

NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARINGSANTA FE, NEW MEXICOHearing Date JULY 11, 1996 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
W. Kellahin	Kellahin & Kellahin	Santa Fe
LES CARNES	Matabar Petroleum Corp	Midland, TX
Mark McClelland	CONOCO	Midland, TX
Jerry Hoover	CONOCO	Midland TX
Joe Miller	CONOCO	Midland TX
Dave Nelson	CONOCO	midland, TX
DENISE COX	MARATHON OIL	Midland, TX
Ron Folse	MARATHON OIL	Midland, TX
Cathy Colby	Richardson Operating Co.	Denver, Co
Dana Delverthal	" " "	Farmington, NM

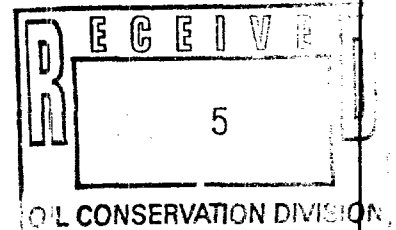
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY)
THE OIL CONSERVATION DIVISION FOR THE)
PURPOSE OF CONSIDERING:)

CASE NO. 11,567

APPLICATION OF CONOCO, INC., TO EXTEND)
THE VERTICAL LIMITS FOR THE WARREN-)
SAN ANDRES POOL, TO RENAME SAID POOL AND)
FOR THE PROMULGATION OF SPECIAL RULES)
AND REGULATIONS THEREFOR, LEA COUNTY,)
NEW MEXICO)

ORIGINAL



REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: MICHAEL E. STOGNER, Hearing Examiner

July 11th, 1996

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, MICHAEL E. STOGNER, Hearing Examiner, on Thursday, July 11th, 1996, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

* * *

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Examiner Hearing
CASE NO. 11,567

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A P P E A R A N C E S

FOR THE APPLICANT:

KELLAHIN & KELLAHIN
 117 N. Guadalupe
 P.O. Box 2265
 Santa Fe, New Mexico 87504-2265
 By: W. THOMAS KELLAHIN

* * *

1 WHEREUPON, the following proceedings were had at
2 8:15 a.m.:

3 EXAMINER STOGNER: Hearing will come to order --
4 please note today's date, July 11th, 1996 -- to consider
5 Docket Number 19-96. I'm Michael Stogner, appointed
6 Hearing Officer for today's cases, and we're going to take
7 these somewhat out of order. This is going to be a short
8 day.

9 At this time I will call Case Number 11,567,
10 which is the Application of Conoco, Incorporated, to extend
11 the vertical limits for the Warren-San Andres Pool, to
12 rename said pool and for the promulgation of special rules
13 and regulations therefore, Lea County, New Mexico.

14 At this time I'll call for appearances.

15 MR. KELLAHIN: May it please the Examiner, my
16 name is Tom Kellahin.

17 I'm with the Santa Fe law firm of Kellahin and
18 Kellahin, appearing on behalf of the Applicant, and I have
19 two witnesses to be sworn.

20 EXAMINER STOGNER: Are there any other
21 appearances?

22 Will the witnesses please stand to be sworn?

23 (Thereupon, the witnesses were sworn.)

24 MR. KELLAHIN: Mr. Examiner, I have two witnesses
25 to present to you.

1 Mr. Dave Nelson is a petroleum geologist with
2 Conoco, and he's going to present the geologic picture for
3 your consideration.

4 Mr. Mark McClelland is the petroleum engineer for
5 this project, and he will present to you the engineering
6 details.

7 By way of summary, Conoco is seeking to expand
8 the vertical limits of what is currently identified as the
9 Warren-San Andres Pool. They propose to include the
10 Grayburg. Now, that's commonly done in New Mexico, and if
11 that was the only request, it would have been accomplished
12 through the District's office with the assistance of Mr.
13 Sexton.

14 But Conoco has met extensively with Mr. Sexton
15 and, with his approval and cooperation, has conducted tests
16 on the three producing wells in the pool, and they have
17 determined that there is a substantial cost savings, in
18 excess of \$900,000, to be realized by not only combining
19 these two formations into one pool but to seek your
20 approval for increasing the oil allowable from what I think
21 is about 100 barrels a day -- is it 87?

22 MR. HOOVER: Eighty.

23 MR. KELLAHIN: Eighty, I'm sorry. It's 80
24 barrels a day currently, to 200 barrels a day on 40-acre
25 oil spacing, and ask permission for a special gas-oil ratio

1 of 10,000 to 1.

2 As I mentioned, Mr. Sexton has been involved in
3 allowing Conoco to run some tests of these various zones
4 within particularly the San Andres, and as a result we want
5 to show you the conclusions from that test and ask your
6 permission, then, to extend the vertical limits of the pool
7 to include the San Andres and the Grayburg for a special
8 200-barrel-of-oil-a-day allowable and a special gas-oil
9 ratio of 10,000 to 1.

10 With that introduction, then, we'll call Mr. Dave
11 Nelson.

12 DAVID E. NELSON,
13 the witness herein, after having been first duly sworn upon
14 his oath, was examined and testified as follows:

15 DIRECT EXAMINATION

16 BY MR. KELLAHIN:

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

19 A. My name is David Nelson, and I'm employed by
20 Conoco, presently as a geophysical advisor.

21 Q. On prior occasions, Mr. Nelson, have you
22 testified before the Division as a qualified petroleum
23 geologist?

24 A. Yes, I have.

25 Q. Pursuant to your employment, have you been the

1 geologist responsible on behalf of your company for
2 involvement concerning geologic matters for what is known
3 as the Warren-San Andres Pool?

4 A. Yes.

5 MR. KELLAHIN: We tender Mr. Nelson as an expert
6 witness.

7 EXAMINER STOGNER: Mr. Nelson is so qualified.

8 Q. (By Mr. Kellahin) Let's take a moment, Mr.
9 Nelson, and first put the Warren-San Andres Pool in some
10 context within the State of New Mexico.

11 If you'll turn to what we've marked as Exhibit
12 Number 1, identify and describe that display for us.

13 A. Exhibit Number 1 is an index map showing parts of
14 southeast New Mexico and west Texas. It shows the Central
15 Basin Platform province and the northwest shelf, and we
16 have color-coded the existing Grayburg and San Andres
17 fields.

18 Q. What's the significance of the color code?

19 A. The Grayburg fields and San Andres fields are
20 colored differently, but we're primarily showing that most
21 fields in the area already have combined Grayburg and San
22 Andres.

23 There are just two instances of the Central Basin
24 Platform portion of New Mexico in which there are just
25 Grayburg fields, those being south of the present Warren-

1 San Andres Pool. And those primarily are Grayburg fields
2 because that's the only formation that's been found
3 productive there.

4 Q. All right. So the San Andres is not present, or
5 if it is present, it is wet; is it not?

6 A. That is correct.

7 Q. Okay. What are you seeking to accomplish?

8 A. Well, what we would like to do is combine both
9 the Grayburg and San Andres as one pool. This has been
10 done in all the other fields around us. It's commonly
11 recognized that these fields have similar producing
12 characteristics.

13 Q. Identify for the Examiner the basis by which
14 you're requesting a special oil allowable of 200 barrels of
15 oil a day.

16 A. Well, the reason for asking for 200 barrels of
17 oil per day depth allowable is because we have found
18 multiple reservoirs within the San Andres, and when
19 combining that with the Grayburg we have found that each of
20 these zones is capable of production at a rate greater than
21 the current depth allowable of 80 barrels a day.

22 Q. Does that appear to be unique for your particular
23 area, as compared to other areas in New Mexico where the
24 Division has combined the Grayburg and the San Andres
25 formations?

1 A. Well, the other pools within the area are all
2 under waterflood presently, and so there is no depth
3 allowable established for those fields at this time. This
4 would be -- This Warren-San Andres is under primary
5 production.

6 Q. Historically, as the Grayburg and then the lower
7 formation San Andres has been developed, what has been the
8 strategy historically for that development? Would an
9 operator drill to the Grayburg and stop and produce it?
10 How did that occur?

11 A. Well, historically operators discovered what
12 water-producing zones they found within the San Andres and
13 would typically drill down to that lowest known oil -- or
14 that water contact. And they would complete wells back up
15 the borehole to shut off water-productive zones that were
16 underneath them.

17 Q. In your area, have you found a unique
18 circumstance where below the water in the San Andres there
19 is yet another oil-producing member of the San Andres that
20 is productive?

21 A. That's correct. We have found two separate zones
22 within the San Andres. The upper part of the San Andres is
23 producing oil. We've found a water leg to that. And then
24 we've found a second oil zone underneath that water zone.

25 Q. Let me have you turn to what is marked as Exhibit

1 Number 2 and identify that for us.

2 A. Okay, Exhibit Number 2 is a structure map of the
3 San Andres formation, the top of the formation.

4 The map is color-coded to indicate the blue areas
5 and green areas are structurally low, the pink and yellow
6 areas are structurally high.

7 And we're showing with this map also the boundary
8 of the Warren Unit, which is a ratified unit, and --

9 Q. It's a voluntary unit for primary production, is
10 it not, as to the San Andres and the Grayburg? You do not
11 know?

12 A. No, it's not. It is a federal unit.

13 Q. All right, but it has been consolidated where all
14 the interest owners have contractually agreed to some
15 sharing arrangement?

16 A. Yes.

17 Q. Okay. And it's your interpretation that this
18 structural feature is a closed feature, and is contained
19 entirely within the Warren Unit?

20 A. That's correct.

21 Q. And Conoco is the operator of the unit?

22 A. Conoco is the operator of the unit.

23 Q. Did you find, Mr. Nelson, that you had sufficient
24 well control by San Andres or Grayburg wells or wells
25 drilled to a deeper depth for which you had logs of the San

1 Andres and Grayburg to give you an accurate and reliable
2 interpretation of the structure?

3 A. Yes, we have. I have shown wells on this map
4 that establish the control for mapping the present depth
5 structure of the San Andres, and it's clear that this is a
6 four-way closed anticline, entirely within the unit, with
7 60 feet of structural closure.

8 Q. All right, sir, let's turn to Exhibit Number 3,
9 then, and have you identify and describe that display.

10 A. Okay, Exhibit Number 3 is a plat showing the
11 current pool limits of the Warren-San Andres Pool, and it
12 is confined to the southeast quarter of Section 28 of
13 Township 20 South, Range 38 East.

14 The map also shows the three producing wells that
15 we have within the pool presently, and these are the Warren
16 Unit 125, Warren Unit 108 and the Warren Unit 100.

17 Q. What's the sequence as to which these wells were
18 drilled, or the order?

19 A. The Warren Unit Number 108 was the exploratory
20 test of the San Andres.

21 Extensive testing of this well established that
22 there are these two separate intervals within the San
23 Andres, the lower zone, and these are sandwiched by water
24 production.

25 Q. The next --

1 A. The next well drilled was the Warren Unit 100,
2 and we have tested Grayburg in the Warren Unit 100.

3 And then we followed that with an offset to the
4 north in the Warren Unit 125. That's the third well within
5 this Warren-San Andres Pool.

6 Q. All right, sir. Let's turn now to Exhibit Number
7 4 and have you identify and describe that display.

8 A. Okay, Exhibit Number 4 shows the proposed
9 development of the Warren-Grayburg-San Andres Pool as we
10 propose with this hearing.

11 We are showing an ultimate projected pool limit
12 based on the structural geology of the pool. This contour
13 is the spill point of the reservoir, at minus 560 feet
14 subsea vertical depth.

15 Q. Okay, that minus 560 represents what you believe
16 to be the lowest portion of the lower San Andres that would
17 produce oil?

18 A. Yes, what this represents is the structural
19 elevation of the top of the San Andres at the spill point.

20 Q. Okay, the spill point being the top --

21 A. Basically, we would not -- we would expect to see
22 higher water production outside this limit and probably not
23 see economic wells beyond that limit.

24 Q. Why was the San Andres only included in the
25 vertical limits of the Warren-San Andres Pool? How do we

1 get to where we are now?

2 A. Yeah, well, initially the tests were conducted
3 just for the San Andres. We attempted to stay away from
4 the Grayburg, as we saw it as a separate formation that
5 wouldn't likely be a separate pool under the existing
6 rules. So we tested only the San Andres, and we tested
7 multiple zones within that San Andres formation.

8 Q. Let's look at Exhibit 4 and identify the color
9 code. Obviously the blue closed dots are the three current
10 wells, and then you have wells -- future well locations --
11 identified by an open green circle, and then you have some
12 checks representing other locations.

13 Describe what you're saying here.

14 A. Well, we have a proposed drilling program for the
15 next two years -- well, including this year, 1996, and
16 extending into 1997 -- to complete the development of the
17 Grayburg and San Andres formations.

18 Q. The plan, then, is, as future wells are drilled,
19 we would go through the conventional process of having the
20 pool's horizontal boundaries expanded as the wells are
21 completed and added under the Division's nomenclature
22 procedure?

23 A. That's correct.

24 Q. All right. Let's look at Exhibit Number 5 and
25 have you describe for us what would be a typical log

1 section for the formations in question.

2 A. Okay, Exhibit 5 is a type log of the proposed
3 Warren-San Andres -- Warren-Grayburg-San Andres Pool. This
4 is a log from the Warren Unit 108, which was the first well
5 and the exploratory well for the San Andres Pool.

6 The point of this display is to show the
7 stratigraphic names that we're applying to the formation,
8 to show that the -- that both the Grayburg and the San
9 Andres have been broken down by -- into zonations.

10 The upper part of the Grayburg we find to be
11 tight, to be the seal for the reservoir.

12 The lower 60 feet of the Grayburg is productive.

13 And then the San Andres formation has been broken
14 down into four zones which we have numbered sequentially
15 downward, San Andres 1, 2, 3 and 4.

16 Q. Geologically, is the Grayburg physically isolated
17 from the upper San Andres so that hydrocarbons could not
18 flow from one formation to the other?

19 A. Well, we have not found a permeability barrier
20 between the two formations. There is no porosity barrier
21 either, so really these formations have no seal between
22 them, and as we were to produce near the top of the San
23 Andres, would probably be draining reserves from the
24 Grayburg anyway.

25 Q. All right. Geologically, then, do you see any

1 reason to keep these two formations separated as two
2 separate pools?

3 A. No.

4 Q. All right, let's turn to Exhibit 6 and have you
5 identify and describe for us the cross-section.

6 It may be helpful to keep one of these locator
7 maps out -- perhaps Exhibit 4 is a good locator -- so that
8 we can follow the wells you've chosen on the three-well
9 cross-section.

10 If you'll start, Mr. Nelson, by identifying for
11 the Examiner why, on the far left side of Exhibit Number 6,
12 you've chosen to identify the log for the Warren 112, as
13 opposed to using the third well in the pool, which is 125?

14 A. Yes. Well, this cross-section is a north-south
15 cross-section; north is on the left, south is on the right.
16 We would have liked to use the Warren 125 in this cross-
17 section, but we did not obtain open-hole logs on the well,
18 so I really don't have anything for comparison to the
19 others.

20 However, the Warren 112 is drilled on the same
21 pad, and it's drilled for production deeper in the
22 Blinebry, Tubb and Drinkard. So we've used the -- we've
23 substituted the log curves from that well for the 125.

24 Q. Let's talk about the color code on the cross-
25 section. When you as an expert geologist examine the logs

1 from these three wells, are you able from log examination
2 alone to determine which portions of the San Andres are
3 going to be oil-and-gas-bearing, as compared to water-
4 bearing?

5 A. Well, it has been very difficult for us to
6 identify the zones that will be oil-productive from water-
7 productive in the San Andres, based on wireline logs alone.
8 Extensive testing has been necessary in order for us to
9 establish the characteristics.

10 Q. So the color code we see on Exhibit Number 6
11 represents the inconclusion that you and Mr. McClelland
12 have come to based upon subsequent tests of these various
13 zones within the San Andres?

14 A. Yes, sir. The color coding of green is to
15 indicate oil-and-gas-bearing formations.

16 The San Andres zone 2 has been found to be water-
17 bearing; the San Andres zone 3 has been found to be oil
18 bearing; and then beneath that there is water-bearing zone
19 4.

20 Q. In order to control water production, if you
21 will, is it going to be possible or necessary to produce,
22 for example, only the upper San Andres separately from this
23 San Andres number 3, which is the lower San Andres? Would
24 you want to do that?

25 A. Do you mean for the purpose of water or for --

1 Q. For the purpose of maximizing oil production,
2 would you want to maintain some separation?

3 A. Well, we have found that San Andres zone 3 is
4 capable of at least 100 barrels of oil production a day,
5 and that exceeds the current depth allowables.

6 Q. Okay.

7 A. And we have also found that San Andres Zone 1,
8 and if you were to combine the Grayburg with that, is also
9 capable of production of more than 100 barrels of oil per
10 day.

11 Q. Okay. My question for you is, with regards to
12 the water component of production, is it necessary, in your
13 opinion, to maintain some separation, if you will,
14 internally within the San Andres Pool?

15 A. Well, we've found that we can shut off a certain
16 amount of the water by being selective with perforations.

17 Q. All right. And so operationally, you as the
18 operator want the flexibility to produce the San Andres 1
19 and 3 in any combination?

20 A. That's correct.

21 Q. All right, sir. Geologically, there is not going
22 to be any benefit to maintaining any separation in terms of
23 pool rules between the San Andres 1 and San Andres 3?

24 A. No, there's not really a geologic reason to do
25 that.

1 Q. Okay. What is the -- Have you correctly
2 indicated the perforations on the logs on the cross-section
3 here?

4 A. Yes.

5 Q. The red dots indicate what?

6 A. Yes, we have shown the perforated intervals that
7 we have made in these wellbores. Those are shown by the
8 red flags adjacent to the depth track on each well.

9 I am not showing you what the results of those
10 tests are, but those will come up in the latter part of
11 this testimony. So --

12 Q. Give us a sense of --

13 A. -- this shows, anyway, at least that we have
14 perforated different intervals and we've isolated these
15 zones and established the production characteristics of
16 each of these perforated sets.

17 Q. Geologically now, we've seen the size and shape
18 of the container contained within the structure. We now
19 have a visual representation of what it looks like
20 vertically.

21 Give us a sense geologically of how the
22 hydrocarbons are distributed, and is there any kind of
23 water drive or active water drive that's a component of the
24 reservoir?

25 A. Well, in terms of analogy to other reservoirs, we

1 have found that there is a weak water drive in some
2 reservoirs. For this pool, we are not yet certain as to
3 what the drive mechanism really is. But by analogy we have
4 found that there is a weak water drive to some Grayburg-San
5 Andres reservoirs, but primarily it is a solution gas drive
6 reservoir.

7 MR. KELLAHIN: That completes my examination of
8 Mr. Nelson.

9 We would move at this time the introduction of
10 his Exhibits 1 through 6.

11 EXAMINER STOGNER: Exhibits 1 through 6 will be
12 admitted into evidence.

13 EXAMINATION

14 BY EXAMINER STOGNER:

15 Q. In referencing to Exhibit Number 2 -- that's the
16 color-code map -- there are quite a few well spots on here.
17 What is the primary zone in which these wells are drilled
18 to?

19 A. Most of these wells are drilled to the Blinebry-
20 Tubb, as the Warren-Blinebry-Tubb Pool, and extend to the
21 Drinkard, which has been also produced within this unit.

22 Off to the west there are a few wells -- this is
23 in the northwest corner -- a few wells that have been
24 drilled to the Ordovician McKee, and that is part of the
25 Warren-McKee Pool.

1 Q. Okay. In referencing Exhibit Number 6 on that
2 first well, you're utilizing the log off of the Warren Unit
3 Number 12 -- 112?

4 A. 112, correct.

5 Q. The perforations shown, are those referencing to
6 the Number 125?

7 A. That's correct. I've moved the perforations by
8 -- well, within the 125 well onto this section. So it's
9 the equivalent intervals in 112.

10 Q. Now, it's my understanding that the San Andres 1
11 and 3 zones, both being oil productive, that's an unusual
12 situation in this area and that you have two producing
13 zones in the San Andres?

14 A. Yeah, that's true. The offset fields, if you
15 look to the Eunice Monument, which is to the west, is
16 primarily productive from the Grayburg and just an upper
17 part of the San Andres.

18 Q. What happens when you go west with the San Andres
19 number 3 zone? Does it pinch out or --

20 A. Well, the zones are there stratigraphically, but
21 apparently the oil production just hasn't been found in
22 those intervals.

23 Q. Is it watered out, or are we seeing any --

24 A. I don't know, I don't know whether it's been
25 tested or whether it's an operational decision because of

1 the Grayburg being the primary producing interval. And
2 those are under waterflood. So it may be an operational
3 choice to choose just the upper part of the San Andres to
4 include in production.

5 Q. How about impermeable zones that separate the
6 four zones in the San Andres? Is there an impermeable
7 layer or is there vertical crossflow from the water to the
8 oil and vice-versa?

9 A. Well, from this interpretation, I'd have to say
10 that there must be vertical permeable barriers in order to
11 establish a lower oil zone underwater. This formation is
12 characteristically tight, and even our reservoir has
13 perhaps 2 millidarcies of permeability.

14 Q. On that first well -- I believe that was the
15 108? --

16 A. Yes, sir.

17 Q. -- you show in your perforations here -- oh, I'm
18 sorry, when I say "here", Exhibit Number 6 -- that you
19 perforated throughout that water-bearing number 2 zone?

20 A. Yes.

21 Q. But you didn't repeat that action in the other
22 two wells?

23 A. Right, we have not tested that zone again. We
24 did put a submersible pump on that interval and pump up to
25 800 barrels a day of water.

1 In our plan, we do plan to come back and test in
2 another well just to be certain of that being completely
3 water-bearing. But the logs all indicate that is likely to
4 be a water-producing zone, and our production testing has
5 shown that.

6 EXAMINER STOGNER: I have no other questions of
7 this witness, Mr. Kellahin. He may be excused, unless you
8 have any.

9 MR. KELLAHIN: No, sir.

10 Call Mr. Mark McClelland.

11 MARK MCCLELLAND,

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

14 DIRECT EXAMINATION

15 BY MR. KELLAHIN:

16 Q. Mr. McClelland, would you please state your name
17 and occupation?

18 A. Yes, my name is Mark McClelland. I'm a staff
19 reservoir engineer with Conoco, located in Midland, Texas.

20 Q. Mr. McClelland, on prior occasions have you
21 qualified as a petroleum engineer before the Division
22 Examiner?

23 A. Yes, I have.

24 Q. And have you participated with Mr. Nelson in
25 examining the technical aspects of this particular

1 Application?

2 A. Yes, I have.

3 Q. Were you involved in discussions with Jerry
4 Sexton, the OCD supervisor in Hobbs, with regards to the
5 Application?

6 A. Yes, I traveled to Hobbs with Mr. Hoover and
7 another engineer to discuss this Application.

8 Q. And you discussed with Mr. Sexton the testing
9 procedures that you conducted on your various wells,
10 particularly, I believe, it was the 108?

11 A. Yes, that is correct.

12 Q. As a result of your tests and your study, do you
13 now have engineering conclusions and opinions with regards
14 to the adoption of certain special rules and regulations
15 for the pool?

16 A. Yes, I do.

17 Q. In addition, do you concur with Mr. Nelson's
18 recommendation that the vertical limits of the pool be
19 expanded to include the Grayburg?

20 A. Yes.

21 MR. KELLAHIN: We tender Mr. McClelland as an
22 expert witness.

23 EXAMINER STOGNER: Mr. McClelland is so
24 qualified.

25 Q. (By Mr. Kellahin) Let's discuss the first

1 special circumstance you're requesting, and that is a
2 special 10,000-to-1 gas-oil ratio. Give us a general
3 summary of why you're seeking to do that, Mr. McClelland.

4 A. This request is based off the production
5 performance of the Warren Unit 100. Again, the 100 was the
6 first offset to the discovery well, the 108. The 100 has a
7 capability of producing initially over 2 million cubic feet
8 of gas per day.

9 Q. Are you surprised by the fact that that well
10 produces gas?

11 A. This well was a surprise to us, yes.

12 Q. Is there specific tests on this well to determine
13 that if a higher gas-oil ratio is approved for the pool, in
14 fact, it results in more efficient oil production from the
15 pool?

16 A. Yes, we have conducted such a test on this well.

17 Q. And were you able to reach that conclusion?

18 A. Yes, that is our conclusion.

19 Q. Let's turn to Exhibit Number 7, then, and
20 identify for the Examiner what you've done in terms of
21 conducting a test on the performance of that well. It's
22 the Warren Unit 100.

23 A. Yes. If I could on Exhibit 7, Mr. Examiner, I
24 need to correct a typo on that exhibit.

25 At the very top, you'll see two graphs side by

1 side on Exhibit 7. These graphs show oil, gas and water
2 production. The typo I need to correct is under Warren
3 Unit 125 San Andres. The title reads "Grayburg San Andres
4 Zone 2". That should be "Grayburg San Andres Zone 1".
5 That is, both the 100 and the 125 are completed in the
6 identical formations.

7 We -- This graph compares two wells in this pool.
8 Again, on your cross-section, the 100 is the well to the
9 right and the 125 is the well to the left.

10 In the 100 we conducted a maximum efficient rate
11 type test in June, conducting four different choke-size
12 settings. The GOR testing is shown in the middle graph on
13 this Exhibit 7. As you can see, when we choke back the
14 well in order to produce the rate back -- to try to get
15 back to the 160-MCF-per-day allowable, our GOR escalated
16 over to 250,000 to 1. As we opened the well, our GOR
17 dropped tremendously down to approximately a 10,000-to-1
18 GOR.

19 When we opened the well, we realized a rate of
20 over 100 barrels of oil per day at about a 1.6 million
21 cubic feet of gas per day on this well. In addition, when
22 we opened the well, we saw our water cut drop off also.

23 Q. For the performance of this well, what, in your
24 opinion, is the optimum rate at which it does produce?

25 A. It's most efficient when we had the choke wide

1 open on this well. When we pull this well as hard as
2 possible, we get the most oil production at the lowest GOR.

3 Q. In order to be able to do that for this well, you
4 would need exceptions or modifications of the current
5 statewide depth bracket oil allowable and the statewide
6 2000-to-1 GOR?

7 A. That's correct. And keep in mind, this is only
8 for the upper zone in the 100. In this well we have
9 another zone, zone 3, that's capable of producing over 100
10 barrels of oil per day also.

11 So yes, this zone alone beats the 80-barrel-a-day
12 allowable, but that's only one of two zones in this well.

13 Q. Okay. When we look over at the Unit 125 well on
14 the right side of Exhibit 7, what are we seeing here?

15 A. We're seeing this well's production. These two
16 graphs side by side are on the same scale, so it's a direct
17 comparison.

18 You'll notice right off that we're not seeing
19 nearly the gas rate that we saw in the 100. The 125 is
20 producing about a 1500 to 1800 GOR, oil rate is in the
21 neighborhood of 65 barrels of oil per day.

22 The point being, the gas that we're seeing in the
23 100 is not large in area, that is, it's not present in the
24 125. Again, these wells are perf'd across the same
25 geologic interval, but we're seeing a drastically different

1 production profile in these two wells.

2 Q. Sometimes in reservoirs we have a circumstance
3 where you have a gas cap and you want to preserve the gas
4 energy in that gas cap so you can maximize the oil
5 production. Do you have that circumstance here?

6 A. We definitely do not have this circumstance here.
7 The two production profiles show that. That is, the 125 is
8 not making the gas rate as the 100. And also comparison of
9 the porosity and the production profiles in the two wells
10 we'll see later, that is definitely not the case. We have
11 a small area of gas pay in the 100 that is not present in
12 the 125.

13 Q. So placing the 100 at its maximum efficient rate
14 of production is not going to have an adverse consequence
15 on the 125, which is the offsetting well?

16 A. That is correct.

17 Q. All right. Let's turn to Exhibit Number 8 and
18 have you identify and describe that display.

19 A. Exhibit 8 is our production profile of the
20 discovery well, the 108. This well has been on line about
21 16 months in the San Andres. Again, this is the well that
22 we did extensive testing in, in all four intervals of the
23 San Andres. This well is currently producing San Andres
24 zones 1 and 3.

25 This well, on average, makes 60 barrels of oil

1 per day, which is below the depth allowable of 80 barrels
2 of oil a day. But it is a dual completion and, being such,
3 is dually completed with the Drinkard zone. We have
4 production problems on this well that really hamper it
5 producing at a higher rate, which we think it's capable of
6 making.

7 And again on the 108, you don't see the extensive
8 gas production that we see in the 100. Again, this
9 supports the fact that the gas cap, or the small gas
10 production we see in the 100, is not large in area.

11 Q. If the Examiner chooses to grant your
12 Application, then, that approval would benefit the
13 performance of the 108 well?

14 A. That is correct. We still have the Grayburg zone
15 to open in the 108. We anticipate an additional 20 to 30
16 barrels of oil per day being added through that action.

17 Q. Let me have you turn to Exhibit Number 9, and
18 let's talk about what your analysis is of the development
19 plan if the rules are not changed, if we stay on the
20 current oil limit and the current statewide GOR.

21 Describe for us what you're confined to do.

22 A. Again, to re-emphasize, the current depth
23 allowable for the Grayburg-San Andres is 80 barrels of oil
24 per day, with a limiting GOR of 2000 to 1, which means
25 we're allowed to produce 160 MCF of gas per day. That

1 would severely restrict the potential of this new
2 discovery.

3 What we would be forced to do is to drill these
4 wells and complete in San Andres zone 3 only. That would
5 leave San Andres zone 1 behind pipe.

6 We would anticipate drilling six wells this year,
7 nine wells next year, producing these wells out of zone 3
8 only to start with. As the wells decline, we would plug
9 back to zone 1 and the Grayburg and produce that interval
10 out. At such time that we could put the two zones together
11 so that it would be below the depth allowable, then we
12 would reopen zone 3.

13 So in effect, we've got a staggered completion
14 scenario of a three-year development plan to access all pay
15 in this area.

16 Q. Have you estimated what the additional cost is to
17 the working interest owners and the operator if you're
18 required to confine your development to the current rules?

19 A. Yes, we have. Just in completion costs alone,
20 we're estimating an additional \$900,000 to develop this
21 field under existing pool rules.

22 Q. Describe for me where the \$900,000 estimate comes
23 from.

24 A. The \$900,000 is primarily due to an increase in
25 completion cost. The staggered completions forces us to do

1 multiple rig-up/rig-downs with the stimulation equipment.
2 We have developed a technique in our area where we can do
3 what we call a stack frac. We pump two fracs in one day.
4 As a result, we have a significant savings in our
5 completion cost.

6 Q. Let's turn to Exhibit 10, then, and have you
7 contrast what happens under a development plan if the
8 Division approves your Application.

9 A. Approval of our Application, first off, helps us
10 develop this field in a much more rapid fashion. We're
11 able to go ahead and drill our six wells this year and open
12 not only zone 3 but zone 1 in the Grayburg interval, in
13 combination. We can do this by shortening our completion
14 time, pumping our two stimulations in one day, and
15 basically we're on and off the well with all formations
16 open to production within a few days. This eliminates a
17 need to come back in the well two more times in the future
18 to open new pay and remove plugs and other mechanical work.

19 This Application also allows us to produce the
20 Warren Unit 100 in its most efficient manner. In fact, it
21 results in more efficient use of the reservoir energy in
22 the Number 100. As we showed, we get a higher -- with
23 higher oil rate, we produce at a lower GOR.

24 In addition, there's costs and health, safety and
25 environmental exposure risks that we feel are other

1 considerations upon this Application.

2 Q. Let's go to Exhibit 11 and look at a similar
3 cross-section that Mr. Nelson used, but that now has the
4 production and testing data on it.

5 Again, we're looking at the same three wells that
6 Mr. Nelson utilized. He's used -- and you have used the
7 log on the 112 well, but we are showing test information
8 from the 125, as well as the perforations from that well.

9 A. That's correct. If I may add, we ran a gamma ray
10 in the Number 125 after we cased it, and it correlated
11 directly to this log that we're showing on this exhibit.
12 So the perfs are directly on depth in this exhibit.

13 This exhibit demonstrates the extensive testing
14 that we've done in this area, to prove up the existence of
15 multiple reservoirs within the San Andres Section. The
16 Warren Unit 108, we did four separate completions, in San
17 Andres zones 4, 3, 2 and 1. Again, zones 4 and 2 we found
18 to be wet, zones 3 and 1 we found to be productive. Also
19 note that we have not yet perf'd the Grayburg on this well.

20 In the Warren Unit 100, the first offset that's
21 shown on the right of Exhibit 11, zone 3 we IP'd at 145
22 barrels of oil per day. We produced this zone five months,
23 from November, 1995, through May, 1996, at allowable
24 production.

25 In May, 1996, we set a plug, came uphole, opened

1 Grayburg and San Andres zone 1, and then we got our
2 pleasant surprise of strong oil production with the strong
3 gas production also in this well.

4 Finally, we drilled the 125, the well to the left
5 on the cross-section. In this well, this well was drilled
6 within a few days after we had brought on the 100 and had
7 the strong gas production. So instead of going after zone
8 3, we wanted to do more testing to either prove or disprove
9 the strong gas production. We completed only in Grayburg
10 and San Andres zone 1 in the Warren Unit 125.

11 Note, this well is producing approximately 65
12 barrels a day, but in the 125 we have zone 3 yet to add to
13 production, which we feel will produce over 100 barrels of
14 oil per day also.

15 All three of these wells again demonstrate the
16 need for the higher oil allowable. The Warren Unit 100
17 demonstrates the need for the higher GOR, limiting GOR.

18 Q. I asked Mr. Nelson if he had any geologic reason
19 to either keep the Grayburg and San Andres separate. He
20 said he did not. Do you see any engineering reason to keep
21 the Grayburg separated from the San Andres in this pool
22 area?

23 A. No, I do not. We are seeing some water
24 production in both zone 3 and zone 1, so there's no
25 engineering need to plug off zone 3 for now, to produce

1 zone 1, or we would not prematurely water out the one zone
2 over another. Both zones contain water production.

3 Q. Mr. Nelson also described the fact, in his
4 geologic opinion, there was no geologic reason not to adopt
5 a higher oil rate and a higher GOR for the combined San
6 Andres-Grayburg Pool. Is there any reservoir engineering
7 reason not to -- ?

8 A. No, there's not. Again, in the 100, by trying to
9 operate this well at current depth allowable, we actually
10 result in waste of reservoir energy, we see our GOR climb
11 tremendously in this well.

12 Again, fluids are compatible. We'll have a
13 future exhibit to demonstrate this.

14 Q. All right, let's look at that now while you're
15 describing it. It's Exhibit Number 12. Your conclusion is
16 that the fluids are compatible and you've displayed that on
17 this spreadsheet?

18 A. Yes, that is correct. We wanted to make certain
19 that San Andres zone 3 and San Andres zone 1 and Grayburg
20 were similar, so we did take oil gravities and gas analysis
21 separately.

22 And indeed, they are similar. They're both sour,
23 they have gravities in the same range, and the gas content
24 is very similar also in these wells.

25 Waters are slightly different, but there is no

1 markedly -- increase in scaling or -- There is no permanent
2 damage that would result from putting these two zones
3 together.

4 Q. Okay. Let's come back now to a summary on the
5 gas-oil ratio issue. Let's look at the final two exhibits.
6 Let's start with Exhibit Number 13, where you've plotted
7 out the different choke-rate testing on the 100 well.

8 A. Yes, this is just a -- the MER tests we ran on
9 this well. On the left, on the Y axis, I had gas-oil
10 ratio. On the X axis is our oil rate.

11 And again it just demonstrates, as we choke this
12 well back, in order to try to keep the well down to an
13 allowable production limit, we see our gas-oil ratio climb
14 tremendously, to over 250,000 to 1.

15 As we open the well, we get a much stronger oil
16 production, and the gas-oil ratio drops down to a 10,000-
17 to 15,000-to-1 GOR. The point being, it's much more
18 efficient when the well's wide open.

19 Q. Have you conducted any -- Based upon this data,
20 have you conducted any engineering calculations with
21 regards to the gas-oil ratio in determining the potential
22 extent of the gas zone?

23 A. Yes, we did. Exhibit 15, the last exhibit in
24 your packet, helps demonstrate this. We ran a buildup test
25 on the 100, as we did another well, the 125.

1 The buildup on the 100 is very interesting. It
2 helps confirm the fact that it is a limited gas pay
3 interval in this well.

4 What I've shown in Exhibit 15 is a Horner plot.
5 It's a buildup test. The point of this exhibit is, there's
6 a nearby wellbore boundary that this pressure buildup
7 interpretation identifies. This helps back up the fact
8 that we have a wellbore barrier, be it fault or pinchout --
9 most likely a pinchout of porosity -- near the 100, that
10 again limits the gas in areal extent.

11 Q. When we look at the distribution of hydrocarbons
12 within the ultimate limits of what may be the pool
13 boundary, as Mr. Nelson has identified it, do you and he
14 concur on what you believe to be the top of the water of
15 the lowest San Andres formation, that minus-560 number I
16 think he was using?

17 A. Yes, I am in concurrence with that.

18 Q. Okay. Summarize for us your conclusions, then,
19 Mr. McClelland.

20 A. We have an exciting opportunity here in the
21 Warren Unit. We have a new discovery in a field that's 40
22 years old. It's not often we get to develop reservoirs
23 that have virgin pressure and have good production
24 capability.

25 Under the current limiting depth allowable and

1 2000-to-1 GOR, we are severely restricted in how we develop
2 this new reservoir. The current rules require us to slow
3 our development, to spend more money to do so, and increase
4 our mechanical risk over the life of this reservoir.

5 What we're seeking with the 200-barrel-per-day
6 allowable and a 10,000-to-1 GOR is the opportunity to
7 access all the pay in the wellbore up front, to produce the
8 wells at the most efficient rate, and it helps us maximize
9 our value in this reservoir and also the other working
10 interest owners in this reservoir.

11 We feel that this request is reasonable and will
12 cause no reservoir waste. In fact, it will actually help
13 the reservoir produce at its optimum capability.

14 MR. KELLAHIN: That concludes my examination of
15 Mr. McClelland.

16 Exhibit Number 14 is Mr. Hoover's certificate of
17 mailing of notification. You can find the offsetting
18 operators by looking at Exhibit Number 3, and it shows that
19 the operators adjoining the Warren Unit were notified by
20 Mr. Hoover on June 19th.

21 With the addition of the certificate and Mr.
22 McClelland's exhibits, we would ask your introduction of
23 what is before you as Exhibits 7 through 15.

24 EXAMINER STOGNER: Exhibits 7 through 15 will be
25 admitted into evidence at this time.

EXAMINATION

BY EXAMINER STOGNER:

Q. In referring to Exhibit Number 11, when you go back into -- I'm assuming it's Conoco's plan to go back into that Warren Unit Number 108 and recomplete into the Grayburg; is that correct?

A. Yes, Mr. Examiner, that is correct. We'll add the Grayburg to existing production in that well.

Q. When you do that in this particular zone, will there be any further stimulation to that Grayburg?

A. Most likely, we will frac that Grayburg again. Our stimulation on zone 1, we had problems, we screened out the frac and we don't feel like we've got a real good stimulation on that well, on the upper zone. So yes, we will open and frac both Grayburg and the existing perms in zone 1 again.

Q. Okay, just the 1, so what will you do? Put something between the zone 1 and 2 to block that off --

A. Yeah.

Q. -- to limit your stimulation?

A. That's right. Actually, zone 2 is already squeezed. It's zone 1 and 3 in this well that are producing.

Yes, we would set a cast- -- we would set a retrievable bridge plug below the zone 1.

1 Q. For the future wells in which you're proposing --
2 or which was proposed in Exhibit Number 4, what will the
3 stimulation program and the perforation program be on
4 future wells?

5 A. As the plan is right now, zone 3 will be the
6 first completion interval. We will come in -- If you look
7 to the Warren unit 125 -- that's the most recent well we've
8 done -- you'll see that the perms there are shaded a little
9 differently. Those are the planned perms we've proposed
10 for that well. That's most likely what we'll go after in
11 each of the new wells in the first completion. Our plan is
12 to perf, frac, set a plug, come up to the Grayburg in zone
13 1, perf, frac, go back in and clean out and then produce
14 zones 1 and 3 together.

15 We are still doing some testing in zone 2.
16 That's the other -- We've drilled a couple new wells that
17 have not yet been completed, but we are looking at zone 2
18 one more time to try to prove up an area in zone 2 for
19 potential production.

20 But we failed in the 108 in zone 2. We got over
21 800 barrels of water per day there, but we do have a zone
22 in the log that we want to try one more time.

23 Q. Now, back when you were talking about the Number
24 125, you're going down to that zone 3 --

25 A. Right.

1 Q. -- and then frac'ing, plugging back, and going
2 into zone 1.

3 Are you referring to just zone 1, or are you
4 referring also the Grayburg in the first -- in the upper
5 San Andres?

6 A. You're correct, Grayburg.

7 Q. Okay.

8 A. Grayburg and San Andres zone 1 is what I'm
9 referring to.

10 Q. Okay, I just wanted to make that clear.

11 A. Right.

12 Q. I knew what you were talking about by looking,
13 but...

14 A. Yes.

15 Q. You're talking about zone 3, zone 1 and -- Okay,
16 so we have that.

17 Are these three present wells, are they still
18 flowing, or do you have pumps on them?

19 A. The Warren Unit 100 is flowing. We recently put
20 the 125 on pump within the last week.

21 Q. Is that a submersible or a jack?

22 A. No, just on beam pump.

23 Q. Beam pump.

24 A. 108 is a pumping well, dual-pumping well, because
25 of the Drinkard completion.

1 Q. Do you see the other wells as stand-alones, or
2 are they going to be dual with the Drinkard also?

3 A. No, they're definitely stand-alones. We're out
4 of the dual business.

5 Q. So those will all be new completions that you're
6 showing -- or that is shown on Exhibit Number 4?

7 A. That is correct.

8 If I could update you on Exhibit 4, since we put
9 this exhibit together we have drilled wells Warren Unit 129
10 and Warren Unit 131, so the southeast quarter of Section 28
11 has been developed. Now, we have not yet completed the
12 completion operations.

13 Currently we are drilling Warren Unit 130, which
14 is northwest corner of Section 34. It's down in the bottom
15 of the exhibit. That well is currently drilling today.

16 Within another six weeks, we will have the other
17 three wells drilled this year that will complete our 1996
18 development program.

19 Q. You're referring to 132, 133 and 134?

20 A. That is correct.

21 Q. Now, that Drinkard production, that's a fairly
22 old, established production interval, isn't it?

23 A. That is correct.

24 Q. And when -- How was this overlooked, and when was
25 it decided to go back in and check it out behind the pipe?

1 A. I'd like to take claim for it, but I can't,
2 credit for it, but I can't --

3 Q. Well, since you're here, you can --

4 A. (Laughter) Yeah, okay.

5 No, we've always -- Warren Unit development in
6 the Blinebry, Tubb and Drinkard in the past few years has
7 been in Section 28. We see a similar structural high down
8 in the Blinebry-Tubb-Drinkard.

9 When we were doing 40-acre primary wells over the
10 last two or three years, we kept taking oil on pits, mud-
11 log shows through the San Andres, which led us to our
12 Warren Unit 108 test. So we had mud-log shows,
13 indications, that something was there.

14 We went ahead and put money in our budget as an
15 exploratory well in the 108 to test the San Andres, did
16 extensive testing to try to prove up or disprove the
17 production capability in the 108 that has led to the
18 current development program.

19 Q. Was there any -- Did you go back to some of the
20 old completion reports on some of older wells and see if
21 there was any of the same indications there on the drilling
22 logs?

23 A. There are some mud-log shows in the older wells,
24 yes, but evidently they didn't feel like it was worth
25 stopping and producing it. So it's surprising how it can

1 happen, but it has happened.

2 EXAMINER STOGNER: No other questions?

3 MR. KELLAHIN: No, sir, that completes our
4 presentation.

5 EXAMINER STOGNER: You may be excused.

6 Anything further, Mr. Kellahin?

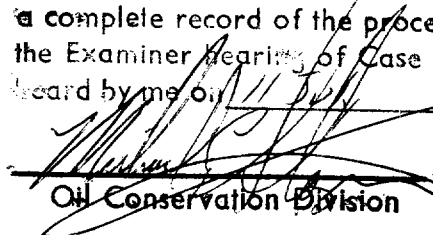
7 MR. KELLAHIN: No, sir.

8 EXAMINER STOGNER: Does anybody else have
9 anything further in Case Number 11,567?

10 This case will be taken under advisement.

11 (Thereupon, these proceedings were concluded at
12 9:07 a.m.)

13 * * *

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20
21 I do hereby certify that the foregoing is
22 a complete record of the proceedings in
23 the Examiner hearing of Case No. 11567,
24 heard by me on 11 Feb 1996.
25  , Examiner
Oil Conservation Division


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 July 12th, 1996.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 1998