

Q And as set forth in your application, and exemplified in your testimony, is the only method where those rights can be protected?

A Yes, sir, there is no way of making it flow primarily on its own gas. It has to be mechanically lifted, the water does.

MR. GIRAND: Mr. Examiner, I wanted to bring that out, in the light of your question. That's all I have at this time.

MR. UTZ: Mr. Watson, in regard to your Exhibit 3 again, at the time you spoke of the line pressure increasing approximately 5 pounds, you also had the pump jack shut down, did you not?

A Yes, sir.

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MR. UTZ: Now, wouldn't it be reasonable to assume that your decrease in production was due more to the pump jack being shut down, than the 5 pound increase in line pressure?

No, I don't think so.

MR. UTZ: Your well would be logging up, would it not? It is logging up, that is true, but I think the

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suddenness of the decline is evident there, because after we shut down, it established a pretty normal curve; if you will draw a line through the median of that hashed line as it goes up and down there, you come up around 4.2 on the chart where it was, where the line pressure, and the corresponding place the line pressure went up and you had a drop down to approximately 2, and it almost went to zero when that line pressure went up, and that is true of all those wells on pistons. I wish I had some more charts to show that, because any time that line pressure varies even the slightest amount, all those wells have a tendency to do the same thing, and that's what I was trying to do in that thing.

MR. GIRAND: You are referring to Exhibit 3?

A He is.

MR. UTZ: Does this well produce any more water at a higher rate of flow than it does at some lesser rate of flow?

A That we have not determined, that is something we need to find out.

MR. UTZ: All that is necessary to keep this well, to produce gas, is to keep water out of the production formation, is it not?

A Yes, sir.

MR. UTZ: As long as you are pumping the water out of the producing formation, then how would the rate of flow be affected?

A Let me back up a little.

MR. UTZ: You are pumping at a rate here of 23 barrels



a day?

## A Yes, sir.

Q If the rate of 23 barrels a day, keeps the formation clear of water, then why would you have to produce it at a higher rate in order to keep the formation clear of water, rather than a lower rate?

A As you clear the formation of water, you naturally get more gas; if you keep it clear, that's the history of all these wells. Now, let me refer you to this Exhibit Number 2, if I may. In 1958, the El Paso line pressure was higher than it was in 1959, they lowered the line pressure in January of '59 approximately there; if you will look at that production curve, you will see that that thing is dropping at the end of '58 at that higher line pressure, and immediately when the high pressure was lowered, the productivity came back up, and the only explanation I have for that is that the well was flowing, is capable of lifting that water on its own with the aid of the free piston, and keeps the well from being logged off; whereas at a higher pressure, it was not able to do so.

MR. UTZ: Yes, sir, but you were using a free piston, a free piston was being used under these conditions, as shown in this exhibit rather than a pump jack --

Right.

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MR. UTZ: -- and --

Right, and at the end of '59 you can see a sharp drop



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to where we got to 853 MCF during the month of August; I mean, the well is no longer capable of producing any more gas mechanically under the pistons, that's the reason we put the pump jack on it, and I feel that over a period of time, the same conditions are going to exist with the pump jack. We are flowing at a higher rate of flow now, in the progress of time the volume will decrease the same as it did on our piston, even though you keep the water off all the time.

MR. UTZ: Do you have any idea how much water the well was producing with the free piston during 1958?

A Well, I didn't personally make any test on it, but I would assume that it is neraly the same as the pump production. I mean, it would have been for the well to keep flowing. It is probably less than that, it would probably be a lesser figure.

MR. UTZ: Close to 20 barrels a day?

Yes, sir, I think it would be. A

MR. UTZ: The well was producing through tubing at that time?

A

Yes, sir, it was.

MR. UTZ: Is it producing through tubing now?

A It is producing through both the tubing and the casing; we are turning the water into a high pressure separator and it is separated, and the gas, if any comes out through the tubing, goes into the sales line the same as the gas out of the casing.

MR. UTZ: You are pumping some gas out with the water?



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Γ	A	Yes, sir.	
		MR. UTZ: Both pumping and flowing, whatever it is?	
	Å	Yes, sir.	
PHONE CH 3-6691		MR. UTZ: And the balance of the production is through	
	the annulus?		
	A	Through the annulus, that's right.	
		MR. UTZ: The rate you are requesting here, it will	
	never be poss	sible for the well to ever get into balance?	
	A	Well, what about the increase in allowable due to the	
	winter months	s as far as El Paso's end of it, the sales end?	
		MR. UTZ: That would about triple demand in order to	
-	equal what you are asking for?		
	A	Yes, sir, we are asking, at the rate that they will	
	keep producing.		
		MR. UTZ: Your maximum production from over the past	
	year has been	n 17,048 MCF per day; did you have any water trouble	
	during that	production rate?	
_	A	Yes, sir.	
ALBUQUERQUE, NEW MEXICO		MR. UTZ: And that was when you had the free piston	
	and all?		
UERQUE	A	Right, the free pistons were installed shortly after	
ALBUQ	it was compl	eted.	
		MR. UTZ: And you don't feel you can reduce that	
	rate with th	e pump jack installed?	
	A	Well, I would be willing to try, but I don't think	



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it would last. If this follows the history of the free piston, PAGE 41 in a matter of time this production here is going to be down even though you produce the water at all times the way we are now. Now, I don't think, in my opinion, this is not a sustained rate of CH 3-6691 production, it is going to drop, it is going to follow a decline PHONE curve as it did on the piston to nothing. MR. UTZ: Any other questions of the witness? MR. PAYNE: Yes, sir. CROSS EXAMINATION BY MR. PAYNE: Q Mr. Watson, what is the rate that you propose for this well, as a minimum rate to keep from having these water Well, as far as a minimum rate is concerned, at the A present time we don't know exactly what it might be. Are you asking for capacity production? If that is what it takes to keep the water off, yes. A And your application asks for relief for this well Q under Rule 10, I believe, of order R-967? A Yes, sir. Q Let me read the composition of that Rule: "The Commission may allow overproduction to be made up at a lesser rate than would be the case if the well were completely shut in, upon a showing at public hearing, after due notice, that complete shut in of the well would result in material damage to the well."

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Does that indicate to you that the intent here is that overproduction should be made up, but simply at a lesser rate than if the well were completely shut in?

Well, we know what will happen if the well is com-A pletely shut in, we feel we do.

Now, all of these wells in this flank of the pool Q have water problems, do they not?

> A Yes. sir.

So do you feel that when a pool starts making water. Q that the well should be exempt from proration?

It is possible that would be the best solution for A everybody. This to me is a very similar situation to a water flood project, it is a natural water flood, no question about that; but, I mean it is acknowledged in an oil pool, a water flood project, that if the water is allowed to be produced, if the oil is allowed to be produced at a capacity of the well, there would be more oil ultimately recovered than if that well is restricted by an allowable.

Q

It is recognized by whom?

Well, I think it is pretty standard throughout the A industry that unrestricted allowables are given or transferred to the wells in a water flood project.

Q Have you read various technical articles by the Humble engineers?

> Â I can't tell you that I have, no.



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Q Well, to pin it down then, unless market demand from the Jalmat Pool goes up considerably, and nominations go up accordingly, it would never be possible to bring this well back into balance?

A I can't say that it wouldn't be possible, because the production that we have at the present time is not going to continue at that rate even with the pump jack; it is just a matter of time, it may be 4, 5, 6, or 7 years before that thing is completely gone.

Q Before the well has to be abandoned?

A Yes, sir.

Q Well, now, referring to your Exhibit Number 5, which deals with a different well, deals with the Repollo, I notice a statement here by Mr. Stanley, he says:

"Furthermore, it will only be a matter of time whereby the Commission will cause the well to be plugged and abandoned." Now, of course it is always a matter of time until the well is plugged and abandoned, but assuming you were producing this well at capacity, when do you think it will have to be plugged and abandoned?

A I think we are faced with the Repollo at the present time; it is 6 years.

Q Let's get back to the Winningham.

A I think that these other wells will follow along in the same general pattern. Like I say, it may be more or less years,

I don't think any of us can sit here and say. My guess is that it would be longer than six years, due to the lesser water in the Winningham; that area was severely drained in the beginning of the pool by some of the older wells originally drilled in the pool.

Q This well is making some 23 barrels of water per day?A Yes, sir.

Q Was it making that back when you produced your maximum, was it making that much water in July of '56?

A To my knowledge, I don't know whether there was any accurate water test taken on it or not; I couldn't say how much water it did make.

Q Well, you feel then that your production rate has to be geared to the amount of water that the well is making?

A Very definitely do. I mean, what we have done and gone through, I don't see any other way to approach the subject and still get the reserves that are there.

Q What deliverability does this well have?

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A It is 366 MCF, I believe, is the last deliverability test.  $N_0w$ , it is very difficult to obtain an accurate deliverability test on all the wells that are on piston.

You say this well does have tubing in it?

A Yes, sir, two and a half inch tubing.

Does it have a blow-down string?

A It's got a string of sucker rods. See, it is on

pump at the present time.

Q

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Now, referring to Exhibit Number 6, which I believe Q your counsel introduced to establish the fact that relief has been granted to some of these wells in the past, due to water problems, I would like you to read the last paragraph:

"Both you and the transporter, El Paso Natural Gas Company, should attempt to produce the well in such a manner that the overproduction is made up as soon as possible."

Under your proposal, do you feel that overproduction will be made up as soon as possible, or is it just not possible?

A Well, if in our opinion we are not damaging the well. I think we'll be entirely willing to go along with anything that the Commission desires to reduce it, if it is possible.

Q But at this time you feel that the 17 or 1800 is the lowest rate, or 18,000?

> A I think it is in that neighborhood, yes, sir. MR. PAYNE: Thank you.

MR. GIRAND: If the Commission please, I would like to make a statement here. We are saying according to our Exhibit 3 that that would be the rate of recovery of gas, as shown on just the early test. This well has only been on pump since the last of September, what the decline or rate of decline will be, we don't know; we are not seeking any given fixed or set allowable, no, sir. We are calling the Commission's attention to a water encroaching situation, and asking this Commission to give us relief from it so as to allow us to protect our reservoir.

MR. PAYNE: Let me ask you this, Mr. Girand, while



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you are not proposing any set gure, as I gather from the testimony of your witness, you would not be satisfied with an order that said, that provided that well would be allowed to make up its overproduction by producing say at 50 or 75 percent of the average monthly allowable for the preceding six months proration period?

MR. GIRAND: Mr. Payne, we don't know that we can protect our well and our reservoir, and produce a well in that manner. I believe if you'll recall the testimony of the witnesses in both the Continental case and in the El Paso case heard at the September 30th hearing, they both withdrew that part of their application, amended that part of their application, which dealt with a percentage of allowable, because we are dealing with an unknown. Now, there is another factor to be considered in these cases. These wells are overproduced because they have, previous to the May check, been produced as marginal wells. There had been no effort on the part of either the transporter or the operator to arrive at any conclusion of what the production practice should or should not be. Basically, I feel that making the test, and under your rules, that your rules can be unfairly exercised, because on any given day on any given proration month, if that happens to be the day a well is investigated, and if it happens to be a day in which the nominations are unusually low, a well could be overproduced more than six times, based on that particular day; when the following month it might be underproduced.

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MR. PAYNE: We don't go by the day.

MR. GIRAND: I understand, but I'm referring to the rule that was adopted by the Commission.

MR. PAYNE: Well, it is based on a month.

MR. GIRAND: Yes, and we are willing to work along with the Commission in any way possible. We just say let's don't take an action here that will destroy our reservoir and our property. If the Commission wants to take another look at what we have done at a later period, that's fine, but right now, give us a chance to find out what we are doing; and we came forward with the best we could get in the period of time we had. We had one well here that we have been able to go from a piston type operation over to a pump jack, we have been able to furnish the Commission with a record of that well, not conclusive, it is too early to tell, but at least it shows that these applicants are coming before this Commission with clean hands, we are trying to do something. Right now, our opinion is we can't be shut in without loss of reservoir, and we have been messing with producing gas this way for more -since 1953, and we feel that we are fairly qualified on this type of method of production.

Now, we have not gone through the elaborate detail of furnishing factual information as to what the ratio would be, what we can do, how much we can choke a well down, how much we can't, we are dealing with something that any inexperienced handling of could easily result in the loss of our reservoir. So we got to



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have some relief in order to prevent waste and protect our property.

MR. PAYNE: Let's proceed to the next well. MR. UTZ: I have a couple of more questions. Getting back to your Repollo well, what was the history of water production on that well which you say is virtually in the stage of abandonment at this time? Did the water production increase as the gas production decreased?

MR. WATSON: After a period of time, yes. Now, when that well was originally drilled, it was drilled in April of 1950, and I came out here in September of '50, and prior to that time, I'm not familiar with what the actual completion, I mean, how much it made on the initial completion, but all the records and the initial deliverability test show that the well did make a considerable amount of water. Now, the water has increased, I mean, it did increase as the gas decreased until the pump jack was put on, and then in a manner similar to this Winningham, the gas rate increased to approximately a million and a half a day after they got it unloaded and pumped off, it was allowed to produce a million and a half to a million eight hundred thousand a day. During that period that I was talking about, on this exhibit, and since that time, it has not been able to produce at that rate with the pump jack operated continuously; the only time the well has ever been down, to my knowledge, is whenever there is something mechanically wrong. Once in a while we have to change the electric



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motor, or the lighting would knock it out, and the pump had to be changed, so the water was increasing as the gas decreased, definitely.

MR. UTZ: Well, you had to increase the strokes per minute on your pump, increase the rate of withdrawal?

MR. WATSON: Yes, sir, when we originally put it on, we had a real small pump jack on it in 1953, and a small pump, inch and a half pump, T believe, and after so long a time, in 1955 we had to install a larger pump jack and put it on electricity to keep it on all the time, and a larger pump was installed, and I'm not sure of the date, but some time since 1955, a volume producing pump has been put on, capable of producing 650 to 800 barrels of water per day, and that's the way it has been producing since that time.

MR. UTZ: If your rate of water increases as the rate of gas production decreases, then it would seem that your water encroachment is not sensitive to gas production?

MR. GIRAND: Mr. Examiner, we have not had the exhibit on that yet, and if I may, I think the witness may be a little confused on your question. My understanding, while the well was a sitting well, the well was consistently producing water, is that correct?

MR. WATSON: Yes, sir, when the well was first put on, they numped the water and the gas out through the tubing, and while we were doing that in the Winningham, and at a later date it





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got to where no gas was coming out of the tubing, and it was pumped right straight to the pit as it is now. The water that comes out of the tubing goes straight to the pit, though no separation; it comes out and into the pit, and the only gas production is produced through the casing, and at the same time the well did, up until it died here, it produced water and gas out of the casing.

So the gas, the pump jack was lifting the maximum amount of water that it could lift, and the water was being lifted by the gas out of the casing, and as long as that amount of water is lifted from the tubing it is all right, which is a tremendous amount of water.

MR. UTZ: The hearing will be recessed until 1:30.

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## AFTERNOON SESSION 1:30 P.M., WEDNESDAY, OCTOBER 7, 1959 MR. UTZ: Did you want to continue with Mr. Watson: MR. GIRAND: I think that's all we have to offer in that particular case, the Winningham. Of course, we have offered some evidence in regard to the Repollo, but then we will cross reference it, expedite it as much as we can. I would like to have Mr. West back on the stand. MR. UTZ: The hearing will come to order. DIRECT EXAMINATION (Continued) BY MR. GIRAND: Your name is John West? Q Yes, sir. A You are the same John West who appeared in the morning 0 session, testifying in regard to the Winningham Number 3 Well? Yes, sir. A Q Mr. West, I direct your attention to Exhibit 1 before you there, and ask you to identify the location of the S. R. Cooper Number 1? A S. R. Cooper Number 1 is located in the SE/4 of the NE/4 of Section 23, Township 24 South, Range 36 East. Now, Mr. West, did you have occasion to inspect the Q property known as S. R. Cooper Number 1? A Yes, sir. ୁ On what date did you make that inspection?



ALBUQUERQUE

A October 5th, this year.

Q In connection with your inspection, did you also make certain checks and tests in regard to that particular well?

That is right.

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Q I hand you Exhibit Number 16, that has been identified as Exhibit Number 16, and ask you if that exhibit was prepared under your supervision?

A Yes, sir, it was.

Q Tell the Commission what the exhibit purports to show? A This, as in our previous exhibit, shows the average production and the monthly production from the solid line graph, and the average line pressure each month that was on the El Paso lines; this information was taken from the El Paso records in their Jal office, and we have indicated here for you the type of lifting, which is a free piston, and we did not have any records as to what the casing pressure was in 1958 or tubing pressure, but October the 1st 125, tubing pressure 110, and the estimated production of 15 barrels in October 1958; but the water, we still have it lifted as estimated, 16 and a half was an actual field gauge on that, and overproduction as of August 1959 was 20,630 MCF.

Q You actually went upon the premises and inspected on August the 5th?

A Yes, sir.

- Q I beg your pardon, October the 5th, 1959?
- A Right.

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Was the well producing at that time? Q A Yes, sir, it was producing. And the water that was required to be lifted per day Q was 16.5 barrels per day? 3-6691 A That's right. HONE CH MR. GIRAND: We would like to offer Exhibit Number 16 MR. UTZ: Without objection, it will be accepted. MR. GIRAND: That's all the questions we have from Mr. West in regard to that well. CROSS EXAMINTION BY MR. PAYNE: Mr. West, how did you measure the water? Q A It was measured in the tank, actual gauge tank. Q It flows into the tank, and then you run it out, is that it? A That's right. Flowed in there and measured, and then released. MR. UTZ: Any other questions of this witness? ALBUQUERQUE, NEW MEXICO (No response.) MR. UTZ: If not, he may be excused. MR. GIRAND: I would like to call Mr. Watson, please. DIRECT EXAMINATION (Continued) BY MR. GIRAND: State your name, please. Q A Dewey Watson.

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Q Are you the same Dewey Watson who was on the stand here this morning in regard to the Winningham Number 1?

A Number 3, yes, sir.

Q Number 3. Mr. Watson, what if anything have you had to do with the production of S. R. Cooper Number 1?

A The well was reworked in 1955, under my supervision, and I have been associated with it over a year and a half since that time.

Q Now, in your association with the well, are you familiar with the producing practices that have been employed in order to produce the well?

A Yes, sir, I am.

. What and when did the well go off natural flow, as a gas well?

A There was an intermitter installed on the well immediately after it was reworked in 1955, however, there was not a free piston installed until January of 1958.

Q And was the installation of the free piston under your supervision?

A Yes, sir.

Q And has it been produced, being produced at the present time by the use of the free piston?

A Yes, sir, it is.

Q Based on its past history of production and the influx of water, and the producing methods you are now employing,



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what is your opinion as to whether or not the well would be maintained and the reserve exhausted, if the well is allowed to be shut in at any time for any appreciable length of time?

A Well, I think it would permanently damage the formation; whether it would completely kill the well or not, I don't know.

Q Now, in installing your free piston method, how does that free piston work? Is that set on a time basis for operation of dumping every so often by time, or by volume, or how do you work it?

A Well, it is in reverse of what we would normally use on an oil well installation; the well is allowed to flow, the intermitter opens up, and it is allowed to flow for a period of time, say as an example three hours, and it, during that time the well is flowing gas and water through the tubing, and the piston comes to the top and is held up there by the flowing pressure; and the intermitter closes in for, we try to give it about 30 minutes for that piston to go back to bottom, which the tubing has a setting nipple and a stop at the bottom of the tubing, and the piston goes back to bottom and travels through the water that has accumulated in the tubing as the well flows, and in 30 minutes; it is opened back up and produces say for another three hours. Now, and that has to be adjusted as the water increases and the pressure goes down, you have to flow more often to keep the well on production.

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Since the installation of that piston, has the com-Q pany watched the well closely to protect against the well logging off by adjusting the interval and the operation of the free piston PHONE CH 3.6691 A Yes, sir, we have. DEARNLEY-MEIER REPORTING SERVICE, Inc. And at the present time, do you feel that the inter-Q val that the piston is allowed to operate at the present time, is the one that would afford the maximum operation of your installation ---A Yes, sir. -- obtaining the maximum of your gas reserves? Q A Yes, sir, right now it is. Do you anticipate that in time the wells will be Q required to be converted to artificial lift, such as a pump jack -Q -- in order to raise the gas? A Yes, sir, I do. Have you had occasion for this well to be shut in Q ALBUQUERQUE, NEW MEXICO in the past? A It has been shut in, yes, sir. When the well has been shut in in the past, what was Q required of the operator in order to bring the well back on production? We've only had to swab this well one time; we've only Ą swabbed it one time since the piston was installed.



When you swab the well, does that require your moving in a swabbing unit --A Right. -- go through that expense? Q PHONE CH 3-6691 Right; right. A Q How long would the swabbing unit have to stay on the location? In the neighborhood of four hours. A ۵ Now, do you have any way of determining within reasonable bounds, how long you would be able to continue this well with the mechanical method you are presently using, that's your free floating piston? A Well, the only basis that we have is the experience that we have had with the other wells that have already gone on pump, just as the Winningham 3, and it flowed on the free piston for approximately, it was four years and eight months, and I assume that this well will follow the general pattern; it may be

less or more.

Q Well, are there any other determinative factors involved such as the line pressures the well has to produce in, or the encroachment of water, are they to be considered?

A Yes, sir, they very definitely are. If at any time the line pressure goes up, you reduce your volume of gas and water both; and the more water that comes in, which is maybe slow but it is steady in this case here, well, it will have to be lifted.

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Do you believe that the method you are now employing Q in the production of the S. R. Cooper Number 1, to be a method designed to protect the correlative rights and to prevent waste of the reservoir?

> Yes, sir, I do. A

Do you feel that a shutdown of this well could result O. in a loss of the well or the loss of reserves?

> A Yes, sir.

You previously testified in regard to the Winningham Q. . Number 3, and to some extent the Repollo Number 1, and if the same questions were asked you in regard to the S. R. Cooper Number 1, as were asked you in regard to the Winningham Number 1, insofar as their applicability to the method of production, would your answer be the same or similar?

> Yes, sir, they would. A

MR. GIRAND: We will pass the witness. I would like to withdraw that.

Q (By Mr. Girand) Mr. Watson, I'm going to hand you here Exhibits Numbered 17 through 23, and askyou to identify those, if you will, please.

A Exhibit Number 17 is a letter from Gas Engineer, El Paso Natural Gas Company, Edward Maybe to Aaron Cummings, who was then employed by Olsen Oils Company. This is December the 9th, 1953, and it states there that:

"We were unable to run a minimum contract test on your Jenkins Number 1 and S. R. Cooper Number 1 on date scheduled.



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November 9, 1953. The Jenkins 1 was logged off, and would not produce into our line; the S. R. Cooper Number 1 well had valve leaks.

"If remedial work is done on these wells, please notify our Dispatching Department when well is ready for production."

Well, I think this will have more to do, as far as the wells are concerned, to the Jenkins Number 1 than it would be to the S. R. Cooper Number 1. I would like to refer to that, or defer it until the Jenkins Number 1 comes up.

Q Well, we will refer back to it on the Jenkins Number 1. A Exhibit Number 18 is a minimum contract test taken by EI Paso on March 8, of '57, and I think you'll note there on the tubing data, when the 24 and 48 and 72 hour tests were taken, the 72-hour test was 2 pounds less; the shut-in pressure test was 2 pounds less than it was at the end of the 48-hours, which indicates fluid. I believe that's -- and it's -- I would like to note there it is a fairly low rate of flow even at that early date in '57.

And Exhibit Number 19 is a minimum contract test run on 7-19-57, and here again the shut-in pressure follows the same pattern. It built up the first 24 to 48, and then drops at the 72-hour shut-in test. And the open flow deliverability is a little bit higher than it was in the other well, it is 175 against 182 on the last test.

And Exhibit Number 20 is another test run on March 14th, 1958, and that was taken after the free piston installation in January. And I think the significant thing there that this shows is the fact that the tubing and casing pressures are higher on

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the shut-in, which to me means that the fluids, due to the piston installation, have been removed from the well bore, giving it a better chance to flow. And the shut-in pressure on the 48-hours was lower, and then it came back up to its maximum on the 72-hour; and also the rate of flow is increased over the previous tests from approximately six months before.

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Exhibit Number 21 is another minimum contract test, taken on 9-15-58, and here again it follows the same general pattern as the others except the flow rate drops from 205 MCF down, or the deliverability of a hundred pounds comes from 205.90 to 206.8 MCF.

And Exhibit Number 22 is a deliverability test taken in February of '59. This has been reported to the Commission on 122-C, and the casing head pressure here and the tubing pressure shut-in there is in the shut-in zone. This is just a rate of flow, and then your deliverability calculated from your 80 percent. I would like to call attention to the fact that there is only a deliverability of only 52.54 MCF at 80 percent, which is very low, and as I mentioned before, it is very difficult to take a real accurate test on a well of that type when it's on piston.

Exhibit Number 23 is a minimum contract test taken on February the 20th through the 27th of 1959, and the shut-in pressures here again go back to where it was before we installed the piston, the 24-hour build-up, the 48 is higher, and then it drops again on the 72-hour, which indicates to us that the water is catching up with the free piston installation to a certain

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degree, and I think that is further evidenced by the low rate of flow which is 72 MCF, and the deliverability was 801 MCF, which there is a correction on it, should be 80.1 instead of 801.

Q That's on Exhibit 23?

A Yes, sir.

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MR. GIRAND: With the Examiner's permission, we would like to make a correction on that exhibit.

MR. UTZ: Is that .8?

A 80.1. As you can see, that's getting to be a pretty low rate of flow, as far as commercial production is concerned. However, the well seems to be doing better than this would indicate as far as actual production is concerned. I believe that's the significance of those exhibits.

Q (By Mr. Girand) In your opinion, would the operator take on an undue risk and loss of the well if the operation of the well would change in any manner --

I certainly think it would, yes, sir.

Q -- including the removal of artificial lifts?

A Would you state your question again?

Q I say, such as removal of the artificial lifts of one kind or another?

A Well, if we removed the artificial lifts, the well would be dead, I'm sure.

Q And if it were shut down for any period of time, in your opinion would the well be dead forever?



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PAGE 62 It is very possible it would be. Â Do you have anything to add to your testimony, Mr. Q Watson, in regard to the S. R. Cooper Number 1? Nothing except that I think it's -- I mean, we can A 3-6691 consider that it will follow the same pattern that the Winningham £ PHONE Number 3 did, in requiring a pump jack at a later date. MR. GIRAND: That's all the questions we have. We would like to introduce the Exhibits 17 through 23. MR. UTZ: Without objection, they'll be accepted. QUESTIONS BY MR. UTZ: Mr. Watson, after your test of February 27th, \*59, Q the minimum contract test, was it necessary to swab the well? No, sir, it was not. A I note on these tests that without exception your Q highest shut-in pressure is from 48 to 72 hours, is that correct? Well, on this last one, the highest shut-in pressure A was 48 hours, and it dropped at the end of 72. Now, the one previous to that, the high shut-in pressure was 72 hours, and it dropped from 48 to the 24; and the one previous to that is the same situation. Now, this is right, this is about two months or sixty days after the installation of the free piston, and I think as I noted the pressures the surface pressure increased considerably over the pressures that were taken before; the next test back they come from 488 to 670 pounds. Now, that can only mean to me that the water has been relieved from the bore that had been

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accumulated in the bore, and I think in 159 it shows it is going back to the same situation it was on the intermitter, showing that the water is overtaking the method of lifting. You are producing this with free piston and intermitter? CH 3-6691 Yes, sir. 4 And your shut-in period on the intermitter is 30 DEARNLEY-METER REPORTING SERVICE. Inc. minutes? I have not got the exact time, but I know it is right A close to 30 minutes, it will not be more, it might be less. Q With only a 3C-minute shut-in on the well, the shut-in pressure would be substantially less than it would be for these 24, 48 and 72-hour shut-ins, wouldn't it? £. Yes, sir, it is. And even with that amount of buildup, your free piston Q is operating satisfactorily, lifting the load of water? It is except for one exception, from the one time we A had to fish it out and swab it, it was dead. Q If you allowed the well to be shut-in a little longer MEXICO and build up a little more pressure, wouldn't it still lift? NEW A I assume it would. I mean as far as knowing for sure, **LBUQUERQUE** I wouldn't know until I tried it; I imagine that's something we would be willing to do. MR. UTZ: Any other questions of the witness? MR. PAYNE: Yes, sir.

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## CROSS EXAMINATION

BY MR. PAYNE:

Mr. Watson, I notice you don't have an intermitter chart on this well?

A No, sir, I do not.

Q Now, you testified that this well was reworked in 1955, what was done to 107

A We were producing out of open hole prior to that time in the Yates section. All those forms and everything are in the Commission files, and there was a 4-inch liner run and a portion of the Yates section perforated and fractured.

Q Now, you also testified that this well was shut in at least on one occasion, why was it shut in them?

A It was shut in to take the minimum contract test, and this is different periods that we have here; it was shut in on all those occasions.

Q Do you have any idea what the reserves are that are left under this tract that are dedicated to this well?

A Not exact figures, nc.

Q Would a pressure croduction decline curve tend to show what reserves are there?

A I think it would be an indication, yes, that's all. Q Now, since you have not run an intermitter chart on this, what do you feel this well has to produce to avoid premature abandonment, the average for the last twelve months?

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PAGE Well, under the existing circumstances, the way it is producing right now seems to be the only way it will keep the water off. Now, by "right now", you mean to the, say the last Q CH 3-6691 month that you have the production history on? PHONE I mean we feel that under the present operating con-A DEARNLEY-MEIER REPORTING SERVICE, Inc. ditions, that we are operating it as best we can. Well, how much did it produce the last month that you Q have records on? Well, let's see here. A MR. UTZ: You can have access to Commission's records here, if you care to. Well, we have them right here. I'm taking a minute A to look at them. Well, according to this figure here, we have produced 4,301,000 MCF for the month of September. (By Mr. Payne) 4,301,000? Q Yes, sir, I think that's a relatively new figure; yes, A it is. It has not been entered. And the August production was NEW MEXICO 2,675,000. All right, sir. Now, taking the 4,301,000, let's see, Q ALBUQUERQUE, that would be a little over 4,000 MCF, right? I would like to make a correction. That is not pro-A duction, that is allowable for August and September, rather than production. Q You do not have the production figure?



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		PAGE 66
PHONE CH 3-6691	A	I do not have the production figure for that.
		MR. PAYNE: Do you have the production figure?
		MR.UTZ: Not for September.
		MR. PAYNE: What's August?
		MR. UTZ: The production figure we have for August
	is 5421.	
		MR. GIRAND: MCF?
		MR. UTZ? Right.
	A.	Yes, sir, that is correct.
	Q	(By Mr. Payne) Now, I believe you testified in answer
	to Mr. Girar	nd's question, that your answers in regard to this well
	insofar as t	he same were applicable, would be the same as in
	regard to th	e previous well, the Winningham well?
	A	Yes, sir, it would.
	Q	Now, I believe you testified in regard to that well
ALBUQUERQUE, NEW MEXICO	that you fe]	t that a water drive field and a secondary recovery
	project shou	Id be governed generally speaking by the same rules
	and regulati	lons, is that right?
	A	Well, I said insofar as the allowable was transferred
	and allowed	to produce at capacity on those wells.
	Q	Well now, in an actual water drive field, that's not in
	the process	of secondary recovery, do you know of any that are
	allowed to p	produce at capacity?
	• <b>A</b>	No, sir, I don't. In Texas they are given an un-
	restricted a	allowable on numbered days to produce; I mean, that's

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the way they hundle it. Yes, but it is not unrestricted insofar as the well's ability to produce? Α No, sir. CH 3-669 They produce 8 or 9 days?  $\mathbb{Q}$ A No, they produce 31 days, or whatever it is, as the field allowable. The same as New Mexico? Q No, sir, they have shut down days, I mean, their A allowable is governed by shut down days, and unrestricted allowable means that they are allowed to produce every day their field allowable, rather than 10 or 12 days. Isn't that the way we prorate here? Q That's the proration here. A Do you actually feel that the same physical principles 0 and engineering principles apply to a water drive field that apply to secondary recovery projects? A No, they can't be exactly the same, but I maintain NEW MEXICO they are similar. Your recommendations in regard to this well are that Q ALBUQUERQUE, it be allowed to continue producing in the neighborhood of what it is producing right now? A Well, the way we have it producing now is the maximum, or minimum rate that we feel that will keep the water off of the formation and prevent any damage to the well.

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MR. PAYNE: Thank you. MR. UTZ: In order to correct the record, I possibly ought to ask this question of the other witness. On your Exhibit Number 16, as well as your Exhibit Number 1 on the Winningham 3, there appears to be some discrepancy in the amount of overage. Exhibit Number 16 states August overproduction of 2630, when actually our records show that to be September 1st overproduction status. MR. GIRAND: Well, I assume they took the figure at the end of the month. It was an end of the month figure. MR. UTZ: But it had August production charged against it. MR. GIRAND: That's right. MR. UTZ: That's all I have. Any other questions? <u>REDIRECT EXAMINATION</u>

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# BY MR. GIRAND:

Q I may be repeating. The productivity of the subject well, the S. R. Cooper Number 1, is dependent upon two things, the encroachment of water and the line pressure the well has to produce into?

A That's true.

Q And are both of those factors, the encroachment of water, and the line pressure, variable from time to time?

A Well, I think your line pressure is subject to more variation than the water encroachment, because the water encroach-



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ment is continuous.

Q If allowed to come in uninhibited, in other words without lifting any of the water off, just let it be flowing in without any pressures on it whatever, would the water build up faster than it would volumewise as you are lifting it off from time to time? In other words, if your well is shut in, will your accumulation of water accumulate at a greater rate than it would while the well is being produced?

A Yes, sir, it accumulates around the bore hole, and just shuts itself off.

Q What I mean, does that accumulation, is it more advanced, is it faster when the well is shut in than when the well is being produced? In other words, in a 24-hour period you get so many barrels of water from the well bore; now, if the well were shut in that period of time, would you have more water accumulated than the amount of water you produce during the 24-hours?

A Yes, sir, I believe you would.

## RECROSS EXAMINATION

## BY MR. PAYNE:

Q Mr. Watson, did you just testify that the productivity of this well is dependent upon the encroachment of water and the line pressure?

A Well, let me qualify the productivity, if I may. May I ask Mr. Girand, do you mean by productivity, the ultimate recovery on that well?



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MR. GIRAND: That's right, its ability to produce. A Yes, sir, and the line pressures too. I mean, in this way, with our contractor, El Paso, as you are familiar with, they will take the gas down to a certain pressure, and then compressors will be put on; these wells are running in the neighborhood of 70-pound pressure now, and El Paso can't go much below that. So as far as the ultimate production of the well, it does depend partly on the line pressures, and the water encroachment in the same time.

Q But that is not all it depends on is it? It also depends on the deliverability, doesn't it, the reserve, recoverable gas in place?

A Well, your reserves are no good if you log off with water.

Q But the recoverable gas in place is what you are attempting to get out of this well, isn't that right?

A Yes, sir, sure is; and if we shut that well in, not only this well but all of them in -- some of that recoverable gas we are not going to get due to being shut in.

Q How long do you think this well could be shut in without doing any material damages to the reservoir, or the well?

A Well, I wouldn't even hazard a guess, and I wouldn't go shut it in, because I probably would be run off if I did; those things are pretty critical, we just don't feel like they can be shut in for any length of time at all.



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Q They are shut in sometimes for what, 72 hours, 48 hours?

A That's right, but it is not like being shut in for six months or a year.

Q When do you feel you will have to go to the pump jack method on this well?

A Well, I think the pump jack is down the road quite a ways, it would be a guess on my part to set a date on it.

Q Do you think the pump jack method of getting rid of the produced water is more efficient than the free piston?

A Very definitely; I mean, that's the last resort, we can't go any further than that pump jack. I mean, when you get to that, you are at the bottom of the barrel.

Q Would you explain to me just how this pump jack works?

A Well, it is a conventional pump jack, you run a sitting nipple on the end of your tubing, and run a pump, a tubing pump on the end of your sucker rod string, and hook it up just like an oil well installation, I mean, it is no different at all.

Q Well now, when you are using this pump jack and you are pumping the water by -- does this run by electricity or --

A Well, they can be run either way, there is no --I mean, no designation there.

Q You are using this to get rid of your water; I still don't understand what physical principle requires that the rate of production will have anything to do with the water en-

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croachment, or the injuring of the well. I mean, your pump jack is getting rid of all the water, is it not?

A Well under the way we are producing it now, it is keeping the well bore clean, yes.

All right. Even if the well was making no gas, well, Q even if the well was shut in, the production part of the well was shut in, and you were pumping the water out, could you damage the reservoir then?

Well, the only thing that would happen there is when-A ever, if you can pump the water fast enough to get it out of the tubing and leave your casing shut in, and still have pressure on your well, the well, the casing when it is shut in and if you keep that water out of there, it is going to flow through your tubing and wherever the water is going, that's where your gas is going; if you had it hooked onto a low pressure line, it will be there, and if you had it going to a pit, your gas would go to a pit. That's the reason why you can't shut this particular pump -- and as new as the pump jack installation is, if you shut your casing in, that would build up and the first thing you would know, you would be flowing part of your gas out of your tubing.

> I see. Q

A And under our circumstances, we are tied in where that gas goes into the low pressure meter and the battery?

MR. UTZ? It would be a substantially lesser rate, wouldn't it?



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Yes, sir, it would be very much less.

MR. PAYNE: That's all, thank you.

MR. UTZ: Mr. Watson, do you think this water problem you have is the result of water drive in this area, or is it just the formation water problems? Is the water table moving up structure?

A Yes, sir, I believe it is. It is not a real active water drive, T know that, but especially in the south end of the thing, and on the west side where it is coming out of the basin, I feel it is an active water drive.

MR. UTZ: Any other questions?

MR. GIRAND: I have one or two questions.

### REDIRECT EXAMINATION

### BY MR. GIRAND:

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Q If I understand you correctly, Mr. Watson, does the method you are employing in producing this S. R. Cooper Number 1, and as well as the Winningham, the method produces water and gas at the same time?

A Yes, sir.

Q And as you produce your water there, is some gas produced along with it?

A Yes, sir, there is.

Q And the mere unloading the hole of water, and keeping it clean of water, would not stop the flow of gas, there would be some gas flowing?



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Yes, sir. A And if it is, if they shut down the gas, why you'd Q have to shut down your pump and water, or flare the gas, or waste off the gas? CH 3-6691 A Under these circumstances, yes, we would. Now, in regard to when you had to put a pump jack on Q this particular well, that could be any period providing the well was required to be shut in for any considerable period, why it might hasten the time when you might have to put a pump jack on it? Yes, I'm sure it would, and if it is shut in for A more than normal tests that have been conducted on this. As a matter of fact, later on we are going to present Q evidence in regard to the well known as the Owens Number 1 --Yes, sir. A -- it is a well that has been shut in for some time? Q A Yes. Q I'm asking these preliminary questions just to give you a background for answering another question. When the Owens MEXICO Number 1 was checked on October the 5th, 1959, was the well dead? NEW Yes, sir, it was dead. A ALBUQUERQUE, Q And how long had it been shut in? A Approximately one year.

Q You don't know whether or not you are going to be able to bring the well back or not?

A No, sir, we wouldn't know until we go in there and try.

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Q It is evident that you are going to have to swab the well at this time in order to try to bring it back?

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A Yes, sir, we will.

Q Do you solicit attendance of a Commission agent at the time, to go back into the Eva Owens well to see what happens?

A I think it would be beneficial for all of us.

## RECROSS EXAMINATION

BY MR. PAYNE:

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Q Mr. Watson, does the water production increase as your gas production rate increases? The more gas you produce, do you produce more water?

A Well, there has never been any specific tests run for that reason, so I mean I can't honestly say; and I wouldn't want to make a statement without being able to say it was, because we have not run any test, I mean, to substantiate that one way or the other.

Q I take it then that the water encroachment problem is the same no matter what the rate of production is?

A No, I don't think that is, I mean, I can't go with that being true.

Q Well, have you established to the contrary?
A Would you state your question again, please?
Q If you increase your gas production, does this increase the water production?

Well, to answer that, I don't know, because as long

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as those wells have been producing without being shut in, I mean, it is a maximum rate, so the only way we could do that would be pinch them back and go the other way and see.

Q It is a maximum rate, but you don't know if it -- if it is a minimum rate?

A Not for sure, but we feel it is.

Assuming that increased gas production causes increased water production, then you also have an additional wastage of gas that comes out with the water, lon't you?

A Well, under the system that we are using now, that gas all goes down the line, there is no waste to it. See, it is pumped directly into a high pressure separator which separates, and the casing goes through that also, and it all goes into a high pressure separator, and then El Paso's line, and the water is fumped out the dump value in a regular manner.

> Q None of this gas goes in with the water --A No --

Q -- any substantial amount?

A -- just very minor amount, yes, sir, so there is no waste as far as that operation is concerned at all.

MR. GIRAND: But you could not do that if you shut in your gas. or attempted to shut in your gas, and continued to produce your water?

A No, sir, I don't think so.

MR. UTZ: But if you continue to pump your water, then

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you could reduce the rate of gas production, couldn't you?

A By how, now?

MR. UTZ: Well, you just stated awhile ago that if you shut in the casing, it would build up and flow through the tubing as you were pumping the water?

A It is possible, yes.

MR. UTZ: At some reduced rate?

A Yes.

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MR. UTZ: When you are producing through the tubing and through the casing, is there any gas produced through the casing?

A In this particular installation, I don't know; we have not had it long enough to find out. The Repollo, it produced solid water with just no gas at all out of the tubing, and water and gas out of the casing. Of course, that was in a more advanced stage. This is a relatively new installation, and I don't feel like there is any fluids coming out of the casing. Think we are getting it all out of the tubing.

MR. UTZ: Any questions of the witness? If not, we will continue to the next well.

DIRECT EXAMINATION (Continued)

BY MR. GIRAND:

Q You are the same John West who previously testified in this matter?

A Yes, sir.



Q Mr. West, have you had occasion to check the production of the well installation known as the Repollo Number 1 ---

A Yes, sir.

Q -- located in the SW/4 NW/4, 28-25-37?

A Yes, sir.

Q I hand you here what has been marked Applicant's  $E_{\underline{x}}$  hibit Number 24, and ask you whether or not that exhibit was prepared under your supervision or not?

A Yes, sir, it was.

Q What does that exhibit purport to show?

A It is a graphic representation of the production of of the well in the last part of '58, and the first part of '59 in the solid line, and a broken line for the line pressure that El Paso Natural Gas line maintained that this well was producing into. Ard all these records are taken from El Paso Natural's files.

Q Bid your check of that well include a study of the subsequent cost to operators one and two in order to install the pump jack --

A Yes, sir.

Q -- and attempt to produce the well?

A Yes, sir, this was their records, I mean, in fact the records of the Jal Oil Company shows money that they actually spent, which was roughly \$8,000.00.

Q Did you have occasion on October the 5th, 1959, to physically inspect the subject well?



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			A	I did.										
			Q	And at	that	time,	did y	rou ma	eke o	hecks	s in	regar	rd to	>
	192	casing	and	tubing p	ressur	e, as	refle	ented	by E	<b>x</b> hibi	lt Nu	mber	247	
, c			A	Right,	they	were	very,	very	dead	l, pre	essur	e on	both	of
	<b>CH</b> (- 669)	them.												
3				MR. GI	RAND:	I be	lieve	that	's al	1.				
In.		QUESTIONS BY MR. UTZ:												
ICE.			Q	That w	ell, a	t the	time	you	inspe	ected	it,	that	well	L
R		was bei	ing p	umped?										
SERVICE, Inc.			A	That's	; right	, it	was pi	umped	, and	i ther	re wa	s a,	I	
NC		suppose it was sulphur, it was a very blackish water coming out												
КТІ		in pretty good quantities.												
EY-MEIER REPORTING	•		Q	Did yo	ou dete	rmine	the d	quant	ity (	of wat	ter?			
RE			A	We dia	in't, t	his i	s an e	estim	ate,	we di	id nc	ot, I	mear	1 <b>,</b>
ER	albuquerque, new mexico	it was	just	going i	into a	big p	it and	d we	didn	't, di	id no	ot tal	ke tł	nis
MEI		into a	tank	and gau	uge it	or an	ything	g; it	was	just	an e	estim	ate	
.Y-A		volume	of w	ater. 3	hey ha	ad thr	ee bi	g pit	s the	ere t	hat t	his y	wate	r
		was running from one to the other.												
DEARNL			Q	Has th	nis wel	ll bee	n shu	t in?						
DE			A	So fai	r as I	know	it ha	s not	; it	is n	ot pr	roduc	ing a	any
		gas, i	t's j	just, the	ey are	just	conti	nuing	to	punp	it be	ecaus	e as	
	ALBUQI	I unde	rstar	nd the s:	ituatio	on, th	ey ar	e try	ing	to ge	t the	e wat	er of	ff
		of it,	and	maybe r	elease	some	gas t	hat i	s tr	apped	. Is	sn't	that	
		the gen	nera]	L thinki	ng or t	chat c	ontin	uous	pump	ing t	herei	?		
		-		MR. W	ATSON:	That	s ab	out a	11 W	e can	do,	to p	ump	it

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continuously to see if that water will decrease enough to let some of the gas come on in.

MR. GIRAND: I intend to establish that with Mr. Watson.

MR. UTZ: I figured you might. That's all the questions I have. Any questions of the witness?

(No response.)

MR. GIRAND: At this time we offer Exhibit Number 24. MR. UTZ: It will be admitted.

MR. GIRAND: Mr. Examiner, rather than give all these exhibits for numbering, may I give a portion of El Paso Natural Gas Company's file on the Repollo Number 1, dated from June 9th, 1950 through July 29th, 1959, and I'll give you the number?

MR. PAYNE: You are just asking relief on this particular well, Mr. Girand, in case you are able to get it back into production, is that right?

MR. GIRAND: Mr. Payne, you have guessed it. We are still pumping, we are hoping we do, and if we do, we don't want to lose it. That's the only purpose of this application, plus the fact that we think this a representative well, that the history of this well will in time become the history of any other well producing from there.

Our Exhibit Number 25 is 15 pages.

DIRECT EXAMINATION (Continued)

BY MP. GIRAND:



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Q You are the same Mr. Watson who previously testified in this case?

A Yes, sir, I am.

Q You previously testified in regard to the Repollo Number 1, located in SW NW of Section 28, Township 25 South, Range 37 East, Jalmat Pool. In regard to your testimony covering the Winningham Number 3, which was the first well upon which evidence was offered, the remarks you made in regard to the Repollo Number 1 at that time, do they constitute your testimony in support of the application of the Repollo Number 1?

Yes, sir, they do.

Q At the present time, is the Repollo Number 1 capable of producing any gas into the El Paso Natural Gas line?

No, sir.

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Q How long has it been in that condition?

A I'm not exactly sure of the date, but it has been in the neighborhood of a month, or maybe two months.

Q And how is the well equipped, Mr. Watson?

A It is equipped with a conventional pump jack, but the pump is a double displacement pump, which is capable of producing 750 barrels per day.

Q And has the pump jack been operated at its maximum efficiency?

Yes, sir, it has.



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A Not more than just a few hours at a time.

Q A<sub>g</sub> a matter of fact, has it been a well that has been produced since 1955 under exception of one kind or another by the Commission relieving it from shut in periods?

A Yes, sir, it has been.

Q Now, prior to the installation of the pump jack on the Repollo Number 1, how was the Repollo Number 1 being produced, if you know?

A Well, the only way we could get it to flow any at all would be to go out there and swab it for, I think the last time it was swabbed about 24 hours steady, and it produced, as f recall, it has been quite a while, quite some time back, as I recall, it produced about three days and then completely died.

Q Now, were you with the Jal Oil Company, or R. L. Olsen at the time the Repollo Number 1 was placed on pump jack?

A Yes, sir.

Q Now, at that time, and the time you made the decision to install a pump, had they refused or failed to make that installation with the Repollo Number 1, as a dead well?

Yes, sir.

A

Q By reason of the installation of that pump jack, has the Repollo Number 1 been able to produce gas?

A Yes, sir, it has, up until now.

Q Did you consider the gas, produced reservoir gas that

PAGE 83 had been indicated under the well? A Yes, sir. If the well had been abandoned at that time, or if Q the pump jack had not been installed, then all the gas the Repollo 3-6691 Number 1 has produced since the pump jackwas installed has been ΗJ saved for the public, for the State, for the people, is that right? Yes, it has. A And which otherwise would have been lost? Q Yes, sir. A Now, at the present time, you don't know whether or Q not you are going to be able to bring this well back to where it can produce? A At the present time we don't know that it will ever produce again. Q However, you are still continuing your pumping operation? That's right. A For the purpose of this application, if you obtain Q NEW MEXICO an order from this Commission, that should the Repollo start flowing any gas through this operation, that you be entitled to go ALBUQUERQUE, ahead and produce that gas? --A Yes, sir. Q -- is that based on the fact that your continued pumping over the two or three months' period here, would make it entirely feasible to try to bring the well back if it was shut in

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again? Would you go through that again? A I mean this: You have a history now, how much it Q would cost to bring this well back for two or three months, should 3-6691 you get gas back on the well or out of the well, would another Ю shutdown result in the same expense and experience? Yes, sir, I'm sure it would. A MR. GIRAND: I believe that's all I have. One other thing. (By Mr. Girand) Mr. Watson, I hand you here a photo-Û. graph, which has been marked Applicant's Exhibit Number 26, and ask you can you identify that? Yes, sir, that's a picture of the pits that the water A is going into from the Repollo Number 1. Q About what is the depth of the pit, if you know? Those pits run anywhere from 6 to about 12 foot deep. A And during the producing period of the Repollo Number 0 1, even up to the present time, would you say that the water level on that pit has remained constant? Very nearly constant, yes, sir. A ALBUQUERQU MR. GIRAND: We would like to offer this exhibit primarily for the purpose of showing the volume of water that is

Q (By Mr. Girand) Mr. Watson, do you have anything to add to your previous statement in regard to this well?



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being produced.

#### No, sir, I don't believe I do. A

MR. GIRAND: That's all.

# CROSS EXAMINATION (Continued)

## BY MR. PAYNE:

Mr. Watson, you testified that if you had not put the Q pump jack on there and tried to get this well back on production, that all the gas would have been lost. Are you assuming that no other well in the immediate area would have produced it?

A I'm assuming that the greatest share of it would not have been produced by any other well. Now, I don't think it can be said that some of it might not have been.

How do you arrive at that conclusion, what do you Ű. think one well in there will efficiently drain?

A Well, I don't think it is very efficient when you have that amount of water; but one well will drain a considerable amount of acreage, just exactly how much, I don't think anybody can say.

> Q This well only has 40 acres dedicated to it?

No, sir, it has 160 acres. A

You don't feel that that gas can be produced at the Q start out of the Number 2 well to the South, or the Number 1 well to the West, or the Number 1 to the East?

A Not nearly the amount that has come out of the well the way it was producing, no.

Q Was this the first well that Olsen drilled in this Jalmat Pool?



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I don't think it was the first well, no. A Q I just wondered if he had some sentimental attachment to this well. A Well, I think he is pretty proud of the fact that he HONE CH 3-6691 put that pump jack on there, and rightly so. REDIRECT EXAMINATION BY MR. GIRAND: Q Mr. Watson, you are convinced that where water is encroaching, and the well is required to be shut in, that the gas underlying that immediate well, or the acreage assigned to it, to a great extent will be lost? A Yes, sir, I certainly do. And that drainage will not occur to any other wells Q or other location? A No, sir. Q And you are concerned with the fact that should that exist, that your gas might go to some other operator and not to you? Α Let me hear that again. Q And -- well, if there was such a migration, it would be of no benefit to you if one of your offset operators, or competitors produced your gas, just because you weren't allowed to produce water? A No, sir, it wouldn't.

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MR. GIRAND: That's all.

MR. UTZ: Mr. Watson, this well has produced anywhere



From two to ten times its allowable anywhere in the past year. Do you think possibly the reason you lost that well was because of the rate of production causing a certain amount of coning? A Well, it was either produce it that way, or not

produce it.

MR. PAYNE: Is this well tubed?

A Pardon?

MR. PAYNE: Is it tubed?

A Yes, sir.

MR. UTZ: Is the production through tubing?

A Well, at the beginning it was, and since that time the water has become such great volume the production was through the casing.

MR. UTZ: I notice on El Paso's 1, back pressure test, they listed it as producing through the casing?

A Yes, sir, it is only for several years that it has produced water through the tubing.

MR. UTZ: Do you think that if this well would have been produced at a substantially lower rate, that it would still be producing?

A No, sir, I don't believe it would; the fact that the water is coming in on the bore hole, and if it is not kept clean it is going to do damage to the Yates section.

MR. UTZ: The overproduction on this well is around 123 million at the present time, is it not?

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Yes, sir, it ic. r. MR. UTZ: If you can't bring this well back, you will abandon it at a pretty, well, good allowable situation, would you not? A It should be good for a month or two. I would rather not abandon it, if it is at all possible, but it does not look like there is anything more for us to do. MR. UTZ: Is there any other questions of the witness? If there are no others, we will proceed to the next well. MR. GIRAND: We would like to offer exhibits 25, 26 ---24, 25, and 26. MR. UTZ: Without objection, they will be received. Let's take a 10-minute recess. (Recess.) MR. UTZ: The hearing will come to order. MR. GIRAND: At this time we would like to take up another well. Mr. West, will you take the stand, please? DIRECT EXAMINATION (Continued) NEW MEXICO BY MR. GIRAND: Q Mr. West, you are the same Mr. West who has been ALBUQUERQUE testifying before in this proceeding? Yes, sir. A Q I hand you here an instrument which has been marked Exhibit Number 27, and ask you whether or not that exhibit was

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89 prepared by you and under your direction? Yes, sir, it was. A Without going into what the exhibit shows, does that, Q is that exhibit comparable with the tests and records that you in-CH 3-6691 spected in regard to the other wells you tested before? A Yes, sir. Q And contains the same information? Å Right. MR. GIRAND: That's all. We offer Exhibit 27. MR. UTZ: Without objection, it will be accepted. MR. GIRAND: Mr. Watson, will you take the stand, please? DIRECT EXAMINATION (Continued) BY MR. GIRAND: Q You are the same Mr. Dewey Watson that has previously testified in this matter? A Yes, sir. Q Mr. Watson, in addition to testimony you have pre-NEW MEXICO viously given concerning the wells, the Winningham Number 3, the S. R. Cocper, the Repollo Number 1, do you have any additional **LBUQUERQUE** remarks to make in regard to the Eva Owens Number 1, the subject well? Well, I think that as Mr. Utz stated a minute ago, A

the well is back in balance and it had been shut in for approximately a year, and I think it would be well for the Commission and -



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burselves both, for the Commission to have a representative present when we attempt to put that well back on production, because I think it will show everybody concerned, I mean, what it does mean whenever a well like that is shut in.

Q Well now, as a representative of the operator in this application, you are willing to notify the Commission when you intend to start your work toward bringing the well back on production?

A Yes, sir, I think so.

Q And you are willing to furnish the Commission with any production data that is available until the well is brought in?

A Yes, sir.

Q And thereafter in regard to the water situation, as well as the ability of the well to produce gas?

A Yes, sir.

Q Now, prior to the time this well was shut in, what type of well was it?

A It was flowing under the same circumstances as the other wells, free piston. Q When it was checked recently, the well was dead, is

Q When it was checked recently, the well was dead, is that correct?

A Yes, it was.

Q What do you anticipate you will have to do to bring this well back, if you can bring it back?

A The first step in the procedure would be to move a



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swab unit on the well and attempt to remove the water and get it to flowing.

Q Do you have any idea how long that will take?

A There is no way to know.

Q And until you do bring the well back into production, you will have no way of comparing the production you are able to obtain after you do this work, as against the production it was capable of making prior to the shut in period?

A It will have to be produced for a while.

Q In your opinion, would the well to some extent be an example of what will happen, and can happen, if these wells are shut in, the wells that are being presently produced?

A Yes, sir, I think it will.

MR. GIRAND: If the Commission please, we have some remarks from the files of El Paso Natural Gas, which I have marked and numbered, marked Exhibit Number 28; these exhibits speak for themselves. They show information about the well, which shows that the well was making water from time to time even during producing periods. We would like to offer Exhibit 28.

MR. UTZ: Without objection, it will be admitted.

MR. GIRAND: Now, I would like to make a remark here, if I may. While the well is in balance, we would like to commence getting that well back on production as soon as possible; and I realize the Commission has no further control on it now that the well is in balance, we would like to solicit the Commission's



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participation to some extent, or whatever extent they think advisable during these operations. MR.UTZ: I'm sure the Commission will be quite interested in following this operation. I suggest that when you are CH 3-6691 ready to begin operations, that you contact the Hobbs office. MR. GIRAND: Yes, sir. I suspect that will be in the next day or two, because we would like to get it back on if possible. QUESTIONS BY MR. UTZ: Q Mr. Watson, the well produced 1364 MCF the month of April, 1959, how did you produce that? Did you open it up? No, it was on a free piston installation. A Is it still on a free piston? Q A Well, the piston was taken out of it after it was shut in, but the installation is still there. Q You opened it up and it just went to producing in April? I'm not familiar -- I see what you mean, that's on A this exhibit here, is it not? NEW MEXICO Q Yes, sir. I don't know what that well was on, we might possibly A ALBUQUERQUE, be able to find out through the well record, but I personally don't have knowledge of that particular test. It is possible that was a deliverability test on the well, I'm not certain. 0 At any rate --MR. GIRAND: I don't have any information unless --



let me see, the exhibit, the deliverability test was in May? MR. UTZ: 5-16-58, that's probably what it was.

MR. GIRAND: \*59, in March, that's probably when

the production occurred.

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Is that deliverability?

MR. GIRAND: It is deliverability.

A That's the only time that I could think it would be turned on; and I believe there was permission obtained at the time, I'm sure there was, for that work to be done.

Q (By Mr. Utz) We are not questioning production, I want to know whether or not you had to swab the well at that time in order to make it produce?

A I don't have personal knowledge of that particular test to answer the question.

MR. GIRAND: When we get in there this time, we will know. Up to that time, the well was being produced as a marginal well, and had that classification.

> Q (By Mr. Utz) That well has never been a marginal well. MR. GIRAND: Withdraw my statement.

A No, sir, I don't believe it has ever been classified as a marginal well, due to the 80-acres on the well. I think regardless of classification, that by water being in that formation will show us what we are up against there, whether it is marginal oil or non-marginal.

MR. UTZ: Any other questions of the witness?

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MR. GIRAND: The remarks you made in regard to the other wells, insofar as they apply to Eva Owens Number 1, is that your testimony for that particular well, the Eva Owens Number 1 Well?

A Yes, sir, it is.

MR. GIRAND: That's all.

MR. UTZ: Any other questions? We will proceed to the next well.

MR. GIRAND: We will call Mr. John West to the stand.

DIRECT EXAMINATION (Continued)

### BY MR. GIRAND:

Q Your name is John West, and you are the same John West who has appeared in this case before?

A Yes, sir.

Q In regard to the well known as the Watkins Number 2, did you make similar cherks as you did on the wells known as the Eva Owens Number 1, and the Winningham Number 3, and the S. R. Cooper Number 2?

A I did.

Q I hand you here what has been identified as applicant's Exhibit Number 29, and ask you whether or not that exhibit contains the information comparable to the information on the exhibit introduced by you, or identified by you?

A Yes, sir.

MR. GIRAND: We would like to offer Exhibit Number 29.



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MR. UTZ: Without objection, it will be accepted. MR. GIRAND: Mr. Watson, will you take the stand? <u>DIRECT EXAMINATION</u> (Continued)

BY MR. GIRAND:

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Ho :		G.	Now, Mr. Watson, are you familiar with the well known						
РНОНЕ	as the	Watkins Number 2?							
		A	Yes, sir.						
		Q	Is that well presently in balance?						
		A	I don't know; let me look here.						
		Q	Did you answer the question?						
		A	No, sir, it is not overproduced						
	1	Q	Then						
		A	it is in balance.						
		Q	Will you state for the benefit of the record, the						

purpose of this application in regard to the Watkins Number 2?

A I would like to bring out, referring to Exhibit Number 29, the fact that when the well was drilled and completed in November of '58, the shut-in tubing pressure was 1025, or 10, and casing pressure was 1025. And the casing pressure on October 5th, 1959 is 525 pounds, and the tubing pressure was zero.

Q Now, based on the pressure readings, what conclusion do you arrive at as to what is happening to the well?

The well is logging off with water.

Q Now, you have not attempted to commence reproduction of that well at this stage, have you?



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ļ	A	No, sir, not to date.				
	Q	Do you know at this time just what will have to be				
	done in order to bring that well back on production?					
6691	A	Not exactly; we do know it will have to we swabbed				
PHONE CH 3-6691	to put it or	production.				
	Q	Now, in connection with the swabbing, do you know how				
	much swabbing will have to be done?					
	A	No, sir, it would only be an estimate.				
	Q	Now, you previously testified that up until about a				
	year, year a	and a half ago, you had been with the Jal Oil Company,				
	is that correct?					
	A	Yes, sir.				
	Q	And during the time you were with the Jal Oil Company				
	you were fam	iliar with the Jal Oil Company wells that are involved				
	in this hearing, were you not?					
	A	Yes, sir.				
	Q	And since the threatened shutdown order was entered,				
0	you have made some study of the Jal Oil Company wells involved in					
MEXICO	this hearing, is that correct?					
E, NEW	A	Yes, sir, I have.				
ALBUQUERQUE, NEW	1 • •	MR. GIRAND: We would like to have these marked for				
ALBU	identification; they deal with the records of El Paso Natural Gas					
	Company, dealing with multiple point back pressure test and graph,					
	and two deliverability tests, one in '58 and one in '59. Be our					
	Exhibit Number 30, I believe.					

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(Thereupon the documents referred to above were marked Applicant's Exhibit No. 30, for identification.)

(By Mr. Girand) Now, Mr. Watson, your testimony in Q 3-6691 regard to soliciting the observation on the part of the Oil Conserva-£ tion Commission of what transpires when you try to bring this well back, the Watkins Number 2 applies to it as well as to the Eva Owens Number 1, does it not? Yes, sir, I think it would. A Now, was the Watkins Number 2 ever determined to be Q a marginal well? No. sir. A However, you don't know what its classification will Q be after you re-enter the hole and try to produce it again? No, sir, we do not. A Do you anticipate that there will be any material Q permanent damage by reason of the shut-in? A Yes, sir, I do. After you have brought the well back on production, Q MEXI will you be in a position to determine to what extent the damage NEV would be? ALBUQUERQUE, Yes, sir, I think, with the Commission's approval, we A could determine what if any damage had been done. Q How do you propose to do that, by comparison of production records, amount of water involved .--A Yes, sir.



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	ĺ	(J	and the pressures on the tubing and the casing?						
LEY-MEIER REPORTING SERVICE, Inc.		A	Right.						
			MR. GIRAND: No further questions.						
	3-6691	QUESTIONS BY	MR. UTZ:						
	£	Q	Mr. Watson, is this oil completely shut in at the						
	PHONE	present time?							
		A	It is at the present time, yes, sir; and on the tubing						
		it is dead.							
		Q	How long has it been, do you know?						
		A	I don't know the exact number of days, how long it has						
		been shut in.							
		Q	Well, during the time that, since the well went on the						
		line, it has	never been completely shut in, has it?						
		А	Well, from the in April there was no production,						
MEIER		and only 51 MCF in March, 244 MCF in May, and 63 MCF in June, and							
		112 MCF in J	uly, and 1,866,000 in August.						
EY.		Q	Did you have any water problems in producing this well						
DEARNL	8	or was it sh	ut in part of August?						
	ALBUQUERQUE, NEW MEXICO	A	Yes, sir, it was swabbed off during the month of						
	UE, NEV	August, and	produced,I don't know how may days it did produce.						
	UQUERQ	Q	Did you shut the well in after you produced it?						
	ALB	A	Yes, sir.						
		Q	Why did you shut it in?						
		A	Well, that I can't answer. The only thing I know is						
		to keep it i	n balance, not to have it overproduced; and it was not						

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to my knowledge ordered shut down, no. The well became in balance in July? Q That is correct. Å And you had a 1940 MCF allowable in December which Q you could have produced if the well --Yes, sir. I don't know whether the well was produced Ą in September or not, but it is very dead at the present time. MR. GIRAND: May I ask some questions? MR. UTZ: Yes, sir. DIRECT EXAMINATION (Continued) BY MR. GIRAND: Q Mr. Watson, checking Exhibit Number 29, I believe it

is, looking at the drop in the casing pressure from 1025 in 1958 to 525 pounds in 1959, October the 5th, and the water, increase in water production from 100 barrels per day to 300 barrels per day, in your opinion, after and if you are able to get this well on production, do you feel that it will be a non-marginal well, or a marginal well?

A I think it has a very good chance of being a marginal well before it is over with.

Q Is it your opinion that the well should be so classified as a non-marginal well?

A Yes, sir, I believe it should.

Q What is the pressure maintained by the El Paso line?

A ... I assume that -- let's see, the dotted line on

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Exhibit Number 29 --The average pressure I believe shows on Exhibit 29 to 0 be 170 -- I beg your pardon, 188 pounds average, is that what they call a low pressure line, or intermediate? 16661 Well, that is on the intermediate line at the present A Đ PHONE time. Now, a casing pressure of 125, assuming that you are able to bring the well back, will the pressure as reflected by the Exhibit 29 be sufficient to plug the intermediate line of El Paso? I seriously doubt that it will, due to the excess A amount of water that will have to be produced. MR. GIRAND: I believe that's all. QUESTIONS BY MR. UTZ: Q Have you requested this well be put on the low pressure system? No, sir, I don't think so; normally, not always but a A majority of the time, El Paso is pretty good to us. They'll go ahead and tie it in without our request; in some cases they have requested it.

I would like to make a statement on this Exhibit Number 30, if I may. I think it's significant on the two deliverability tests that the rate of flow --

Q Are you --MR. GIRAND: Will you refer to them by date, Mr. Watson? A -- on November 10<sup>th</sup> to 14<sup>th</sup> of 1958, the deliverability



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test, the deliverability is 1,320,000 MCF per day. On 2 -- would be in February of '59, another deliverability test was taken, and the deliverability is only 650.8 MCF. Now, that I think shows pretty clearly that the well is dropping pretty fast for one reason or another, and it is most likely the water increase is causing it; and I think the well head pressure indicates that on the tubing on 24, 48 and 72-hour shut in pressure test, because they go from 543 on down to nothing on the February test; and they are dropping continually on the other one, from 723 to 633 on the November '58 test.

Q (By Mr. Utz) This is on the tubing?

A Yes.

Q The casing increased?

A Right. And as long as the well is tubed, and the production comes through the tubing, she's dead. I believe that's all I have on that.

> MR. UTZ: Any other questions of the witness? MR. GIRAND: Just one question.

> > DIRECT EXAMINATION (Continued)

### BY MR. GIRAND:

Q Apparently I misunderstood the witness a moment ago. I intended to ask him this question: Mr. Watson, do you consider the subject well to be a well that should be classified as marginal or non-marginal well, in the light of the records that have been introduced in evidence?



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A Well, from the drop in the deliverability, and production inability, I'd say it is due to be classified as a marginal well, if not right at the present in the very near future. Q Then if you answered that question, or a similar CH 3-6691 question by saying "non-marginal", you misunderstood my question? HONE A Yes, sir. MR. GIRAND: That's all I have. Do you have anything else to offer? A No, sir. MR. UTZ: On what do you base the answer to that question, what premise, the deliverability test, or the amount of production, or by comparison against the well's allowable? A Well, I think the amount or production, and the deliverability test show that the well is falling off pretty rapidly. MR. UTZ: This well produced more than normal allowable, so you think it would be a marginal well? Å Due to influx of water. NEW MEXICO MR. UTZ: Do you interpret our Rule 520 to say that? A Not exactly. ALBUQUERQUE, MR. UTZ: I don't either. Off the record. (Discussion off the record.) MR. GIRAND: Mr. West, will you take the stand, please? DIRECT EXAMINATION (Continued) BY MR. GIRAND:

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PAGE 103 I hand you an exhibit that has been marked Exhibit Q 31, and ask you if that exhibit was prepared under your supervision? A Yes, sir. And does that exhibit show the same information in Q CH 3-6691 regard to the Jenkins Number 1 as was reflected in the exhibit you prepared for the Winningham Number 3, and the other wells you previously testified to? Yes, sir, that is correct. A And the record was prepared from the records of El Q Paso Natural Gas Company in regard to the line pressures and the production of the well? Right. A Q I hand you here Exhibit Number 32, been marked Number 32, a similar exhibit to Exhibit 31, and it deals with the Legal Number 2; I'll ask you whether or not this exhibit was prepared under your supervision? A Yes, sir, it was. And the same information reflected on it as reflected 0 on the Jenkins Number 1? MEXI NEV A Right. ALBUQUERQUE I hand you here Exhibit Number 33, pertaining to the Q Dyer Number 3, and ask you whether or not this exhibit was prepared under your supervision? A Yes, sir.

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And the information shown thereon is comparable to the



information shown on Exhibit 31 and 32, dealing with the Jenkins No. 1, and the Legal Number 2 wells?--A That's right. Q -- only insofar as it pertains to the Dyer Number 3? A That's correct.

MR. GIRAND: We would like to offer Exhibits 31, 32,

MR. UTZ: Without objection, they will be received. MR. GIRAND: Mr. Watson, take the stand, please.

DIRECT EXAMINATION (Continued)

BY MR. GIRAND:

and 33.

Q Mr. Watson, you are the same Mr. Watson who previously testified here in this matter?

A Yes, sir.

Q Now, in regard to the Jenkins Number 1, how is that well being produced?

A It is producing on a free piston installation.

Q Bo you anticipate that you will have to go to a pump jack in the immediate future?

A Yes, sir.

Q Now, in regard to that particular well, if the same questions were asked you in regard to it as were asked you in regard to Watkins Number 2 and the other wells that you have previously given testimony to, would your answer be the same? A Yes, sir.

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PAGE 105 The only variations being the variations between the two wells? Yes, sir. A Do you believe that this well is such a well as would 2 CH 3-6691 have to be continuously produced using the methods now employed in order to protect the gas reserves underlying the well? A Yes, sir, I do. Do you think such an operation will result in the Q protection of correlative rights, and the prevention of waste? Yes, sir. A MR. GIRAND: I would like to get this marked for exhibit, 2-page exhibit. (Thereupon the document referred to above was marked Applicant's Exhibit No. 34, for identification.) Q (By Mr. Girand) In regard to the Jenkins Number 2, I beg your pardon, Number 1, are there any peculiarities with regard to producing that well contrary to the other wells that you have testified to? MEXICO A No, sir, it follows the same general pattern as the NEW ALBUQUERQUE, rest of them; it was shut in for a period of time, the piston went to the bottom. it up and flowed for a period of time. opened Q That procedure, up to date, has been the most satisfactory manner known, the manner in which you could produce the well without putting it on a pump jack? Yes, sir. A

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Now, in answering this generally as to all the wells in question, where a piston had been used, in setting the frequency of that, the run of that piston, I understand it is time controlled, is that right?

A Yes, sir, it is.

Q Can that piston be set to unload itself at intervals that will maintain the well as a producing well, is that right?

A Yes, sir.

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Q Those intervals just have an even flow, a period of time of setting and re-setting and adjusting the interval, is that correct?

A Yes, sir, that is correct. Usually when a well goes on an installation of this type, it is an experimental proposition when you first start out, but we have found that somewhere between 6 and 8 flows per day is the usual number required to keep the water off of the formation, keep the well on production. And as time progresses over a period of months, even years, the frequency of those pin on trips are increased in order to handle the influx of water that is coming in.

Q Basically, the bottom of the water controls the frequency of the trip?

A Yes, sir.

A

Q Then you get to that point where it can't make enough trips to keep the hole cleaned up?

That's right.



Q Then you are required to go to pump jack? A That's right; that's exactly what happened to the Winningham Number 3.

MR. GIRAND: We would like to offer Exhibit 34, being the minimum contract test sheet, as well as the deliverability report. We call the Examiner's attention to the notation on the bottom of both. Under the Minimum Contract Test Report, the notation is: "Well cannot be shut in; shut in pressure taken from R. Olsen Winningham Number 3". And on the Deliverability, why virtually the same notation was -- P. C., what's that?

A Shut in pressure.

Q -- P. C. was taken from our R. Olsen Well Number 3. "Well cannot be shut in because of water logging at well bore". Do you have anything else to add, Mr. Watson, in regard to the Jenkins Number 1?

A No, sir, I don't believe I do.

MR. GIRAND: We will pass the witness.

CROSS EXAMINATION (Continued)

BY MR. FLINT:

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Q Mr. Watson, in response to a question by Mr. Payne regarding a well on the pump jack, you stated in producing water, a certain amount of gas of necessity is produced with it?

A Yes, sir.

Q Would that be true of the free piston installation as well?



A Yes, sir, it is more so; you produce more gas with the water in a free piston installation than you would on a pump jack.

Q In either of those -- I think this question has been asked, but I'm not certain of what your answer was, in either of those two types of installations, do you feel that it would be possible to produce the water, sufficient water to keep the well cleaned out, and still produce less gas than you would anticipate producing with it, if the request that you have made is granted?

A Well, under the present operating conditions, we are lifting what we think is the minimum amount of water to produce to keep the wells flowing.

Q And are you at the same time producing a minimum amount of gas that it is possible to produce with that amount of water?

A We feel that we are producing the amount of water necessary to keep that well flowing, which would be the minimum amount of gas.

Q In other words, the gas that is being produced now is as little gas as it is possible to produce with that amount of water?

A Until further tests prove different, why I think we are, yes.

Q You mean, is this a matter of physical possibility, or is this a question of your decision as to the desirability of

ALBUQUERQUE, NEW MEXICO

producing this amount of gas?

A Well, I think it is a physical proposition.

Q It is?

A I mean, we will be perfectly willing to cut the gas down if it were possible.

Q But producing, for example in this Jenkins well, producing an estimated 30 barrels per day, it would not be possible to restrict the gas that is produced with that to any extent?

A No, sir, we have not been able to. Now, the well will log off at the slightest increase in El Paso's pressure, even as much as 10 pounds will kill the well; and you are operating under such a close tolerance that there is no tolerance there, does not seem to be any margin for relief there at all.

MR. FLINT: Thank you, that's all.

QUESTIONS BY MR. UTZ:

Q Mr. Watson, I believe that you are asking, actually asking here to produce more gas than the non-marginal allowable, this is what this amounts to, isn't it?

A We are asking to be able, be permitted to produce the water necessary to keep the well on production.

Q So far we have ended up with the non-marginal allowable in every case?

A Yes, sir, in the past six months, I think that is true. However, I think if you would just roll back the clock a year and compare the allowable at that time with the allowable

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that we've had in the past six months, it would probably be in balance; it would still be above, but it would be somewhat nearer, so I think we are a victim of the demand of gas during that period as much as anything else. I mean that definitely, in my mind, has something to do with our overproduced status.

Q Well, I think that is a very true statement, but I believe you stated that this would be necessary in order to prevent waste and protect correlative rights. How would overproducing these wells protect correlative rights?

A Well, the ultimate production of gas would be shortened, in our opinion, by shutting these wells in and doing permanent damage to the formation, and in that sense it would; I mean, I think we are protecting correlative rights.

Q Whose correlative rights?

A Orrs and the offset operators.

Q Well, if you are producing more gas than he is allowed to produce, then how would it protect his correlative rights?

A It does not sound as it would; I will retract that statement.

MR. UTZ: Any other questions of the witness?

#### REDIRECT EXAMINATION

BY MR. GIRAND:

Q Mr. Watson, with water encroachment on your wells, if your wells are shut in, is it your opinion that that water will go on over to offset operators' property?



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A To a certain degree, yes; it is at the present time. And so if your well were shut in, and water allowed to accumulate to the extent that it isolated gas from your well bore, as well as the well bore of offset operators, it would then affect correlative rights in the area, would it not?

Yes, sir, it would.

MR. FLINT: However, if that gas that is trapped were produced through the well that is not shut in, it would not have been your neighbor's gas anyway, so that it wouldn't really be an ultimate gas loss to him, would it?

A No, sir.

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MR. FLINT: And your land, it is under your land? That's right.

MR. FLINT: Except that it would be gas that you would hope to produce, not gas which he is entitled to?

A Yes, sir.

Q (By Mr. Girand) But if you were denied the right to produce the gas that is underlying your own land, then the correlative rights would be denied?

A That's right.

Q And you are denied -- and you are entitled to as much protection as the offset operator?

A Yes.

MR. UTZ: And you agree that you are deried as much production as the offset --



MR. GIRAND: I said the same protection as the offset operators.

MR. UTZ: The same protection. Well, Mr. Watson, have you been allowed to produce as much gas as your offset operators in the past twelve months?

1 In the past twelve months, yes, but not in the previous twelve months or eighteen months. As you will recall, those wells were classified from non-marginal to marginal either in '57 or '58, and at that time there were some three hundred million under-production cancelled; I believe I'm correct, some time in '57 or '58, some of them were reclassified in '57 and some in '58, and at that time all the underage was cancelled, and as far as we are concerned evidently its lost to us, and now during that period the offset operators definitely produced more gas than we did.

MR. UTZ: Well, the reason they did was bacause your well was not capable of producing the allowable for that particular period, isn't that right?

A That's correct, but that does not balance the fact that they didn't, they did produce more gas than we were allowed to, not that we were allowed to, but that we were unable to.

MR. UTZ: You feel that in view of the fact that your wells are severely overproduced that your correlative rights have been impaired at this time?

> A No, sir, that is the problem.

> > MR. UTZ: That's all I have.



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(By Mr. Girand) Do you feel that you have been immaired, if you are required to shut the wells in and possibly the loss of your reserves?

A Yes, sir, that's right.

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MR. UTZ: The wells are overproduced at this time; at this time you are ahead of the game as far as correlative rights are concerned?

A As of the past twelve months, yes, sir.

MR. GIRAND: We would like to introduce Exhibit Number 35, containing five sheets, and being a part of the records of El Paso Natural Gas Company, which covers the subject well, Legal Number 2.

MR. UTZ: Exhibit Number 35?

MR. GIRAND: It is Exhibit Number 35, yes.

MR. UTZ: Without objection, it will be accepted.

Q (By Mr. Girand) Mr. Watson, in regard to your -- you are familiar with the application covering the Legal Number 2, are you not?

A Yes, sir.

Q You are acquainted with the method and type of production, and the production method used?

A Yes, sir.

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Q Briefly state what those methods are in similarity to the other wells you have testified to.

It is the same as the piston installation that we



			<u>.</u>								
		have d	escrib	ed in the S. R. Cooper, Eva Owens, Jenkins Number 1.							
			J	In other words, this well is making water							
			Â	Yes, sir.							
	3-6691		Q	and is being mechanically produced at the present							
	Н	time?									
Inc.	PHONE		A	Yes, sir.							
			Q	Is it your opinion that this well will suffer irrepar-							
ICE		able d	able damage if it is required to be shut in over any extended								
SERVICE.		period of time?									
			A	Yes, sir, it is.							
INC		<b>1</b>	Q	The well is being proverly produced by a piston or							
$RT_{1}$		by a p	by a pump?								
Odf		:	A	It's being properly produced by a piston.							
EY-MEIER REPORTING			Q	Do you anticipate that in the future that you will							
IER		have to install a pump jack in order to recover the gas underlying									
ME		the property?									
5Y-			A	Yes, sir, we do.							
-			Q	Do you feel that the methods employed by the Jal Oil							
DEARNL	MEXICO	Company in the production of gas on the subject wells at this									
DE	NEW	hearing, as well as the Olsen Oils Company on the subject wells is									
	ALBUQUERQUE, NEW MEXICO	in the	best	interest of conservation of natural resources							
	ALBUQ		A	Yes, sir.							
			Q	and to obtain the ultimate recovery from the							
		minera	l depo	sits underlying the acreage?							
			A	Yes, sir.							
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MR. GIRAND: I have no further questions. MR. UTZ: Any other questions of the witness? If not, you may broceed. Q (By Mr. Girand) Mr. Watson, since figuring these applications, have you had occasion to check into the Dyer Number 3 Well of the Jal Oil Company? A Yes, sir. Q Were you familiar with that well and its operation during the time you were employed by Jal Oil Company? A Yes, sir, I was. Q Was that well, the Dyer Number 3, a comparable well to the other wells you have testified to? A Yes,sir, very similar. Q And if the same questions were asked you in regard to the Dyer Number 3 as have been asked you in regard to the other wells, would your answer be the same? A Yes, sir, they would be.
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wells, would your answer be the same?
A Yes, sir, they would be.
Q That well makes water?
A Yes, sir.
Q And it is presently being produced in what manner?
A By a free piston.
Q And in your opinion, is that the only method other
than a pump jack with which the well can be produced?
A Yes, sir, I believe it is.
Q And in producing that well, it is the production of

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the water that controls the production of gas, and not the production of the gas that controls the water, is that correct?

> A Yes, sir, it is.

As a matter of fact, in all of the subject wells, in-Q cluding the wells of the Olsen Oals Company, and the wells of the Jal Gil Company, the prime question involved in this hearing is, and the prime concern of the operator is the removal of the encroaching water, is that correct?

> A Yes, sir, that is right.

Q And the only means you use, and those means that you have used, seem to be satisfactory and best practice for the preservation of the reservoir?

A That is the only means in which we have been able to keep the wells on production.

So you are not before this Commission asking for more Q gas or less gas, you are just asking for whatever gas is produced incidentally with the required amount of water you have to produce?

> A Yes, sir, that is correct.

Q Now, I'll ask you, during your overproduced period here, and on some of the wells involved, I'll ask you whether or not at the time that production was being made, you had been reclassified from the non-marginal -- I mean from marginal to nonmarginal well?

> A Yes, sir.

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You had been re-classified at that time, at the time



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PAGE 117 the overproduction occurred? A During the period the overproduction occurred, it was classified as a non-marginal well. Ũ, It was classified at the time, is that true on all PHONE CH 3-669 the applications? No. not all. The Eva Owens and Watkins 2 were never A marginal wells. Q But the overproduction occurred after they had been re-classified? A I don't think the Eva Owens or the Watkins have been re-classified. I'm talking about the other wells. Q The other wells, yes, sir. A 0 It is my understanding that the notice from the Commission stated that due to the lack of information in 1958, that the wells have not been, had not been able to reclassify the wells at that time, is that correct, Mr. Examiner, on your May or June notices when you sent out the allowables? ALBUQUERQUE, NEW MEXICO MR. UTZ: On the memorandum? MR. GIRAND: On the memorandum, yes. MR. UTZ: Yes, sir, I believe that's correct. MR. GIRAND: I'll ask you if this is a correct statement to go on the record, Mr. Utz. The well operators, as well as the purchasers were not notified of any re-classification of any subject well down there or that their allowable would be, during

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that period in which the old production occurred?

MR. UTZ: Except by provisions of Order R-967.

MR. GIRAND: Except by the old order, but then as far as the actual taking of the tests and evaluating the allowable that would be assigned to these wells, those had not been completed, nor had the operators been notified of their assigned allowables under your order R-967?

MR. UTZ: No, they had not been notified of the actual amount of non-marginal allowable. However, the data is available at any time for an operator to calculate his non-marginal allowable, if he so desires.

MR. GIRAND: I'm not trying to argue, I'm just trying to find out. It was my understanding that the operators had not been notified of their re-classification.

MR. UTZ: No, they had not been notified of your reclassification until you received the supplement of it.

MR. GIRAND: That's right, and that was the one in which the Commission gave them until the first of September in which to file.

MR. UTZ: That is correct.

MR. GIRAND: So I would like to introduce Exhibit 36, which is the record of the El Paso Natural Gas in regard to Legal Number 2.

> MR. UTZ: Without objection, it will be accepted. MR. GIRAND: Mr. Utz, for the purpose of the record,

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I would like to make just a brief statement. I know I have been up here too long, but the problem of these operators involved in the two cases in which we are appearing here, is a water problem.

Now, the producing of gas is controlled entirely by the alleviation of that water problem, and it is their opinion, as it was the opinion of other operators who had cases before us, that if the water is allowed to encroach, it will result in loss of reserves. We feel that the subject wells are entitled to some exception, which is authorized under Rule R-967, in order that the great waste which could occur might be alleviated.

Now, I don't think it is the object of this Commission, or of the operators, or of the operator to take any further gamble than has been taken, particularly the applicants here, where they have gone to every mechanical device in order to produce the gas. I think the Commission will agree with me that the overproduction was brought about, you are tied into a gas line, you don't have much to say when you take from them and when you don't. At the time that we were taking, you had a marginal classification which was not covered, and that is one of the pitfalls of the order. You go along in that position, and then one of these sunshiny days why you are six times overproduced and you cease to be a man; you are over here, a female, you change sex in midstream, and you didn't even know you had it done to you. That is where these applicants find themselves.

Now, we are willing to cooperate with the Commission in



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every way possible to arrive at a just and honest way to produce these wells, but we think it would be much more wrong to require us to shut in wells and thereby lose our reserve, that that will not be conservation: that would be confiscation. We feel that ---I don't think it has been definitely established, I went through all those gas hearings, and everybody said that, some of them said one well would drain the entire Lea County in Southeastern New Mexico. I believe that was the position Phillips took in that matter, they only needed one gas well; others had different lines that they drew on the maps. How much one gas well will drain, until somebody gets down there and digs it out and sees, goes down there and sees and smells the gas and walks out the 40acres, we don't even know whether it will take out 40-acres; none of us were here when it was put down, and we just got to guess, because their spacing program is such that we don't, we don't get that much inside, so I say that these applicants are willing to cooperate with the Commission in every way possible, but I don't think the Commission should require them to lose their reserves which they are entitled to.

Now, I appreciate allowables and the requirements for allowables, we all recognize that, where you got a producing ability in excess of your allowable, of your market demand, but then at the same time their old law has been to help the weak as against the strong; there has been no evidence here that by reason of your present method of production, that we were going to drain their

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acreage that would have been here. One of these weak sister gas wells out there producing water and gas is not going to cause the gas to come back from offsetting operators into their reservoir. We are doing pretty good just trying to maintain a dry reservoir, and that's all we are trying to do, and we are helping them to the extent that if we didn't control the water, the water is bound to move somewhere in this gas zone, where a void has been created by production of either cil or gas, or both, and I submit it is a problem that is here not on just a few wells before this Commission today, but as the field goes down, it is going to be before this Commission from every corner where you have any encroachment of water.

MR. UTZ: Mr. Girand, you are not contending here, are you, that Order R-967 allows, by virtue of the fact that a well is classified as marginal, that you are allowed to produce that well more than a non-marginal well if it is capable of doing it?

MR. GIRAND: I think that is the purpose of the Commission, yes, sir. The Commission was designed to protect and conserve. Now, the Commission has latitude in how it will arrive at that conservation, but it has all got to be designed toward the ultimatum of conservation.

Well, from the record before this Commission on these cases, the fact that the wells will be damaged stands uncontradicted, and I think the Examiner is acquainted with the fact that if water comes in, it can kill your well and might lose it. Now, I say

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under your R-967, your Rule 10 gives the Commission quite a bit of latitude there,"at any time a well is overproduced in an amount equal to six times current monthly allowable, it shall be shut in during that month and each succeeding month the well is overproduced," that's your shutdown provision. It goes on in the same Rule 10, "The Commission may allow overproduction to be made up at a lesser rate than would be the case if the well were completely shut in, upon a showing at public hearing, after due notice, that complete shut in of the well would result in material damage to the well."

Mr. Examiner, we have shown that this is not a spigot outfit, we don't have that gas and water mixed in certain proportions, one-third water and one-third gas. We have a certain volume of water, and by lifting that water, the gas pressure is able to produce so much. We operate in some of these wells, some of the testimony was that it varies and often will be, pressure would log up a well. We have trimmed the thing down, as I see it, to just about as near a marginal operation as you can have, and I think there is plenty of support in the Rule here that your -- and the evidence, that the production curve on these type of wells are going to be declining rapidly.

There can't be any relief on the part of anyone in the method that we are using, that we are going to overproduce our wells as compared to the extent of pulling gas out from other wells. If we had that kind of pressure behind us, we wouldn't be having this trouble; we are bound to be getting the dregs on it from under our



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### own wells.

Now, I believe the spirit of the Act is conservation, it has to be or you don't have any legal entity, you don't have any right to be here, because that's the power of the State to conserve it. And if you don't conserve, if the Commission allowed the ultimate recovery now. I don't think the Commission is confronted with any problem that requires it do run and hide its head; that we take the secondary recovery oil wells where they are using water flood, the Commission has entered several orders there where they can produce from certain wells all they could produce. I can see a great deal of similarity between the encroachment of water on gas, and secondary recovery on an oil field, and I don't believe it is comparable to a water drive oil field because we know that the water will push the oil in front of it, that is, that has been the history.

Now, if we were talking about tremendous volumes of gas being taken from the Jalmat Pool, as against the overall Jalmat Pool allowable, it would be one thing, but it occurs to me that we are overlooking the growl of the bear and listening to the rattle of the cricket in this case. We have seven wells that the operators can lose, and on one of them we think we have already lost. We've got two wells we are going to find out when we get in.

In my prayer, I asked for 120 days to see if we could bring out some further information, not just for our information, but for the information of the Commission. We realize the Commission

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has not entered a shut in order on these wells except the Eva Owens well, which was shut down a year ago, and the Watkins Number 2, but those wells are now where they can be reopened. Why wouldn't it be reasonable for the Commission to see what happened to those two wells?

I think I've clearly established that in this method of production there is no way to separate the gas and the water; they both come out together. Of course, we go ahead and get back in balance by flaring that gas up in the air if the Commission turns its head to it, but then we can't do that under the regulations. I might state here that I think that I'm trying to enlarge on the scope of the Commission's authority, and have you prorate water, not the gas, because actually that is what we are asking you to do.

> MR. WATSON: Could I make a statement here? MR. UTZ: Sure.

MR. WATSON: Although we are the only ones here at the present time, there are several operators in and around the same area that are confronted with the same problems, and the whole South end of that field is in a very similar shape.

MR. UTZ: We've had other applications, as you know, but none who requested that they produce more than a non-marginal allowable. I have to differentiate this case from the other cases that refer to the matter.

MR. GIRAND: May I make this statement in connection with that? None of those cases are producing through any mechanical



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device such as we are in the wells in question.

MR. WATSON: These wells passed the blowdown stage several years ago, where you go down and blow them down maybe for an hour or two, and blow out the water and go on to producing.

MR. GIRAND: Off the record.

(Discussion off the record.)

MR. GIRAND: I would like to go back on the record just a minute. I believe I'm correct in stating that the Commission received a letter from El Paso Natural Gas --

MR. FLINT: Yes.

MR. GIRAND: -- supporting both Application 17 -- both Case 1778 and 1779, is that correct?

MR. UTZ: 78 and 79?

MR. GIRAND: Yes, 1778 and 1779. Mr. Howell showed me the letter, and I direct your attention to their wording in regard to their belief that this was a matter of conservation. And like we said, we are not making any request for offset reserves, we better keep what we got and utilize them to the fullest extent.

MR. UTZ: The letter of El Paso's will be entered into the record. Is there anything further in this case?

MR. GIRAND: That's all the applicant has.

MR. UTZ: Any other statements to be made? If not, the case will be taken under advisement, the cases will be taken under advisement, and the hearing is adjourned.

(Whereupon the hearing was concluded at 4:45 P.M.)



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STATE OF NEW MEXICO ) ) ss. COUNTY OF BERNALILLO )

I, J. A. TRUJILLO, Notary Public in and for the County of Bernalillo, State of New Mexico, do hereby certify that the foregoing and attached Transcript of Proceedings before the New Mexico Oil Conservation Commission was reported by me in stenotype and reduced to typewritten transcript by me and/or under my personal supervision, and that the same is a true and correct record to the best of my knowledge, skill and ability.

WITNESS my Hand and Seal, this, the 20th day of October, 1959, in the City of Albuquerque, County of Bernalillo, State of New Mexico.

My Commission Expires:

October 5, 1960.

I do hereby ce : n or a complete the En 778 iner New usion



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\* Well could not be shut-in. Snut-in pressure taken from A. Olsen - Winningham No. 3

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\* P. was taken from R. Olsen Winningham No. 3. Well could not be shut-in due to water logging off well-bore

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# EL PASC HATORAL DAY DOMPANY MINIMUM CONTRACT TEST

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NOTE: Well cannot be shut-in logs off quickly.

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Pc WPS taken from R. Olsen Winningham #3. Well could not be shut-in due to water logging off well bore.

# NINIMUM CONTRACT TEST CORRECTED COPY

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\* well could not be shut-in. Shut-in pressure taken from R. Olsen - winningham No. 3

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When this situation is corrected and the well is ready to be produced, please contact this office.

1 Remarks: This will confirm my relephone conversation with Mr. Watson on August 14, 1958. Mr. Watson stated first one jal Oir Company was pulling the subing on this well.

Yours truly,

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EL PASS NATURAL GAS COMPANY

Dispatching Separtment R. L. Pagin

BLP: LIC cc: 2. A. Scearce 2. N. Woodruff R. T. Oright Central File File

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÷ .	•					No.: 60-832	-01
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n file La file	J. B. Ma	Muna		•			
					· · · · · · ·		
	• • • • • • • • • •		A. A.				

• :

This well was not shut-in due to logging off. The Jenkins No. 1 shut-in pressure was used for this test - which is the nearest offset.

the state said

## EL PASO NATURAL DAVIDAMENT MINIMUM CONTRACT TEST (To Determine Wellhead Deliverandity of 100 PSiG)

Jal Oil Company	Dyer	· <u>3</u>
thu: <b>H</b> Sec. <b>31</b> that	25 37 Le	
Teo: Jalmat	Single	3-(7-14) 1958
Production Linear Charts	<b>x</b> .680	
• <b>767</b>		7-19-57

FLOW DATA					SUPPLY DATA		С 1915 р. (С. 4. Т. А.				
N 0.	HANN Line Size	×	Billion Orifice Size	Pres Savig		Femp.	Press	Ferna.	Р. <del>ге</del> хч. В.ч.д	≗ €क⊅. कह	: Duration : EFlaw Hr.
S hut-						ani () (	224-194	-135	264-277	-283	24-48-72
ĭ. j	<u>4 x</u>	1.	250_	93	21.16	47	108	•	_		24
2.						•					<ul> <li>Company and the second s</li></ul>

Γ	Coefficient		Pressure	Flow Temp.	Gravity	Compress.	Rote of Flow
No.	(24+1 arr)	√h <sub>w</sub> P <sub>w</sub>	psia	Factor F <sub>1</sub>	Eastor Fg	Factor Fpv	Q-MCPPD 15.025 psca
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2.	<u> </u>						

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$P_d^2 =$	12.8	<ul> <li>72 State and the second second</li></ul>				
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- P <sub>c</sub> <sup>2</sup> - P <sub>d</sub> <sup>2</sup>	74.9 1.026 73.0	lit Adding an ieutrerKinty ar aborrae Studiesteric (1500 € 1800) Studiesteric (1500 € 1800)				
.018 =	011147 .767	.008549 1.020				
	435 , 3 <sup>ne</sup> 1.020	_ 444				
	er to driften that the	Unit Size: 1.00 Meter Station No. 60-832				
-	given above is trie and	B. G. Boaz				
correct. Name	Jack T. Littlefield	El Paso Natural Gas Company				

Position 11 to 2

EL PARCHATURAL GAT TOM ANY

جمعتني وللالا العطافة

1.

## EL PAST NATURAL SAS JOMP ONY MINIMUM CONTRACT TEST (To Determine Welthead Deliverability at 100 PSIG)

John I.	Jal	Oil Com	nany			Dye	r	<u> </u>		
			] ×;-	25				Lea		
	almat					Single			<u>3-6/3-13/195</u>	
Etritaur		1 an t-	······		X	1997 <b>*</b> 1997 1997 <b>*</b> 1997				
the Bloom	11 (n. 1977) 1	4 ° <u>-</u>	•767			**** - 1	1197 C.A.	9/12/5	8	
······		FLOW	V CATA		• •		6 DATA	SASING PAPA	a Duration	
No. Li		Drilien	Press.	⊃ # <b>.</b>	Temp.	Press	Temp.	Fress. Tem	p. offiow	
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2.		¥	and the state of the second	· · · · · · · · · · · · · · · · · · ·					an a	
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	Caefficien	•		Pressure		Temp.	Gravity	Compress.	Rate of Flow	
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and the second sec	-in Time	Date	Taken Time	Duration Hours	Wellhead (Pc) J Tubing	osia	F W.H. Wo	LOW DATA rking Pre nd( <sup>P</sup> t)psi	
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#### HIGH FREGRUPE TAL WELL FEST REPORT June 9, 1950

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Operator: R. Clom

Well Name and Number Provile 1

Location: Senting 79-17: 20 0 10 00 3 34/4 10/4

Shut-in Pressure, FOTER Open Flow, MOFFD Adv Dested: Det 200 Floor die, through 20 ch paring. Most On control at an blosting two humme. Volume 2 PSTS N.P., MOFPD HgS, gr. 100 dr. OFM (20.0 P.B.):

ఉందే ఎందరంది. శ్రీభ సంపర్ణాలు -

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This will be increase in our prosent high property. Contract corrange.

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D. S. Mite

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C. S. Kondrick

Jupe 28, 1930 Jul Division Office 43

Ra: R. Olean Uil Company - Repolto 16. 1

We are proceeding with errangements to the this well into our high pressure system and should have it tied in by July 13, 1050.

I will section that this call is taking water at the present time. If it does not clear up, (Ilson should set a separator to take care of this excessive water.

Endich

OEX:pd

oc: H. F. Steen J. W. Baulet File



• Se Minlei,

### Jel Division Office

8 4st (9, 1951

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is you know, this would have the a large quarkity of power since the initial blo-in to our high Recordse bettering tuber. I. Clean set a Farkershurp Hydra-cepter to eliminate value contain 1 our of state.

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Jal, New M. co

.) 23, 1951

Mr. Howard Olsen R. Olsen & Hlaunt Prawer "2" Jal, New Mexico

Dear Sir:

This will confirm our telephone conversation on June 23, 1954, regarding a soutdown at our Jal No. 3 Plant.

As stated our Jal No. 3 Flant will go of at 0:00 A.M. June 24, 1954, for approximately ten to twelve hours. Furing this period of time our Intermediate lathering System will be off. Therefore we request you make necessary arrangements on your Repollo #1 well to prevent it logging off during this time.

> Yours truly, EL PASO NATURAL DAS COMPANY

A. O. Sniplet

AOS:eeh cc:EAS, GEK, . VMP, File //

#### n, in strand to the Alignan in SMP the MINIMUM CONTRACT DEST (To Determine the level clear orbits of 100 PSEG)

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## El Paso Matural Gas Company O. Puse, Trees

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#### 992 P. N. CONTRACT DEST MINIMENTCONTRACT TEST To Detroit nel Active a Jeduverabilisticar 100 PSIG)

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\* Well could not be shut-in. Shut-in pressure taken from Jal 001 Co. - Eva Owens No. 1.

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W. D. GIRAND LOWELL STOUT

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GIRAND & STOUT LAWYERS 204 LEA COUNTY STATE BANK BUILDING HOBBS, NEW MEXICO COBT OFFICE BOX 1445

Lugust 27, 1959.

Oil Conservation Commission, Santa Fe, New Mixico.

Atcention: Mr. A. L. Porter.

IN RE: OLSEN OILS, INC. WINNINGHAM #3 GAS WELL, NEZSEZ, SECTION 30, TOWNSHIP 25 SOUTH, RANGE 37 EAST.

Gentlemen:

Enclosed you will find original and two copies of Application of Oisen Oils, Inc. for relief from shut-in action on the part of the Commission covering the above captioned well.

Please advise the case number assigned to this Application and the Hearing date on same.

Very truly yours,

GIRAND & STOUT,

BY:

G/bc Encls.

cc: Oil Conservation Commission, Hobbs, New Mexico. (Attention: Mr. Randall Montgomery) Olsen Oils, Inc., 2808 Liberty Bank Bldg., Oklahoma City, Oklahoma.

#### BEFORE THE OIL CONSERVATION COMMISSION,

STATE OF NEW MEXICO.

APPLICATION OF OLSEN OILS, INC. FOR AN ) EXCEPTION TO RULE TO OF ORDER NO. R-967 ) AND FOR THE ASSIGNMENT OF MINIMUM ) ALLOWABLE TO ITS WINNINGHAM #3 GAS WELL,) LOCATED IN THE NEZSEZ OF SECTION 50, ) TOWNSHIP 25 SOUTH, RANGE 37 EAST, ) JALMAT GAS POOL AND FOR RELIEF FROM A ) THREATENED SHUT IN. )

CASE NO.

COMES NOW the Olsen Ofls, Inc., a New Mexico corporation, with principal office in Jal, Lea County, New Mexico, and files this its Application for an exception to Rule 10, Order No. R-557 and for the Commission to assign a minimum allowable to its Winningham #3 and for cause would show:

1. Applicant is the owner and operator of the gas well known as the Winningham #3 located in the NE2SE2 of Section 30, Township 25 South, Range 37 East, in the Jalmat Gas Pool.

2. That the Winningham #3 has previously been designated as a marginal gas well and has been operated under said classification.

3. That in connection with the production of gas from said well, the water has encroached to such an extent

that the well was shut in on August 1, 1959 and has not produced any das since said date. That operator is presently engaged in the installation of a pump jack. Operator believes that with one use of the pump jack it will be able to reduce the water to such an extent that the well can and will produce large quantities of gas.

4. Applicant would snow that after the classification of said well as a marginal well the El Paso Natural Gas Company reduced their line pressures considerably in the lines to which said well was connected and by reason thereof, the well was capable of producing into the El Paso Natural GLS Company's line gas in excess of the fixed allowable. However, this condition was not the only condition existing which caused the over-production. During recent months the allowables assigned to marginal wells within the Jalmat Gas Pool was so reduced that the production of gas by the methods employed by the applicant could not keep from over-producing.

5. Applicant states that in its opinion enormous gas reserves are located under the acreage assigned to the

Winningham wo and that unless applicant is allowed to install the pump jack and produce pas from the well op reason of the lifting of enormous amounds of water, the well will have to be abandoned and allgas reserves attributable to saw well will be lose.

o. Applicant would further show the Commission that on January 29, 1958, the Commission entered its Order No. 1092 & in Case No.1327. That said Order has been under attack of the Courts in the State of New Mexico by many operators within the affected gas pools. That on July 1, 1958, the Jalmat Gas Pool proration formula was changed and the Commission, on its own motion, found it necessary to delay for approximately one year before attempting to reclassify the gas wells under the new proration formula. That, thereafter, in the month of June, 1959, the Commission reclassified approximately 118 gas wells, including applicant's and advised applicant that said Winningham #3 was no longer a marginal gas well and had over-produced more than six times its allowable. Thereafter, by Memo No. 13-59, the Commission notified all operators that unless Applications were filed seeking relief from this Commission,

all of the 118 wells would be shur in as of September 1, 1959. That Grder No. R-907 provides under Rule o-C as follows:

> "The Commission may assign minimum allowables in order to prevent the premature abandonment of wells."

The Order further provides, under Rule 10:

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"The Commission may allow over-production to be made up at a lesser rate than would be the case if the well were completely shut in upon a showing at public hearing after due notice that complete shut in of the well would result in material damage to the well."

7. Applicant states that in order for applicant to protect its gas reserves, the eneroaching water must be produced from its well to prevent the killing of the same. The exact amount of water that will be required to be produced in order to stablize a flow of gas from said well cannot be definitely ascertained at only time. However, applicant believes and states to the Commission that if the Commission will allow a 120 day producing period, applicant will report to this Commission the minimum amount of water required to be produced in order to prevent the willing of the well and yet allow its continued production. ipplicant will advise the Commission as soon as possible, the total flow of gas that will be produced under such production method.

8. The Commission being charged with the conservation of oil and gas and the protection of correlative rights adopted the rules and regulations above quoted to insure relief to an operator situated as the applicant. In light of ics declared policy, the Commission should enter an Order covering applicant's Winningnam #3 well authorizing applicant to continue to produce the same for a period of 120 days and then report to this Commission the data necessary for this Commission to enter an Order establishing a minimum allowable for this well. However, if applicant is wrong in its interpretation of the meaning and intent of the Commission in its quoted Rule 5, then applicant believes that the Commission should allow applicant to make up its over-production over an extended period whereby applicant could continue to produce its well employing a pump jack presently being installed.

9. The Commission, on numerous occasions, has seen fit in the manufing of production of oil to disregard Fixed allowables where production was made by secondary recovery methods. Applicant believes and so states to the Commission that the methods to be employed by it in the production of gas from its well, winningnam #3, is a secondary recovery method and designed to obtain the ultimate production of gas underlying the acreage assigned to said well.

WHEREFORE, applicant prays:

(1) That the Commission enter an Order allowing applicant to produce its well employing the methods presently used for a period of 120 days requiring applicant to keep a record of its production of both gas and water and to establish within said period insofar as it is capable of doing so, the minimum amount of water required to be produced in order to produce gas.

(2) And, the Commission further provide that the control of production on applicant's well be under the direct supervision of the Hobbs Office granting unto the Director of the Hobbs Office the right to notify the producer the determined amount of water to be produced or allowed to be produced pased on production reports should it be determined that the water is encroaching at a greater rate than is established through the 120 day testing period.

(3) That the Commission fix a minimum allowable for the Winningham  $\frac{1}{2}3$  gas well located in the Jalmat Gas Pool as provided by Rule 5 of Order R-957.

(4) And, in the alternative, that the Commission enter its Order authorizing applicant to make up its allowable over such extended period of time as will allow applicant to continue the production of gas through the methods presently being installed be employed to such an extent as to maintain said well as a gas well.

GIRAND & STOUT,

(ATTORNEYS FOR APPLICANT) POST OFFICE BOX 1445, HOBBS, NEW MEXICO.

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HIGH FREGULES LAS WELL TELT REPORT

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A. Olsen's Jal Office (Mr. French, Mr. NoCollised dr. Daos) was notified before the end of and routh that the well had not been produced. Also, that the well was goth as behind on contract requirement.

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J 23, 195L

Mr. Howard Olsen R. Olsen & Blount Drawer "J" Jal, New Mexico

Dear Sir:

This will confirm our telephone conversation on June 23, 1954, regarding a soutdown at our Jal No. 3 Plant.

As stated our Jal No. 3 Flant will go off at 5:00 A.M. June 24, 1954, for approximately ten to twelve hours. During this period of time our Intermediate Sathering System will be off. Therefore we request you make necessary arrangements on your Repollo #1 well to prevent it logging off during this time.

> Yours truly, EL PASO NATURAL GAS COMPANY

ADS:eeh cc:EAS, GEK, VMP, File /

A. O. Sniplet

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#### - CAR NATIRAL GAR OVERNY MINIMUM CONTRACT TEST

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(To Determine Wollhead Deliverability at 100 PS/S)

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. OIL CONSERVATION COMMISSION HOBBS. NEW MEXICO Storact 25, 1754 Mr. A. Clser 2808 Liberty Such Jing. Set Hells of Gity test Rejo of 21 Oklehona City, Chia. Deer Sir: ine to the fact that your Repairs all the Cat. CM-150-371, Johnst . 1 Pool, is producing a considerable count of order to outlined in your lotter of August 6, 1954, the Constantion executs the valiverableity tests or . the above-centioned well. Yours very truly, OIL CONTERVIZION CONTRACT A Maning S. Z. Stanley l Engineer BEFORE EXAMINER UTZ CE CONSERVATIO 1 -1 SJS/hs cc- Mr. Elvis Utz-Oil Comission-Santa Pe MARISSION epp. EXMUT El Paso Natural Cas Coppart Jal, New Yexico CASE NO. 778 

DIL CONSERVATION COMMISSION HOBBS, NEW MEXICO BEFORE EXAMINER UTZ 1778 (11 Conservation Considerion YE: ... (1867, Kepollo #1, 28-25-37 Tax 371 Santa Fe, Now Verico The operator of the above gas well requests a waiter pertaining to OUE OPERATOR OF THE BROVE ERS WELL REQUESTE & WELCH PERTAINING TO OVER PROINCTION OF THE 140 BORE PROPATION WILL AS fully of in Order 1-520. Dear Siri The area in question is water-logged and presents an unusual operating thes for the continued production of war- with respect to the above The masor for the request is as follows: practice for the continued preduction of Far. With respect to the above practice for the continues preduction of save with respect to the month will the operator has installed pumping equipment some time during the month of Fritzen for the wetch come the optical well when WHIL THE OPERATOR CAS INSTALLED DUNDING EQUIPMENT SOMETIME OUTING THE MONTH of Fe' VIEW, 1975, to Wick-off" the water-logged well. The operator pumped the wall for content of four works and a the the test of the operator of the the wall, for a pariod of four weeks prior to & show of was and finally the will flowers for wears provide show of gas and indexy the Well flowers for wears provides water with the gas. To maintain The to make of the normaling time and an analysis of the present time to revise the regular type fas endine to insure a source of fuel time to revise the regular type fas endine to insure a source of fuel whenever vater caring comments we have disched the mounde of the well time to replace the regular type fas endine to insure a source of inst whenever vater-loging occurs. We have checked the records of the well and find that the Top of the Vates is at 2,292 and the Total Depth is 2,463 thereby numbers connections are curvited. The reason that this case has been reviewed in detail is that 31 Pase Satural Gas Co., may be forced to shut-in the well due to ever-production as directed by were contact. thereby plus-back operations are cutruled. ·. . The misraignal leals that the statting-in all to will will cause pro-manume abandonment. Furthermore, it will only be a matter of time whereby economics will names the well to be pluced and abandoned. The desire of a directer by very crite. TAULT: BUSINGCONTENTS. : LITTLETTORE, IN WALL OF IV GE & RADDER OF LINE ANDREDY ECCLORISE VILL CAUSE the Well to be plugyed and Bhenderst. The desire of one measured eccr.chiss this cause the well to be prupyer and aberians. Ine resure of an and chemater is to extend the over-projuction rule for a period of one year and the dependent of an end of the over-projuction rule for a period of the over-period cpenator is to extend the over-production rule for a period of one year and i sinceral fiel that the waiver should be granted in the interest of conser-STRUCTURAL LEET THE WEIVER STOLLS OF FRANCES IN THE INTEREST OF CONSE TETION AND PERSONS A "RECOMMENDATION FOR disposal of the case be initiated. S. J. Starley Stated Ct. It Street

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### OIL CONSERVATION COMMISSIGN P. O. BOX 871 SANTA FE, NEW MEXICO

A at 21, 1955

S. Clark Jal, Nam Perioo

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det of Olasm depollo No. 1, Section 25. Two. 250, Ste. 5/E. Jalaat Car Fool, Lea Count , NY

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da: R. Olsen Licerty Bank Building Oklasoma City

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BEFORE EXAMINER UTZ
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