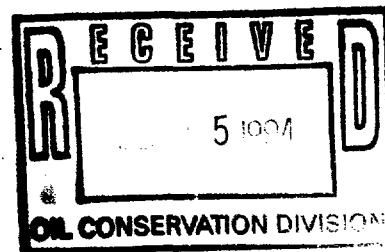


NEW MEXICO OIL CONSERVATION DIVISION  
STATE LAND OFFICE BUILDING  
STATE OF NEW MEXICO  
CASE NO. 11078

IN THE MATTER OF:

The Application of Bass Enterprises  
Production Company for a  
Pressure Maintenance Project,  
Eddy County, New Mexico.



BEFORE:

JIM MORROW

Hearing Examiner

State Land Office Building

September 1, 1994

REPORTED BY:

CARLA DIANE RODRIGUEZ, NMCCR No. 4  
Certified Shorthand Reporter  
for the State of New Mexico

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ATTORNEY  
GENERAL

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## A P P E A R A N C E S

FOR THE OIL CONSERVATION DIVISION:

State of New Mexico Oil Conservation Division  
Room 206, Land Office Building  
Post Office Box 2088  
Santa Fe, New Mexico 87504-2088  
By: **RAND L. CARROLL, ESQ.**

FOR THE APPLICANT:

KELLAHIN & KELLAHIN  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265  
BY: **W. THOMAS KELLAHIN, ESQ.**

## I N D E X

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1 EXAMINER MORROW: I believe there's a  
2 protest in 11077, so the next case that's not  
3 protested is 11078, the Bass case.

4 We'll call, at this time, Case No.  
5 11078.

6 MR. CARROLL: The application of Bass  
7 Enterprises Production Company for a pressure  
8 maintenance project, Eddy County, New Mexico.

9 EXAMINER MORROW: Call for  
10 appearances.

11 MR. KELLAHIN: Mr. Examiner, I'm Tom  
12 Kellahin of the Santa Fe law firm of Kellahin &  
13 Kellahin, appearing on behalf of the Applicant,  
14 and I have one witness to be sworn.

15 Mr. Examiner, I have one witness, Mr.  
16 Terry Payne. He's a consulting engineer from  
17 Austin, Texas.

18 **TERRY PAYNE**

19 Having been first duly sworn upon his oath, was  
20 examined and testified as follows:

21 EXAMINATION

22 BY MR. KELLAHIN:

23 Q. Would you please state your name and  
24 occupation?

25 A. My name is Terry Payne. I'm a

1 consulting petroleum engineer.

2 Q. For whom have you done consulting work  
3 for this project, Mr. Payne?

4 A. For Bass Enterprises Production  
5 Company.

6 Q. Have you testified on prior occasions  
7 before the Division?

8 A. No, sir, I have not.

9 Q. Summarize for us your education.

10 A. I graduated in 1985 from the University  
11 of Texas in Austin, with a bachelor of science in  
12 petroleum engineering.

13 Q. Subsequent to graduation, summarize  
14 your employment experience.

15 A. Subsequent to graduation I was employed  
16 by Conoco as a field engineer in South Texas. I  
17 worked for them for approximately one year and I  
18 joined Chevron, USA as a production engineer and  
19 reservoir engineer in New Orleans. And then, in  
20 1981, I joined Platt, Sparks & Associates as a  
21 consulting engineer.

22 Q. As part of your duties as a consulting  
23 engineer, do you, on a regular basis, make  
24 engineering studies and present those studies to  
25 regulatory bodies in other states?

1           A.       Yes, sir, I do.

2           Q.       Have you qualified as an expert  
3 engineering witness in other agencies in other  
4 states?

5           A.       Yes, sir.

6           Q.       At the request of your client, have you  
7 made a study about the feasibility of a pressure  
8 maintenance project for the area identified in  
9 the application for this case?

10          A.       Yes, sir, I have.

11                   MR. KELLAHIN: We tender Mr. Payne as  
12 an expert petroleum engineer.

13                   EXAMINER MORROW: We'll accept Mr.  
14 Payne's qualifications.

15          Q.       Before we look at the displays, Mr.  
16 Payne, describe for us the concept for pressure  
17 maintenance in this project and start, if you  
18 will, to characterize what portion of the  
19 Delaware pool we're dealing with.

20          A.       We are interested in what Bass  
21 designates as the purple unit of the 49er member  
22 of the Cherry Canyon sand in the Delaware  
23 Mountain group.

24          Q.       When we look in this area, do you find  
25 oil production in either the Bell Canyon or the

1 Brushy Canyon member of the Delaware Mountain  
2 group?

3 A. In this particular area, the only  
4 production that's been established to date is the  
5 Cherry Canyon interval that we're talking about  
6 today.

7 Q. Describe for us, before we get to the  
8 displays, the concept that you've concluded is  
9 the most feasible by which to institute pressure  
10 maintenance for the Delaware production in this  
11 area.

12 A. Bass seeks to reinject produced water  
13 from the South Golden Lane Field into the Golden  
14 "8" Federal No. 3 wellbore. Again, it is a  
15 pressure maintenance project. We just seek to  
16 essentially stabilize reservoir pressure at or  
17 near its current level, and reinject produced  
18 water as it is produced.

19 Q. Why is the No. 3 well, in your  
20 engineering opinion, the initial suitable first  
21 well for injection?

22 A. As we'll establish with the exhibits,  
23 the Golden "8" Federal No. 3 has, essentially,  
24 watered out in this reservoir. It's down to an  
25 oil rate of about three barrels a day with a 96



1     percent water cut, and the well is perforated in  
2     a thin, six-foot interval at the top of the  
3     sand.

4             There are really no recompletion  
5     possibilities, and the well has reached its  
6     economic limit, essentially.

7             Q.     Do you have an opinion or a forecast of  
8     the additional oil that may be recovered if the  
9     Division approves this pressure maintenance  
10    project?

11            A.     Our studies indicate that an additional  
12    76,000 stock tank barrels of oil could be  
13    recovered as a result of this project.

14            Q.     In addition to your other duties for  
15    the project, have you reviewed the information  
16    submitted to the Division on the Division form  
17    C-108--

18            A.     Yes, sir, I have.

19            Q.     --to qualify this well as an injection  
20    well?

21            A.     Yes.

22            Q.     When you look at all that information,  
23    what is your conclusion about the suitability of  
24    this wellbore for injection purposes?

25            A.     This is a suitable well both from a

1     reservoir engineering standpoint and from a  
2     mechanical aspect, to use as a reinjection well.

3           Q.     As part of your review, have you  
4     reexamined the Division's area of review for this  
5     injection well to determine whether or not there  
6     are any problem wells located within the area of  
7     review?

8           A.     Yes, sir, we have reviewed that  
9     half-mile radius area of review, and we will  
10    discuss those wells, but we don't see any problem  
11    with any wells that penetrate this interval.

12          Q.     All right, sir. Let's start with your  
13    first display, then. Would you identify that?

14          A.     Exhibit No. 1 is a copy of the NMOCD  
15    form C-108. As stated on the top, the purpose is  
16    for pressure maintenance, and this is a new  
17    project. There is no existing disposal going on  
18    in this area.

19          Q.     Let's turn to the first display which  
20    is marked Exhibit No. 2. Identify that for us.

21          A.     Exhibit No. 2 is a base map on which we  
22    have drawn both the half-mile radius circle,  
23    defining the area of review, and also the  
24    two-mile radius circle, and would show all the  
25    wells that Bass knows to exist, or that are known

1 to exist in that two-mile circle.

2 Q. Within the two-mile circle, it would be  
3 all wells to any depth?

4 A. To any depth, that's correct.

5 Q. Within this area, as part of your  
6 search, did you find that the Division had  
7 previously approved any of the other wells for  
8 salt water disposal into the Delaware portion?

9 A. Yes, sir. In fact, the Bass Big Eddy  
10 Well No. 84, which is in the northeast corner of  
11 Section 18, just to the southwest of our  
12 half-mile radius circle, was approved in May of  
13 1993 as a disposal well for the produced Delaware  
14 water from this field back into the Delaware  
15 formation.

16 MR. KELLAHIN: For the Examiner's  
17 reference, that was an administrative salt water  
18 disposal approval, and it is Order SWD-5-17.

19 Q. (By Mr. Kellahin) Let's turn to the  
20 next display, Mr. Payne: So that we could see in  
21 better detail the relationship of the wells in  
22 the half-mile radius area of review, do you have  
23 another display?

24 A. Yes, sir, we do. We've gone from a  
25 1-to-1,200 foot scale to a 1-to-500 foot scale in

1 this map, concentrating on the area of review and  
2 the one-half mile radius.

3 Again, the half mile radius is shown,  
4 and we show all of the wells that penetrate the  
5 Delaware interval. And we also, on this exhibit,  
6 show the project area outline which matches our  
7 reservoir simulation grid that we'll talk more  
8 about in a few minutes.

9 Q. In terms of complying with the  
10 requirements of the filings under form C-108, did  
11 you cause the Bass personnel to examine the  
12 surface in this project area to see if they could  
13 locate or find any fresh water sources?

14 A. Yes, sir, we did.

15 Q. Within the half-mile area of review,  
16 was there a surface inspection made to see if  
17 there was any stock tank, windmills, domestic  
18 water wells, or any other source by which fresh  
19 water was being produced?

20 A. Yes.

21 Q. Was there any such water?

22 A. None within the half-mile area of  
23 review, no.

24 Q. Where is the closest known point of  
25 fresh water production shown on this display?

1           A.       The closest known fresh water source is  
2       in the northeast quarter of the northwest quarter  
3       of Section 18.

4                   In discussions with BLM personnel, we  
5       could not actually establish conclusively  
6       distances from the lease lines or section lines  
7       of that well, but, as mentioned previously, we  
8       know it's in the northwest quarter of the  
9       northwest quarter of Section 18, and it's  
10      spotted, essentially, in the center of that  
11      quadrant on this map.

12          Q.       It's identified as a fresh water well  
13      on this display?

14          A.       That's correct.

15          Q.       What data do you have on that well in  
16      terms of its maximum depth?

17          A.       Our information is that that water is  
18      produced from the Rustler at a depth of about 300  
19      feet.

20          Q.       The dashed, dark outline shown on the  
21      display represents what, sir?

22          A.       The dashed, dark outline, the entire  
23      square that is shown is the project area  
24      outline.

25                   We also show the Big Eddy Unit outline

1 to the north, but the project area outline which,  
2 again, matches our simulation study, is shown.

3 Q. Let's talk about the reservoir. Have  
4 you prepared a cross-section that shows the  
5 relationship of this particular zone in the  
6 Delaware to any other formations?

7 A. Yes, sir.

8 Q. We've put on the display board, Mr.  
9 Payne, what is marked as Bass Exhibit No. 4.  
10 Before we discuss it, describe for us the  
11 location of the wells, if you will, the line of  
12 cross-section for the wells.

13 A. The line of cross-section is shown in a  
14 base map inscribed in the upper right-hand corner  
15 of the exhibit. We go generally from the  
16 northwest to the southeast across the field,  
17 using the Golden "8" Federal No. 3, Golden "8"  
18 Federal No. 1, Golden B Federal No. 2 and Golden  
19 D Federal No. 2.

20 Q. As the Examiner looks at that display,  
21 the log of the well on the far left side is the  
22 proposed injection well, is it not?

23 A. That is correct.

24 Q. Describe for us, within the context of  
25 this display, the point in the reservoir that you

1 propose or recommend water be introduced through  
2 that injection well.

3 A. We have colored in the proposed  
4 injection interval across the cross-section, in  
5 yellow. Again, as we described earlier, it's  
6 what we designate as the purple unit of the 49er  
7 sand member.

8 Q. Why this portion of the pool for  
9 waterflooding or pressure maintenance?

10 A. That is the portion of the pool that is  
11 currently productive of oil and would be shown to  
12 be beneficial or benefit from water injection.

13 Q. Geologically, are there barriers to  
14 vertical flow of fluids above and below this  
15 particular 49er member of the Delaware?

16 A. Yes, sir, there are.

17 Q. And characterize those for us.

18 A. We have shale sequences above and  
19 structural control that form the trap. We also  
20 have some capillary pressure differences across  
21 the field. It's not purely a structural trap.  
22 There are some capillary pressure differences  
23 that also help with the trap.

24 Q. Any geologic or engineering evidence to  
25 indicate that there is hydrologic connections or

1 fracture systems or other means by which to  
2 communicate the 49er member of the Cherry Canyon  
3 with any fresh water sources?

4 A. None that we know of, through our  
5 review.

6 Q. What's the deepest known producing  
7 fresh water there?

8 A. To our knowledge, in this area it's the  
9 Rustler, which we mentioned before at about 300  
10 feet.

11 Q. In order to satisfactorily isolate and  
12 protect the fresh water sands, how deep would you  
13 have to set the surface casing string on any  
14 injection well?

15 A. That would be basically into the top of  
16 the salt which, in this area, the surface casing  
17 in these wells is set at about 3,000 feet.

18 Q. No doubt in your mind, as an engineer,  
19 that that well is adequately cemented and cased  
20 such that it would not be a source of potential  
21 contamination to any water contained in the  
22 Rustler?

23 A. No. And, in addition, our proposed  
24 injection well which we'll show in a moment, the  
25 production casing has been cemented all the way



1 to surface.

2 Q. Let's turn to the data that you  
3 utilized in reaching your conclusions about the  
4 feasibility of a pressure maintenance project for  
5 the project area. If you'll turn to Exhibit 5  
6 and identify that, please?

7 A. Exhibit 5 is a field production history  
8 for the entire South Golden Lane Delaware field.  
9 We show a number of things on here. On the  
10 left-hand Y axis, we show daily production rates  
11 which are the red, green and blue curves that are  
12 shown with dots.

13 Then, on the right-hand Y axis, we show  
14 the cumulative production of oil, water and gas.

15 As shown on the graph, as of July 1,  
16 1994, our oil rate from the field was about 400  
17 barrels a day, gas was about 290 Mcf per day, and  
18 the water rate was about 340 barrels a day.

19 Q. Do you have a plot of production from  
20 the proposed injection well?

21 A. Yes, we do.

22 Q. How is that identified?

23 A. That's Exhibit 6.

24 Q. Describe that for us.

25 A. We see the same display as far as the

1 axis are concerned. This is just the information  
2 for the Golden "8" Federal 3. And, as described  
3 before and shown on the green, dotted curve,  
4 we're down to a daily oil rate of about three  
5 barrels per day, with a water rate of about 70  
6 barrels per day, and a current water cut of 96  
7 percent.

8 Q. This is the producing well in the  
9 project area that produces the least amount of  
10 oil on a daily basis?

11 A. That is correct.

12 Q. Let's turn to the reservoir data sheet  
13 that you've summarized, the reservoir data for  
14 the project. If you'll look at Exhibit 7?

15 A. Okay.

16 Q. Summarize for us the items of  
17 significance to you on that exhibit.

18 A. Again, this is a reservoir data sheet.  
19 We show that the discovery well was the Golden  
20 "8" Federal No. 1, and completion in that well  
21 was made in March of 92, and it flowed at a rate  
22 of 149 barrels a day with no water.

23 Since that time, eight more wells have  
24 been drilled in the field and only one of which  
25 has been considered noncommercial. As we saw in

1 the previous exhibit, cumulative production is  
2 almost 140,000 stock tank barrels of oil, and 104  
3 million cubic feet of gas.

4 Q. As a result of your work, have you  
5 estimated ultimate oil recovery from the project  
6 area in the absence of pressure maintenance?

7 A. Yes, sir, we have. If the reservoir  
8 were to continue on primary production without  
9 pressure maintenance, we estimate the recovery to  
10 be about 602,000 stock tank barrels of oil.

11 Q. Have you estimated what the additional  
12 oil recovery will be with the institution of  
13 pressure maintenance?

14 A. We estimate that to be 678,000 stock  
15 tank barrels of water.

16 Q. The incremental difference being 76,000  
17 barrels of oil?

18 A. That's correct.

19 Q. Let's turn to the next display. What's  
20 Exhibit 8?

21 A. Exhibit 8 is the input data that we  
22 used in the reservoir simulation study of the  
23 subject field.

24 Q. Let's turn now to Exhibit 9. What are  
25 we looking at in Exhibit 9?

1           A.       Exhibit 9 is a three-dimensional  
2 depiction of the grid used in the simulation  
3 study. The coloring is as per oil saturation  
4 initially assigned to the grid.

5                   As we move from the darker blue colors  
6 to the greens, and then on into the reds, the oil  
7 saturation is increasing. The orientation, we  
8 see the north arrow so, I guess, the northeast  
9 side of the graph is actually oriented to the  
10 north.

11          Q.       Let's try something to see if we can  
12 help the Examiner orient the display. If you'll  
13 skip down and pick up Exhibit 11, which is your  
14 grid map, your simulation, if you'll pick up  
15 Exhibit 11 and compare it to 9, show us how to  
16 orient Exhibit 9 so it matches the grid  
17 orientation.

18          A.       One thing we've done on the exhibits to  
19 try and help that is, we've shown the location of  
20 the proposed injection well with a small red dot.

21          Q.       On Exhibit 9?

22          A.       On Exhibit 9. That's correct. Again,  
23 if we can orient the north arrows, on Exhibit 11,  
24 north is straight towards the top of the page;  
25 and on Exhibit 9, orient those two together, and

1     it looks like you've got it oriented properly  
2     there. I think he's got it.

3           Q.     What's the benefit of having the  
4     injection well located at this point in the  
5     reservoir?

6           A.     Our studies indicate that there is some  
7     water expansion going on below the oil leg of  
8     this reservoir. It appears that the water-drive  
9     support, it's not a true water-drive reservoir,  
10    but the water influx does appear to be coming  
11    from the west side of the reservoir, and we're  
12    merely wanting to reintroduce that water into the  
13    same area that it appears to be coming from.

14          Q.     Continue with your description of  
15    Exhibit 9. What do the individual colors  
16    indicate?

17          A.     The individual colors are  
18    representative of oil saturation that was  
19    initially assigned to the various blocks within  
20    the simulation grid. And, obviously, higher oil  
21    saturation are higher on structure.

22                 As we move down structure, we lose oil  
23    saturation and show the darker colors.

24          Q.     We get into the areas of greens, then  
25    that's higher oil saturation on this color code?

1           A.       That is correct.

2           Q.       As we move into the blues and the  
3 purple, we're well below oil saturation levels  
4 that would produce economic oil recovery rates?

5           A.       That's correct.

6           Q.       Let's turn to Exhibit 10 and have you  
7 identify that.

8           A.       Exhibit 10 is a structure map on the  
9 top of the 49er sand. It is drawn with 25-foot  
10 contour intervals. As you can see, the field is  
11 centered on a structural high on the south half  
12 of Section 8.

13                   We also see that regional dip is  
14 generally to the southeast, at approximately 150  
15 feet per mile.

16           Q.       Let's turn now to your grid map, which  
17 is Exhibit 11.

18           A.       This is merely a hand-drawn version of  
19 what we saw on the color, three-D depiction.  
20 It's just a two-D representation directly from  
21 above the simulation grid.

22           Q.       Have you decided, as an expert, that  
23 the grid size for the simulation was appropriate?

24           A.       Yes. There is some variation in grid  
25 size. We were attempting to center wells in the

1 grids, and also, you want to have the least  
2 number of cells possible to have a representative  
3 study and have the model run as fast as possible,  
4 but you do want definition around the wells to  
5 make sure that you can identify what's happening  
6 between wells and directly around them.

7 Those tend to be the smaller grids  
8 around the wells, and the larger grids are  
9 located on the flank of the reservoir, as shown  
10 on Exhibit 11.

11 Q. Have you satisfied yourself that you  
12 used an appropriate grid size and a project area  
13 size, if you will, by which to accurately and  
14 reliably model and forecast the reservoir?

15 A. Yes, sir, we have.

16 Q. Let's look at your history match  
17 exhibit. If you'll turn to Exhibit 12, identify  
18 that for us.

19 A. This is a history match of our  
20 simulation efforts. What we see here is the  
21 reservoir pressure on the Y axis versus  
22 cumulative oil production from the entire field  
23 on the X axis.

24 Q. Start with the pressure data points  
25 which are shown with the circles and then

1 connected with the red line?

2 A. That is correct. Those are actual  
3 pressures measured in various wells, through  
4 time, in this field, and corrected to a -835 feet  
5 subsea datum.

6 The solid green line depicted on the  
7 curve is the reservoir simulation predicted  
8 average oil zone pressure. That's the average of  
9 pressure that we would expect to see in the oil  
10 portion alone of the reservoir.

11 Q. Is there any significance attached by  
12 you to the fact that one of the last measured  
13 pressure points lies on the green plot?

14 A. Yes. That indicates to us that we have  
15 successfully matched the pressure history, both  
16 in the oil zone, which again is the green line.  
17 That dot that lies directly on the green line  
18 happens to be the Golden "8" Federal No. 3, our  
19 proposed injection well.

20 In the oil zone, the dot directly above  
21 that is from the Golden D Federal No. 1 which,  
22 upon initial completion, was perforated in the  
23 water section of the reservoir and the pressure  
24 was measured there.

25 As you can see, the pressure is higher



1 in the water section of the reservoir but it has  
2 dropped, as you would expect, so we are seeing  
3 some pressure support from the water leg of the  
4 reservoir.

5 But we feel like we've matched pressure  
6 from both the oil zone and the water leg of the  
7 reservoir.

8 Q. Having achieved a satisfactory match,  
9 what, then, did you do?

10 A. We ran the model in a predictive mode  
11 to attempt to quantify future oil production from  
12 various reservoir management schemes.

13 Q. When we look at Exhibit 13, what are we  
14 seeing?

15 A. These are the results of what we  
16 consider to be the best reservoir management  
17 opportunity for this reservoir. What we show  
18 here is the field oil rate, versus time, on two  
19 case: One, the primary production under existing  
20 conditions, which is the blue curve, and we  
21 contrast that with the red curve, which is oil  
22 production from the field under the pressure  
23 maintenance scenario.

24 Q. If you run the forecast long enough,  
25 eventually the two curves are going to join, at

1 some point in the future?

2 A. Eventually the rates would be similar.  
3 And that is due to a simulation constraint. The  
4 constraint on the wells was that they could not  
5 produce with a flowing bottomhole pressure below  
6 300 pounds. So both cases are eventually going  
7 to reach that limit and produce at the same rate.

8 Q. Can you give us the next display that  
9 will show us the significance of pressure  
10 maintenance versus continued primary depletion in  
11 the absence of pressure maintenance?

12 A. Yes. And I should back up and explain  
13 that what we're looking at on Exhibits 14 and 15  
14 is oil rate and cumulative oil production--

15 Q. 13 and 14, I think, are the exhibits.

16 A. You're right, 13 and 14, versus days  
17 from project initiation. We weren't sure when  
18 the project would be approved or started, but  
19 it's from project initiation is what we're  
20 plotting against here.

21 And, on Exhibit 14, what we've shown is  
22 cumulative oil production under each scenario.  
23 Again, the blue curve is the primary depletion  
24 with ultimate recovery of 602,000 barrels of oil,  
25 and the red curve is pressure maintenance with

1 ultimate recovery of 678,000 barrels of oil.

2 Q. The project area would include, under  
3 this concept, how many producing oil wells?

4 A. There are eight wells currently  
5 producing, one of which would be converted to an  
6 injector, which would leave us, obviously, with  
7 seven.

8 Q. With eight wells in the project area,  
9 in the absence of pressure maintenance, do you  
10 know what the Division allows for an oil  
11 allowable for these wells?

12 A. 80 barrels per day.

13 Q. On 40-acre spacing, the depth bracket  
14 is 80 barrels a day for these wells?

15 A. That is correct.

16 Q. What does Bass desire in terms of a  
17 project allowable for the project?

18 A. Bass's desire would be for the field  
19 allowable to remain at the total rate it is now  
20 and the allowable for the injection well to be  
21 divided among the remaining producing wells.

22 Q. Would Bass want the operational  
23 flexibility to produce the project allowable out  
24 of any combination of the remaining producing oil  
25 wells?

1           A.       Yes.

2           Q.       Plus, to take the allowable otherwise  
3 assignable to the injection well, and share that  
4 among the producing wells?

5           A.       That is correct.

6           Q.       All right. Let's turn to the topic of  
7 the present configuration of the injection well.  
8 Do you have a diagram that shows that?

9           A.       Yes, we do.

10          Q.       Let's turn to Exhibit 15 and have you  
11 describe that for us.

12          A.       Exhibit 15 is a depiction of the  
13 present wellbore status. As mentioned before,  
14 the production casing is cemented all the way to  
15 surface.

16                 Major points on this exhibit are the  
17 tubing anchor, which, as we'll see on the next  
18 exhibit, will be replaced by a packer, and the  
19 perforated interval which is currently only six  
20 feet, we propose to extend over the entire 49er  
21 interval.

22          Q.       Let's turn to Exhibit 16 and have you  
23 show us the changes.

24          A.       Exhibit 16 is our proposed wellbore  
25 schematic. The changes are index through tubing,

1 through the extended interval, going from six  
2 feet of perforations to 62 feet of perforations.

3 Q. What will you do with that annular  
4 space between the tubing and the casing?

5 A. That will be full of annular fluid.

6 Q. Let's turn now to 17. Identify that  
7 for the record.

8 A. Exhibit 17 is a lot of the same  
9 information we saw on 15 and 16. It's just on  
10 the prescribed form, as part of the injection  
11 application. The information is repeated from 15  
12 and 16.

13 Q. Let's look now at the tabulation sheet  
14 that identifies the individual wellbore data  
15 within the area of review.

16 A. Okay.

17 Q. Have you reexamined what Bass filed  
18 initially with its C-108?

19 A. Yes, we have.

20 Q. Have you supplemented and reexamined  
21 the top of cement in each of those wellbores?

22 A. Yes, we have.

23 Q. What's your conclusion?

24 A. As shown on Exhibit 18--and the major  
25 columns of interest are on the second page under

1 the production casing section--we've listed the  
2 number of sacks of cement used on each well,  
3 whether or not there's a stage tool, and then  
4 we've calculated the top of cement.

5 In every case, with the exception of  
6 one well, the first well on the list, the cement  
7 top is up above--higher than the interval  
8 proposed for injection. The lone exception, the  
9 Big Eddy No. 73, although it's included on the  
10 area of review list, actually lies outside the  
11 one-half mile area of review.

12 Q. It's the well in the northern portion  
13 of Section 8 that is more than a half-mile away  
14 from the injection well?

15 A. It's very close. We wanted to include  
16 it just for completeness, as well as a couple of  
17 other wells that lie right on the circle, but  
18 it's technically outside the half-mile radius.

19 Q. For those cement tops that you had to  
20 calculate, describe for us the method you used to  
21 calculate the cement top.

22 A. Rather than estimate a whole size or a  
23 safety factor, what we did was digitized the  
24 caliper curve and used the integrated hole volume  
25 so that we knew the actual volume that the cement

1     could fill. With the calculated cement yields,  
2     we used that information to mathematically  
3     calculate the top of the cement.

4           Q.     Any reservation in your mind, as an  
5     engineer, that in each instance, for the wells  
6     within the area of review, you have adequate  
7     cement covering the proposed injection area?

8           A.     No, sir, it's adequately covered.

9           Q.     Do you have a summary sheet showing us  
10    the operational data for the project?

11          A.     Yes, we do.

12          Q.     Let's look at that. It's Exhibit 19?

13          A.     Yes.

14          Q.     Describe it.

15          A.     We propose an average daily injection  
16    rate of 500 barrels of water per day; anticipated  
17    maximum rate of 1,000 barrels a day. It is a  
18    closed system. Our average pressure will be 800  
19    psi, and the maximum injection pressure we  
20    anticipate will be 850 psi, which is about  
21    two-tenths of a psi per foot.

22                 The injected water will be  
23    Delaware-produced water, and it will be through  
24    2-3/8" internally plastic coated tubing below the  
25    packer, as we mentioned previously, through the

1 extended interval shown earlier.

2 Q. The Division practice for issuing  
3 orders in these types of cases includes a method  
4 for administrative approval to increase the  
5 surface injection pressure limitation based upon  
6 step rate tests.

7 What would you recommend the procedure  
8 be for increasing the surface injection rate for  
9 this injection well?

10 A. If that proves to be necessary, we  
11 would recommend that a step rate test be done on  
12 the well. We do have a proposed stimulation  
13 procedure that we'll get to in just a moment, and  
14 hopefully that will provide adequate injectivity  
15 for this well.

16 Again, it's a pressure maintenance  
17 project. We're not looking to increase reservoir  
18 pressure, merely just to augment the water  
19 support we're seeing currently.

20 Q. Let's turn to Exhibit 20. Identify  
21 that for us.

22 A. Exhibit 20 is a geologic discussion.  
23 We've covered most of that.

24 Q. It repeats what you've described about  
25 the integrity of the geology and the separation



1 of the injection zone for fresh water sources?

2 A. That is correct. It also describes the  
3 fresh water well again.

4 Q. Exhibit 21?

5 A. Exhibit 21 is the proposed stimulation  
6 program. 3,000 gallons of 15 percent HCl, at two  
7 to three barrels a minute, with maximum surface  
8 injection pressure of a thousand pounds.

9 Q. Exhibit 22?

10 A. Again, we have examined all geologic  
11 information and see no link or fault to allow the  
12 injected water to escape.

13 Q. Exhibit 23?

14 A. Exhibit 23 is a water analysis from the  
15 fresh water well that we mentioned earlier. We  
16 might point out total solids are shown down  
17 around the middle of the page to be over 3,700.  
18 Total hardness is shown to be over 2,000. It's  
19 our understanding that this water is merely for  
20 livestock use. It's a windmill and a stock tank  
21 out there.

22 Q. And Exhibit 24?

23 A. Exhibit 24 is the affidavit of  
24 publication from Carlsbad, from August 11th  
25 through 13th of this year.

1           MR. KELLAHIN: Mr. Examiner, Exhibit  
2 25, which I have in my hand, is our certificate  
3 of notice to the interest owner at the location  
4 of the injection well. This is a federal tract  
5 and it's our understanding that this individual  
6 is a grazing lessee.

7           Bass is the operator of all wells  
8 within the half-mile radius, so there was no  
9 offset ownership required.

10          In addition I have, and I will submit  
11 to you, a letter from the BLM showing their  
12 approval of the project area which consists only  
13 of federal leases. There are portions of three  
14 federal oil and gas leases, and that letter shows  
15 their approval of the project.

16          EXAMINER MORROW: It's all federal?

17          MR. KELLAHIN: Yes, sir. With that  
18 comment, that concludes my examination of this  
19 witness. We move the introduction of Exhibits 1  
20 through 25.

21          EXAMINER MORROW: 1 through 25 are  
22 admitted.

23                       EXAMINATION

24 BY EXAMINER MORROW:

25       Q.       Mr. Payne, are you currently using No.

1 84 for disposal of water? The Big Eddy No. 4,  
2 you mentioned it had been approved, but I wasn't  
3 clear whether or not you had ever used it?

4 A. It was approved. We never used it, and  
5 obviously are currently not using it.

6 Q. What are you doing with the water now?

7 A. It's being transported by truck outside  
8 the field.

9 Q. Is this 49er member of the Cherry  
10 Canyon, I'm sure you told me, but that's the  
11 yellow zone across the cross-section, is that  
12 correct?

13 A. That is correct.

14 Q. That's what produces in this pool?

15 A. Yes, sir.

16 Q. All the wells in this pool are  
17 Bass-operated wells, those nine wells you talked  
18 about, most of them in a single section and maybe  
19 one or two in the section immediately south?

20 A. That's correct. They're all  
21 Bass-operated wells, also.

22 Q. You will inject your water into the top  
23 or into all of the oil column, is that right?

24 A. That is correct. We want to open up  
25 the entire interval to allow injection into the

1 water leg as well as the oil section.

2 Q. And that well is essentially watered  
3 out now?

4 A. Yes, sir.

5 Q. On Exhibit 12, there was a low pressure  
6 that you didn't explain. What was the  
7 explanation for that? There was one that was way  
8 down below--

9 A. Yes, sir. That's the Golden D Federal  
10 No. 2 well. Although we do see--I think I  
11 mentioned water influx from the west side of the  
12 field, we see a little bit higher pressure on the  
13 west side of the field. There is a small  
14 gradient across the field, but that pressure was  
15 a 72-hour static shut-in.

16 The only pressure build-up survey we  
17 conducted in the field, it was also run for 72  
18 hours, and the shut-in pressure of that well was  
19 about 50 pounds below the calculated P star. So,  
20 a 72-hour shut-in in that well only got us to  
21 within about about 50 pounds of actual reservoir  
22 pressure.

23 If you take the 72-hour shut-in in this  
24 well and add the 50 pounds to it, it gets us  
25 closer to that green line that we were trying to

1 match.

2 Q. So the other pressures that were up on  
3 the green line or the other line, were they P  
4 star pressures, or more lengthy shut-in times, or  
5 what was the situation on those?

6 A. They're more lengthy shut-in times, or  
7 they are taken with less production from the  
8 well. Essentially, virgin pressure from those  
9 wells, before they were produced.

10 Q. They're not extrapolated pressures?

11 A. No, sir.

12 Q. None of them are?

13 A. That's correct.

14 Q. What is the allowable? It would be 9  
15 times what, 80 barrels, or what is it?

16 A. We actually have eight producing wells,  
17 so 640 barrels a day for the field. There were  
18 nine wells drilled, but one was not commercial.

19 Q. So, even including the injection wells,  
20 it would be just eight wells times--

21 A. 80, or 640.

22 Q. When you calculated the cement tops,  
23 did you look back at the field reports to see if  
24 there had been any reports of problems with loss  
25 circulation or anything of that nature on those

1 cement jobs?

2 A. We didn't review for loss circulation.  
3 It was taking the whole volume and a calculated  
4 yield.

5 Q. Did you allow for any excess safety  
6 factor?

7 A. We didn't allow for any safety factor  
8 since we had calculated the whole volume in the  
9 yield.

10 Q. Okay. Those that show surface, where  
11 cement got back to the surface, were those  
12 reported from field reports, or was that from  
13 your calculations?

14 A. That was from field reports, where the  
15 cement was actually circulated to surface.

16 Q. On one of your exhibits, it looked like  
17 you identified the injection zone as the Ramsey  
18 zone, is that correct?

19 A. That's on Exhibit 19. That's correct.

20 Q. I think the Ramsey is on top of the  
21 Bell Canyon and not the Cherry Canyon?

22 A. It should be the Delaware or the 49er,  
23 it's going back into the current interval it is  
24 ~~current~~ coming from.

25 Q. And not in the Ramsey?

1           A.       That's correct.

2                   EXAMINER MORROW:   Thank you, Mr.

3       Payne.

4                   THE WITNESS:   Thank you.

5                   MR. KELLAHIN:   Mr. Examiner, I've  
6       marked as Exhibit No. 26 the approval by the BLM  
7       for the project area, and I would like to  
8       introduce that at this time.

9                   EXAMINER MORROW:   We accept Exhibit 26  
10       into the record.

11                   MR. KELLAHIN:   That concludes our  
12       presentation, Mr. Morrow.

13                   EXAMINER MORROW:   Thank you.   Case  
14       11078 will be taken under advisement.

15                   (And the proceedings concluded.)

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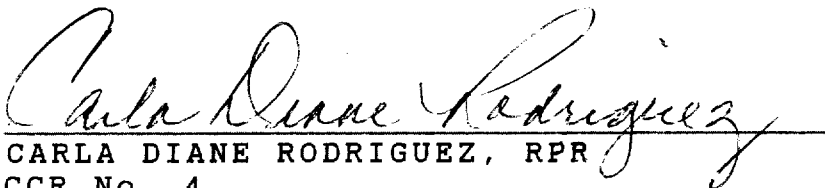
## CERTIFICATE OF REPORTER

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                                  ) ss.  
COUNTY OF SANTA FE     )

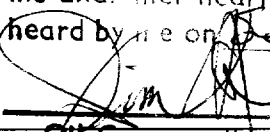
I, Carla Diane Rodriguez, Certified  
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CERTIFY that the foregoing transcript of  
proceedings before the Oil Conservation Division  
was reported by me; that I caused my notes to be  
transcribed under my personal supervision; and  
that the foregoing is a true and accurate record  
of the proceedings.

I FURTHER CERTIFY that I am not a  
relative or employee of any of the parties or  
attorneys involved in this matter and that I have  
no personal interest in the final disposition of  
this matter.

WITNESS MY HAND AND SEAL September 16,  
1994.

  
CARLA DIANE RODRIGUEZ, RPR

CCR No. 4  
I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 11078  
heard by me on Sept. 1, 1994.

  
Examiner

Oil Conservation Division

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