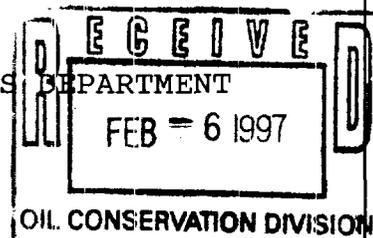


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION



IN THE MATTER OF THE HEARING CALLED BY)
THE OIL CONSERVATION DIVISION FOR THE)
PURPOSE OF CONSIDERING:)
)
APPLICATION OF DEVON ENERGY CORPORATION)
(NEVADA) FOR WATERFLOOD EXPANSION AND)
AUTHORIZATION TO INJECT, EDDY COUNTY,)
NEW MEXICO)
)

CASE NO. 11,694

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

January 23rd, 1997

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, January 23rd, 1997, 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.

* * *

I N D E X

January 23rd, 1997
 Examiner Hearing
 CASE NO. 11,694

PAGE

APPLICANT'S WITNESS:

DICK MORROW (Engineer)

Direct Examination by Mr. Bruce	3
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REPORTER'S CERTIFICATE	17
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* * *

E X H I B I T S

Applicant's	Identified	Admitted
Exhibit 1	5	10
Exhibit 2	5	10
Exhibit 3	5	10
Exhibit 4	5	10
Exhibit 5	10	10

* * *

A P P E A R A N C E S

FOR THE APPLICANT:

HINKLE, COX, EATON, COFFIELD & HENSLEY
 218 Montezuma
 P.O. Box 2068
 Santa Fe, New Mexico 87504-2068
 By: JAMES G. BRUCE

* * *

1 WHEREUPON, the following proceedings were had at
2 1:32 p.m.:

3 EXAMINER CATANACH: At this time I'll call the
4 hearing back to order, and I'll call Case 11,694, which is
5 the Application of Devon Energy Corporation (Nevada) for
6 waterflood expansion and authorization to inject, Eddy
7 County, New Mexico.

8 Call for appearances.

9 MR. BRUCE: Mr. Examiner, Jim Bruce from the
10 Hinkle law firm in Santa Fe, representing the Applicant.

11 I have two -- excuse me, one witness to be sworn.

12 EXAMINER CATANACH: Okay, will the witness please
13 stand to be sworn?

14 (Thereupon, the witness was sworn.)

15 DICK MORROW,

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

18 DIRECT EXAMINATION

19 BY MR. BRUCE:

20 Q. Would you please state your name and city of
21 residence for the record?

22 A. My name is Dick Morrow. I live in Edmond,
23 Oklahoma.

24 Q. What is your occupation and who are you employed
25 by?

1 A. I'm a reservoir engineer, employed by Devon
2 Energy Corporation.

3 Q. Have you previously testified before the
4 Division?

5 A. Yes, I have.

6 Q. And were your credentials as an expert reservoir
7 engineer accepted as a matter of record?

8 A. Yes.

9 Q. And are you familiar with the engineering matters
10 related to this Application?

11 A. Yes, I am.

12 MR. BRUCE: Mr. Examiner, I would tender Mr.
13 Morrow as an expert reservoir engineer.

14 EXAMINER CATANACH: Mr. Morrow is so qualified.

15 Q. (By Mr. Bruce) Mr. Morrow, briefly what is it
16 that Devon seeks in this Application?

17 A. Devon seeks authority to inject water into the
18 Grayburg-Jackson Pool for waterflood purposes through four
19 wells within its Keel "B" and West "B" leases, located in
20 Sections 3, 5, 6 and 10, Township 17 South, Range 31 East.

21 Q. Okay. Why don't you refer to your -- Let's take
22 your exhibits, maybe 1, 2 and 4 together, and if you could
23 identify those for the Examiner and comment upon their
24 contents.

25 A. What I'd like to do is briefly introduce those

1 three sets of exhibits and then go back in detail and talk
2 about each area specifically.

3 Exhibit 1 is a map of the area showing our four
4 proposed conversions by the large red dots. I've also
5 shown a half-mile circle around the three dry holes in
6 question, our proposed monitor wells with green circles and
7 other nearby injection wells with blue triangles.

8 Exhibit 2, there's actually three pages to this,
9 2A and 2B and 2C. These are wellbore diagrams of the
10 plugged and abandoned wells. Each diagram shows the
11 wellbore condition at the time the well was drilled. There
12 are no records at either the OCD or the BLM as to how the
13 wells were plugged.

14 And finally, just introducing Exhibit Number 4,
15 this is data on the various injection wells in the vicinity
16 of the old plugged wells, and I've shown operators, current
17 status of the wells, and cumulative injection to date.

18 Q. Maybe before you go into more detail, let's just
19 take care of a bookkeeping matter, then, Mr. Morrow.

20 Exhibits 3A and 3B are a copy of Waterflood
21 Expansion Orders 687 and 690. It was those orders that
22 approved injection wells but required Devon to go in and
23 properly plug the Grier Number 1, the West "A" 3 and the
24 Repollo 1 before injection operations were commenced in
25 these four wells marked in red?

1 A. That's correct.

2 Q. Okay. Why don't you go on back, then, and
3 describe the situation and what Devon requests?

4 A. Okay, if we start in the northwest, around the
5 Grier Number 1, this well was drilled and abandoned in 1940
6 by Everts Drilling Company. Within a half-mile radius
7 around there, there is one injection well, the Grier Number
8 6, which has a current injection rate of about 50 barrels a
9 day at 2250 p.s.i., as I've shown on Exhibit Number 4.
10 Just outside the circle to the north is the Grier Number 7,
11 which is currently shut in.

12 If you refer back to Exhibit 4 again, each of
13 these wells has injected about 2 million barrels of water
14 with seemingly no adverse effects in the area.

15 Devon's nearest injection wells are the Keel "B"
16 31 and Keel "B" 36, which are just outside of the half-mile
17 circle to the south there. These wells are recent
18 conversions, just having converted to injection in
19 September of 1996.

20 If we're allowed to convert the Keel "B" 34 and
21 Keel "B" 37 to injection, we would still have essentially
22 two rows of producing wells between the water injection and
23 the Grier Number 1 dry hole. This would allow us the
24 opportunity to monitor the waterflood and the pressure
25 response and, by keeping these producing wells pumped off,

1 prevent any pressure buildup around the Grier Number 1.

2 I'd like to point out that the Keel "B" 49, shown
3 by the open circle, has not been drilled yet, because we
4 could not justify that economically on primary reserves
5 alone. However, if we are able to expand our waterflood up
6 into this area, we can justify it on secondary reserves,
7 and we will drill that well.

8 If you look at the other two areas to the east,
9 around the West "A" Number 3 and then to the southeast
10 around the Repollo Number 1, some of the specifics in each
11 of those areas are different -- the exact location of the
12 wells, injection rates and cumulative injection -- but they
13 all have two things in common:

14 One, there are both active and inactive injection
15 wells in the vicinity of these dry holes, which have
16 injected considerable amounts of water with no seemingly
17 adverse effects.

18 And two, there is two producing wells between our
19 proposed conversion and the dry holes, which we would use
20 as monitor wells.

21 So I don't intend to go into detail on the two
22 other areas, other than to point out the similarities.

23 Q. Okay. Now, if these injection wells, these four
24 injection wells, cannot be converted, what is the estimated
25 loss of reserves?

1 A. We estimate secondary reserves of 80,000 to
2 100,000 barrels per injection well in this area. So for
3 the four wells, the total reserves we would lose would be
4 between 300,000 and 400,000 barrels.

5 I might also point out that these areas are
6 similar to the area around the Keel "B" 28, which is in the
7 southeast quarter of Section Number 8. We had a hearing on
8 this last July, and we were allowed to convert certain
9 wells within the half-mile radius, as long as we maintained
10 several monitor wells between the injection well and the
11 problem well.

12 Q. Do you think these situations are equivalent to
13 the Keel "B" 28 situation, with respect to intervening
14 monitoring wells?

15 A. Yes, I think they're very similar. In all three
16 instances, as I said, we would have at least two rows of
17 producing wells between the injection and the dry holes.

18 Q. Okay. Now, what about simply re-entering these
19 three wells listed on Exhibit 2 and trying to plug and
20 abandon them?

21 A. Well, as I said, we have no plugging data on
22 these wells, so we really would be going in blind with no
23 idea what we could find. We've estimated that if we
24 encounter no problems whatsoever, it would cost us about
25 \$50,000 each to re-enter and re-plug those wells. If we

1 run into any problems, the cost could be significantly
2 greater.

3 If you recall from our July hearing, Arco spent
4 almost a month and several hundred thousand dollars trying
5 to plug the Keel "B" 28 and never were successful.

6 Q. In fact, it appears that in the Keel "B" 28 it
7 made the situation worse?

8 A. It could have. And that could be the situation
9 here. There's a possibility that these dry holes are
10 mechanically sound now, but by re-entering them we could
11 actually do more harm than good.

12 Q. What are the sources of fresh water in this area?

13 A. There are really no sources of fresh water in
14 this area that we could find. We checked with the State
15 Engineer's Office. The nearest wells that were drilled for
16 fresh water are to the south of this map, in Section 22 and
17 34 of 17 South, 31 East. The nearest water that we know of
18 is about ten miles to the northeast in the Caprock.

19 Q. Now, Exhibit 1 also identifies the offset
20 operators to these three wells that the OCD required to be
21 plugged, does it not?

22 A. Yes, it does.

23 Q. And was notice of this Application given to those
24 offsets?

25 A. Yes, I believe that is Exhibit Number 5 in the

1 packet.

2 Q. And that's simply my affidavit of the mailing of
3 the Application to these offsets; is that correct?

4 A. Yes.

5 Q. Okay. Mr. Morrow, in your opinion is the
6 granting of Devon's Application in the interests of
7 conservation and the prevention of waste?

8 A. Yes, it is.

9 Q. And were Exhibits 1 through 5 prepared by you,
10 under your direction or compiled from Devon's business
11 records?

12 A. Yes, they were.

13 MR. BRUCE: Mr. Examiner, at this time I would
14 move the admission of Devon Exhibits 1 through 5.

15 EXAMINER CATANACH: Devon Exhibits 1 through 5
16 will be admitted as evidence.

17 EXAMINATION

18 BY EXAMINER CATANACH:

19 Q. Mr. Morrow, what kind of examination did you --
20 have you caused to happen in looking for the plugging
21 records of these wells?

22 A. We contacted both the OCD and the BLM to check
23 their records. We also checked the records that we had,
24 that we acquired when we purchased these properties. We
25 could find nothing.

1 Q. Did the BLM or OCD have a record of the wells
2 being drilled?

3 A. Yes, they did.

4 Q. They just did not have any plugging records?

5 A. That's correct. We found in public records,
6 like PI scout tickets, we found the exact locations of the
7 wells and how they were drilled. That's how we compiled
8 these wellbore schematics. But there are no records as to
9 how they were plugged.

10 Q. Do you recall who the operators were?

11 A. The operator of the Grier Number 1 was Everts
12 Drilling. I think some of this data is shown on Exhibit 2.
13 The West "A" 3, I am not sure who drilled that one. And
14 the Repollo Number 1 was drilled by Repollo Oil.

15 Q. Okay, the Repollo Number 1 you're referring to,
16 is that the J.L. Keel "B" Number 1?

17 A. Yes. There's some confusion as to what the
18 actual well name is on that. In the records it's referred
19 to both as the Keel "B" Number 1 and the Repollo Number 1.
20 But in all instances we could find, the same location is
21 referenced. So it's just a matter of name; there's no
22 question as to where the well is.

23 Q. Now, were these -- To your knowledge, were these
24 wells drilled and were dry and abandoned at the time they
25 were drilled?

1 A. Yes, sir, they were.

2 Q. They were not produced for any length of time?

3 A. No. I believe in the heading on each of the
4 wellbore schematics there shows a spud date and a
5 completion date, and they're all within -- It looks like
6 anywhere from three to six months.

7 Q. To your knowledge, of the practices that might
8 have occurred during this time period, do you have an
9 opinion as to whether these wells were actually plugged and
10 the records just aren't available?

11 Or do you think they were actually not plugged at
12 all?

13 A. I couldn't answer that. Historically, I don't
14 know what the plugging practices were at that time.

15 Q. Have you examined any of the records available at
16 this office of the OCD?

17 A. I don't know which office was contacted for
18 plugging records.

19 Q. I know we do have some old scout tickets that may
20 not have been accessed by Devon, that may contain some
21 information that you're looking for.

22 You testified that -- Is it Xeric that has that
23 active injection well in Section 31?

24 A. Yes, sir, the Grier Number 6.

25 Q. And that has -- Did you say that has cumulatively

1 injected --

2 A. -- about 2 million barrels, as shown on Exhibit
3 Number 4 there.

4 Q. Do you know how long that well has been
5 operating, by any chance?

6 A. Not right offhand, I do not.

7 Q. Have you actually inspected the -- gone out in
8 the field and inspected these wells or looked at these
9 wells, these P-and-A'd wells?

10 A. The P-and-A'd wells? I personally have not. I
11 don't know if anybody from our company has.

12 Q. I'm wondering if there's even -- if you can even
13 find the locations.

14 With regards to the West "A" Number 3, I notice
15 that you've got -- is it two producing wells, the Number 31
16 and the Number 15? Are those both producing wells?

17 A. Yes, they are.

18 Q. And those are producing from the same interval --

19 A. Yes.

20 Q. -- the Grayburg-Jackson Pool?

21 A. Grayburg-Jackson Pool.

22 Q. And those, as far as you know, will continue to
23 operate as producing wells?

24 A. Yes.

25 Q. With regards to the Repollo, you've got two there

1 also, the 68 and 31?

2 A. Yes, they are current producers, and they will
3 remain producing wells.

4 Q. And those were completed in the same interval
5 that you're injecting into?

6 A. Yes.

7 Q. Okay. I can't recall the specifics of the last
8 case we heard, but I seem to recall that if we had a
9 producing well in between the injection well and the
10 problem well, that we let you go ahead and inject into it?

11 A. Yes, sir, we did.

12 Q. Okay. It doesn't seem to be the case in the
13 Grier that you've got a producing well, a direct line
14 between the two. Do you want to comment on that?

15 A. Well, it's true that they're not really a direct
16 line between our proposed wells and the Grier Number 1.
17 However, as I said, we do essentially have two rows of
18 producing wells, which should provide enough pressure sink
19 so that we don't see the injection pressure get up to the
20 Grier Number 1.

21 I think we'll have sufficient withdrawals there
22 to prevent any fluid migration northward.

23 Q. And do you seek authorization to inject into
24 these wells at the same pressure that you are in the
25 remainder of the flood?

1 A. Yes, sir.

2 Q. Which is approximately what?

3 A. I don't know what our original application is.
4 Probably 2100 to 2300 pounds.

5 I don't know specifically.

6 MR. BRUCE: Mr. Examiner, I believe the Order
7 10,663 states that they're currently injecting at about
8 2000 to 2100 pounds, and that was involving the Keel "B" 28
9 well.

10 Q. (By Examiner Catanach) Have you actually
11 commenced injection into that well that we approved
12 previously?

13 A. Yes. I think the three wells that were approved
14 -- If you look in the southeast quarter of Section 8, the
15 Keel "B" 76 -- well, it's actually in the northeast
16 quarter, but it's right almost in the middle of the section
17 there --

18 Q. Uh-huh.

19 A. -- Keel "B" 76, we have begun injection in that.
20 And there's the Keel "B" 92, and then the Keel
21 "B" 57, down to the southeast, which will be our monitor
22 wells.

23 EXAMINER CATANACH: Okay. I think that's all we
24 have, Mr. Bruce.

25 MR. BRUCE: I have nothing further in this

1 matter.

2 EXAMINER CATANACH: Okay, there being nothing
3 further in this case, Case 11,694 will be taken under
4 advisement.

5 (Thereupon, these proceedings were concluded at
6 1:53 p.m.)

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I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiners hearing of Case No. 11694,
heard by me on January 23 1997.

Steven T. Brenner, 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 January 27th, 1997.

STEVEN T. BRENNER
 CCR No. 7

My commission expires: October 14, 1998