

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. 11,779

APPLICATION OF CONOCO, INC., FOR A)
PRESSURE MAINTENANCE PROJECT AND TO)
QUALIFY FOR THE RECOVERED OIL TAX RATE)
PURSUANT TO THE NEW MEXICO ENHANCED OIL)
RECOVERY ACT, LEA COUNTY, NEW MEXICO)

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: MICHAEL E. STOGNER, Hearing Examiner

May 29th, 1997

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, MICHAEL E. STOGNER, Hearing Examiner, on Thursday, May 29th, 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.

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 Examiner Hearing
 CASE NO. 11,779

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A P P E A R A N C E S

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By: W. THOMAS KELLAHIN

* * *

1 WHEREUPON, the following proceedings were had at
2 8:18 a.m.:

3 EXAMINER STOGNER: At this time I will call Case
4 Number 11,779.

5 MR. CARROLL: Application of Conoco, Inc., for a
6 pressure maintenance project and to qualify for the
7 Recovered Oil Tax Rate pursuant to New Mexico Enhanced Oil
8 Recovery Act, Lea County, New Mexico.

9 EXAMINER STOGNER: Call for appearances.

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

14 EXAMINER STOGNER: Any other appearances?

15 (Thereupon, the witnesses were sworn.)

16 EXAMINER STOGNER: Mr. Kellahin?

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

18 RAY HINCHCLIFF,

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

21 DIRECT EXAMINATION

22 BY MR. KELLAHIN:

23 Q. All right, sir, for the record would you please
24 state your name and occupation?

25 A. Ray Hinchcliff, staff engineer for Conoco.

1 Q. Mr. Hinchcliff, have you testified before the
2 Division on any prior occasion?

3 A. No, sir.

4 Q. Summarize for us your education.

5 A. BS degree in petroleum engineering, University of
6 Wyoming, 1985.

7 Q. Summarize for us your employment experience.

8 A. I worked for Conoco for 12 years, Gulf Coast,
9 North Sea and here in New Mexico, Lea County.

10 Q. Summarize for me what your responsibilities are
11 for that portion of the operations in Section 36 that's the
12 subject of this Application.

13 A. It's a pressure maintenance project to inject
14 water into the ground to -- in charge -- add additional
15 reservoir pressure.

16 Q. And is that a subject you've studied on behalf of
17 your company?

18 A. Yes, sir.

19 Q. And is this Application your responsibility?

20 A. Yes, sir.

21 Q. Are the details that were compiled and submitted
22 to the Commission -- or the Division -- on the Division
23 Form C-108 information that you reviewed and tabulated?

24 A. Yes, sir.

25 Q. For the underground injection control compliance?

1 A. Yes, sir.

2 MR. KELLAHIN: All right. We tender, Mr.
3 Examiner, Mr. Hinchcliff as an expert petroleum engineer.

4 EXAMINER STOGNER: Mr. Hinchcliff is so
5 qualified.

6 Q. (By Mr. Kellahin) Let me have you turn to the
7 first display. Let's orient the Examiner as to the area,
8 and let's first talk about the pool. What pool are you in?

9 A. North Hardy-Tubb-Drinkard Pool.

10 Q. And is there an outline on this display that
11 shows the boundary of that pool?

12 A. Yes, sir, it's in green.

13 Q. Within that area, have there been area have there
14 been wells drilled that produce from this pool?

15 A. Yes, sir, there's presently been five wells
16 that's been drilled and completed and producing in that
17 pool at present.

18 Q. And how are they illustrated on this display?

19 A. They're illustrated four in an orange-type red
20 dot, 18, 19, 4 and 2; and one, number 3, is our proposed
21 injector.

22 Q. All right, that currently is a producer that
23 would be converted to injection with the approval of the
24 Division?

25 A. That's correct.

1 Q. This display only shows those wells in the pool
2 and has excluded all the other wells in the area?

3 A. That's correct.

4 Q. And when we look at the C-108, we can see the
5 other wells?

6 A. That's correct.

7 Q. All right. Describe for me what you are
8 proposing for the project area.

9 A. The project area is outlined in black. It's a
10 240-acre outlined area that we would like to inject water
11 to recharge the reservoir.

12 Q. Are there any Tubb or Drinkard wells that are
13 producing in the immediate vicinity, other than those shown
14 on this display?

15 A. No, sir.

16 Q. Lynx is shown as an interest owner and was
17 provided notice of this hearing. What is their interest?

18 A. Conoco sold the Hardy 36 State lease interest
19 from 3900 feet to surface to Lynx Petroleum, and they
20 presently operate a shallow waterflood.

21 Q. Okay. The pressure-maintenance project area in
22 the Application proposes injection authority for an
23 interval described as 6423 feet down to 6593 feet?

24 A. Correct.

25 Q. Do you have displays that illustrate that

1 vertical interval?

2 A. Yes, we do.

3 Q. And what would that interval consist of? Is that
4 the limits of the pool?

5 A. That's the existing limits of the pool, right.

6 Q. Okay. Based upon your conclusions and study of
7 the project, what have you determined is a forecast of the
8 additional oil that may be recovered with the approval of
9 this project?

10 A. The additional oil we estimate to be
11 approximately 131,000 more barrels.

12 Q. Describe for me why you have chosen the Number 3
13 well as the injection well.

14 A. Primarily because of its location. It's
15 centrally located. We can use it to provide pressure
16 support to the other four wells.

17 Q. Give us a summary, Mr. Hinchcliff, of your
18 analysis of why you think this is a viable opportunity for
19 a pressure maintenance project.

20 A. The wells were originally completed in the Tubb,
21 pressure decrease has been significant from original
22 reservoir pressure of approximately 2300 pounds down to its
23 present limit of about 850. Production has dramatically
24 fallen off, and we believe that by injecting water in the
25 Number 3 we can recharge the reservoir, which will arrest

1 our decline and result in an additional recovery of crude
2 oil.

3 Q. Of the five wells in the pool, what is the
4 approximate age or vintage of these wells?

5 A. Ninety- -- The exhibit's got dates. 1995, 1994
6 and 1996 vintage.

7 Q. When the wells were initially potentialied, what
8 kind of daily oil rate did they achieve?

9 A. Average of about 110 barrels a day.

10 Q. And on average, what are these wells now doing?

11 A. Oh, about 13 to 14 barrels a day.

12 Q. And is there water produced in association with
13 the oil?

14 A. Yes, sir.

15 Q. The conclusion, then, is with the conversion of
16 one of these wells to injection, it will be a way to
17 increase reservoir pressure; that's the primary objective.
18 And with doing that, then, you expect to increase ultimate
19 oil recovery.

20 A. That's correct.

21 Q. Let's go into the specifics of the project. If
22 you'll turn to Exhibit Number 2, identify and describe what
23 we're seeing on this display.

24 A. Number 2 lists the five wells that we plan in the
25 project.

1 The first well is the Number 3, which we plan to
2 convert to injection. It's presently completed in both the
3 Tubb and Drinkard.

4 The other four wells, the 2, 4, 18 and 19, are
5 our producing wells or proposed wells. All of those are
6 presently in the Tubb. The Number 2 well is also completed
7 in the Drinkard.

8 Q. Okay. Let's turn to Exhibit 3 and have you
9 identify this display. What are you looking at here?

10 A. Exhibit 3 is the top Tubb marker structure map,
11 mapped on TVD subsea. It shows the North Hardy-Tubb-
12 Drinkard wells on production, which are the 2, 4, 18, 19,
13 and the Number 3 is also on production at present.

14 We have listed four other wells, 7, 21, 15 and
15 Number 1 as penetrations through the Drinkard and Tubb --
16 they are presently not completed in those reservoirs -- to
17 give a better description of the outline of the reservoir.

18 And we also have indicated a cross-section we
19 have prepared going from 2, 4, 3 and 18, and then the 240-
20 acre project area.

21 Q. Based upon your engineering study, is there a
22 geologic component of this reservoir, based upon structure,
23 that would be affected by this project?

24 A. No, sir.

25 Q. So the location and the selection of the

1 injection well is not affected by a structural position?

2 A. No, sir.

3 Q. Okay. What has caused you to propose this as the
4 project area? What explains this boundary?

5 A. It's defined by the existing wells we have on
6 production right now that we would like to provide support
7 to.

8 Q. There's an open location in the southeastern
9 portion of the project area. In your opinion, is it now
10 reasonably probable to drill another producing well in that
11 area, in the absence of pressure maintenance?

12 A. At present, no. We -- Wells are not economic
13 unless we can recharge the reservoir.

14 Q. Okay. Let's turn to the type log. If you'll
15 look at Exhibit 4, let's identify the reservoir more
16 specifically. The pool limits we identified earlier, let's
17 do it on this display. We need to find the top of the pool
18 at 6423. Can we do that on this log?

19 A. Yes, sir, the 6423 is the top perforation on this
20 log, indicated in red.

21 Q. Okay. And above that, then, you don't see an
22 opportunity to produce hydrocarbons in this formation or in
23 this pool?

24 A. No, above that the formation doesn't have the
25 reservoir quality to be productive.

1 Q. And then as we move down vertically and get to
2 approximately 6593, that represents the bottom limit of the
3 pool?

4 A. On the Tubb portion of the pool, yes.

5 Q. The Tubb and the Drinkard have been combined by
6 previous order of the Division into one pool?

7 A. That's correct.

8 Q. When we look at the target interval, you're
9 seeking authority to have the project area be the entire
10 pool, but you have specifically targeted in the injection
11 well a certain portion of the Tubb?

12 A. Yes, the area indicated on the type log "Target
13 Injection Zone" is what we believe to be the better quality
14 of the reservoir, and this is the area we believe will be
15 the area that we'll have the most success in injecting our
16 water.

17 Q. In order to have the greatest opportunity, then,
18 to efficiently inject water into that portion of the pool
19 which will provide you the greatest potential for pressure
20 increase --

21 A. Yes, sir.

22 Q. -- is this the place?

23 A. Yes, sir.

24 Q. Okay. And how did you select that?

25 A. Based on our log data, core data and offset

1 production data and production logging, we have a fairly
2 good idea that this is the area that we're producing
3 approximately 80 to 85 percent of our production out of the
4 Tubb at present, out of this 75-foot interval that
5 stretches from about 6420 to about 6500 feet.

6 Q. Okay. All right, let's go to the cross-section
7 now. I'm sorry, you've got a display before we get to
8 that. Let's look at 5, which is your summary of reservoir
9 data. Explain that exhibit to us.

10 A. This is just a summary of the Tubb formation,
11 listing the various fluid parameters of the reservoir and
12 the reservoir data.

13 The reservoir pressure, the 2325 was the original
14 pressure. At present it's approximately 850 pounds.
15 Recently we took a survey in the Number 4 well in April to
16 verify that.

17 Average permeabilities were gathered from core
18 data and pressure buildup data. The information here is
19 quite complete.

20 Q. All right, let's turn to Exhibit 6 and look at
21 the cross-section. When you look at that perforated
22 interval or that portion of the pool that is targeted for
23 injection, can you correlate that interval --

24 A. Yes, sir.

25 Q. -- among and between all the wells in the pool?

1 A. Yes, sir, you can. It correlates very well.

2 Q. Does it appear that the injection well will
3 provide you an effective and efficient means to communicate
4 pressure with the other wells?

5 A. Yes, we believe that the injection well will
6 communicate to the other four wells.

7 Q. Okay. When we look at the schematic in a minute
8 for the injection well, we're going to see exactly how you
9 propose to recomplete it for injection. Currently the
10 injection is producing -- proposed injection well is
11 producing how many barrels of oil and water?

12 A. Presently, the Number 3 well, our proposed
13 injector, six barrels of oil a day, 10 barrels of water and
14 245 MCF gas.

15 Q. When you recomplete this for injection, are you
16 going to do anything other than simply convert it for
17 injection?

18 A. We are going to isolate the Drinkard by setting a
19 cast-iron bridge plug and putting the required footage of
20 cement on top of it.

21 Q. Again, that's an effort to do what, then?

22 A. Our effort is to minim- -- is to prevent any
23 water going into the Drinkard formation.

24 Q. And that will give you an opportunity to pressure
25 up this portion of the Tubb zone?

1 A. That's correct.

2 Q. Okay. Let's turn to see how you have analyzed
3 the opportunity for increased oil recovery and look at the
4 specifics. If you'll turn with me to Exhibit 7, what are
5 we looking at in this display?

6 A. Exhibit 7 has four curves. The one in the black
7 squares is production without water injection as we predict
8 it. The --

9 Q. All right, let's start with that curve.

10 A. Okay.

11 Q. Its beginning point is about 95, and it is in the
12 upper left-hand corner of the plot?

13 A. That's correct.

14 Q. That's a composition of production from how many
15 wells?

16 A. That's from all five production wells.

17 Q. Okay. And as you follow that curve down, it
18 intersects with a point where other curves come through --

19 A. That's correct.

20 Q. -- and then continues on a decline where you have
21 a black line and black dots?

22 A. Yes, it terminates in the year 2008.

23 Q. All right. What is your analysis of that? What
24 does that mean?

25 A. Basically, 2008 is our economic limit we have set

1 at Conoco, and that's the decline we have estimated the
2 reservoir will have without pressure maintenance.

3 Q. Correspondingly, there's a curve that shows the
4 accumulation or cumulative oil production forecasted over
5 time for those same wells without pressure support?

6 A. That's the curve with the solid triangles, black
7 triangles. And we have accumulated approximately 116,000
8 barrels through the end of 1996, and we project that to be
9 about 262,000 barrels at the time of economic limit.

10 Q. Okay. How did you approach the analysis that got
11 you to the conclusion that increasing the pressure was
12 going to generate additional oil recovery? What was your
13 method?

14 A. Our method was based on just sound reservoir
15 principles. We -- At present, the decline in the Tubb is,
16 on an average, between now and the time we reach economic
17 limit, it's approximately 12.8 percent. And we feel by
18 injecting water we can arrest that to an average of about
19 7.7 percent, which will result in the additional oil
20 recovery.

21 Q. How did you determine what volume of water to
22 inject over what period of time?

23 A. We used the pressure limitation as our driving
24 factor, and from that we came up with the decline -- or I
25 mean an injection schedule, to fill the reservoir back up.

1 Q. You're referring to the Division guideline of a
2 surface pressure limitation based upon depth using .2
3 p.s.i. per foot of depth?

4 A. That's correct.

5 Q. And you've generated a volume of water that would
6 keep you within that pressure limit?

7 A. That's correct.

8 Q. And using engineering analysis, then, you've
9 developed a schedule for injection?

10 A. That's correct.

11 Q. Let's look at that schedule. It's Exhibit 8.

12 As water is injected, then, you have calculated a
13 certain quantity of additional oil to be produced?

14 A. Yes, we --

15 Q. Let's finish the curves, then, on Exhibit 7 and
16 show you how you have forecasted an extension in the
17 producing life of the wells and, correspondingly, an
18 increase in the ultimate oil recovery.

19 A. Yes, we -- We have concluded that by the
20 injection water we can effectively arrest the decline from
21 about 12.8 percent to 7.7 percent, on average, and that new
22 decline is shown in the triangles, the gray triangles. The
23 square -- The squares that are filled in indicates the
24 reserves that we project from the project with an
25 additional approximately 131,000 barrels from pressure

1 maintenance.

2 Q. Okay. When we look on Exhibit 8, what are we
3 seeing here?

4 A. Exhibit 8 is just the hard data that went into
5 the -- support the Exhibit Number 7. There's six columns
6 and the years.

7 The first column is production of barrels per
8 year without water injection and the cum barrels without
9 water injection.

10 The third and fourth column are -- or the fourth
11 and fifth column, excuse me, are the production with water
12 and cums with water injection. And then the delta oil, and
13 delta oil is in barrels of oil per year and barrels of oil
14 per day.

15 Q. Okay, let's turn to the subject of information
16 contained on the Division Form C-108 -- it's marked as
17 Exhibit 9 -- and let's start by having you turn to the last
18 page of Exhibit 9, which shows the area of review map. Do
19 you have a copy of that?

20 The two-mile radius on the map shows all the
21 wells in the area, regardless of depth?

22 A. Yes, sir.

23 Q. And then within the half-mile area of review,
24 you've analyzed the data from all those wells, have you?

25 A. Yes, sir.

1 Q. The Division looks for problem wells, which are
2 wells that may be inadequately cemented or cased across the
3 approved injection intervals. Do you find any of those
4 kinds of wells?

5 A. No, we do not have any problem wells.

6 Q. Did you tabulate for the Division and supply
7 either the measured or the calculated cement tops of all
8 the producing wells within the area of review?

9 A. Yes, we have.

10 Q. Were all those measured tops of cement with the
11 exception of one well?

12 A. Yes, all of them excepting the one.

13 Q. With the one that was a calculated top of cement,
14 what was your method for making that calculation?

15 A. Our method was, we used the bit size, calculated
16 our hole volume and used our casing to come up with the
17 annular volume. We -- From that, knowing the volume of
18 cement we pumped and the yield from the sacks of cement, we
19 came up with estimated volume of cement, and on our
20 Application we --

21 Q. Let's find the right page. We're looking at the
22 fourth page down in the C-108? There's a table, right?

23 A. That's correct.

24 Q. All right, it's the last well on the table, is it
25 not?

1 A. Yes, Well Number 19.

2 Q. Tell me what your calculation was.

3 A. Our calculation was -- As I mentioned, we used
4 the hole volume from the bit and the annular volume from
5 the casing, and we calculated the volume that was between
6 the two, using the yields and the number of sacks of cement
7 we pumped.

8 We came up with a cement top of 2210 feet.
9 That's based on an 80-percent efficiency or an 80-percent
10 fill-up. If you use a 50-percent fill-up, that gets you to
11 a cement top of 3992, approximately 2500 feet above our
12 average injection target.

13 Q. Have you also determined that all the wells in
14 the area of review have sufficient surface casing strings
15 and cement to protect any freshwater sources?

16 A. Yes, sir.

17 Q. What is your opinion of the depth and the source
18 of any freshwater source?

19 A. Our opinion is that it's protected from our
20 existing wells.

21 Q. And is this the Ogallala formation?

22 A. Yes, it's the Ogallala formation.

23 Q. It is found at approximately what depth in this
24 area?

25 A. Approximately 200 feet.

1 Q. Have you supplied the Division with an analysis
2 of any freshwater sources in this vicinity?

3 A. Yes, Conoco operates two freshwater wells in
4 adjacent Section 35.

5 Q. When we go to the last portion of Exhibit 9, the
6 area of review, can you show us the approximate location of
7 the freshwater wells?

8 A. Yes, they're located in Location I and P of
9 Section 35.

10 Q. Okay. You said Conoco drilled those wells. Who
11 uses them and for what purposes?

12 A. Conoco uses those for fresh water for drilling
13 mud -- using to make up drilling mud or for operations in
14 the field and things of that nature.

15 Q. Okay. All right, let's turn to the third page of
16 the Exhibit 9 and look at the schematic of the proposed
17 injection well. It's been reduced as to scale and some of
18 these numbers are perhaps hard to read, but give us a
19 summary, then, on this display of what you're proposing to
20 do.

21 A. Our proposal is to remove all the production
22 equipment downhole, the rods and pump and tubing, and set a
23 bridge plug and isolate it with cement on top of the bridge
24 plug to isolate the Drinkard formation from the Tubb, and
25 then run back in the hole with a packer and tubing to

1 convey the water into the Tubb formation.

2 Q. What is to be the source of the injection water?

3 A. The source is the produced water from the lease.

4 Q. And from what formation or formations does that
5 water produce?

6 A. The water right now is coming from the Tubb,
7 Drinkard and McKee formations.

8 Q. Are all those waters compatible for purposes of
9 injection into the proposed target interval?

10 A. Yes, they are.

11 Q. And you have provided an analysis for the
12 Division?

13 A. No, sir, we haven't.

14 Q. But you do have compatibility --

15 A. We do have compatibility tests. We could provide
16 them at a later date if they so wished.

17 Q. All right. Are you aware of any objection to the
18 approval of the Application?

19 A. No.

20 MR. KELLAHIN: Mr. Examiner, that concludes my
21 examination of Mr. Hinchcliff.

22 In addition, Exhibit 10 is a newspaper
23 notification of the request.

24 And then finally Exhibit 11 is my affidavit of
25 notification. I am aware of no objection.

1 is scheduled to come on production in June.

2 Q. Now, the McKee out there is -- What's the
3 approximate depth of that?

4 A. Approximately 10,000 feet.

5 Q. 10,000. And what's the water volumes coming off
6 of the current producers now?

7 A. At present we make 19 barrels of fluid a day -- I
8 mean, excuse me, 19 barrels of water a day from the five
9 producers.

10 EXAMINER STOGNER: Mr. Kellahin, subsequent to
11 today's hearing could you provide the compatibility --

12 MR. KELLAHIN: Yes, sir.

13 EXAMINER STOGNER: -- test out there in this area
14 for the complete record?

15 MR. KELLAHIN: Yes, sir.

16 Q. (By Examiner Stogner) Okay, are all the water
17 source wells -- are they going to be tied in with a
18 pipeline running over to the 3? Is that the way you look
19 at it at this point?

20 A. The present setup is that all the wells going to
21 the Hardy battery where the water is commingled, and from
22 that point we will take a common line back to Number 3.

23 Q. Where is that battery at?

24 A. The battery is located adjacent to the Number 1
25 well.

1 Q. So essentially in the center of the section?

2 A. That's correct, sir. In fact, we plan on using
3 the existing production flow line from the Number 3 to the
4 battery as our water injection line.

5 Q. Okay, now, will the water be pressured up at the
6 battery site, or do you propose to pressure it up at the
7 well site?

8 A. It will be pressured up at the battery.

9 Q. Okay. Did you do a cost analysis of the cost of
10 this -- of the proposed conversion and the -- any other
11 facilities that are going to be needed?

12 A. Yes, we have. We estimate the cost to be in the
13 \$35,000 to \$40,000 range.

14 Q. And what all would that entail?

15 A. That will entail installing the injection pump,
16 the well work needed on the Number 3 well, and some
17 automation in our existing water system.

18 Q. Explain that automation a little bit more.

19 A. The automation is basically to make sure that we
20 don't -- we protect the pump, the surface injection pump,
21 tie it into the water tank, and also it will be used to
22 meter the amount of water that we put into the ground.

23 Q. Are there going to be any work necessary on the
24 current producing wells, 18, 19, 2 and 4?

25 A. No, sir, we plan on no additional work on those

1 wells.

2 Q. When do you foresee a drilling of an additional
3 fifth well down in that far southeastern corner of the
4 project?

5 A. If we see a positive response from the pressure,
6 such that the Number 3 provides the water support to the 19
7 and Number 4, I would envision us going ahead with the
8 proposal to drill a fifth producer in that corner.

9 Q. What kind of response would you have to see
10 before that decision would be made?

11 A. Well, we are projecting we will have fill-up in
12 approximately a year and a half. And I would anticipate in
13 that period of time we would have sufficient pressure data
14 to support either drilling an additional well or not
15 drilling an additional well.

16 Q. What would the cost of such a well be?

17 A. At present cost, approximately \$380,000.

18 Q. You don't foresee the need of any makeup water
19 being utilized?

20 A. Not at this time, no, sir.

21 Q. How about at a later date or in the future?

22 A. No, the McKee wells are projected to have a life
23 similar to what we project for the Tubb.

24 Q. Okay. No possibility of utilizing fresh water,
25 or are you going to stay with produced water?

1 A. We prefer to stay with produced water.

2 Q. Will there be any treating necessary for the
3 reinjection of that water?

4 A. Yes, we will probably utilize some scale
5 inhibitors.

6 Q. The tubing that you're -- that will be utilized,
7 will that be a plastic- or cement-coated tubing?

8 A. We have had success with running a -- luck --
9 coated tubing, plastic-coated tubing.

10 Q. What kind of coating?

11 A. Plastic-coated tubing.

12 Q. Well, what did you say before that? It sounded
13 like a product, a Luck or something?

14 A. No, I -- You may have just misunderstood me.

15 Q. Oh, I'm sorry, I'm sorry. So that's a -- So
16 you're running a plastic --

17 A. We've had some -- I said, We've had some good
18 luck with running plastic-coated --

19 Q. Oh, I'm sorry --

20 A. -- tubing.

21 Q. -- okay. You've had good luck with running
22 plastic-coated tubing, okay.

23 Okay, what is the producing interval directly
24 above your Tubb producer?

25 A. The stratigraphic column above the Tubb is the

1 Blinebry.

2 At present we have no Blinebry production in the
3 Hardy 36 State area. The Tubb marker is the base --
4 basically the base of the Blinebry.

5 Q. Okay, what are the most of the -- When I refer to
6 your area-of-review map, there are quite a few wells within
7 the half-mile radius, and what are those producing?

8 A. Okay, the wells on that map that are labeled EHU
9 are the Eumont Hardy Unit, which is -- it's an ex-Conoco
10 waterflood unit that we sold to Lynx. It's presently in
11 the Penrose. It's basically in the 3750-to-3850-foot
12 range.

13 Q. So that's the Eumont, and they're all oil and
14 being -- Are they still being flooded at this time?

15 A. They're still being flooded. There are some
16 inactive and active wells in that unit.

17 Q. When I look in the far northwest quarter,
18 northwest quarter, Section 36, you have an EHU well that is
19 a designated gas well.

20 Is that in the Eumont Gas Pool, outside the
21 waterflood area that you know? Or do you know anything
22 about that well?

23 A. I couldn't give you an accurate answer on that,
24 sir.

25 Q. Okay.

1 A. The -- I can tell you that the Eumont-Penrose
2 interval, as you move to the northeast, you get into a gas
3 cap, and as you move to the southeast you get into an oil
4 rim.

5 Basically the waterflood's in the oil rim, so I
6 would assume that Number 9 is probably close to that oil
7 rim boundary.

8 Q. Do you know if that one is a Lynx Petroleum well
9 also?

10 A. It's a Lynx Petroleum well. All the wells that
11 are indicated EHU are operated by Lynx.

12 Q. So within that area of review, there are no
13 plugged wells?

14 A. No, sir, at present there are no plugged wells.

15 EXAMINER STOGNER: Okay. Does anybody else have
16 any questions of this witness?

17 MR. KELLAHIN: No, sir.

18 EXAMINER STOGNER: Mr. Kellahin, is there
19 anything I've forgotten as far as the enhanced-oil-recovery
20 portion of this?

21 MR. KELLAHIN: No, sir, I think you have it
22 covered.

23 EXAMINER STOGNER: Does anybody else have any
24 questions?

25 THE WITNESS: Thank you, sir.

1 EXAMINER STOGNER: You may be excused.

2 Do you have anything further, Mr. Kellahin?

3 MR. KELLAHIN: No, sir.

4 EXAMINER STOGNER: I'll hold the record open
5 pending the compatibility data for the water, and at this
6 time we'll move on.

7 (Thereupon, these proceedings were concluded at
8 8:58 a.m.)

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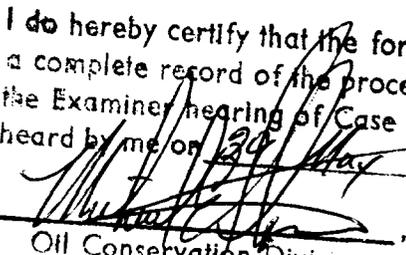
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I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 11779,
heard by me on 13th May 1997.

_____, Examiner
Oil Conservation Division

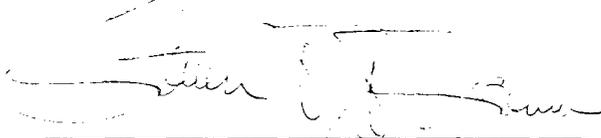
CERTIFICATE OF REPORTER

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 June 2nd, 1997.


 STEVEN T. BRENNER
 CCR No. 7

My commission expires: October 14, 1998