BEFORE THE OIL CONSERVATION DIVISION EXAMINER HEARING JUNE 13, 2019

CASE No. 20531

HUBBARD COM 002 WELL

SAN JUAN COUNTY, NEW MEXICO



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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 20531

AFFIDAVIT OF ROB CARLSON IN SUPPORT OF CASE NO. 20531

I, Rob Carlson, being of lawful age and duly sworn, declare as follows:

- 1. My name is Rob Carlson. I work for Hilcorp Energy Company ("Hilcorp") as a Landman.
- 2. I have previously testified before the New Mexico Oil Conservation Division as an expert witness in petroleum land matters. My credentials as a petroleum landman have been accepted by the Division and made a matter of record.
- 3. I am familiar with the application filed by Hilcorp in this case, and I am familiar with the status of the lands in the subject areas.
- 4. None of the affected parties in this case has indicated opposition, and therefore I do not expect any opposition at the hearing.
- 5. Hilcorp seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to complete and simultaneously produce three Mesaverde gas wells in the same quarter section, with two Mesaverde gas wells in the same quarter-quarter section, for a total of four Mesaverde gas wells within the same standard 309-acre, more or less, spacing and proration unit.

Case # 20531

- 6. The Blanco-Mesaverde Gas Pool is governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. The Special Rules therefore limit the number of wells in a spacing unit to four and the number of wells in a half section within a spacing unit to two. The Special Rules also provide that well density exceptions can be approved only after notice and hearing.
- 7. Hilcorp is the operator of a standard 309-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of the W/2 of Section 30, Township 32 North, Range 11 West, San Juan County, New Mexico, in which the following three wells are currently completed and producing:
 - a. Hubbard LS 002 Well (API No. 30-045-11265) Sec. 30, T32N, R11W (Unit E);
 - b. Hubbard LS 002A Well (API No. 30-045-23052), Sec. 30, T32N, R11W (Unit L); and
 - c. Hubbard LS 002B Well (API No. 30-045-30585), Sec. 30, T32N, R11W (Unit N).
- 8. Hilcorp now proposes to simultaneously dedicate and produce the following fourth well within the same standard spacing and proration unit, at the following location:
 - a. **Hubbard Com 002 Well** (API No. 30-045-24898), Sec. 30, T32N, R11W (Unit N).
- 9. This will be the fourth well within the same spacing unit with three wells in the same quarter section, and two wells in the same quarter-quarter section, exceeding well density limits imposed by the Special Rules.
- 10. Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule 1.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the **Hubbard Com**

- **002 Well** (API No. 30-045-24898) within the W/2 of Section 30, Township 32 North, Range 11 West, permitting the total number of wells dedicated and producing within this spacing and proration unit to four, with three wells in the same quarter section and two wells in the same quarter-quarter section (Unit N).
- 11. The proposed simultaneous dedication of the **Hubbard Com 002 Well**, which is currently producing in the Dakota formation, within the Blanco-Mesaverde is part of Hilcorp's strategy to use existing wells completed in other zones to economically target development of incremental Mesaverde gas reserves in areas where there is not adequate gas drainage.
- 12. The Division has pre-approved downhole commingling the Dakota formation with the Blanco-Mesaverde Gas Pool.
- 13. Pursuant to the Special Rules and Division precedent, Hilcorp provided notice to all Division-designated operators in offsetting 320-acre spacing units. Where Hilcorp is the operator, Hilcorp identified all working interest owners in offsetting spacing units as affected parties requiring notice. In some offsetting spacing units, Hilcorp may own 100% of the working interest, in which case there are no affected parties to notice.
- 14. **Exhibit A-1** is an overview map identifying the location of the subject Blanco-Mesaverde Gas Pool spacing unit, in the green outline, within the W/2 of Section 30, Township 32 North, Range 11 West, to which the well will be simultaneously dedicated.
- 15. Exhibit A-1 also identifies the locations of the existing Mesaverde wells as dark blue circles, as well as the **Hubbard Com 002 Well** as a dark blue triangle.
- 16. Exhibit A-1 also depicts the notice area comprised of the offsetting spacing units, which is the area within the dark blue dashed line surrounding the subject spacing unit outlined in green. Hilcorp has provided notice of this application to the operators within the notice area. In

some instances, Hilcorp may be the operator of offsetting spacing units within the notice area, in which case notice of the application was provided to all the working interest owners within the notice area.

- 17. **Exhibit A-2** identifies the affected parties within the offsetting spacing units who are required to be noticed. I provided a list of all affected parties requiring notice to Holland & Hart LLP. All parties were locatable.
- 18. To the best of my knowledge, the addresses used to provide notice are valid and correct addresses which have been recently used by Hilcorp and at which mail has been received by the notice parties.
 - 19. Exhibits A-1 and A-2 were prepared by me or under my direction and supervision. FURTHER AFFIANT SAYETH NAUGHT.

Rob Carlson

STATE OF TE	XAS)
COUNTY OF	Houris)

SUBSCRIBED and SWORN to before me this 4th day of June, 2019 by Rob

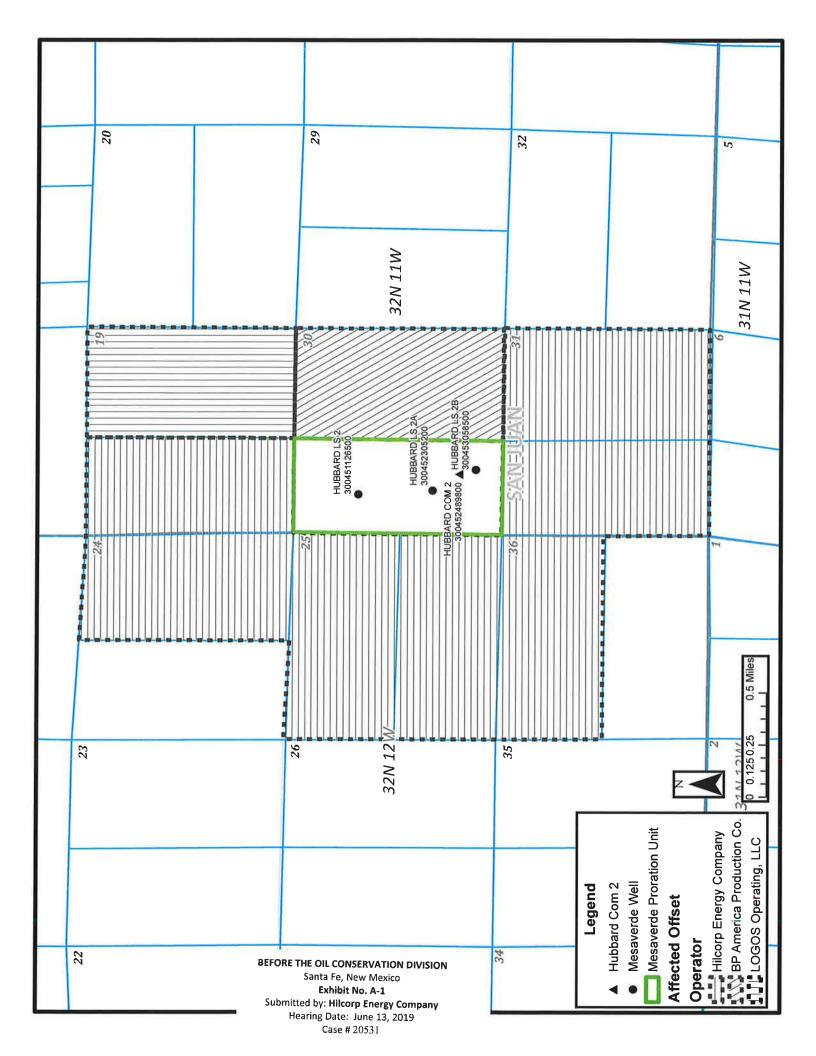
DANIELLE PAPETTI
Notary Public, State of Texas
Comm. Expires 03-23-2022
Notary ID 129752864

NOTARY PUBLIC

My Commission Expires:

03/23/2022

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Name	Address	City	State	Zip Code	Remarks	Offset Drillblock
HILCORP ENERGY COMPANY	1111 TRAVIS	HOUSTON	XT	77002	OFFSET OPERATOR	
LOGOS OPERATING, LLC	2010 AFTON PLACE	FARMINGTON	NN	87401	OFFSET OPERATOR	E/2 Sec. 19-T32N-R11W
BP AMERICA PRODUCTION COMPANY	PO BOX 848103	DALLAS	¥	75284-8103	OFFSET OPERATOR &	E/2 Sec. 30-132N-R11W (OO)
					WIO	W/2 Sec. 19-T32N-R11W (WIO)
						W/2 Sec. 30-T32N-R11W (WIO)
						E/2 Sec. 31-T32N-R11W (WIO)
DONA LISA JOHNSON TRUST	U/A DTD 10/29/91	PLEASANT HILL	<u>ব</u>	94523		
	DONA LISA JOHNSON TRUSTEE					
	2300 CONTRA COSTA BLVD SUITE 315				WIO	ALL Sec. 31-T32N-R11W (WIO)
FINLEY RESOURCES INC	1308 LAKE ST STE 200	FORT WORTH	۲	76102	WIO	W/2 Sec. 30-T32N-R11W (WIO)
LANIER FAMILY MINERAL CONTROL	AGENCY MA076 FROST NATL BANK AGENT	SAN ANTONIO	XT	78296		
	ATTN: DEBBIE DORSETT					
	PO BOX 1600				WIO	ALL Sec. 31-T32N-R11W (WIO)
V F NEUHAUS PROPERTIES INC	4621 N TAYLOR RD	PALMHURST	X	78573	WIO	ALL Sec. 31-T32N-R11W (WIO)

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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 20531

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STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

Adam G. Rankin, attorney in fact and authorized representative of Hilcorp Energy Company, the Applicant herein, being first duly sworn, upon oath, states that the above-referenced Application has been provided under the notice letters and proof of receipts attached hereto.

Adam G. Rankin

SUBSCRIBED AND SWORN to before me this 12th day of June, 2019 by Adam G. Rankin.

Yotary Public

My Commission Expires:



Adam G. Rankin Phone (505) 988-4421 Fax (505) 983-6043 agrankin@hollandhart.com

May 24, 2019

<u>VIA CERTIFIED MAIL</u> CERTIFIED RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re:

Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico.

Ladies & Gentlemen:

This letter is to advise you that Hilcorp Energy Company has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on June 13, 2019 and the status of the hearing can be monitored through the Division's website at http://www.emnrd.state.nm.us/ocd/. Division hearings will commence at 8:15 a.m. in Porter Hall at the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four business days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

If you have any questions about this matter, please contact Rob Carlson at (832) 839-4596.

Adam G. Rankin

ATTORNEY FOR HILCORP ENERGY COMPANY

Utah

POSTAL DELIVERY REPORT HUBBARD CM 002 Case No. 20531

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New Mexico State Land Office 310 Old Santa Fe Trail Santa Fe		Ref#: C1396627.7847373
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Shipment Confirmation Acceptance Notice

Note to Mailer: The labels and volume associated to this form online, must match the labeled packages being presented to the USPS® employee with this form.

Hubbard Com 002 Well HEC 93904.0003 Case No. 20531

Shipment Date: 05/22/2019

Shipped From:

Name: HOLLAND & HART LLP

110 N GUADALUPE ST # 1 Address:

City: SANTA FE

State: NM ZIP+4® 87501

Type of Mail	Volume
Priority Mail Express®*	
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^{*}Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

B. USPS Action

Note to RSS Clerk:
1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm

Scan or enter the barcode/label number from PS Form 5630 Confirm the volume count message by selecting Yes or No Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail. Leave form with customer or in customer's mail receptacle.



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BEFORE THE OIL CONSERVATION DIVISION

Submitted by: Hilcorp Energy Company Hearing Date: June 13, 2019 Case # 20531

AFFIDAVIT OF PUBLICATION

Ad No. 0001286993

HOLLAND AND HART PO BOX 2208

SANTA FE NM 87504

I, being duly sworn say: THE DAILY TIME, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newsaper duly

qualified for the purpose within the State of New Mexico for publication and appeared in the internet at The Daily Times web site on the following days(s):

05/28/19

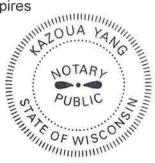
Legal Clerk

Subscribed and sworn before me this 28th of May 2019.

State of WII, County of Brown

My Commission Expires

Ad#:0001286993 P O : Hubbard # of Affidavits :0.00



STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION SANTA FE, NEW MEXICO

The State of New Mexico through its Oil Conservation Division hereby gives notice pursuant to law and the Rules and Regulations of the Division of the following public hearing to be held at 8:15 A.M. on June 13, 2019, in the Oil Conservation Division Hearing Room at 1220 South St. Francis, Santa Fe, New Mexico, before an examiner duly appoint for the hearing. If you are an individual with a disability who is in need of a reader, amplifier, qualified sign language interpreter, or any other form of auxiliary aid or service to attend or participate in the hearing, please contact: Florene Davidson at 505-476-3458 or through the New Mexico Relay Network, 1-800-659-1779 by June 3, 2019. Public documents, including the agenda and minutes, can be provided in various accessible forms. Please contact Florene Davidson if a summary or other type of accessible form is needed.

STATE OF NEW MEXICO TO: All named parties and persons having any right, title, interest or claim in the following case and notice to the public.

(NOTE: All land descriptions herein refer to the New Mexico Principal Meridian whether or not so stated.)

TO: ALLWORKINGINTERESTOWNERSIN THE SUBJECTSPACINGUNIT AND OFFSETTINGOP-ERATORS OR LEASED MINERAL INTERESTOWNERS, INCLUDING: LOGOS OPERATING LLC; BP AMERICA PRODUCTION COMPANY: DONALISAJOHNSONTRUST; FINLEYRESOUR CES INC; LANIERFAMILY MINERAL CONTROL V F NEUHAUS PROPERTIES INC.

CASE 20531: Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regula-tions of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico. Applicant in the above-styled cause seeks an order for an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (72319), San Juan County, New Mexico, to permit it to comand simultaneously produce Mesaverde gas wells in the same standard 309-acre, more or less, spacing and proration unit, with three wells in the same quarter section and two wells in the same quarter-quarter section. Hilcorp further seeks approval for the proposed location of the Hubbard Com 002 Well (API No. 30-045-24898) in the Mesaverde formation with a surface location in Unit N of the W/2 of Section 30, Township 32 North,

Range 11 West, NMPM, San Juan County, New Mexico, and authorization to simultaneously complete and produce the **Hubbard Com 002 Well** from the Blanco-Mesaverde Gas Pool. Said area is located approximately 9 miles north of Aztec, NM.

Legal No. 1286993 published in The Daily Times on May 28, 2019.

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

APPLICATION OF HILCORP ENERGY COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS OF THE SPECIAL RULES AND REGULATIONS FOR THE BLANCO-MESAVERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 20531

AFFIDAVIT OF ALEX LIANG IN SUPPORT OF CASE NO. 20531

Alex Liang, being of lawful age and duly sworn, declare as follows:

- 1. My name is Alex Liang. I work for Hilcorp Energy Company ("Hilcorp") as a reservoir engineer.
- 2. I have previously testified before the New Mexico Oil Conservation Division as an expert in reservoir engineering. My credentials as a reservoir engineer have been accepted by the Division and made a matter of record.
- 3. I am familiar with the application filed by Hilcorp in this case and have conducted an engineering study of the subject area and of the Blanco-Mesaverde Gas Pool.
- 4. As with Hilcorp's prior applications for well density exceptions in the Blanco-Mesaverde Gas Pool, I used a decline curve analysis of existing wells to estimate ultimate recoveries for the subject spacing unit under the existing well density. I then compared the estimated ultimate gas recoveries against log-derived volumetric calculations for the original gas in place with the cumulative gas production in the spacing unit. Using this approach, we identified areas, including the subject spacing unit, that have substantial remaining recoverable

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. C
Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019

Case # 20531

gas and lower-than-expected gas recoveries where additional well bores or well completions are necessary to adequately drain remaining gas reserves.

- 5. **Exhibit C-1** contains information relating to the subject spacing unit and the **Hubbard Com 002 Well** (API No. 30-045-24898) within the W/2 of Section 30, Township 32 North, Range 11 West, which is the well Hilcorp proposes for simultaneous dedication within the Blanco-Mesaverde Gas Pool in this application. It is currently producing within the Dakota formation. It will be the third Mesaverde completion in the quarter section in the spacing unit. I anticipate that it will help drain the area to the northeast.
- 6. **Exhibit C-2** is a basin-wide map reflecting Hilcorp's calculations for original gas in place across the Blanco-Mesaverde Gas Pool. The warmer colors represent areas where there is more original gas in place. The cooler colors indicate areas where there is less original gas in place. The red star indicates the location of the subject well in an area where we calculate moderately high volumes of original gas in place.
- 7. **Exhibit C-3** is a map depicting the calculated estimated ultimate recovery (EUR) from the Blanco-Mesaverde Gas Pool and drainage radius. The larger radius circles reflect wells with higher EURs and larger drainage areas. The red star identifies the location of the subject well where there is relatively low EURs and the drainage radii are smaller.
- 8. **Exhibit C-4** is a map depicting calculated remaining recoverable gas. The cooler colors indicate areas where there is relatively less remaining recoverable gas. The warmer colors reflect areas where there is relatively more remaining recoverable gas. The red star identifies the location of the subject well in an area where we calculate that there is relatively considerable remaining recoverable gas and relatively low EURs under the existing well density.

- 9. **Exhibit C-5** is a table that supports this volumetric analysis. The first column titled "Volumetric OGIP" reflects the calculated volumetric original gas in place on a quarter section, section, and nine-section area basis around the subject spacing unit. The column titled "Section Equivalent OGIP" shows the estimated gas in place to show that the estimates are consistent across the area. The column titled "CTD/RF%" shows the cumulative gas production to date on a quarter section, section, and nine-section area basis and the calculated recovery factor. The column titled "Remaining GIP" shows the estimated remaining gas in place on a quarter section, section, and nine-section area basis. The last column titled "EUR/RF%" shows the estimated ultimate gas recovery and recovery factor calculated on a quarter section, section, and nine-section area basis.
- 10. I would expect recovery factors of approximately 70-80% in a gas pool of this type. The relatively low recovery factors in Exhibit C-5 indicate that this area is not being sufficiently drained by the existing wells in the subject spacing unit under the existing well density and that additional well bores, or completions, are necessary to adequately drain the Blanco-Mesaverde Gas Pool in this area.
- 11. Approval of Hilcorp's application is therefore necessary to drain unrecovered gas reserves that will otherwise be left in place under the existing well density.
- 12. **Exhibit C-6** is a well bore diagram for the subject well. It provides the most current information known regarding the status and construction of the well, as well as the location and condition of cement within the wellbore. Hilcorp will separately seek administrative approval from the Division's Aztec District Office for authorization to recomplete this well in advance of undertaking any recompletion operations.

- 13. In my opinion, granting this application will not impair the Blanco-Mesaverde Gas Pool, and will be in the interest of conservation, the prevention of waste and will protect correlative rights.
- 14. Exhibits C-1 through C-6 were prepared by me or under my direction and supervision.

FURTHER AFFIANT SAYETH NAUGHT.

Alex Liang

COUNTY OF Harris

SUBSCRIBED and SWORN to before me this _____ day of June, 2019 by Alex Liang.



NOTARY PUBLIC

My Commission Expires:

03/23/2022

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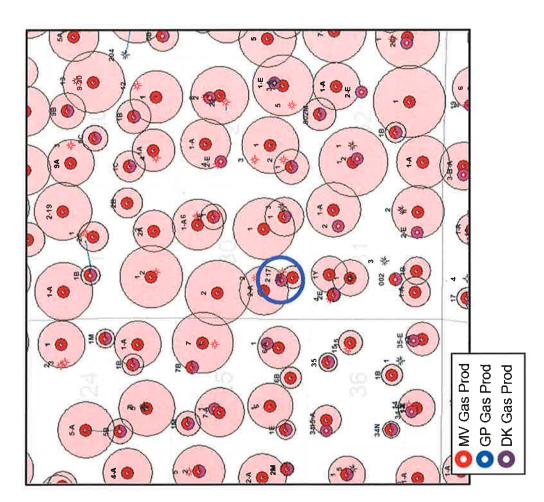


Well Specifics

- SW30 32-11 3004524898 1982 drill
- 3rd MV completion in 1/4 section 460' from nearest MV producer
- Help drain area to the northeast

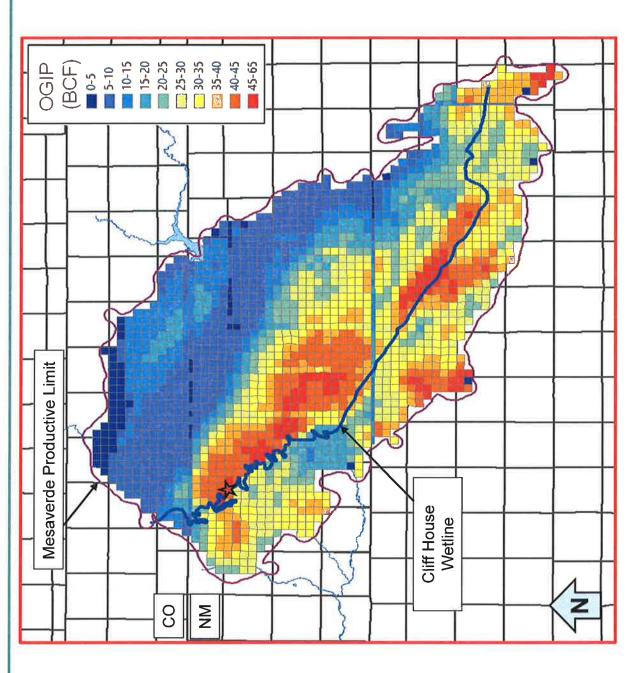
 Complete MV in 1-2 stages

 BEFORE THE OIL CONSERVATION DIVISION
 Santa Fe, New Mexico
 Exhibit No. C-1
 Submitted by: Hilcorp Energy Company
 Hearing Date: June 13, 2019
 Case # 20531



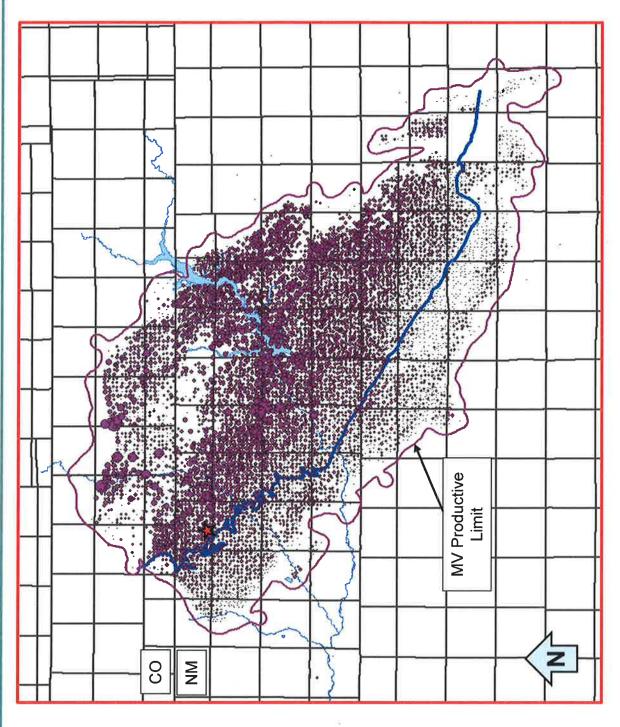


MV Original Gas In Place



MV EUR and Drainage Radius





BEFORE THE OIL CONSERVATION DIVISION

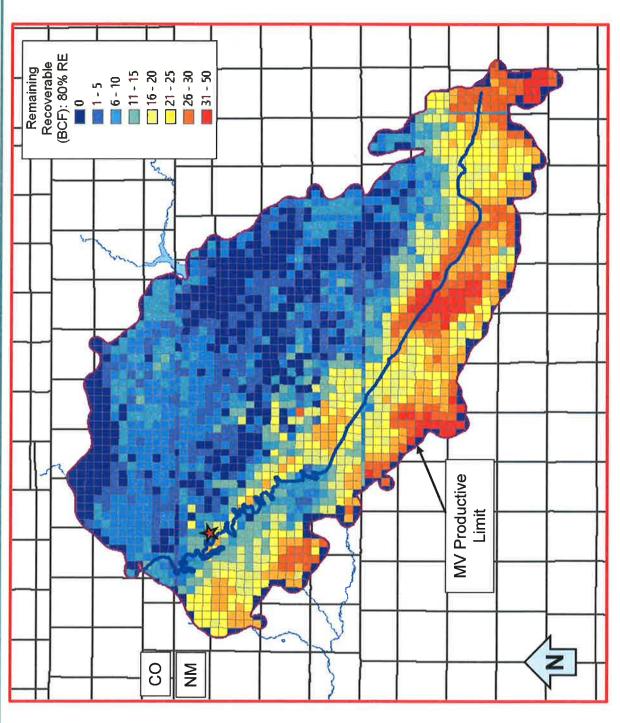
Santa Fe, New Mexico
Exhibit No. C-3

Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019

Case # 20531

MV Remaining Recoverable Gas





BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico
Exhibit No. C-4

Submitted by: Hilcorp Energy Company
Hearing Date: June 13, 2019

Case # 20531



HUBBARD COM 002

EUR/RF%	5.4 Bcf / 48%	26.8 Bcf / 71%	155.7 Bcf / 51%
Remaining GIP	7.3 Bcf	19.3 Bcf	222.9 Bcf
CTD / RF%	4.0 Bcf / 35%	21.4 Bcf / 57%	155.7 Bcf / 26%
Section Equivalent OGIP	45.2 Bcf	37.6 Bcf	42.1 Bcf
Volumetric OGIP	11.3 Bcf	37.6 Bcf	378.6 Bcf
Reference Area	Qtr Section	Section	9 Section

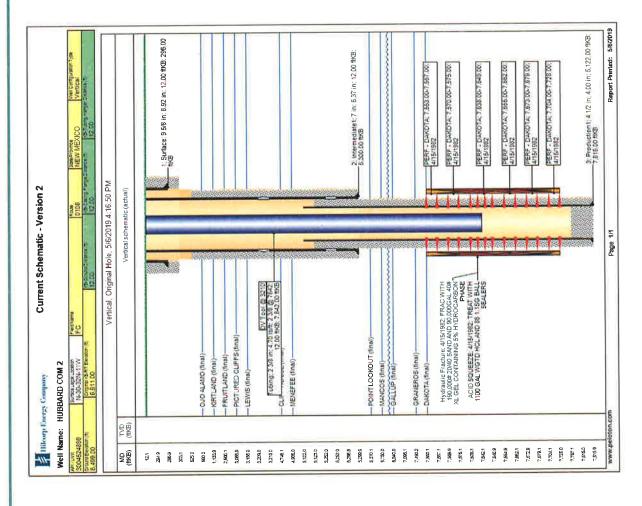
Remaining Gas in Place in Quarter Section of 7.3 Bcf

Cumulative Recovery Factor to Date 35% and 57% in the Quarter Section and Section, respectively

Considerable gas remaining in area with opportunity to recover additional volumes utilizing existing wellbore



HUBBARD COM 002



BEFORE THE OIL CONSERVATION DIVISION Santa Fe, New Mexico

Exhibit No. C-6

Submitted by: Hilcorp Energy Company Hearing Date: June 13, 2019

Case # 20531