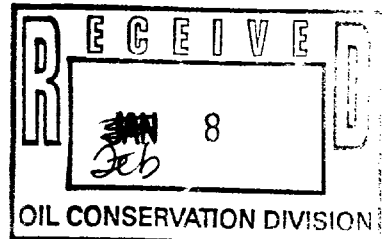


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING)
CALLED BY THE OIL CONSERVATION)
DIVISION FOR THE PURPOSE OF)
CONSIDERING:)
)
APPLICATION OF DALEN RESOURCES)
OIL AND GAS COMPANY)
_____)

CASE NO. 11,201



ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

February 2nd, 1995

Santa Fe, New Mexico

This matter came on for hearing before the Oil Conservation Division on Thursday, February 2nd, 1995, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, before Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

* * *

STEVEN T. BRENNER, CCR
(505) 989-9317

I N D E X

February 2nd, 1995
 Examiner Hearing
 CASE NO. 11,201

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* * *

A P P E A R A N C E S

FOR THE DIVISION:

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FOR THE APPLICANT:

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Santa Fe, New Mexico 87504-2265
By: W. THOMAS KELLAHIN

* * *

1 WHEREUPON, the following proceedings were had at
2 8:17 a.m.:

3 EXAMINER CATANACH: At this time we'll call Case
4 11,201.

5 MR. CARROLL: Application of Dalen Resources Oil
6 and Gas Company for pool creation, the promulgation of
7 special pool rules, and for the assignment of a special
8 depth bracket oil allowable, Lea County, New Mexico.

9 EXAMINER CATANACH: Are there appearances in this
10 case?

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

15 EXAMINER CATANACH: Any additional appearances?
16 Will the witnesses please stand and be sworn in?
17 (Thereupon, the witnesses were sworn.)

18 MR. KELLAHIN: Mr. Examiner, we're appearing
19 before you today to provide technical evidence to support
20 our Application, which requests the creation of a new
21 Strawn oil pool. We have a discovery well.

22 The major issue for you is whether or not you
23 agree with our technical witnesses that temporary rules on
24 80-acre oil spacing are appropriate. It will be their
25 testimony that it is.

1 You will see evidence from a petroleum geologist
2 and a reservoir engineer in which they have calculated that
3 the initial drainage area for the discovery well is in
4 excess of 80-acres, so that's the principal reason we're
5 here.

6 In addition, we would like the following special
7 rules established on a temporary basis for the pool: That
8 there would be only one well in an 80-acre spacing unit and
9 that a well location, to be standard, would be drilled
10 within 150 feet of the center of either 40-acre tract.

11 We believe that the establishment of the depth
12 bracket allowable is appropriate for the pool. My
13 recollection is, that's 400 barrels of oil a day on the
14 depth bracket and that the standard statewide gas-oil ratio
15 of 2000 to 1 is appropriate. This is a solution gas drive
16 reservoir, and this is the discovery well.

17 My first witness is Dalen's geologic witness who
18 has reached certain geologic conclusions about the
19 reservoir, and we will call him first.

20 DAVID A. SCOLMAN,
21 the witness herein, after having been first duly sworn upon
22 his oath, was examined and testified as follows:

23 DIRECT EXAMINATION

24 BY MR. KELLAHIN:

25 Q. For the record, sir, would you please state your

1 name and occupation?

2 A. My name is David Scolman, and I'm a geophysicist
3 for Dalen Resources.

4 Q. Mr. Scolman, for the benefit of the reporter
5 would you spell your last name?

6 A. S-c-o-l-m-a-n.

7 Q. You'll have to speak up. There are no
8 amplifications in the room. The microphones are simply for
9 the court reporter's aid, so speak up so we can hear you.

10 A. Okay.

11 Q. On prior occasions, Mr. Scolman, have you
12 testified before this agency?

13 A. I have not.

14 Q. Summarize for us your education.

15 A. I have a bachelor's degree in geophysical
16 engineering from the Colorado School of Mines.

17 Q. In what year did you obtain that?

18 A. 1982.

19 Q. Summarize for us your employment experience as a
20 professional geologist or geophysicist.

21 A. I was employed beginning in June of 1982 as a
22 petroleum geophysicist with Superior Oil Company, Mobil Oil
23 Company, Corpus Christi Oil and Gas, and PG&E Resources,
24 which is now Dalen.

25 Q. Where are you currently assigned? Where do you

1 reside?

2 A. I'm in Dallas, Texas.

3 Q. And the area of your responsibility, is it such
4 that it would include that portion of Lea County, New
5 Mexico, that's the subject of this Application?

6 A. It is.

7 Q. Summarize for us the particular play that's
8 involved here in this case.

9 A. We have a Pennsylvanian reef play composed of mud
10 mounds that are growing on structural positive features in
11 this portion of the Tatum basin.

12 Q. All right. You're here before the Examiner to
13 establish what, sir?

14 A. We are here to establish the geological/
15 geophysical model that controls the development and
16 placement of these reservoirs.

17 Q. Have you examined the available geologic
18 information upon which you could then reach geologic
19 conclusions?

20 A. Yes, I have.

21 Q. And based upon that work, do you now have certain
22 geologic opinions about spacing for this pool?

23 A. I do.

24 MR. KELLAHIN: We tender this witness as an
25 expert.

1 EXAMINER CATANACH: He is so qualified.

2 Q. (By Mr. Kellahin) Let me have you turn to what
3 is marked as Exhibit 1. It's a montage of several geologic
4 displays. If you'll take a moment and simply identify for
5 the Examiner what he's looking at.

6 A. Very good. What we have is a structure contour
7 map of the area that the discovery well is in. It is in
8 the general area of the Lovington-Strawn trend.

9 Noted on this map is the Lovington arch, which is
10 a large structural positive that runs through this area.

11 We have then also sketched in what we believe to
12 be the updip limit of the Strawn mounds. That was mostly
13 controlled at time of deposition by sea level.

14 We have outlined our discovery area, which also
15 has an isopach of the net reef facies within that area.

16 To the north we have outlined an analogy field
17 that resides in roughly the same structural position that
18 we will use for comparison. An isopach map is there that
19 also has the reef facies isopach.

20 And we have noted the initial potential of the
21 wells in red, the cumulative total production from the
22 wells in green.

23 Q. Mr. Scolman if you'll take the part of the
24 display that enlarges the isopach map in the right lower
25 side of the display and specifically locate by footage the

1 discovery well.

2 A. It is located in section 20 at 1980 feet from the
3 north line, 1980 feet from the east line.

4 Q. It's identified by your company as the Shipp
5 Number 1-20 well?

6 A. That is correct.

7 Q. What is your preference for an orientation of the
8 80 acres within the section to be dedicated to the well?

9 A. We would have the preference of allocating the
10 south half of the northeast quarter.

11 Q. When we look at this portion of the display,
12 there are two lines that appear to me as a layman to be
13 seismic lines.

14 A. That is correct.

15 Q. Describe those for us and why they're of
16 significance to you in looking at this portion of the map.

17 A. They are seismic lines, one of which, the line
18 I-5, is commercially available. The other is a proprietary
19 line shot in 1988 by British Petroleum. We have inherited
20 that data through their Texcon affiliate. Those lines were
21 used to geophysically delineate the prospect and provided
22 the basis for the original drill location.

23 Q. What's your geologic opinion about the
24 appropriate temporary spacing to be initially applied for
25 this well and any other well in the pool?

1 A. We have no evidence to indicate that the 80-acre
2 spacing would not be appropriate.

3 Q. Okay. Describe for us some of the data with
4 regards to the discovery well. When was it drilled and
5 with what results?

6 A. The discovery well was drilled -- Let's see,
7 would you like to go to the cross-section for that?

8 Q. Just summarize for me. This is a recent well?

9 A. Recent well.

10 Q. Within the last few months?

11 A. Within the last few months.

12 Q. And what type of results did you achieve?

13 A. We -- As we drilled through the Strawn pay
14 section, we had a significant mud log show. We ran a drill
15 stem test that indicated a potential reservoir. We set
16 casing, perforated it, tested it and are currently
17 producing the well.

18 Q. You have tied this well into two other wells on
19 cross-sections that we'll look at shortly, at least the
20 B-B' cross-section. Why did you do that?

21 A. Well, we believe from the map that since we are
22 near the updip limit of the Strawn mounds, that there is a
23 position updip that would be out of the range of the reefs.

24 To indicate that geologically, we have shown --
25 we've taken wells both in the area of the field and in the

1 area of the analogy field and have shown how the reef
2 changes as we move from the updip limit into the productive
3 areas of the Strawn play.

4 Q. Let's have you do that. Take your interpretation
5 of the Strawn mound for your pool and make the comparisons
6 to the analogy in the Northeast Lovington Pool, which is
7 also shown north on this same display.

8 A. Okay. We've noted in our well, in our cross
9 section, we start at the BHP Kimbrough well, which we
10 believe to be too far updip to have entered into the
11 reservoir, but it does have traces of the reef facies.

12 We then come down through our well, which we
13 believe to be a marginal well that has tagged the edge of
14 the reservoir, and that the reservoir will continue and
15 increase in economic and geologic goodness as we move to
16 the northeast.

17 The Amerind well at the far end of the cross-
18 section also is nonproductive, but does have some
19 indication of reef, indicating that it could be an edge
20 well to this reservoir.

21 As we move up to the analogy field, the first
22 well on the cross-section, the Montieth, again, is a well
23 that tagged what we believe to be the edge of the
24 reservoir. It did have production.

25 We move one location away and we move into the

1 significant reef facies and into a very economic well.

2 We move through the reef, moving off to the
3 northeast, and then finally get into a dry hole which,
4 again, though uneconomic, did have reef facies in the log.

5 So that both cross-sections represent coming from
6 the updip limit through the best reef facies and then
7 heading into a downdip limit to the extent of the reef.

8 Q. Do you have a geologic opinion about whether your
9 discovery well, the Shipp 1-20, is in fact a true discovery
10 of a new pool?

11 A. We do believe so. Our knowledge of this field in
12 this area would indicate that we have no -- effectively no
13 marginal wells surrounded by dry holes.

14 In each case where a marginal well exists within
15 one location, you enter into a more significant reef, so
16 that marginal wells indicate the proximity of reef facies
17 and of an economic field.

18 Q. Characterize for us the geology of this Strawn
19 mound reservoir.

20 A. You'll notice the updip limit of the Strawn
21 mounds has several re-entrants in it, and at those points
22 of the re-entrants you'll notice on the structure map that
23 there is a structural positive that comes out from those
24 re-entrants.

25 This map is drawn on the top of the Strawn, and

1 we believe that structural high represents the thickening
2 of the Strawn in the reef facies.

3 And what's happening within the grottos or within
4 these re-entrants, they're forming nice embayments for the
5 reefs to grow. So we notice that analogy field has a nice
6 re-entrant, a nice structural high.

7 As we come down to our new discovery, we notice
8 the re-entrant in the structural high that propagates to
9 the northeast from there. The mounds are growing on
10 structural positives that will form a -- give sea level
11 circulation to allow these reefs to grow.

12 Q. The Division in the past has established a number
13 of Strawn oil pools, many of them on 80-acre spacing.
14 Where are they in relation to your proposed pool?

15 A. Well, we've chosen the analogy field, since it is
16 on 80s, as the most direct comparison.

17 Q. Where would we go to find the Shipp-Strawn and
18 the Casey-Strawn and those other Strawn pools?

19 A. They would be directly north of our proposed --
20 of our discovery, in the area, roughly, where the isopach
21 for the analogy field is, within that area. So directly
22 east of the analogy and then to the southeast of the
23 analogy.

24 Q. Let's go to your cross-section that sets up the
25 vertical display of the reservoir, and see what you

1 concluded. If you'll take a moment and unfold your copy
2 then we can talk about it.

3 First of all, Mr. Scolman, describe for me why
4 you've chosen these three wells.

5 A. These three wells are the closest -- The two
6 wells at the outset and our well form the only wells within
7 a reasonable radius of our area for study. They also have
8 indications of reef in them so that we believe that they
9 are all within one reef, showing indication of one reef
10 area.

11 Q. Upon what point are these three logs hung or
12 correlated?

13 A. This is a structural cross-section, datum'd at
14 7000 feet below sea level.

15 Q. What is your datum marker that you have found
16 that allows you to establish structure? Is there an
17 identifiable portion of some signature on the log that
18 tells you you are at a certain point --

19 A. Yes.

20 Q. -- in one of these reservoirs?

21 A. Yes, we have several markers.

22 The topmost marker is a shale hot streak, within
23 the gamma ray, that we have called out Canyon marker.

24 We also have top of the limestone out here, which
25 is the top of the Strawn.

1 We have a strawn mudstone, tight micritic
2 mudstone, that we use as a marker to mark the base of the
3 reef, and then a set of siliciclastics, which we've labeled
4 as the Strawn clastics, that underlie the entire limestone
5 complex.

6 Q. How difficult is it for experienced geologists to
7 come to an agreement about these marker points?

8 A. These are fairly straightforward markers.

9 Q. Having established the cross-section, what does
10 it show you that's of significance?

11 A. What we see here, starting with the BHP well, we
12 believe this is a well that was too far updip, too far
13 towards the shoreline, to have had significant or economic
14 reef development. But we do see the distal end of what we
15 believe is a reef.

16 As we move into the Dalen, the Shipp 1-20, we
17 notice that this has thickened significantly, that the reef
18 facies also is developing nice porosity. We DST'd that
19 porosity and had excellent evidence of hydrocarbons.

20 As we move out finally towards the Amerind well
21 to the northeast, again, we see that the reef facies is
22 thickening some, but there is some porosity development,
23 indicating that the reef is present there.

24 Q. In examining the geology for the Northeast
25 Lovington-Strawn Pool, let's go to that cross-section, and

1 then have you make the comparison for us.

2 If you'll take a moment and unfold Exhibit Number
3 3, then we can talk about that cross-section.

4 Again, describe for us why you've chosen these
5 wells for this cross-section.

6 A. Structurally, they represent the same point, as
7 far as environment of deposition, that both these fields
8 are up near the very updip limit of the Strawn reef play.

9 We start with the southwest, the Montieth. We've
10 got the same markers, the Canyon, the reef facies, the
11 mudstone and the clastics, and we see a well with a thin
12 section of reef that blossoms nicely into the Nearburg well
13 where the significant reef is developed.

14 We proceed through the reef and we see a second
15 economic well, finally moving out to the Cities well which,
16 though uneconomic, still has the last remnants of reef
17 facies in it and a slight bit of porosity.

18 So we believe this to be a reasonable type
19 section of what we're seeing down at the Shipp 1-20.

20 Q. On the cross-section for the Northeast Lovington
21 Pool, which well on that cross-section is the comparable --
22 or equivalent, if you will -- of your discovery well?

23 A. We believe it's most comparable to the first
24 well, the Montieth State.

25 However, based on the DST analysis, we believe

1 that our well is closer to the reef facies than the
2 Montieth well is.

3 Q. Summarize for us your geologic conclusions.

4 A. What we see here, we have an environment of
5 deposition of reefs growing in shallow water that are
6 structurally controlled. They do have an updip limit that
7 would be represented by something analogous to a beach.

8 That where these reefs grow they're in good
9 continuity, that a marginal well in every case out here is
10 indicative of a reef in close proximity, and that we
11 believe our well has tagged into one of these reef
12 features.

13 Q. Do you see any currently available geologic
14 information to preclude the development in an appropriate
15 fashion of this reservoir on 80-acre spacing?

16 A. I do not.

17 Q. Do you recommend to the Examiner that he adopt
18 80-acre spacing on a temporary basis for this pool?

19 A. I do.

20 MR. KELLAHIN: That concludes my examination of
21 Mr. Scolman, Mr. Examiner.

22 We move the introduction of his Exhibits 1, 2 and
23 3.

24 EXAMINER CATANACH: Exhibits 1, 2 and 3 will be
25 admitted into evidence.

EXAMINATION

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BY EXAMINER CATANACH:

Q. Mr. Scolman, Has that updip limit of Strawn mounds been generally defined by development?

A. It has.

Q. Down in the area where you're drilling, how did you define that line down there?

A. We used the Kimbrough well. We also have -- In our own analysis, we carefully isopach out everything that we feel are important facies, and we watch for the thinning. We've calibrated the seismic data to get a sense of how that relates to the hard numbers from the well control.

Q. Does this entire mound that you've mapped -- Is it in communication?

A. We believe so.

Q. What would be the closest Strawn production to your Shipp 1-20?

A. There is a set of wells to the northeast, up in Section 10, in the southeast quarter of Section 10. There are also productive wells in Section 8 and in the north half of Section 9.

Q. Do you know what pool those wells would be in?

A. I do not.

Q. Mr. Scolman, do you know if the Division -- or

1 generally speaking, in this area, there are some Strawn
2 pools that do contain more than one mound, producing algal
3 mound?

4 A. There's been some controversy that as you get
5 into these, because the porosity begins to move around in
6 the overall reef section, that you may be dealing with some
7 form of stacked reefs or reefs that are of different ages
8 that have been put -- have become in communication through
9 some sort of diagenesis or some sort of porosity
10 development.

11 From the model that we have in this area, we
12 believe the Strawn reefs are growing virtually at the same
13 time, so that when you see a reef complex, for all intents
14 and purposes that represents one colony.

15 Q. There may be -- Within any given Strawn pool,
16 there may be several reef mounds; is that right?

17 A. Probably the only way to be able to tell that
18 would be if you had significant actual dry holes or if you
19 had pressure information that could delineate that, take it
20 into the reservoir engineering realm.

21 Geologically, we've seen that these reefs are
22 generally isolated on structures and can have fair
23 continuity along the structures.

24 There are some relatively high-frequency
25 tectonics that give you lows out here. Those lows tend to

1 end the reef development.

2 And the size of the underlying structure, then,
3 generally determines the size of the overall field.

4 Q. Well, what evidence do you have to show that your
5 particular mound is not connected to anything in the north
6 or northwest?

7 A. As far as north or northwest -- Any of the
8 existing production to the north?

9 Q. Right.

10 A. Or any of the existing production over to the
11 northeast?

12 Q. Well, I -- Yeah, go ahead and answer that.

13 A. We have quite a bit of seismic in the area and
14 have delineated what we would consider structure maps that
15 allow us to predict the structural features that have
16 seeded these reefs, and we believe that between the pools,
17 between those pools to the north and pools to the
18 northeast, that there are significant lows in which the
19 reef could not purge, could not cross, to link up with
20 those fields.

21 Q. So you have -- So you're satisfied that the data
22 you have indicates that your pool is isolated from any
23 other Strawn production in this area?

24 A. That's correct. The reefs tend to give a good
25 seismic anomaly, and we've got enough seismic data to see

1 that those seismic anomalies do not exist -- do not
2 continue, in our opinions, up into the other currently
3 developed fields.

4 Q. Mr. Scolman, have you looked at the geologic
5 properties of the producing formation and compared them to
6 any of the other Strawn fields in this area?

7 A. Yes, we have. From our well, that would have
8 been based on cuttings. We did not pull any hole core or
9 any sidewall core, but we have looked at core through the
10 field where it's been available and have looked through
11 cuttings.

12 Q. How does that compare to other Strawn pools in
13 this area?

14 A. It appears to be the same reef-building organism.
15 These are a phylloid algal mudstone, that the algae acted
16 as a mud baffle. The grasses as such that the algae grew
17 on the structural positives were fed by currents, baffled
18 out mud. That mud later weathered or went through a
19 diagenetic history, then became extremely porous.

20 Q. Have you compared porosity and permeability in
21 your well?

22 A. We can look at porosity. Permeability data would
23 be -- you would really need to get some form of hole core
24 for that.

25 We can infer -- From a reservoir engineering

1 standpoint, we can infer what we can from the DST
2 information.

3 From a geologic standpoint, we've looked at the
4 interval of cuttings where the porosity shows up on the
5 logs, and we believe that it is the same type of reef
6 organism that has produced the majority of the Strawn
7 mounds in this area.

8 Q. So the porosity compares favorably to the other
9 Strawn pools in this area?

10 A. Both in magnitude and in reason of origin.

11 EXAMINER CATANACH: I think that's all I have of
12 the witness.

13 MR. KELLAHIN: All right, sir.

14 Mr. Examiner, in response to your question about
15 the identify of the pools to the north and northeast, my
16 research leads me to believe that the pool that's to the
17 northeast, approximately two miles away, is the Humble
18 City-Strawn Pool and that the other pool that's north of
19 the discovery is identified by the Division as the Midway-
20 Strawn Pool.

21 EXAMINER CATANACH: Okay, thank you, Mr.
22 Kellahin.

23 MR. KELLAHIN: We call at this time Mr. Jerry
24 Anderson.

25 Just leave the displays there.

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JERRY ANDERSON,

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

Q. Mr. Anderson, for the record would you please state your name and occupation?

A. Jerry Anderson. I'm the district landman for Dalen Resources Oil and Gas.

Q. And where do you reside, sir?

A. I reside in Plano, Texas.

Q. On prior occasions have you qualified before this agency as an expert petroleum landman?

A. Yes, I have.

Q. Are you knowledgeable about the operators within one mile of the discovery well?

A. Yes, I am.

Q. And how have you determined that, sir?

A. I had ownership reports prepared by Orion Oil and Gas out of Amarillo and Mckin and McKin out of Midland, Texas.

Q. Are these contract companies with which you have done business in the past and for which you have confidence in their accuracy and reliability?

A. Yes, I do, and yes, I have used them in the past.

1 MR. KELLAHIN: We tender Mr. Anderson as an
2 expert petroleum landman.

3 EXAMINER CATANACH: He is so qualified.

4 Q. (By Mr. Kellahin) Mr. Anderson, let me ask you
5 -- I have taken an exhibit out of order; it's before you as
6 Exhibit Number 6. It is the notification list that we use
7 for purposes of notifying operators within this particular
8 area that might have any comments, concerns or objections
9 to approval of this Application.

10 Would you look through that, sir, and tell me if
11 we have in fact notified all the appropriate parties that
12 may have an interest?

13 A. Yes, we have.

14 Q. All right. If you'll look at the discovery well,
15 give us a general sense of where these other parties have
16 their interests.

17 A. BTA holds the offsetting interest to the north,
18 the east, I have acreage under control to the south, and
19 Pennzoil is over on the west side. I have Maralo on the
20 north side and Devon as a small tract over on the east
21 side.

22 Q. Does that pick up all the operators or, in the
23 absence of an operator, the unleased mineral owner within a
24 mile of the discovery?

25 A. Yes, it does.

1 Q. Have you received any objection from any of those
2 parties?

3 A. No.

4 MR. KELLAHIN: That concludes my examination of
5 Mr. Anderson.

6 We'll move out of order Exhibit Number 6.

7 EXAMINER CATANACH: Exhibit Number 6 will be
8 admitted as evidence.

9 EXAMINATION

10 BY EXAMINER CATANACH:

11 Q. Mr. Anderson, what acreage does Dalen hold in
12 this area, in particular, Section 28 -- or 20, I'm sorry?

13 A. We have the north half and the southeast quarter.

14 Q. You said the north half of the southeast?

15 A. North half and the southeast.

16 Q. North half and the southeast, okay.

17 These operators you've notified, they represent
18 all the leasehold owners within a mile of the pool
19 boundary?

20 A. Yes, they do.

21 EXAMINER CATANACH: Okay. I don't have anything
22 further of this witness.

23 MR. KELLAHIN: All right, sir.

24 Mr. Examiner, I call at this time Mr. George
25 Vaughn. Mr. Vaughn is a reservoir engineer.

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GEORGE L. VAUGHN,

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

Q. Mr. Vaughn, for the record, sir, would you please state your name and occupation?

A. George Vaughn, reservoir engineer.

Q. Mr. Vaughn, on prior occasions have you testified as a reservoir engineer before the Oil Conservation Division?

A. I have.

Q. And where do you reside?

A. Carrollton, Texas.

Q. As part of your reservoir engineering duties for your company, have you studied the reservoir engineering aspects of this discovery well?

A. Yes, I have.

Q. And based upon that work, do you now have reservoir engineering conclusions about drainage areas?

A. I do.

MR. KELLAHIN: We tender Mr. Vaughn as an expert reservoir engineer.

EXAMINER CATANACH: He is so qualified.

Q. (By Mr. Kellahin) Let me have you turn to what

1 we've identified as Exhibit Number 4, and that's your one-
2 page drainage area calculation summary. Do you have that
3 in front of you, sir?

4 A. Yes, I do.

5 Q. All right. Based upon our calculations, what
6 have you concluded to be the potential drainage area for
7 the discovery well?

8 A. I conclude that it will drain 96.4 acres.

9 Q. Identify for the Examiner the method that you
10 applied as a reservoir engineer to reach that conclusion.

11 A. What I have done here is taken the initial
12 month's production which, as you can see on the exhibit,
13 was about 2600 barrels, and based on what I perceive to be
14 a rather general decline rate for wells that have produced
15 initially at rates of around 100 barrels a day in the
16 Strawn, concluded that a reasonable decline rate is 30
17 percent per year, exponentially.

18 In order to substantiate that, I searched through
19 nearby wells in the area, specifically in the northeast
20 Lovington field, and found what I believe to be a very good
21 analogy to what I believe to be the situation at our Shipp
22 20-1.

23 Q. Do you have a production decline curve for that
24 analogy well that we might look at?

25 A. Yes, I do.

1 Q. And that's Exhibit Number 5, is it?

2 A. That's correct.

3 Q. If you'll turn to that, tell us where that well
4 is, and then we'll talk about the curve.

5 A. That is the Amerind State 21 well, located in
6 Section 21, Township 16 South, Range 37 East, in the E
7 location in the northeast Lovington field. It produces out
8 of the Strawn from perforations 11,347 feet to -461 feet.

9 Q. What caused you to believe that that well was an
10 analogy to your discovery well?

11 A. This particular well was drilled in 1984. Its
12 first month's production was 3100 barrels of oil, just, you
13 know, essentially the same as we've experienced at our
14 well.

15 And as you can see on the decline curve, the well
16 went on a rather solid 30-percent-per-year decline from the
17 100-barrel-a-day rate in 1984 to about 80 barrels per month
18 in February of 1994.

19 Q. Why is a steady decline of 30 percent in that
20 analogy well of significance to you?

21 A. That's significant to me because I was seeking a
22 way to, in essence, calculate my estimated ultimate
23 recovery for the Shipp well, which is part of my duties,
24 and concluded that -- as I can show you later -- that the
25 Shipp well will produce around 82,000 barrels, which is

1 very analogous to the 90,000 barrels that the State 21 well
2 has produced through its life.

3 Q. When you look at the State 21 analogy well, what
4 would happen in terms of drainage area if that 30-percent
5 decline rate all of a sudden took a steeper decline?

6 A. Well, it would indicate a very limited depletion
7 area.

8 Q. When you look at the initial producing rates and
9 characteristics of your discovery well, do you yet see any
10 indication that you're going to change your decline rate?

11 A. We do not.

12 Q. So what does that tell you?

13 A. I believe that we will enjoy a decline rate no
14 more severe than 30 percent, and, you know, this could even
15 be maybe conservative.

16 Q. Once you've established a decline rate in your
17 calculations, then what did you conclude to be the
18 estimated ultimate recovery for your discovery well?

19 A. I concluded that by taking the initial rate and a
20 final rate or an economic limit of about 180 barrels per
21 month, that the estimated ultimate recovery for the well
22 will be 82,355 barrels.

23 We have produced in excess of 4000 barrels
24 already.

25 Q. You've now established one of the components to

1 go ahead and do a drainage calculation, have you not?

2 A. That's correct.

3 Q. Let's talk, then, about the center portion of
4 your spreadsheet and talk about how you selected these
5 reservoir parameters to complete the calculation.

6 A. As you can see, the -- several of the parameters
7 came directly off the logs obtained at the Shipp 20-1 well
8 to obtain average porosity, average water saturation, and
9 of course net-pay thickness pay based on a four-percent
10 porosity cutoff.

11 Q. Are you comfortable with a four-percent porosity
12 cutoff?

13 A. Yes, I am.

14 Q. And why, sir?

15 A. That is the cutoff that we have used throughout
16 our Strawn play in evaluating other wells that we've
17 completed in the Strawn formation.

18 Q. How did you arrive at an engineering opinion
19 concerning the percentage of recovery of original oil in
20 place?

21 A. That was based on what from my experience would
22 be a rather good solution drive recovery, as a percent of
23 oil in place, 20 percent.

24 Q. What is your engineering judgment about the
25 permeability of this reservoir?

1 A. The permeability of the reservoir at this
2 particular well is probably rather tight, based on the fact
3 that we did not enjoy a top-allowable well, and only -- the
4 initial rates were about 95 barrels a day.

5 So I would conclude that for this updip portion
6 of the reservoir, that it is rather tight.

7 Q. What is the general belief about the permeability
8 of these Strawn mounds in general?

9 A. In general, they have rather good both horizontal
10 and vertical permeability.

11 Q. Would you expect that permeability component to
12 increase favorably as you move to a better position in the
13 reservoir?

14 A. Yes.

15 Q. What does that do for you as a reservoir engineer
16 when you're trying to decide spacing for wells?

17 A. That would tend to make me believe that a well
18 will drain at least an 80-acre drainage area.

19 Q. With that initial belief, how, then, did you
20 finish this calculation to confirm in a standard way that
21 you could deplete this reservoir with this discovery well
22 for an area larger than 40 acres?

23 A. What I've done is simply taken a -- made an
24 original-oil-in-place calculation -- you can see the
25 figures there -- using the porosity, water saturation, the

1 formation volume factor, which is by analogy to the West
2 Lovington field where there was a good analysis available
3 on similar crude, and calculating an original oil in place
4 of 178 stock tank barrels per acre-foot.

5 Based on our log analysis, we have 24 net feet of
6 pay in the Shipp 20-1. That then calculates out, by using
7 the 24 feet, to be 4272 stock tank barrels per surface
8 acre.

9 Then by applying a 20-percent recovery of
10 original stock tank oil in place, you get the 854.4 stock
11 tank barrels per acre as an estimated ultimate recovery
12 number.

13 Then to calculate a drainage area, you would take
14 my previous estimate of 82,355 stock tank barrels as an
15 estimated ultimate recovery for the well, based on the 30
16 percent decline initial rate, and divide that by that
17 recovery factor for 20 percent recovery of the oil in place
18 as discussed earlier of 854.4 stock tank barrels per acre,
19 and you come up with a drainage area of 96.4 acres, which I
20 believe to be a rather straightforward calculation to
21 calculate the drainage area.

22 Q. If this pool is left on statewide 40-acre oil
23 spacing, do you have an engineering opinion as to whether
24 or not that could result in the drilling of unnecessary
25 wells in this pool?

1 A. I believe it would.

2 Q. Why, sir?

3 A. I believe that as calculated here, the evidence
4 that being that at least 80 acres is drained by a well that
5 we perceive to be rather tight, that drilling on 40-acre
6 spacing, would just simply be overkill and economically
7 unsound.

8 Q. Do you see evidence that puts this discovery well
9 within the boundaries of any existing Strawn pool already
10 declared by the Division?

11 A. No.

12 Q. It appears to you as a reservoir engineer that in
13 fact this is a discovery of a new pool?

14 A. It does.

15 Q. Do you see any evidence in the engineering
16 aspects of your profession to the contrary?

17 A. No.

18 MR. KELLAHIN: That concludes my examination of
19 Mr. Vaughn.

20 We move the introduction of his Exhibits 4 and 5.

21 EXAMINER CATANACH: Exhibits 4 and 5 will be
22 admitted as evidence.

23 EXAMINATION

24 BY EXAMINER CATANACH:

25 Q. Mr. Vaughn, you guys aren't asking for any kind

1 of special oil allowable, right?

2 A. We are not.

3 Q. Okay. Your perforations are -- top perforations
4 in your well are at 10,858; is that right?

5 A. I believe that's right. I believe that's what we
6 show on the --

7 Q. Okay.

8 A. -- on the cross-section.

9 Q. So your allowable should be at 400 barrels a day
10 on an 80-acre unit?

11 A. That's correct.

12 Q. Okay. Mr. Vaughn, in some of your calculations
13 -- for instance, your formation volume factor -- I see
14 where you have an analogy to West Lovington.

15 A. Correct.

16 Q. Did you look at any other pools for that figure?

17 A. I did not. To my knowledge, that probably would
18 not be available to us. That's normally proprietary
19 information to the individual operators, unless that data
20 might have been presented at the Commission at some point.

21 Q. Okay. How about your recovery factor, 20
22 percent? How did you arrive at that figure?

23 A. That is a recovery factor that, based on
24 literature, would be a rather good solution gas drive
25 recovery.

1 I think the literature would state that solution
2 gas recoveries could be in the realm of six or eight
3 percent to 20 percent on the high side. I suppose some
4 texts might say even 25 percent. But nevertheless, 20
5 percent would be generally considered a rather good
6 solution gas drive recovery. I think 15 percent is a
7 number that is quite often used as an average.

8 Q. Again, did you look at any of the other Strawn
9 pools in the area to try and come up with a figure on those
10 pools?

11 A. I did not.

12 Q. Do you know in fact that it's that high, 20
13 percent, in any of the other Strawn pools in this area?

14 A. I could not tell you that just as an absolute
15 fact. But based on the studies I've done where you can
16 see, you know, recoveries in excess of half a million
17 barrels, I would certainly say that -- believe I could say
18 that 20 percent is certainly a reasonable number.

19 Q. As you move to maybe a better permeability area
20 in the reservoir, would you expect the drainage area to
21 increase?

22 A. I think that would be possible, yes, I certainly
23 do.

24 Q. What are your company's plans for drilling
25 additional wells in this pool?

1 A. We plan to monitor this well for several months.

2 I think we are attempting to obtain another
3 precise line to further nail down the reef.

4 And we are very hopeful that we will be drilling
5 another well this calendar year to offset, as we certainly
6 believe that we have the opportunity to develop possibly a
7 half-million-barrel well.

8 If I might just mention, the direct offset to my
9 analogy well --

10 Q. Uh-huh.

11 A. -- is a -- in excess of 400,000-barrel well. It
12 came in at top allowable, produced top allowable for
13 several months, in excess of a year, I believe. It's still
14 producing, having produced over 400,000 barrels.

15 It's an 80-acre offset to the south of this well.

16 So I believe this to be a very good analogy to
17 what we certainly hope to find in our first offset.

18 Q. Speaking of that offset, the offset to your
19 analogy well, did you look at the decline rate for that
20 well?

21 A. I did, inasmuch as I said the well obviously was
22 capable of much more than top allowable for many months and
23 went on a steeper than 30-percent decline, but that was
24 after producing several hundred thousand barrels. But I
25 could not tell you what that decline rate was, or is.

1 Q. There was some mention earlier about -- in your
2 proposed pool rules, about having only one well per 80
3 acres?

4 A. Yes.

5 Q. Is that what you guys are requesting?

6 A. Yes.

7 Q. Can you go into that a little bit on your
8 reasoning?

9 Generally that's not included in the pool rules
10 for an 80-acre pool. I'm kind of just wondering about the
11 reasoning behind that.

12 A. Well, as I think we mentioned earlier, we do not
13 wish to over-drill the reservoir. We believe that this
14 reservoir, however large it might be -- I suppose it could
15 be, you know, hopefully maybe as large as a 320-, 480-acre-
16 size reservoir -- we would hope to not have to drill more
17 than the four to six wells to adequately drain it on an 80-
18 acre basis. We do not want to over-drill.

19 Q. You understand that with 80-acre spacing you're
20 not in any form or fashion required to drill a second well
21 on an 80-acre proration unit?

22 A. Oh, no, we understand that.

23 Q. The option is there generally to do that if you
24 wish.

25 A. And take just the 80-acre allowable, of course.

1 Q. Right, that's generally how it's done in terms of
2 an 80-acre pool.

3 But you guys do want that specific provision in
4 there, that there only be one well on the 80-acre unit?

5 A. That is what we're requesting.

6 Q. Okay. Again, generally, when we establish pools,
7 we generally establish temporary rules for 18 months or a
8 two-year period. Do you think that's appropriate in this
9 case? Give you time to evaluate some more data?

10 A. Yes.

11 Q. Okay. Would you request 18 months or two years?
12 Do you have any preference?

13 A. I believe we would request two years.

14 EXAMINER CATANACH: I believe that's all I have,
15 Mr. Kellahin.

16 MR. KELLAHIN: Thank you, Mr. Examiner.

17 It was my suggestion that the Applicant seek to
18 limit the wells to one per 80.

19 It was my concern, that I shared with my client,
20 that they concurred in, that for small oil pools like this
21 it is highly likely that you can dedicate 80 acres and
22 arrange that dedication in such a way that you have *de*
23 *facto* 40-acre spacing with the producing wells only 40
24 acres apart, and you have in fact drilled too many wells.

25 I thought it appropriate to avoid the problem

1 that we have in some other pools by at least for this
2 temporary period having that additional limitation, which
3 can be easily removed after the two-year period if it
4 appears that additional wells need to be put in place.

5 But it was my concern from other cases that
6 brought that issue into this case.

7 EXAMINER CATANACH: Thank you, Mr. Kellahin.
8 Anything further in this case?

9 MR. KELLAHIN: No, sir, that concludes this
10 presentation.

11 EXAMINER CATANACH: There being nothing further,
12 Case 11,201 will be taken under advisement.

13 (Thereupon, these proceedings were concluded at
14 9:10 a.m.)

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CERTIFICATE OF REPORTER

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

I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I transcribed my notes; and that the foregoing is a true and accurate record of the proceedings.

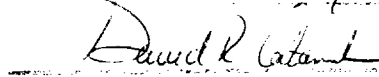
I FURTHER CERTIFY that I am not a relative or employee of any of the parties or attorneys involved in this matter and that I have no personal interest in the final disposition of this matter.

WITNESS MY HAND AND SEAL February 7th, 1995.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 1998

I do hereby certify that the foregoing is a correct and true transcript of the proceedings in the above captioned case, and that I have hereunto subscribed my name and seal on this February 7 day of 1995.

Oil Conservation Division

STEVEN T. BRENNER, CCR
(505) 989-9317

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EXHIBIT HAS
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AND IS LOCATED
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