

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

IN THE MATTER OF THE HEARING CALLED BY)
THE OIL CONSERVATION COMMISSION FOR THE)
PURPOSE OF CONSIDERING:)
APPLICATION OF COLLINS AND WARE, INC.,)
FOR SPECIAL POOL RULES, LEA COUNTY,)
NEW MEXICO)

CASE NO. 11,798

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

COMMISSION HEARING

BEFORE: WILLIAM J. LEMAY, CHAIRMAN
WILLIAM WEISS, COMMISSIONER
JAMI BAILEY, COMMISSIONER

August 14th, 1997

Santa Fe, New Mexico

This matter came on for hearing before the Oil Conservation Commission, WILLIAM J. LEMAY, Chairman, on Thursday, August 14th, 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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 Commission Hearing
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A P P E A R A N C E S

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By: WILLIAM F. CARR

* * *

1 WHEREUPON, the following proceedings were had at
2 9:18 a.m.:

3 CHAIRMAN LEMAY: Now we will call Case 11,798,
4 the Application of Collins and Ware for special pool rules,
5 Lea County, New Mexico.

6 Appearances in Case 11,798?

7 MR. CARR: May it please the Commission, my name
8 is William F. Carr with the Santa Fe law firm Campbell,
9 Carr, Berge and Sheridan. We represent Collins and Ware in
10 this matter, and I have two witnesses.

11 CHAIRMAN LEMAY: Thank you. Will those witnesses
12 kindly stand and raise your right hand to be sworn in?

13 (Thereupon, the witnesses were sworn.)

14 CHAIRMAN LEMAY: Mr. Carr, you may begin.

15 MR. CARR: Thank you, Mr. Chairman.

16 MIKE MOYLETT,

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

19 DIRECT EXAMINATION

20 BY MR. CARR:

21 Q. Would you state your name for the record, please?

22 A. Mike Moylett.

23 Q. Where do you reside?

24 A. In Midland, Texas.

25 Q. By whom are you employed?

1 A. Collins and Ware.

2 Q. What is your current position with Collins and
3 Ware?

4 A. Petroleum geologist.

5 Q. Have you previously testified before the New
6 Mexico Oil Conservation Commission?

7 A. No, I haven't.

8 Q. Could you briefly summarize for the Commission
9 your educational background?

10 A. I have a bachelor's degree and a master's degree,
11 in 1985, my master's degree, from Missouri School of Mines
12 in Rolla, Missouri, in geology and geophysics.

13 Q. Since graduation, for whom have you worked?

14 A. I've worked with Exxon in Midland, Texas, for six
15 years, with Arco Oil and Gas in Midland for two years, and
16 almost four years now for Collins and Ware.

17 Q. Does the geographic area of your responsibility
18 include the portion of southeastern New Mexico involved in
19 this case?

20 A. Yes, it does.

21 Q. Are you familiar with the Application in this
22 case on behalf of Collins and Ware?

23 A. Yes, I am.

24 Q. And are you familiar with the development of the
25 Tubb Formation in the East Warren-Tubb Pool and the

1 surrounding area?

2 A. Yes, I am.

3 Q. Have you made a geological study of the Tubb
4 formation in the area of interest?

5 A. Yes, I have.

6 Q. Are you prepared to share the results of that
7 study with the Commission?

8 A. Yes, I am.

9 MR. CARR: Mr. Chairman, we tender Mr. Moylett as
10 an expert witness in petroleum geology.

11 CHAIRMAN LEMAY: His qualifications are
12 acceptable.

13 Q. (By Mr. Carr) Could you briefly summarize what
14 Collins and Ware seeks with this Application?

15 A. Collins and Ware seeks the adoption of permanent
16 special pool rules and regulations for the East Warren-Tubb
17 Pool, which would provide for a special limiting gas-oil
18 ratio of 6000 cubic feet of gas for each barrel of oil
19 produced.

20 Q. When was the East Warren-Tubb Pool created?

21 A. It was created as the East Warren-Tubb Gas Pool
22 by Order Number R-9467 on March 1st, 1991, and it was
23 subsequently changed to the East Warren-Tubb Pool.

24 Q. Let's go to what's been marked for identification
25 as Collins and Ware Exhibit Number 1. I'd ask you to

1 identify this and review it for the Commission.

2 A. Okay, Exhibit Number 1 shows the -- is a -- shows
3 the boundaries of the East Warren-Tubb Pool in yellow.
4 It's a map at a scale of one inch equal to 3000 feet.
5 North is up towards the top of the page. Each one of those
6 section lines there is a square mile, for scale.

7 This map shows all Tubb wells within one mile of
8 the East Warren-Tubb Pool. The wells in 26 and 27 are in
9 the Warren-Blinebry-Tubb Oil and Gas Pool.

10 The map shows the Tubb producers in gray, it
11 shows the oil, gas and water production associated with
12 each one of those wells. Gas is in red, oil is in green,
13 and water is in blue.

14 It also shows the gas-oil ratios for each well,
15 based on their cumulative production. And I've noticed in
16 the legend the dates up to the cumulative production.

17 Also on this Exhibit Number 1, it shows a trace
18 of the cross-section. That would be Exhibit Number --

19 MR. CARR: It would be Exhibit Number 5, and I
20 have misnumbered them. I have reversed Exhibits 2 and 5 to
21 make this more challenging, but I'll try and keep you
22 advised as we go through those.

23 Q. (By Mr. Carr) Mr. Moylett, what rules govern the
24 development of the Tubb formation in the East Warren-Tubb
25 Pool, the area shaded in yellow on Exhibit Number 1?

1 A. There are statewide rules, 40-acre spacing, 142
2 barrels of oil a day with a gas-oil ratio of 2000 to 1,
3 results in an authorized producing rate of 284,000 cubic
4 feet of gas per day.

5 Q. Now, if we go south and west of the subject pool
6 and we look at the Warren-Blinebry-Tubb Oil and Gas Pool,
7 what rules govern the development of that pool?

8 A. The rules that govern the development of the Tubb
9 and the Warren-Blinebry-Tubb Oil and Gas Pool is special
10 rules, pool rules, adopted in Case 10,245 on March 15th,
11 1991, by Order Number R-9497.

12 Q. Spacing is what? Forty-acre spacing?

13 A. It's a 40-acre oil spacing. The oil wells are
14 wells producing hydrocarbons possessing a gravity of 45
15 degrees API or less. Rule 5 is, Oil wells in the Warren-
16 Blinebry-Tubb Oil and Gas Pool shall have the capacity
17 allowables and shall be exempt from the oil and casinghead
18 gas allowables as provided in either Division Rules
19 701.F.(3) or Rules 503, 505 and 506.

20 Q. And Rule 505 provides for depth bracket
21 allowables; is that right?

22 A. Yes, and 506 for GORs.

23 Q. And so this pool offsets another pool in which
24 there are no gas-oil ratio limitations; is that right?

25 A. That is correct.

1 Q. Why is Collins and Ware seeking to increase the
2 gas-oil ratio in the subject pool?

3 A. Collins and Ware has recently completed two wells
4 that produce in excess of the statewide GOR.

5 The Payday Number 1, located in Section 24 of 20
6 South, 38 East, first produced on March 1st of 1997. The
7 GOR of that well was 4655 to 1.

8 And the second well, also located in Section 24,
9 north of the Payday Number 1, was first produced on March
10 23rd of 1997. It had a GOR of 12,496 to 1 on a day test
11 conducted on June 5th of 1997.

12 Q. And that's the M&M Number 1 well?

13 A. M&M Number 1. And these GORs are consistent with
14 the Tubb producers, you know, on the Central Basin Platform
15 in southeast Lea County, New Mexico. The Tubb in southeast
16 Lea County, New Mexico, averages approximately 16,000 to 1
17 GOR.

18 MR. CARR: Mr. Chairman, at this time I would ask
19 the Commission to direct its attention to what has been
20 marked as Exhibit Number 5, I believe, in your packet.
21 That is a cross-section. It is the east-west cross-
22 section, the trace for which exists on Exhibit Number 1.

23 Q. (By Mr. Carr) Mr. Moylett, if you could review
24 that cross-section for the Commission.

25 A. This is a -- The datum of this cross-section that

1 you note on the cross-section here is the top of the Tubb
2 silt marker. You see on the -- Like I said, the datum is
3 the top of the Tubb silt marker here. The vertical scale
4 of this cross-section is one inch is equal to 100 feet. I
5 have not used any horizontal scale. I've spaced each well
6 approximately two inches apart.

7 The top cross-section is the porosity, neutron-
8 density porosity logs, and the bottom cross-section is the
9 resistivity logs for the same wells.

10 And basically, the cross-section shows the
11 Drinkard formation on the bottom, and the pick on the
12 Drinkard formation is that resistivity tight -- I mean,
13 that lower resistivity streak. And then you have the Tubb
14 silt marker, and above that is the Tubb marker, and a
15 hundred feet above that is the top of the Tubb formation in
16 the Tubb Oil and Gas Pool, as defined by the New Mexico Oil
17 Conservation Commission.

18 The cross-section shows basically the continuous
19 -- it shows a non-homogeneous vertically stratified
20 reservoir. It's a continuous reservoir within the East
21 Warren-Tubb Pool. This cross-section goes across the East
22 Warren-Tubb Pool from west to east.

23 This continuous reservoir within the East Warren-
24 Tubb Pool, you really cannot track the individual porosity
25 stringers. The porosity varies from well to well. But you

1 can see from the cross-section that the Tubb reservoir
2 continues throughout the pool. If you follow the
3 correlation markers there, I feel you can see the
4 continuity of the overall gross Tubb section in there.

5 Q. Let's go to what has been marked Collins and Ware
6 Exhibit Number 3, and I would ask you to identify that for
7 the Commission.

8 A. Exhibit Number 3 shows -- is also at a scale of
9 one inch is equal to 3000 feet. North is up towards the
10 top of the page there. In yellow, highlighted, is the
11 Warren East-Tubb field. In blue I basically show wells
12 which have penetrated the Tubb formation. In gray are also
13 the Tubb producers. I've shown the GORs and the production
14 associated with each one of those Tubb producers. Red I've
15 showed for gas, green for oil, and blue for water again.

16 Also on there I've showed the trace for the
17 cross-section going from the Warren-Tubb Pool up to the
18 East Warren-Tubb Pool, and it's a northeast to southwest
19 cross-section.

20 Q. Let's go to Exhibit Number 4, the structure map.
21 Would you review that, please?

22 A. Exhibit 4 is also at a scale of one inch is equal
23 to 3000 feet, with north to the top of the page. In
24 yellow, again, is the East Warren-Tubb field.

25 This map is on the top of the Tubb silt marker,

1 which was the datum I used in the cross-sections. The
2 contour interval I used here was 50 feet. And the
3 structure out here shows that the M&M and Payday 1 wells
4 are roughly at a subsea depth of minus 3000 feet.

5 As you proceed from the East Warren-Tubb field to
6 the Warren-Tubb field, you go updip to approximately 200
7 feet structurally higher than the M&M 1 and Payday 1 wells
8 in the East Warren-Tubb field.

9 The significance of the structure is that the
10 Warren-Tubb field is at depletion. Most of the wells are
11 plugged back, no longer producing in the Tubb.

12 However, most of the wells in the East Warren-
13 Tubb field are still producing in the Tubb, and if we -- if
14 the -- That field is 200 feet structurally lower than the
15 Warren-Tubb field and producing, and the Warren-Tubb field
16 is pretty much depleted. It shows that these wells aren't
17 draining, you know, a large area. If that was the case,
18 the Warren-Tubb field would still be producing.

19 And that's pretty much the significance of the
20 structure. It shows basically that this field, if you
21 looked at a larger scale, it's -- You know, it's on the
22 northeast end of the Central Basin Platform there. It's
23 pretty much defining the limits of the Central Basin
24 Platform, because if you go further to the east there, you
25 get off the Central Basin Platform into positionally a

1 deeper -- a water environment.

2 Q. The first cross-section that you reviewed, marked
3 Exhibit 5, showed reservoir continuity throughout the East
4 Warren-Tubb Pool.

5 If you'd now go to Exhibit Number 2, your
6 northeast-southwest cross-section, and review the
7 characteristics of the reservoir from the East Warren-Tubb
8 field through the Warren-Tubb field.

9 A. This cross-section is also a stratigraphic cross-
10 section hung on the Tubb silt marker at a vertical scale of
11 one inch is equal to a hundred feet. There's no horizontal
12 scale of spaces. Once again, each well approximately two
13 inches apart.

14 It runs from northeast to southwest, from the
15 East Warren-Tubb Pool to the Warren-Tubb Pool there. Once
16 again, I've shown the correlation lines in there, and you
17 can see that this cross-section, compared to the previous
18 cross-section, are identical; they look -- they're very
19 similar.

20 It shows the continuity of the reservoir from the
21 Warren-Tubb Pool to the East Warren-Tubb Pool. If you look
22 at the logs there, the top cross-section is the porosity
23 log, the bottom cross-section is the resistivity logs. You
24 can follow those markers from both fields there. Those are
25 the gross markers. If you look at the -- You can even

1 break it down even further, but I basically just went from
2 the top of the Tubb to the base of the Tubb.

3 Once again, it shows that even though the overall
4 gross Tubb section is similar, there is some variability in
5 the porosities from well to well.

6 Q. It does show, however, reservoir continuity --

7 A. Yes.

8 Q. -- from the East Warren-Tubb field, the subject
9 of this hearing, to the pool immediately offsetting south
10 and west where there is no GOR limit?

11 A. Yes, the four wells on the left are in the
12 Warren-Tubb Pool, and the three wells on the right are the
13 East Warren-Tubb Pool.

14 Q. Mr. Moylett, let's now go to Collins and Ware
15 Exhibit Number 6. Could you identify this and review it
16 for the Commission?

17 A. Exhibit Number 6 is a two-well cross-section. It
18 runs from north to south. It's also a stratigraphic cross-
19 section hung on the top of the Tubb silt. The vertical
20 scale on that is one inch is equal to 40 feet, and those
21 wells are ten miles apart.

22 The purpose of this cross-section is to show how
23 similar the Tubb formation is throughout the Central Basin
24 Platform in southeast Lea County. Even though these wells
25 are ten miles apart, you can correlate the top of the Tubb

1 to the base of the Tubb or top of the Drinkard throughout
2 the Central Basin Platform.

3 The top of the Tubb, the Tubb marker, the Tubb
4 silt, the base of the Tubb silt and the top of that
5 Drinkard -- It just shows the continuity of the Tubb
6 throughout the Central Basin Platform there.

7 Q. Could you identify and review Exhibit Number 7?

8 A. Exhibit Number 7 is a type log, what I would call
9 a type log for Collins and Ware wells in the East Warren-
10 Tubb field there. It's a neutron-density porosity log
11 there. What I've colored in is a gamma-ray cutoff on the
12 left and in blue is the 20 API gamma-ray cutoff. And on
13 the right is the neutron-density crossplot porosity cutoff
14 at 4 percent.

15 This is basically -- It will be some background
16 information for our engineering presentation there.

17 But what I've shown is, in the blue there,
18 everything greater than 20 API gamma ray is basically the
19 dolomites in the Tubb section there. Anything less than
20 that is the siltstones in the Tubb section there, and those
21 are fairly low permeability siltstones in there, and
22 they're fairly tight and nonproductive.

23 Most of the production coming from our wells is
24 from that Tubb dolomite. And as you look at what I've
25 highlighted in blue on the left and what I've colored in on

1 the right is the porosity is greater than 4 percent
2 associated with the dolomites there.

3 Q. Mr. Moylett, would you now identify Collins and
4 Ware Exhibit Number 8 and review this exhibit for the
5 Commission?

6 A. I've been talking a lot with Paul Kautz, who is
7 the District Geologist with the New Mexico Oil Conservation
8 Commission in the Hobbs Office there. I've talked to Mr.
9 Kautz concerning the development of the acreage matters --
10 concerning the development of the acreage in the East
11 Warren-Tubb field there, and Mr. Kautz prepared this letter
12 for presentation here today.

13 In Mr. Kautz's letter, which is Exhibit Number 8,
14 he supports the higher GOR limit of 6000 to 1 for the East
15 Warren-Tubb Pool.

16 The maps provided by Mr. Kautz note that the Tubb
17 and Blinebry Pools have merged together. He concluded that
18 the Blinebry is one continuous reservoir across this area.
19 Mr. Kautz also concluded that the Tubb formation, and
20 specifically the Warren-Tubb Pool and East Warren-Tubb Pool
21 are one continuous reservoir.

22 Mr. Kautz also summarizes the GOR limits in the
23 Tubb reservoirs in the area, and he notes that the Warren-
24 Tubb-Blinebry Pool has no GOR and concludes that 2000-to-1
25 GOR in the East Warren-Tubb Pool does not protect

1 correlative rights.

2 Q. Now, Mr. Moylett, the Division order which denied
3 the Application of Collins and Ware for a 6000-to-1 GOR for
4 the East Warren-Tubb Pool found, in Finding 10, and I
5 quote, that the Applicant presented no geologic data to
6 establish that the East Warren-Tubb Pool and the Warren-
7 Blinebry-Tubb Oil and Gas Pool represent a single common
8 source of supply in the Tubb formation.

9 Has that data now been presented?

10 A. Yes, it has.

11 Q. The Division order which denied the Application
12 of Collins and Ware also found that the Applicant presented
13 no geologic data, i.e., structure maps, isopachs, et
14 cetera, to characterize the Tubb reservoir in Sections 23,
15 24 and 25. Has that data now been presented?

16 A. Yes, I've reviewed the matter with the Division's
17 geologist in Hobbs who concurs that these pools are one
18 common source of supply. Additional data, including a
19 structural map, several cross-sections and a type log have
20 also been presented to characterize the Tubb reservoir in
21 this area.

22 Q. Will Collins and Ware also call an engineering
23 witness?

24 A. Yes, they will.

25 Q. Were Exhibits 1 through 8 either prepared by you

1 or compiled under your direction and supervision?

2 A. Yes, they have.

3 MR. CARR: At this time, Mr. Chairman, we would
4 move the admission into evidence of Collins and Ware
5 Exhibits 1 through 8.

6 CHAIRMAN LEMAY: Without objection, Exhibits 1
7 through 8 will be admitted into the record.

8 MR. CARR: And that concludes my direct
9 examination of Mr. Moylett.

10 CHAIRMAN LEMAY: Thank you, Mr. Carr.

11 Commissioner Bailey, do you have any questions?

12 COMMISSIONER BAILEY: I don't have any questions.

13 CHAIRMAN LEMAY: Commissioner Weiss?

14 COMMISSIONER WEISS: No questions.

15 EXAMINATION

16 BY CHAIRMAN LEMAY:

17 Q. Just some background, Mr. Moylett. There's no
18 Blinebry production in here at all, it's just Tubb, as far
19 as the East Tubb field? Because I know this other field
20 has got Blinebry production too.

21 A. If you go back to Exhibit 3, which shows -- It's
22 the map showing the producers in the area with the cross-
23 section line on it.

24 Q. Uh-huh.

25 A. Okay, if you look at it, the wells in Section 24,

1 the M&M 2, 3 and Payday 2 are Collins and Ware wells, and
2 they were unsuccessful attempts in the Tubb, and they were
3 plugged back and are now Blinebry completions. And I've
4 noted that "BLBR" underneath those wells there, that there
5 are Blinebry completions. I didn't put a Blinebry
6 production map here, because I was addressing mainly the
7 Tubb.

8 Q. Well, then, would those wells be incorporated
9 because of the mile limit into the Warren-Tubb-Blinebry
10 Pool and not the East Warren-Tubb field?

11 My confusion is, it should be one field, I guess,
12 because it was developed later, but it was established
13 separately.

14 A. Right.

15 Q. Is that right?

16 A. Right.

17 Q. And the Warren-Tubb-Blinebry Pool has Blinebry
18 production in it?

19 A. Yes, it does.

20 Q. Your pool evidently will have Blinebry
21 production, or it looks like it is starting to get some
22 Blinebry production on the plugback?

23 A. Yes, sir.

24 Q. But currently the pool rules only apply to the
25 Tubb and not the Blinebry?

1 A. Right, the statewide Blinebry rules that I was
2 aware of is a 6000-to-1 GOR already.

3 Q. Statewide? I don't think we have a statewide --

4 A. Well, actually the Blinebry Oil and Gas Pool is
5 6000 to 1.

6 Q. Yeah.

7 A. I don't think there was -- I'm aware of the GOR
8 for the Blinebry in the -- I don't think there is an East
9 Warren-Blinebry Pool.

10 Q. Doesn't look like it to me. My concern --

11 A. There isn't --

12 Q. My concern was whether --

13 A. Right.

14 Q. -- you would be protected in your Application by
15 addressing only the Tubb --

16 A. Right.

17 Q. -- and Blinebry completion would fall under a
18 different pool, but you would also have the higher -- the
19 needed GOR relief if you needed it? Because Paul seemed to
20 address --

21 A. Right.

22 Q. -- the Blinebry also in his letter.

23 A. I was under the impression that the Blinebry
24 wells that we're completing will be in the Warren-Blinebry
25 Pool.

1 Q. Yeah, that was my question.

2 A. Right.

3 MR. CARR: And our engineering witness can
4 provide some background on this, because apparently one of
5 the pools was originally formed as a waterflood unit, and
6 the boundaries were frozen back at that time, but we can
7 address that with the engineering witness.

8 CHAIRMAN LEMAY: Okay, thank you. Any other
9 questions? That's all I have.

10 Thank you.

11 THE WITNESS: You're welcome.

12 CHAIRMAN LEMAY: You may be excused.

13 MR. CARR: At this time we would call Brent
14 Lowery.

15 BRENT LOWERY,

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. CARR:

20 Q. Would you state your name for the record, please?

21 A. My name is Brent Lowery.

22 Q. Where do you reside?

23 A. I reside in Midland, Texas.

24 Q. By whom are you employed.

25 A. Collins and Ware.

1 Q. What is your current position with Collins and
2 Ware?

3 A. I'm an operations engineer for Collins and Ware.

4 Q. Mr. Lowery, have you previously testified before
5 the Oil Conservation Commission?

6 A. No, sir, I haven't.

7 Q. Could you summarize your educational background?

8 A. I have a BS in petroleum engineering from Texas
9 Tech University.

10 Q. And when did you receive your degree?

11 A. I graduated in 1984.

12 Q. Following graduation, for whom have you worked?

13 A. I spent four years working for Damson Oil
14 Corporation, a small independent in Midland. The next
15 three years after that, I was a reservoir engineer for
16 Marathon Oil Company, again in Midland, Texas.

17 The six years following that, I was an area
18 engineer for Fina Oil and Chemical that -- including all
19 the reservoir, drilling and operations engineering duties
20 for the geographical area in west Texas. And came to work
21 for Collins and Ware in February of 1997.

22 Q. Does the geographic area of your responsibility
23 for Collins and Ware include the portion of southeastern
24 New Mexico involved in this case?

25 A. Yes, sir, it does.

1 Q. Are you familiar with the Application filed in
2 this case on behalf of Collins and Ware?

3 A. Yes, sir.

4 Q. Have you made an engineering study of the area?

5 A. Yes, sir, I have.

6 Q. Are you prepared to share the results of that
7 study with the Commission?

8 A. I am.

9 MR. CARR: We tender Mr. Lowery as an expert
10 witness in petroleum engineering.

11 CHAIRMAN LEMAY: His qualifications are
12 acceptable.

13 Q. (By Mr. Carr) Let's go initially, Mr. Lowery, to
14 what has been marked Collins and Ware Exhibit Number 9.
15 I'd ask you to identify this exhibit and review it for the
16 Commission.

17 A. Exhibit Number 9 is a tabulation of production
18 information from PI that tabulates all the Tubb completions
19 in the Warren-Tubb field, or -- It's actually the Warren-
20 Tubb-Blinebry Oil and Gas field.

21 This production information includes only what
22 was reported as Tubb production. In some wells I deleted
23 the production information because the perforated interval
24 is also listed, and I went through that and took out
25 anything above approximately 6400 feet in the -- according

1 to our cross-sections and markers and things, that that
2 would be actually considered Blinebry production for our
3 discussion here.

4 So this reflects only what was produced out of
5 the Tubb. It also indicates that there are no Tubb
6 producers, or at least no production being reported in the
7 Tubb in that field at this time.

8 It also indicates that the cumulative recovery
9 from the field is over 2 million barrels and 33 million
10 cubic feet of gas, and the cumulative GOR for the Tubb
11 producers in the Warren-Tubb unit is 16,365 cubic feet per
12 barrel.

13 Q. All right. Now that we've looked at the Warren-
14 Blinebry-Tubb Oil and Gas Pool, let's move to the East
15 Warren-Tubb Pool, Exhibit Number 10. Would you review the
16 data shown on that exhibit?

17 A. Exhibit Number 10 is a tabulation of all the
18 production data available in the Warren-Tubb East field
19 producers. Some of the data is -- Well, let's see. It's
20 all as of March, 1997, with the exception of the two
21 Collins and Ware wells, which is through April.

22 And it indicates, especially in some of the
23 better wells, we have in excess -- or a GOR in excess of
24 2000 to 1, almost fieldwide. There are a few exceptions to
25 that in some of the poorer producers to the south and a

1 little bit east of the -- what we consider the main area of
2 the field.

3 Q. Let's move now to Exhibit Number 11. Will you
4 identify and review that?

5 A. Exhibit Number 11 is a tabulation of production
6 for the Collins and Ware M&M Number 1 well since it started
7 producing. Included for most of the time period is the
8 oil, gas and water rate, along with flowing tubing
9 pressure. Starting in early June we didn't report flowing
10 tubing pressure or water production.

11 And this indicates, in general, a fairly low GOR
12 relative to what it's making now. In the next exhibit
13 we'll see that represented graphically.

14 The other thing that this shows too is, you know,
15 indicated in the periods when the well was shut in, we had
16 a shut-in tubing pressure of roughly 1700 pounds. And as
17 we were producing it on a fairly small choke size, anywhere
18 from 10/64 to 14/64, our flowing tubing pressure exhibited
19 very little drawdown over the shut-in tubing pressure, yet
20 we still have a GOR significantly in excess of 2000 to 1.

21 Let's go on now to Exhibit Number 12, the graphic
22 presentation of the production information on the M&M
23 Number 1, and I'd ask you to review that for the
24 Commission.

25 A. Exhibit Number 12 is a graph of Exhibit Number

1 11, showing the oil, gas and water rates as a function of
2 time. It's listed by day. And the gaps of the data, if
3 you look at the bottom of the scale on the X axis, indicate
4 when the well was shut in.

5 This exhibits fairly normal or typical solution
6 gas drive depletion behavior, and it also indicates some
7 rate sensitivity to lower rates. As the well produces, you
8 can see a gradual increase in GOR, you know, up until June
9 when we shut it in or pinched it back to produce within the
10 statewide 2000-to-1 GOR allowable. You can also see, as we
11 produced it, a gradual decrease in oil production and
12 increase in gas production, which would cause the fairly
13 low but steady increase in gas-oil ratio.

14 In June, when we started pinching it back, you
15 know, to be within our allowables, you can see the top line
16 in blue, which is the representation of GOR, the GOR
17 increased dramatically as we pinched the rate back. And if
18 you refer to Exhibit 11, the rates between June 29th and
19 July 3rd still represent gas production that's a little in
20 excess of the 284-MCF-a-day statewide depth bracket
21 allowable, and the GORs are in excess of 50,000 to 1.

22 As we continued to produce, we opened the choke
23 up a little bit for the next week or so, starting July the
24 4th, which represents a rate that's approximately double
25 the 2000-to-1 GOR limit allowable, and our GORs come back

1 down, not quite to where they were before, but to a more
2 reasonable number, consistent with what the well is making
3 whenever it's producing at a significantly higher rate.

4 Again, we pinched the well back, this time
5 somewhat below what the allowable was, 2000-to-1 depth
6 bracket allowable is, and the GOR again increased. And
7 again we opened it back up some, and the GOR came back down
8 in line with what the well was producing before we pinched
9 it back. And this could be an indication of waste of
10 reservoir energy by not efficiently moving the liquid
11 hydrocarbons and to the surface for sale.

12 Q. When you cut the well back, in fact, the oil
13 production drops dramatically, does it not?

14 A. Yes, it does.

15 Q. Once this happens, in your opinion, can you
16 economically go back and produce this at a later time?

17 A. If it continues for a long period of time at the
18 higher GOR, we're dissipating reservoir energy faster than
19 the liquid is being removed and possibly could result in
20 permanent loss of economic reserves, anyway.

21 Q. Now, you've indicated that the reservoir drive
22 mechanism is a solution gas drive?

23 A. Yes, sir, we have.

24 Q. Does this reservoir perform in a fashion which is
25 consistent with other solution gas drive reservoirs?

1 A. Yes, it does. The typical behavior of a solution
2 gas drive reservoir is a steady -- the gradual increase in
3 GOR until you reach a mobile gas saturation, at which time
4 the GOR increases rapidly.

5 The gentle decline in oil production and the
6 slight incline in gas production, again, are typical of a
7 solution gas drive reservoir.

8 Q. What is Exhibit 13?

9 A. Exhibit 13 is an excerpt from the *Applied*
10 *Petroleum Engineering* book by Craft and Hawkins, which has
11 been the reservoir-engineering textbook for a number of
12 years in the petroleum engineering curriculum.

13 Q. Basically, what does this exhibit show?

14 A. This exhibit describes in detail the producing
15 characteristics of a solution gas drive reservoir. It
16 includes real life examples.

17 The main points that it makes are on pages 117
18 and 118 and again on 391 and 392. It describes what we
19 refer to now as differential depletion, which results in
20 increases in producing GOR early in the depletion history
21 of solution gas drive reservoirs, you know, because of
22 relative permeability changes and differences in the state
23 of depletion at points away from the wellbore.

24 On page 119 it also describes in detail the
25 depletion characteristics of an actual solution gas drive

1 reservoir.

2 On page 120, it also shows that -- in this same
3 example -- that attempts to control GOR were unsuccessful.
4 And it also goes on to state that it's typical for one not
5 being able to control the GOR in solution gas drive
6 reservoirs.

7 And on page 123 it also states that the producing
8 rate does not have a material effect on theoretical
9 ultimate recovery but has a very definite effect on
10 economic recovery.

11 Q. Could you identify Collins and Ware Exhibit 14?

12 A. Exhibit 14 is Society of Petroleum Engineering
13 Paper Number 1887.

14 Q. What does this show?

15 A. In the abstract and in the conclusions here is an
16 extensive study on solution gas drive reservoir and
17 ultimate recovery. It indicates that the solution gas
18 drive reservoirs are insensitive to initial production
19 rate.

20 Q. It talks about the reservoir and it says many are
21 horizontal, homogeneous zones. After these thin zones are
22 depleted, are they predominantly gas-producing, if they
23 become substantially depleted?

24 A. If we refer back to Exhibit Number 7, you'll see
25 that the producing interval -- we see that the producing

1 interval in the M&M Number 1 well, which is the real well
2 in issue here, consists of 15 individual porosity
3 stringers, which in effect could be considered 15 separate
4 reservoirs, and each one of those can be at various stages
5 of depletion.

6 And because of relative permeability, the effects
7 created during drawdown -- you know, as gas saturation
8 increases and you reach the critical gas saturation where
9 gas is mobile, relative permeability to gas increases and
10 the relative permeability to oil decreases, which results
11 in a higher producing GOR.

12 And as this mechanism goes on, each one of these
13 individual stringers, or one where the relative
14 permeability to gas has increased significantly, it's going
15 to be -- although it's oil-bearing, it's going to be
16 predominantly gas-producing because of these relative
17 permeability effects.

18 And you have -- Again in the *Craft and Hawkins*
19 example, it talks about thinner zones, higher permeability
20 zones, depleting faster than thinner -- or thicker, lower-
21 permeability zones.

22 In effect here, we have 15 separate reservoirs
23 that some stringers can be producing predominantly oil,
24 some can already be producing at a high GOR, that would
25 explain some of the high-GOR behavior we see in this well

1 relative to some of the others in the reservoir.

2 Q. Mr. Lowery, would you identify Collins and Ware
3 Exhibit 15 and explain why it is included in the exhibit
4 package?

5 A. Exhibit Number 15 is an older -- it's a
6 forerunner of the Society of Petroleum Engineers -- and
7 this paper was an investigation into high-rate production
8 in limestone reservoirs and its effect on recovery, and
9 this is predominantly a laboratory paper.

10 But their conclusions are that the faster you
11 draw down a solution gas drive reservoir, the higher the
12 recovery is. But they also put a caveat in there that at
13 real life producing rates can't come close to being the
14 size -- what they measured in the laboratory.

15 Q. Now, is this reservoir rate-sensitive?

16 A. It doesn't appear to be rate-sensitive to higher
17 rates. But it appears that when you pinch it back at lower
18 rates, the GOR increases, which could be an indication of
19 rate sensitivity on the low end. But it doesn't appear
20 that it's rate-sensitive to high rates.

21 Q. Will approval of the requested increase in GOR
22 cause the waste of reservoir energy?

23 A. I don't believe it will.

24 Q. How are you currently producing your wells in
25 this pool?

1 A. The two wells that we have completed in the Tubb
2 are both flowing. The Payday Number 1 is on a 14/64 choke,
3 and the M&M currently is on a 10/64.

4 Q. Does Collins and Ware have plans for additional
5 development in the pool?

6 A. We're continuing to drill out there, although, as
7 our geologic testimony indicated, we seem to have defined
8 the limits of the Tubb formation out here, although -- as
9 we continue to drill these wells through the Tubb and
10 evaluate and test the Tubb in offset wells. But we're
11 continuing that with the Blinebry development as a backup.

12 Q. Will the requested increase in gas-oil ratios
13 solve the problem Collins and Ware is facing with GORs in
14 the East Warren-Tubb Pool?

15 A. Yes, it will. It will give us enough gas rate to
16 more efficiently produce our M&M Number well [*sic*] for
17 sure.

18 Q. Now, the Division order which denied the
19 Application of Collins and Ware following the Examiner
20 Hearing found that the Applicant presented no reservoir
21 engineering data to characterize the nature of the Tubb
22 reservoir. Has that data now been presented?

23 A. I believe it has.

24 Q. Will approval of this Application, in your
25 opinion, be in the best interest of conservation, the

1 prevention of waste, and the protection of correlative
2 rights?

3 A. I do.

4 Q. Were Collins and Ware Exhibits 9 through 15
5 prepared by you or compiled under your direction and
6 supervision?

7 A. Yes, they were.

8 MR. CARR: At this time, Mr. Chairman, I'd move
9 the admission as evidence of Collins and Ware Exhibits 9
10 through 15.

11 CHAIRMAN LEMAY: Without objection, Exhibits 9
12 through 15 will be admitted into the record.

13 MR. CARR: One last thing.

14 Q. (By Mr. Carr) Mr. Lowery, you were present when
15 Chairman LeMay asked Mr. Moylett some questions concerning
16 the pool rules and the limits of the existing pools in the
17 area. Could you respond to that question?

18 A. I understood the question to be, Was Blinebry
19 production included in the maps that were presented, and
20 why our field wasn't included in the Warren-Tubb-Blinebry
21 Oil and Gas Pool?

22 And according to Paul Kautz again, the Division
23 Geologist in Hobbs, indicated that the Warren-Tubb-Blinebry
24 Oil and Gas Pool was formed as a secondary or a waterflood
25 unit, and the limits of the field at that time were frozen

1 because of it being a waterflood, and we couldn't be
2 included in that field.

3 Q. So that's why we have two pools and one
4 reservoir; is that right?

5 A. That's right.

6 MR. CARR: Mr. Chairman, that concludes my direct
7 examination of Mr. Lowery.

8 CHAIRMAN LEMAY: Thank you, Mr. Carr.
9 Questions from fellow Commissioners?
10 Commissioner Bailey?

11 COMMISSIONER BAILEY: I have no questions.

12 CHAIRMAN LEMAY: Commissioner Weiss?

13 EXAMINATION

14 BY COMMISSIONER WEISS:

15 Q. Yeah, this differential-flow business, if you
16 look at your Exhibit 7 --

17 A. Yes, sir.

18 Q. -- did you do any selective testing throughout
19 this zone? In other words, is the gas coming out of the
20 top perforation, or as far that --

21 A. The way we completed this -- the perforations are
22 marked on the exhibit -- we put blocks of perforations
23 opposite the highest porosity. But then to get it to
24 produce we had to frac the whole thing.

25 So, you know, if you can imagine a big wedge out

1 here, all these reservoirs are in communication with one
2 another, and it's -- you know, after we frac it, it's not
3 possible to get vertical segregation, you know, by
4 isolating perfs.

5 Q. I understand that. But before you did that, did
6 you do any DST or anything to tell you whether the gas is
7 on the top, on the bottom or --

8 A. No, we didn't.

9 And I might add, too, that just from the size of
10 the stringers here, that, you know, a significant secondary
11 gas cap, you know, in my opinion wouldn't be formed, just
12 from the lack of the thickness in individual stringers.

13 You know, you think of the secondary gas cap
14 being formed in a 50-foot-thick or 100-foot-thick
15 homogeneous reservoir.

16 COMMISSIONER WEISS: That was my only question.
17 Thank you.

18 EXAMINATION

19 BY CHAIRMAN LEMAY:

20 Q. Just a couple quick ones here. What you were
21 responding to Commissioner Weiss, you were saying these
22 stringers, little compartments that, in essence, you don't
23 have very good vertical permeability? Is that why you
24 wouldn't get any secondary gas cap or any particular
25 segregation of the flows?

1 A. There's some natural vertical permeability
2 barriers here, just from changes in lithology, you know, in
3 between and before we, you know, drilled the well through
4 it and did our completion.

5 But because of the fracture stimulation that we
6 put on it, you know, the theory is, we put a nice, big
7 penny-shaped frac behind there as vertical plane, you know,
8 penetrating several hundred feet into the formation.

9 The best example of this graphically is this
10 being the wellbore here, and this being the plane of our
11 fracture and the table being the actual reservoir, if you
12 stack, you know, layers on the table and you put this wedge
13 through them, back here behind pipe you have a vertical
14 conduit that has all these interconnected.

15 And because of that, you know, our isolation
16 techniques are only good at the wellbore. If you've done
17 something outside the pipe such as a frac job, there's no
18 way to vertically segregate, to test for, you know, changes
19 in gas production or whatever. I mean, it's vertically
20 communicated in the back.

21 But also, reservoir pressure itself prevents
22 crossflow because you're producing this well through this
23 fracture. You know, you draw down a significant -- You
24 know, the producing pressure in the wellbore is much less
25 than what it is in the reservoir. So all your flows are

1 going to be coming through these stringers to this vertical
2 fracture that we have here that's much lower pressure than
3 back behind -- you know, in the formation adjacent to that.
4 So you shouldn't have crossflow.

5 I mean, it's possible, you know, if you have a
6 higher pressure zone. I'm assuming that because these
7 stringers were deposited geologically at essentially the
8 same time, that their fluid characteristics and pressure
9 characteristics should be identical. If not identical,
10 they're very similar.

11 And, you know, in that case you're not going to
12 have a higher-pressure zone feeding into a lower-pressure
13 zone because we don't have the well shut in, and anything
14 that flows into our vertical fracture that we've placed and
15 into the wellbore itself is going to the surface and down
16 the sales line, as opposed to crossflowing into another
17 formation. And in that sense --

18 Q. Have you seen any effect of the flood that was
19 instituted down there, in terms of --

20 A. We don't see --

21 Q. -- the pressure of water? You don't see the
22 effect of the flood at all?

23 A. No. In my investigation of what actually went on
24 in the waterflood -- and I'm doing this by memory; my
25 numbers might be slightly off. But I think there were six

1 injectors in those two sections to the south and east of
2 us, or south and west of us, in the Warren-Tubb-Blinebry
3 Pool.

4 And you know, my estimation, having dealt with
5 waterfloods quite a bit, that's loosely considered a
6 waterflood. I would expect it is more along the lines of a
7 disposal project to handle produced water.

8 But as far as being an effective waterflood and
9 that waterflood affecting what we're doing up here, I see
10 absolutely no effect at all, and minimal effect in the
11 Warren-Tubb Unit.

12 Q. One final question. Your maps -- the maps
13 presented -- your partner does show yellows. Is that
14 yellow the -- Is that acreage ownership, or is that just
15 the extent of the --

16 A. That's the extent of the Warren-Tubb East Pool.

17 Q. Is there any other operator besides Collins and
18 Ware in that development, East Warren-Tubb Pool?

19 A. Yes, there are. There are several others.

20 Q. Do you know if they support your Application?

21 A. We haven't --

22 MR. MOYLETT: Stevens and Tull is. They're in a
23 well --

24 THE WITNESS: Yeah, Stevens and Tull operates
25 offset wells, and they're also in ours. And we have -- I

1 personally haven't; Mike has talked with them, and they
2 support that.

3 CHAIRMAN LEMAY: That's all I have. Thank you
4 very much. You may be excused.

5 MR. CARR: Mr. Chairman, that concludes our
6 presentation in this case.

7 CHAIRMAN LEMAY: Thank you, Mr. Carr. Will you
8 prepare a proposed order?

9 MR. CARR: Yes, sir, I will.

10 CHAIRMAN LEMAY: Couple weeks, maybe --

11 MR. CARR: Yes.

12 CHAIRMAN LEMAY: -- submit it within two weeks?

13 If there's nothing else, we shall take the case
14 under advisement, and you may be excused. Thank you very
15 much.

16 (Thereupon, these proceedings were concluded at
17 10:00 a.m.)

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CERTIFICATE OF REPORTER

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

I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Commission 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 August 16th, 1997.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 1998