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BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION
Santa Fe, New Mexico

February 3, 1971

EXAMINER HEARING

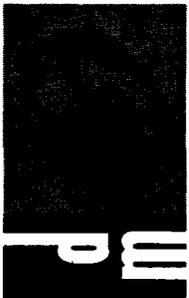
IN THE MATTER OF:)
)
)

Application of BTA Oil Producers)
for a pressure maintenance project,)
Lea and Roosevelt Counties,)
New Mexico.)
)

Case No. 4496

BEFORE: Daniel S. Nutter, Examiner

TRANSCRIPT OF HEARING



1 MR. NUTTER: We'll call the next case, 4496.

2 MR. HATCH: Case 4496, Application of BTA Oil
3 Producers for a pressure maintenance project, Lea and Roosevelt
4 Counties, New Mexico.

5 MR. KELLAHIN: Examiner, please, Jason Kellahin of
6 Kellahin and Fox, Santa Fe, appearing for the Applicant. We
7 have one witness we'd like to have sworn.

8 (Witness sworn.)

9 (Whereupon, Applicant's Exhibits
10 1 through 21 were duly marked
for identification.)

11 JERRY I. MORITZ

12 called as a witness, having been first duly sworn, was
13 examined and testified as follows:

14 DIRECT EXAMINATION

15 BY MR. KELLAHIN:

16 Q Would you state your name, please.

17 A Jerry Moritz.

18 Q By whom are you employed and in what position,
19 Mr. Moritz?

20 A I'm employed by BTA Oil Producers as Secondary
21 Recovery Engineer in Midland, Texas.

22 Q Have you ever testified before the Oil Conservation
23 Commission and made your qualifications as an engineer a
24 matter of record?

25 A Yes.

1 MR. KELLAHIN: Are the witness' qualifications
2 acceptable?

3 MR. NUTTER: Yes, they are.

4 Q Mr. Moritz, briefly, what is proposed by BTA in
5 the application in Case Number 4496?

6 A Our application is asking that we be allowed to
7 inject water into BTA Oil Producers' 685 Ltd. Bond Well No. 5
8 which is located in the southwest quarter of Section 4,
9 Township 9 South, Range 36 East.

10 The reason for this application is that, as
11 exhibits will show later, BTA and many other operators in the
12 Vada Trend, which this area is included in, have noticed that
13 the Bough "C" production has the characteristic of declining
14 at a very rapid rate. In several areas of the field, the
15 production is now below thirty barrels of oil per day, and
16 in this area, we feel, and we hope to show by exhibits, that
17 the production is at the point where it is going to begin this
18 very rapid decline.

19 BTA would like to conduct this pilot operation so
20 that a secondary recovery method can be proven or disproven
21 for this reservoir. If the pilot is successful, it is
22 anticipated that upward of 300 wells in the Vada Trend will
23 be unitized for secondary recovery operations. However, if
24 this pilot is unsuccessful, it is anticipated that in a short
25 time, the majority of the wells in the Vada Trend will have to

1 be abandoned.

2 Q Now, referring to what has been marked as Applicant's
3 Exhibit Number 1, would you identify that exhibit.

4 A Exhibit Number 1 is a land plat of the so-called
5 project area as we have asked for in this application.

6 We have shown it with a bordered area. Also, we
7 have shown the initial injection well in a red triangle.

8 The yellow area is BTA Oil Producer leases. We
9 have actually even shown the ones outside of the project area
10 so that you can have a better idea where all of our properties
11 are.

12 Q Now, where is this area located in relation to the
13 Vada Pool?

14 A This is actually the easternmost edge of the Vada
15 Trend or Vada Pool.

16 Q Now, referring to what has been marked as Exhibit
17 Number 2 through 14, would you identify and discuss the
18 information that is shown on those exhibits.

19 A Exhibit 2 through 14 are production plots, oil,
20 gas and water of the thirteen leases included in this project
21 area.

22 I think, thumbing through some of these, I will
23 point out some specific ones, but you can see in general the
24 oil production has been very good, reaching, in some cases,
25 as high as 300 barrels of oil per day. As you can also see,

1 the water has been equally as good or greater than the oil
2 production in the latter part of '70; in general, you can see
3 that the production has begun to drop, the water production
4 has dropped even more than that, and the gas has begun to
5 increase.

6 In our mind, indicating that this is a straight
7 depletion drive reservoir. Specifically, I'd like to have
8 the Examiner look at Exhibit Number 4 as an example of the
9 possible decline in this production.

10 This is BTA's 686 Harris lease which contains two
11 wells. As you can see, the production dropped from
12 approximately a maximum of twenty thousand barrels a month
13 to its present rate of about six thousand barrels a month
14 which represents about a sixty-seven percent decline in
15 production, oil production.

16 The water production also declined seventy-nine
17 percent during that period.

18 Now, I will refer you to Exhibit Number 6. Exhibit
19 Number 6 again shows the same characteristic in that the
20 production has dropped off in the last few months, dropping
21 approximately seventy-seven percent.

22 The water production likewise has dropped ninety-two
23 percent.

24 There's another characteristic I'd like to show here
25 in June and July of 1970. The production actually picked

1 up, and this is due to the well being returned to a flowing
2 status. There is, on some of these leases, the unique point
3 whereby the water cut, the bottom hole pressure and the gas/oil
4 ratio simultaneously agree that the wells will actually return
5 to a flowing state. It does not happen on all the wells,
6 but it does happen on some of them and this happens to be
7 one of them.

8 Q Now, referring to what has been marked as Exhibit 15,
9 would you identify that exhibit.

10 A Exhibit Number 15 is a plot of all thirteen leases
11 in the project area. The total of all the leases, oil, gas
12 and water.

13 Again, you can see that the oil production has
14 dropped from a maximum of about a hundred and sixty thousand
15 barrels a month to the present rate of about a hundred and
16 ten thousand or about a thirty percent decline.

17 Likewise, the water production has dropped some
18 seventy-eight percent and, as you can see, the gas/oil ratio
19 and gas production has increased tremendously.

20 I might point out the December figures were not
21 available at the time of preparation of these exhibits, but
22 the oil production for December has dropped another thirteen
23 percent.

24 MR. NUTTER: What would that level be, Mr. Moritz?

25 THE WITNESS: It would be about ninety thousand

1 barrels, and the water production dropped on down to about
2 sixty thousand.

3 Q (Mr. Kellahin continuing) Now, would you discuss
4 the information that is shown on Exhibit Number 16.

5 A Exhibit Number 16 is a time plot of the bottom hole
6 pressures that BTA has measured on the wells in the project
7 area only. We do have the practice of drill stem testing
8 most all of our wells on initial completion and, likewise,
9 periodically, when the pumps need changing, the hydraulic
10 pumps, we have run bottom hole pressures on all of the wells
11 and you can see that rather significant decline in pressure
12 here, again indicating that this is a straight forward
13 depletion drive reservoir.

14 I might also point out that the project area of
15 pressure is nearing a thousand pounds and it has been our
16 experience from the operation of about eighty wells in this
17 Bough "C" Trend that once the bottom hole pressure gets to
18 about twelve hundred pounds, this is the point that the
19 production does start to decline oil and water and the G.O.R.
20 starts to skyrocket.

21 I have included here Exhibit Number 17 which is
22 of BTA Oil Producers' 673 Limited Vada "C" Number 3. This well
23 is approximately twelve miles west of the project area, in an
24 area that was drilled about one year earlier than the project
25 area, and this area or this curve, as you can see, has

1 declined tremendously.

2 The well went from essentially a top allowable,
3 well down to almost an uneconomical state in something like
4 ten months. Again, I might point out that this well has the
5 characteristic of going back to a flowing status approximately
6 in August of '69.

7 Q Has it continued to flow since then?

8 A Yes.

9 Q Now, referring to what has been marked as Exhibit
10 Number 18, would you -- well, prior to that, based on the
11 information that is shown on the preceding exhibits, what is
12 your conclusion of the characteristics and feasibility of the
13 pressure maintenance project in this area?

14 A My conclusions from these exhibits are that we can
15 expect, or BTA can expect the production in the area to start
16 this rapid decline and we estimate that within six to eight
17 months, most of the wells in the project area will be at the
18 state we have to consider abandonment of these wells.

19 It is likewise my conclusion that the pressure and
20 the state of the production in this project is at the point
21 where secondary recovery operations should be started. Since
22 the time to form a communitized project would take about
23 **six to a year's** time, at the minimum, BTA feels compelled to
24 initiate a project of this type in an effort to obtain some
25 data regarding the floodability of this reservoir.

1 Exhibit Number 17, we feel, is a good example of
 2 what can happen to the production and, likewise, this shows
 3 what can happen to a lease and how quickly it can be put into
 4 jeopardy as regards to losing the lease and, of course, if
 5 we lose the leases, we cannot conduct secondary recovery
 6 operations on these.

7 Q Is that one reason you feel it essential that a
 8 pilot project be started immediately?

9 A Yes.

10 Q Now, referring to Exhibit Number 18, would you
 11 discuss that exhibit.

12 A Exhibit Number 18 is a schematic of the initial
 13 well that we propose to inject into, the 685 Limited Bond
 14 No. 5. I have marked all the casing strings.

15 We did cement twelve and three-quarter inch casing
 16 at 361 feet and this cement was circulated.

17 We set eight and five-eighths casing at 4085
 18 and cemented it with four hundred sacks with an estimated
 19 top of the cement at 1550 and we set five and a half casing
 20 at 9850 with three hundred sacks, with the cement top at
 21 8290.

22 We perforated the Bough "C" interval from 9221 to -33,
 23 and if this application is approved, we will set a Baker Model R
 24 packer at 9780 and run two and seven-eighths tubing on it and
 25 we will inject below this packer.

1 We feel that we have adequately protected all of
 2 the various formations that we've penetrated in this well.
 3 We will load the annulus with an inhibited fluid and have
 4 pressure gauges on the annulus for periodic checks to see if
 5 pressure is built up on the annulus.

6 Q Will you use an internally coated tubing?

7 A We will not use an internally coated tubing in this
 8 case. We have looked at the water, and the water is not of
 9 the corrosive characteristic and we do not anticipate any
 10 problems from this standpoint.

11 Q Now, in the application, Mr. Mortiz, the Applicant
 12 asked for administrative procedure whereby additional injection
 13 wells may be included in the project and for injection of gas
 14 or air. Will, essentially, the same type of completion as
 15 shown on Exhibit 18 be utilized for those additional wells?

16 A Yes, essentially the same.

17 Q And is your casing of cementing program on the other
 18 wells in the project area essentially the same as shown on this
 19 exhibit?

20 A Yes, sir, it sure is.

21 Q Now, referring to what has been marked as Exhibit 19,
 22 would you identify that exhibit.

23 A Exhibit Number 19 is a reduced copy of the log on
 24 the 685 Limited Bond No. 5 which we propose to use as the
 25 initial injection well.

1 We have marked the normal tops of formations
2 encountered in this well, plus the perforated interval and the
3 packer setting point that we're proposing.

4 Q Now, would you please explain what is shown on
5 Exhibit Number 20.

6 A Exhibit Number 20 is a summary of the calculations
7 of the fluid volumes involved in the project area for the
8 Bough "C" Formation.

9 As can be seen, we are estimating that the project
10 area has approximately nineteen million eight hundred sixty
11 thousand barrels of pore space contained in the Bough "C".
12 Of this nineteen million barrels of pore space, we believe
13 that approximately eleven million nine hundred thousand barrels
14 was oil, and the remaining seven million nine hundred thousand
15 barrels contained water.

16 Now, we have converted the next two figures, these
17 stock barrels which is approximately six millions six hundred
18 thousand barrels of stock tank oil and approximately seven
19 million nine hundred thousand barrels of water.

20 The next group of figures are the recoveries to
21 12/1/70 showing that we recovered approximately three million
22 barrels of oil or about a hundred and fifty-two thousand
23 barrels per well and approximately five million five hundred
24 thousand barrels of water or two hundred twenty-five thousand
25 barrels of water per well.

1 We estimate that the oil recovery has been forty-six
 2 percent of the oil in place at 12/1/70, and approximately
 3 sixty-nine percent of it water. We also are estimating that
 4 a successful secondary recovery project will recover one
 5 million three hundred and eighty-nine thousand barrels of
 6 additional oil or approximately seventy thousand barrels per
 7 well in the project area.

8 O Now, Mr. Moritz, you have discussed, in regard to
 9 converting the 685 Bond No. 5 Well to injection and your
 10 initial plans to inject water into this well, will you tell
 11 the Examiner what fluid you plan to use and where it will come
 12 from and the volumes and pressures expected to be used in
 13 connection with this project.

14 A BTA Oil Producers operates an extensive salt water
 15 disposal gathering system in this area, collecting Bough "C"
 16 water.

17 We plan to divert part of this water to injection
 18 in this Number 5 Well. We presently have about seventy-five
 19 hundred barrels of water a day available. Of course, this
 20 is rapidly declining.

21 We expect to initially begin with about fifteen
 22 hundred barrels of water a day in the Number 5 and, initially,
 23 we expect no pressure at all.

24 MR. NUTTER: How many barrels a day?

25 THE WITNESS: Fifteen hundred.

1 Q Now, in your application, you ask for considerable
2 flexibility in the operation of this project; namely, the
3 ability to change injection wells and to change injection
4 fluids, possibly to gas or air. Would you explain the
5 necessity for this?

6 A Yes. I have already talked about the time factor
7 involved in this project in that the production from this
8 reservoir is expected to decline very rapidly, expect it in
9 the next few months, and we have already pointed out that we
10 feel that there is sufficient oil left in the reservoir or
11 will be left in the reservoir to justify secondary recovery
12 operations.

13 Therefore, we are asking for this flexibility so
14 that we can properly evaluate the secondary recovery technique
15 or recover the maximum amount of oil. Flexibility asked in
16 regard to changing wells is tied in with the request for
17 flexibility of injecting different fluids.

18 BTA has some limited data that indicates possibly
19 that the water is not the fluid to inject into this reservoir.
20 Therefore, since BTA would like to evaluate this reservoir
21 in the best manner, we are requesting that we be allowed to
22 inject different fluids so that in case one fluid does not
23 work, we have the ability to try and change to another.

24 Since we would probably not want to inject gas into
25 the well that had previously injected water, we therefore need

1 the flexibility to change wells. BTA, of course, would
2 advise the Commission and the offsets by administrative
3 procedures of its intent to change operations.

4 Q Now, from your Exhibit Number 1 it would appear
5 that the acreage involved in the project area is federally-
6 owned.

7 A Yes. Most of the acreage is federal.

8 Q Have you received approval from the Department of
9 the Interior Geological Survey?

10 A Yes, we have discussed this project with the federal
11 government, and Exhibit 21 is their letter to us in this
12 regard.

13 Q Mr. Moritz, do you know of any other efforts
14 directed toward either pressure maintenance or secondary
15 recovery in the Bough "C" reservoir?

16 A Yes, I know of one project called the Imbe Unit
17 which is approximately sixteen miles south or west of here.
18 This unit was actively engaged in attempt to form a unitized
19 project. However, we have now received word that the operator
20 has given up on attempts to form this unit. We know of no
21 projects now that are attempting or are injecting fluids into
22 the Bough "C" for secondary recovery purposes.

23 Q This would be a pilot project to determine if it is
24 feasible, is that correct?

25 A Yes.

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1 Q In your opinion, will the approval of this
2 application result in the prevention of waste or correlative
3 rights protected by the proposal you have made?

4 A Yes.

5 Q Were Exhibits 1 through 21, inclusive, prepared by
6 you or under your supervision?

7 A Yes.

8 MR. KELLAHIN: I would like to offer Exhibits 1
9 through 21, inclusively.

10 MR. NUTTER: BTA's Exhibits 1 through 21 will be
11 admitted.

(Whereupon, Applicant's Exhibits
1 through 21 were duly admitted
into evidence.)

14 MR. KELLAHIN: That completes the direct examination
15 of the witness, Mr. Nutter.

16 CROSS EXAMINATION

17 BY MR. NUTTER:

18 Q Mr. Moritz, which well other than the well shown on
19 Exhibit 17 was the one that you mentioned that started
20 flowing and increased its production after you removed the
21 pump?

22 A On Exhibit 17? I believe it is --

23 Q Was it Exhibit 4?

24 MR. COOLEY: 6, I believe it was, Mr. Nutter.

25 THE WITNESS: Yes, 6.

1 Q Exhibit 6?

2 A Yes, 6.

3 Q Now, I notice the same characteristic there on
4 your Vada "C" Number 3 and this Allen Lease here on Exhibit
5 Number 6, that when you took the pump off and the well
6 started flowing, that there was a drastic increase in the
7 amount of gas produced at that time. Did the increase in
8 the production of gas result from putting the well on a flowing
9 status and taking the pump off, or did the well, going on
10 flowing status, result from the increase in gas production?

11 A It may be a little of both. There is, of course
12 when we have the pumps in there, a certain amount of
13 restriction to this gas production because we actually are
14 having to pump the gas and we feel that this probably is one
15 of the reasons we get a little production increase when we
16 put these back on flowing, in that we are not holding back
17 the fluids back there, that they're freely coming out. We
18 have a slight tendency with the pump to hold the fluid back.

19 Q Well, if you are holding it back, preventing this
20 dissipation of the gas energy from the gas reservoir, you
21 are actually helping the reservoir by pumping it, aren't you,
22 if it is going to let the gas break up and overproduce gas by
23 putting it on a flowing status?

24 A I guess we would be.

25 Q So all this pressure that you have lost, would

1 have to be pressure you'd have to make up before you can get
2 any response with your water injection program?

3 A Yes. We think that one of the big questions that
4 we have to answer with this project is: What is the time of
5 breakthrough of this water? This is one of the big problems.

6 If the time of breakthrough is instantaneous, which
7 we can foresee and some other people have discussed, then I
8 would say the possibilities of secondary recovery with water
9 are almost nil.

10 However, if this idea that the water breakthrough
11 does not occur and we don't prove it out, then I think we
12 have a much better chance of recovering this oil and,
13 subsequently, if water does break through, I think there's a
14 chance that gas or air injection may be the answer in that
15 case, and this is just an alternate programming case; water
16 breakthrough does like essentially what everybody says it will.

17 Q Well now, on this recovery, you estimate that you
18 recovered forty-six percent of the stock tank oil in place,
19 up to December of 1970, and that the average in the project
20 area is two hundred and seventy-five thousand barrels a day.
21 This is a rather high recovery factor for solution drive
22 reservoirs, isn't it?

23 A Yes.

24 Q So you've had exceptional performance, really?

25 A Yes, and I personally believe or we believe that the

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1 reason for this was the water contained in the reservoir,
 2 that you had a certain period in the reservoir production
 3 where you actually were operating by water expansion.

4 Q And this connate water, there was so much in there
 5 under so much pressure, the water expansion helped the flow?

6 A Right. The water expansion brought about the oil
 7 well for a short period of time.

8 Q But all that is connate water; no edge water or
 9 water drive, active water drive?

10 A We see no evidence of active water encroachment,
 11 especially when we covered it with our study of dry holes
 12 around this area, we found no place where there could be water
 13 encroachment because all the evidence shows it has not been
 14 encroaching.

15 Q Has the Bough "C" of the Pennsylvania been subjected
 16 to water injection or other forms of secondary recovery in
 17 Lea County or in any other area?

18 A No, not that I know of.

19 Q There was no project initiated in the Allison area?

20 A No. No. There's one slight difference I might
 21 point out in the Allison; the Allison prediction is somewhere
 22 in the neighborhood of eighty percent and this was their
 23 thoughts, that they would not have much left to recovery
 24 anyway, so it was not attempted.

25 Q That area was drilled on eighty-acre spacing?

1 A Right.

2 Q As compared to a hundred and sixty here?

3 A Right.

4 Q Now, in this estimate of seventy thousand barrels
5 per well, secondary discovery, is that based on any scientific
6 procedure or just a guess?

7 A No. It is based on an attempt to arrive at what
8 we think the aerial sweep and the vertical displacements
9 will be. It is very difficult to make these predictions in
10 that the evidence of what water, gas or the other fluids are
11 going to do is very contradictory. Some people have shown us
12 evidence that water will not work at all, so you might say
13 in that case, the recovery would be zero.

14 But we have tried to make some predictions on the
15 basis of the data we can see.

16 Q What is your estimate of primary recovery without
17 any secondary stimulation per well here?

18 A I'd say about a hundred and seventy thousand.

19 Q Well, you've recovered two hundred and seventy-five
20 thousand.

21 A No. We've recovered, on the oil, a hundred and
22 sixty-two.

23 Q I beg your pardon. I'm looking at water. Oil is
24 a hundred and fifty-two.

25 A Right.

1 Q And you say a hundred and seventy thousand?

2 A Yes. This is based on this rapid decline point.

3 Q Now, the secondary recovery would be in addition
4 to the hundred and fifty-two thousand that you recovered or
5 in addition to the hundred and seventy thousand?

6 A In addition to the hundred and seventy.

7 Q So you'd get a total of two hundred seventy thousand
8 per well, approximately?

9 A Right. I might point out one other thing: We are
10 not wanting to enhance this project as an ultimate project.
11 Our ultimate concern is the area in which BTA operates, which
12 as I pointed out before, is about three hundred wells and
13 our ultimate concern is the formation of a unitized project
14 covering these three hundred wells.

15 I think conceivably if we could prove that this
16 project is successful, whatever we inject, we probably in a
17 short period of time would ask for the dismissal of this
18 project and we would instigate negotiation on unitization,
19 simultaneously, on three different units to unitize the
20 three hundred wells.

21 Q Well, for the time being -- have you ever examined
22 any of the Commission's rules for pressure maintenance projects
23 that have been promulgated in the past?

24 A No.

25 Q Some are rather complex and provide for conversion

1 of water injection into m.c.f. of gas to apply against high
 2 G.O.R.'s and such as that. They are rather complicated. Do
 3 you think you need any rules such as have been promulgated by
 4 the Commission for other projects for this pilot, or would
 5 you just be able to --

6 A No, we are not asking for this. We do have some
 7 spare allowable there. We're going to lose a hundred barrels
 8 allowable on production in this well.

9 Q You will produce this from offsetting wells?

10 A We think there's a chance. Our production people
 11 sav that the fluid migrates around enough to where we may
 12 make it up, but we are actually not worrying about it one way
 13 or another.

14 Q Would you like to see some of our rules that we put
 15 out for other projects to prove --

16 A No, not at this time.

17 Q -- offsetting wells? Not at this time; so your
 18 authority seeks to inject water into this well, and administrative
 19 procedure, converse to other wells, if not successful and if need
 20 be in the future, possibly convert to air or gas, is that right?

21 A Right. The reason we ask for the possibility of
 22 area is that we have been negotiating or talking with Warren
 23 in this area and the possibility of gas being available for
 24 injection is a little in question, it may be available; but
 25 at what price is the problem.

1 We would prefer not to inject air, but if it comes
2 to it and our results are negative on water, we may have to
3 go this way and we want this as an alternate to protect
4 ourselves.

5 MR. NUTTER: Very good. Are there any further
6 questions of Mr. Moritz?

7 MR. PORTER: I have one question.

8 CROSS EXAMINATION

9 BY MR. PORTER:

10 Q This well that you said had started flowing again,
11 do you know how long that well flowed initially before it
12 was put on pump, or was it put on pump immediately?

13 A The first one that I was referring to which is shown
14 as Exhibit 6, I believe?

15 Q Yes.

16 A This one, as I remember, it flowed something like
17 two or three weeks. It was a very short -- it was less than
18 a month, and then the water cut, as usual, increased to the
19 point where the well died and we had to put it on pump.

20 Q At the initial point of the time you put it on pump,
21 about what was the total fluid production per day?

22 A I'd say, oh, something like eight hundred barrels
23 of total fluid.

24 Q And now, what is the production? Apparently, I
25 looked at the graph, but --

1 A Oh, we're looking at, probably there's about seventy
2 barrels of oil and maybe twenty; so about less than a hundred
3 barrels of total fluid now.

4 Q Your water has declined apparently faster than the
5 oil has.

6 A Generally, this is the case. The water does decline
7 faster.

MR. PORTER: That's all.

9 RE CROSS EXAMINATION

10 BY MR. NUTTER:

11 Q Mr. Moritz, I have one more question with regard
12 to Exhibit 16 which is your bottom hole pressure history. Now,
13 you mentioned that you normally take bottom hole pressures at
14 the time you put pumps on the well. Was that your testimony?

15 A No. I said when we change pumps, I believe.

16 Q When you change pumps. So this would be a history
17 of -- that defeats my question, because I thought it was at
18 the time you put pumps on, and that this would be a history
19 of decline of pressure as the need came up for installation
20 of pumping equipment.

21 A No. No. I'd say the majority of the wells in this
22 area did not flow. There's probably not one out of ten that
23 flows initially.

24 Q So these wells that are represented here, these
25 twenty wells, had pumps prior to the time of this bottom hole

1 pressure as well as after the bottom hole pressure, there was
2 a pump change?

3 A Right.

4 MR. PORTER: Do you anticipate that some of these
5 wells that didn't flow initially will flow now or will flow
6 at a certain point of decline?

7 THE WITNESS: Some of them, yes, sir. I think
8 there may be some. There's this three-phase point that has
9 to be reached and, for some unknown reason, I say some of the
10 wells may have the G.O.R., and what we predict to be the
11 right bottom hole pressure, but they may have a cut, something
12 like thirty-five percent, and it seems like if it is thirty-
13 five percent, they won't flow. It takes about a twenty-five
14 percent cut to make it.

15 MR. NUTTER: If there's no further questions of the
16 witness, he may be excused. Do you have anything further,
17 Mr. Kellahin?

18 MR. KELLAHIN: Yes. As an owner of royalty under
19 acreage offsetting this project, I am in favor of it.

20 MR. HATCH: The Commission has received a letter
21 from Blackrock Oil Company supporting the Applicant in this
22 case.

23 MR. NUTTER: Does anyone else have any questions to
24 ask?

25 THE WITNESS: You also, hopefully, received one

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from Tenneco and I do have a copy of their letter that they sent me, a copy of that.

MR. NUTTER: You'd better give me that, because I had that Tenneco letter and it's plumb disappeared.

If there's nothing further in Case Number 4496, we will take the case under advisement.

