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I N D E X

VICTOR T. LYON

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1 MR. NUTTER: We'll call Case Number 5957.

2 Do you want to consolidate 57 and 58?

3 MR. KELLAHIN: Yes.

4 MR. NUTTER: We'll also call Case Number 5958.

5 MS. TESCHENDORF: 5957. Application of Continental  
6 Oil Company for downhole commingling, Rio Arriba County, New  
7 Mexico.

8 Case 5958. Application of Continental Oil Company  
9 for downhole commingling, Rio Arriba County, New Mexico.

10 MR. NUTTER: For purposes of taking the record,  
11 we've consolidated Cases 5957 and 5958.

12 MR. KELLAHIN: Tom Kellahin of Kellahin & Fox,  
13 appearing on behalf of Continental Oil. Let the record re-  
14 flect that I have the same witness as in the previous case.  
15 He has been placed under oath and has qualified as an expert  
16 witness.

17 MR. NUTTER: The record will so reflect.

18

19 DIRECT EXAMINATION

20 BY MR. KELLAHIN:

21 Q Mr. Lyon, would you refer to Exhibit Number One,  
22 identify it, and tell us what Continental is seeking to ac-  
23 complish?

24 A Well, Case Number 5957 is the application of Con-  
25 tinental for permission to commingle in the wellbore production

1 from the Otero-Chacra and South Blanco-Pictured Cliffs forma-  
2 tions in four wells on its AXI Apache "J" lease in Sections  
3 5, 6, 7, and 8 of Township 25 North, Range 5 West, Rio Arriba  
4 County, New Mexico.

5 Case 5958 is the application of Continental for  
6 permission to commingle in the wellbore production from the  
7 Gonzales-Mesaverde and the Otero-Chacra pools in eight of its  
8 wells on the same lease.

9 Exhibit Number One is a plat showing the AXI Apache  
10 "J" lease outlined in red and it consists of Section 5, 6, 7,  
11 and 8 in Township 25 North, Range 5 West, Rio Arriba County,  
12 New Mexico.

13 The exhibit also shows the wells on the lease and  
14 by the colored circles the wells which we are seeking per-  
15 mission to commingle in the wellbore. Wells which are circled  
16 in blue are dual completions in the Pictured Cliffs and Chacra  
17 formations. These are Wells Numbers 11, in Unit A of Section  
18 6; 9, in Unit O of Section 6; 10 in Unit A of Section 5; and  
19 12 in Unit K of Section 5.

20 The wells circled in green are dual completions in  
21 the Mesaverde and Chacra and these are Wells Numbers 20 and 21,  
22 in Unit C and I of Section 5; Wells Numbers 19 and 22, in Units  
23 D and L of Section 6; Well Number 25, in Unit A of Section 7;  
24 and Wells Numbers 23, 18, and 24, in Units D, A, and T, re-  
25 spectively, in Section 8.

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1 Q Would you refer to Exhibit Number Two and identify  
2 it?

3 A Exhibit Number Two is a tabulation showing pro-  
4 duction from each of the wells on the lease for the month of  
5 April, 1977.

6 The first column on the left shows the well number.  
7 The second column shows the dual completion order, and the  
8 third column shows the production from the South Blanco-  
9 Pictured Cliffs, and alongside on the righthand of that  
10 column there are some "X's" in parentheses and this shows  
11 that those wells are exempt marginal; the other wells are  
12 marginal. The next column shows the production from the  
13 Gonzales-Mesaverde and then the fifth column shows the pro-  
14 duction from the Otero-Chacra, and then to the right of that  
15 column, on the extreme righthand side of the exhibit, the  
16 figure in parentheses shows the percent that the Chacra pro-  
17 duction represents of the total gas production from the wells  
18 considering both zones, and I used the February figure because  
19 I feel that it is probably more representative than the  
20 April figure. We are beginning to experience higher line  
21 pressures in that area because of lower demand and the lower  
22 pressured zones are encountering some handicapping in pro-  
23 ducing.

24 Q Would you refer to Exhibit Three and identify it?

25 A Exhibit Number Three is a tabulation of the pres-

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1 sure information on the same format that was used on Exhibit  
2 Two.

3 Well Number, the pressure, this is the last shut-in  
4 pressure taken from the last deliverability test, for the  
5 Pictured Cliffs, the Mesaverde, and the Chacra. As you can  
6 see, there are not any extremely large differentials. The  
7 largest differential in pressure, and this is surface pressure,  
8 is on Well Number 24, which shows 976 pounds in the Mesaverde  
9 as compared to 258 pounds in the Chacra, and the Mesaverde  
10 has been shut in, in this well, for some time, therefore it  
11 probably is unusually high on a comparison with the other  
12 wells.

13 Q In your opinion, Mr. Lyon, is the pressure dif-  
14 ferential significantly low enough that there will not be  
15 migration between the zones or other wells producing?

16 A Yes. I think that's true.

17 Q Would you identify Exhibit Number Four?

18 A Exhibit Number Four is a decline curve of the  
19 Chacra in the AXI Apache "J" Number 18. It covers the period  
20 from 1972 through February of 1977.

21 Q Exhibit Number Five?

22 A Exhibit Number Five is a decline curve for the  
23 Mesaverde in the AXI Apache "J" Number 18, covering the same  
24 period.

25 Q Exhibit Number Six?

1           A       Exhibit Number Six is a decline curve for the  
2 Chacra in Well Number 24, covering the same period that I  
3 have shown on the other two exhibits.

4           Q       Number Seven?

5           A       Exhibit Number Seven is a decline curve on the  
6 Mesaverde for Well Number 24, and as it shows, it was shut in  
7 in November of 1973.

8           Q       Exhibit Number Eight?

9           A       Exhibit Number Eight is a decline curve on the  
10 Pictured Cliffs of Well Number 9. It shows the production  
11 is rather erratic.

12          Q       Exhibit Number Nine?

13          A       Exhibit Number Nine is a decline curve on the  
14 Chacra of Well Number 9.

15          Q       Mr. Lyon, have you made any calculations to deter-  
16 mine what the remaining reserves are to be allocated to the  
17 Chacra?

18          A       Well, for Well Number 9 it's estimated that the  
19 Chacra has remaining reserves of 76 million cubic feet, which  
20 we anticipate will be produced in, approximately, in an  
21 11-year period.

22          Q       And as to the Pictured Cliffs formation?

23          A       Pictured Cliffs has an estimated 45 million cubic  
24 feet reserves, to be produced in a 9-year period.

25          Q       Do you have a recommendation to the Examiner and

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1 the Commission with regard to how to allocate production be-  
2 tween the commingled zones?

3 A Well, as to Well Number 9, we estimate that the  
4 Chacra will produce about 20 mcf per day when the downhole  
5 commingling is affected, and we expect the Pictured Cliffs  
6 will continue to produce about the 35 mcf per day, which it  
7 is presently producing, so we would suggest that 35% of the  
8 production be allocated to the Pictured Cliffs; 65% to Chacra.

9 The Exhibit Two shows the current contribution of  
10 the Chacra to the two zones and we would expect that the same  
11 ratio would probably apply in the future.

12 Now, as to Well Number 24, we could make some  
13 estimate of the percentage based on the period of time that  
14 the Mesaverde produced in Number 24. I would suggest that  
15 we -- after the dual completion, or after the downhole com-  
16 mingling is affected, that we test the well for a month or  
17 maybe two months and then allocate the additional production  
18 to the Mesaverde and then apply that percentage for future  
19 production.

20 Q What is your proposed plan for commingling each of  
21 these wells?

22 A Well, the wells are completed in -- are dually  
23 completed in a conventional manner, and we will merely go in  
24 and kill the wells and remove the packers and run the tubing  
25 back in without the packer and place them on production on a

1 commingled basis.

2 Q In your opinion, Mr. Lyon, will approval of this  
3 application be in the best interests of conservation, the  
4 prevention of waste, and the protection of correlative rights?

5 A Yes, I believe it will, and I might point out, sir,  
6 we had originally planned to ask for downhole commingling  
7 in the three wells plus one other well, on which I have ex-  
8 hibits. I believe that these exhibits are representative  
9 of the wells that we are dealing with here, and rather than  
10 come up here several times for hearings, I thought that it  
11 would be appropriate to ask for approval to downhole com-  
12 mingle all of these wells at this time. If the Commission  
13 desires, we can furnish comparable exhibits for the other  
14 wells that we do not have exhibits for today.

15 MR. NUTTER: You're talking about the decline  
16 curves, I presume?

17 A Yes. And/or we could provide in the order for  
18 administrative procedures to handle these other wells, but  
19 just in the interest of time and saving of effort on both  
20 our part and the Commission's part, we'd like to have approval  
21 either to downhole commingle these wells at this time, and  
22 we would do the work whenever it becomes desirable from a  
23 producing viewpoint, or in the alternative, have administra-  
24 tive procedure where we could affect those on a well-by-well  
25 basis.

1 Q Is the ownership between the two producing horizons  
2 common in each of the wells?

3 A Yes, it is.

4 MR. KELLAHIN: We move the introduction of Exhibits  
5 One through Nine.

6 MR. NUTTER: Continental Exhibits One through Nine  
7 will be admitted in evidence.

8 MR. KELLAHIN: That concludes our case.

9

10 CROSS EXAMINATION

11 BY MR. NUTTER:

12 Q Mr. Lyon, I was having a hard time following your  
13 testimony with regard to that Number 9 on that production.

14 A Yes.

15 Q Now, I got the reserves that you mentioned for  
16 each of the zones. Now, what is the average daily rate of  
17 production for each of the zones?

18 A Well, for Number 9, if you'll refer to Exhibit  
19 Two, during April it produced 1005 mcf.

20 Q From the Chacra?

21 A Yes. Which is in the order of 35 mcf per day.  
22 The Pictured Cliffs is not producing.

23 Q And why?

24 A Well, it just -- I'm not sure just what the mechan-  
25 ical problem is in there. I think that the well is probably

1 loaded up with fluids.

2 Q Now, do we have an exhibit for that well, a decline  
3 curve?

4 A Yes. That is Exhibit Eight. It shows the last  
5 production to be in July, I believe, of 1966.

6 Q And that's Pictured Cliffs?

7 A Yes, sir.

8 Q So it was very erratic when it was producing and  
9 it's been shut in, then, for ten years or more.

10 A Well, that's right. I hadn't noticed the differ-  
11 ence in the years, but you're right, it has been.

12 Q Since 1966. Well, I think maybe what we ought  
13 to do is go the same route on it that we go on Number 24, is  
14 take tests on completion of the work.

15 A Well, that's entirely satisfactory.

16 Q Now, these percentages, these figures out here at  
17 the right on Exhibit Number Two in parentheses are the per-  
18 centage from the Chacra in each case, is that correct?

19 A Yes, that's since the Chacra is common in all of  
20 these wells, I just gave a representation of the percent that  
21 the Chacra produced in the two completions in each well.

22 Q Do you anticipate any difference in productivity  
23 from the Chacra upon the commingling of Chacra with the Mesa-  
24 verde or South Blanca, whichever the case might be?

25 A I really don't anticipate any.

1 Q Your Chacra has higher pressures than the Pictured  
2 Cliffs but it has lower pressures than the Mesaverde.

3 A Yes.

4 Q So I don't know, Mr. Lyon, it would appear that  
5 possibly these pressures from the Mesaverde may retard flow  
6 from the Chacra, actually, because they are considerably in  
7 excess. You take Well Number 24 there, the Mesaverde has  
8 976 pounds shut-in pressure as opposed to only 258 for the  
9 Chacra.

10 A Yes, that's true, but Well Number 24 had a shut-  
11 in period of some about three and a half years, as compared  
12 to a week for the others.

13 Q Well, in both zones?

14 A No. No, just in the Mesaverde, so that 976 pounds  
15 is probably not representative of the pressures that are  
16 shown for the other completions.

17 Q I see.

18 A Because of the extended build-up time.

19 Q Well, still we have a differential, though, of  
20 3-to-1 on the others with -- take Number 25, you have a pres-  
21 sure of almost 700 pounds on the Mesaverde as opposed to 259.

22 A That's right.

23 Q So you've still got a 3-to-1 ratio.

24 A Yeah, that's true; that's true, although the wells  
25 are all non-prorated. There may be some --

1 Q South Blanco wells are not non-prorated, are they?  
2 A Well, but they're marginal wells.  
3 Q That was going to be my next question.  
4 A Yes, they're marginal; none of them are non-marginal  
5 wells.  
6 Q They all are classified as marginal?  
7 A Yes.  
8 MR. NUTTER: Are there any further questions of  
9 Mr. Lyon?  
10 He may be excused. Do you have anything further,  
11 Mr. Kellahin?  
12 MR. KELLAHIN: No, sir.  
13 MR. NUTTER: Does anyone have anything they wish  
14 to offer in Case Number 5957 or 5958?  
15 We'll take the case under advisement.  
16 (Hearing concluded.)  
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