

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

APPLICATION OF MERIDIAN OIL, INC.)
FOR A HIGH ANGLE/HORIZONTAL)
DIRECTIONAL DRILLING PILOT PROJECT,)
SPECIAL OPERATING RULES THEREFORE,) CASE NO. 10324
AN EXCEPTION TO RULE 2(B) OF THE)
SPECIAL RULES GOVERNING THE BLANCO-MESA)
VERDE POOL, AND A SPECIAL PROJECT)
GAS ALLOWABLE, SAN JUAN COUNTY,)
NEW MEXICO.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
EXAMINER HEARING
BEFORE: MICHAEL E. STOGNER, Hearing Examiner
June 13, 1991
Santa Fe, New Mexico

This matter came for hearing before the Oil
Conservation Division on June 13, 1991, at the Oil
Conservation Division Conference Room, State Land office
Building, 310 Old Santa Fe Trail, Santa Fe, New Mexico,
before Linda Bumkens, CCR, Certified Court Reporter No.
3008, for the State of New Mexico.

FOR: OIL CONSERVATION DIVISION
(ORIGINAL)

BY: LINDA BUMKENS CCR
Certified Court Reporter
CCR No. 3008

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ALSO PRESENT: MR. BILL HAWKINS

FOR THE GAS CO. OF
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FOR THE DIVISION: ROBERT G. STOVALL, ESQ.
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1 MR. STOGNER: Call the next case number
2 10324.

3 MR. STOVALL: Application of Meridian Oil,
4 Inc. for high angle/horizontal directional drilling
5 pilot project, special operating rules therefore,
6 and exception to Rule 2(b) of the special rules
7 governing the Blanco-Mesa Verde pool, and a special
8 project gas allowable, San Juan County, New Mexico.

9 MR. STOGNER: Call for appearances.

10 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin
11 of the Santa Fe law firm of Kellahin, Kellahin &
12 Aubrey appearing on behalf of Meridian Oil, Inc.

13 MR. STOGNER: Additional appearances?

14 MR. CARR: May it please the commissioner, my
15 name is William F. Carr with the law firm Campbell &
16 Black P.A. of Santa Fe. I represent Texaco Inc. and
17 Amoco Production Company. Amoco will have a brief
18 statement at the end of the case.

19 MR. STOGNER: Any additional appearances?

20 MS. SMITH: Mr. Hearing Examiner, Sarah Smith
21 I'm entering an appearance on behalf of Gas Company
22 of New Mexico and Suntera Gas Gathering Company.

23 MR. STOGNER: Any other appearances? And how
24 many witnesses do you have, Mr. Kellahin

25 MR. KELLAHIN: I have four witnesses,

1 Mr. Examiner.

2 MR. STOGNER: Four witnesses. Are there any
3 other witnesses from either of the other parties?

4 MR. CARR: No, sir.

5 MR. STOGNER: Then will the four witnesses
6 please stand to be sworn? Mr. Kellahin.

7 MR. KELLAHIN: Thank you, Mr. Examiner. Let
8 me provide a brief introduction. Mr. Examiner, what
9 Meridian is seeking to do is to continue some
10 high-angle drilling in the Mesa Verde formation on a
11 pilot project basis.

12 The well that's the subject of this case is
13 the Sunray "G" 2R well. It is located -- to be
14 located in the east half of section 21. There are
15 already currently two vertical Mesa Verde wells, an
16 original well and infield well, and this is intended
17 to be the third well in that reservoir.

18 We have set back from the outer boundaries
19 of the 320 for a drilling window 790 from the side
20 boundaries of the spacing units. We share with you
21 what is a plat of the offset operators. The
22 offsetting operators around our spacing unit, with
23 the exception of Meridian, include Amoco principally
24 to the east and to the south of us. Amoco is
25 appearing today through Mr. Carr and has technical

1 people available.

2 In addition Texaco has got the spacing unit
3 north of us. It's a laydown spacing unit. They're
4 identified on the platt as the operator number three
5 in that location. The notice provisions for this
6 case were that we attempted to conform to the
7 requirements for notification for deviated wells
8 under Rule 111, which was notification to the offset
9 operators of spacing units for the pool.

10 In making those notifications I failed to
11 specifically send the certified mailed cards to
12 Amoco and to Texas, but we believe we've cured that
13 notice problem by notifying them directly, and they
14 have agreed to participate and appear by counsel
15 today.

16 The only other interested party that has
17 appeared to which I have any notice of is the Gas
18 Company. Miss Sarah Smith is here on behalf of her
19 company.

20 What we are asking is the solution that the
21 commission provided for us when we went before them
22 last February of 1990 to obtain approval for the
23 Riddle and the Howell well. They were high-angle
24 wells, and let me share with you at this time, Mr.
25 Examiner, the commission order in that case.

1 It's order R 9037A, and what we will be
2 asking for is the procedure established in the
3 commission order in terms of how to calculate or
4 select the wells from which we calculate the
5 deliverability, select that deliverability and then
6 subsequently calculate the allowable pursuant to the
7 Blanco-Mesa Verde pool rules.

8 We believe that that process is consistent
9 with what the Aztec district office utilizes for the
10 selection of wells when you have three vertical
11 wells in a spacing unit, and so we're seeking to
12 have a similar order to that adopted by the
13 commission in these other horizontal cases.

14 The four witnesses briefly, Mr. Jim Falconi
15 is the reservoir engineer. It's been his primary
16 responsibility to coordinate and consolidate the
17 work of the other technical people to make the
18 presentation today. He'll be my first witness.
19 Second witness, Mr. Jim Hornbeck is a geologist and
20 he'll briefly describe to you the major geologic
21 reasons for the continuation of the high-angle well
22 bore project in the Mesa Verde. Mr. Danny Boone is
23 the drilling engineer, and he can respond to
24 questions about the drilling and completion
25 technique, and then Mr. Alan Alexander is the land

1 man to confirm my representations to you on notice,
2 and that will be our presentation this morning, Mr.
3 Examiner. If I may do so at this time I'd like to
4 call Mr. Jim Falconi.

5 EXAMINATION

6 BY MR. KELLAHIN:

7 Q. For the record, will you please state your
8 name and occupation?

9 A. My name is Jim Falconi. I'm a reservoir
10 engineer for Meridian Oil in Farmington, New Mexico.

11 Q. Mr. Falconi, on prior occasions have you
12 testified as a reservoir engineer before the
13 division?

14 A. Yes, I have.

15 Q. Give us a quick summary of what has been
16 your involvement as a reservoir engineer in this
17 particular case, preparation for the drilling of the
18 Sunray G 2R high angle well.

19 A. My involvement in the proposal of the
20 Sunray G 2R high angle Mesa Verde well was to
21 coordinate a technical team involving a geologist,
22 land man, and reservoir engineer, myself, and the
23 drilling engineer to design the project.

24 Q. Have you completed that study in
25 consolidation with these other technical

1 individuals?

2 A. Yes, we have.

3 Q. And have you reached conclusions about the
4 feasibility of drilling this type of well in this
5 particular spacing unit?

6 A. Yes, we have.

7 Q. And has your company approved your coming
8 forward towards the division seeking the regulatory
9 approval to commence this project?

10 A. Meridian Oil has authorized me to do that.

11 MR. KELLAHIN: We tender Mr. Falconi as an
12 expert reservoir engineer.

13 MR. STOGNER: Are there any objections.
14 Mr. Falconi is so qualified.

15 Q. (By Mr. Kellahin) Mr. Falconi, let me have
16 you go to the exhibit book. Exhibit 1 is simply the
17 application. Let's pass that one for now and go to
18 the tab that's marked Exhibit 2. Identify that
19 display for me.

20 A. Exhibit 2 is a map of the San Juan Basin,
21 and what we tried to depict on this map was the
22 location of two high-angle wells that Meridian has
23 already drilled. Those are represented by the
24 inverted triangle.

25 Q. When we look at that display and we see the

1 inverted triangle to the lower right of the star,
2 which one will that be?

3 A. The triangle to the lower right, or to the
4 east is the Howell number 2R.

5 Q. And the triangle to the west of the first
6 triangle?

7 A. The triangle to the west is the Riddle
8 number 1R which are currently completing.

9 Q. Okay. And then the star represents the
10 project for the Sunray well?

11 A. Yes. The star represents the Sunray G
12 number 2R.

13 Q. Okay. To further orient the examiner with
14 regards to this particular spacing unit,
15 Mr. Falconi, let me direct your attention to the
16 first display after tab Exhibit Number 3. Looking
17 at the C102?

18 A. Yes.

19 Q. All right, sir. Would you identify and
20 describe that for me?

21 A. This plat, the C102, shows the location of
22 the proposed well, the Sunray G 2R in the southwest
23 of the southeast quarter of section 21. That well is
24 located 995 feet from the south line, 1755 feet from
25 the east line, and that's in an orthodox location.

1 The plat also depicts the two existing wells, the
2 parent well, the Sunray G Number 2, which is in the
3 southwest of the northeast of section 21, and the
4 Sunray G number 2A, which is in the southeast of the
5 southeast of section 21.

6 Q. When we characterize the wells as an
7 original well and infield well in the Blanco-Mesa
8 Verde, will that characterization represent either
9 of these wells?

10 A. Yes. The Sunray G number 2 is the parent
11 well.

12 Q. It's the original well in the spacing unit?

13 A. Yes.

14 Q. And the infill well is which?

15 A. The Sunray G number 2A.

16 Q. Give us a quick summary of the current
17 status of the original well, the G 2 well.

18 A. The G 2 is currently a producing well, as
19 is the G 2A, and that well is currently producing
20 approximately 100 mcf a day. Currently that well is
21 shut in, over produced.

22 Q. Describe for me why it is that your company
23 has proposed a horizontal well in this particular
24 spacing unit?

25 A. The technical team that I worked with and

1 coordinated reviewed the Mesa Verde in this part of
2 the Basin, and selected several drill blocks in
3 which to try this project, and through a series of
4 reviews, we narrowed it down and this was our
5 choice. It was based on remaining reserves in the
6 drill block, and land position on the drill block.

7 Q. With regards to the land position, what is
8 your understanding of the ownership within the east
9 half of section 21?

10 A. The ownership in the east half of 21 is 100
11 percent working interest, 82 percent net revenue
12 interest, in the drill block.

13 Q. Why is that one of the criteria for
14 selection of the spacing unit for a pilot project
15 for horizontal well?

16 A. It allows Meridian to bear 100 percent of
17 the cost and retain the information, and develop it
18 at our expense.

19 Q. Give me a quick summary of the basis for
20 the belief that there may be reserves within the
21 spacing unit in the Mesa Verde that are not going to
22 be developed by the two existing wells.

23 A. I reviewed the 9 section surrounding the
24 Sunray G number 2R proration unit, and both through
25 a ray-time analysis and a pressure cume analysis,

1 and this analysis shows remaining reserves to be in
2 the ground on this drill block which may not be
3 recoverable by the G number 2, or the G number 2A.

4 Q. Why have you selected a horizontal well for
5 the spacing unit as opposed to a third vertical well
6 bore?

7 A. We selected the horizontal well as a test
8 of high-angle technology in the Mesa Verde interval
9 as a third project in our continuing projects in the
10 Mesa Verde, and we felt that through our analysis
11 that this well would recover reserves which are
12 otherwise unrecoverable in the Mesa Verde interval.

13 Q. Provide the examiner a quick summary of the
14 drilling and completion and results for the first
15 well bore in this project which was the Howell
16 well.

17 A. Yes. The Howell E 2R was drilled and
18 completed. The results on that well, the well has
19 been producing approximately 9 months, and it is
20 currently producing at 1100 mcf a day.

21 Q. Okay. What was the initial deliverability
22 of that well, do you recall?

23 A. The deliverability of the well was 1196.

24 Q. I mean, how does that compare to the
25 deliverability of the other two wells in that

1 spacing unit, do you remember?

2 A. It compares to the other two wells their
3 latest deliverability were approximately 769 on the
4 2A, and 186 on the number 2.

5 Q. Okay. The Howell well currently produces at
6 what rate?

7 A. Approximately 1100 mcf a day.

8 Q. Okay. And how is the allowable being
9 calculated for that well?

10 A. The allowable for that well is being
11 calculated on the deliverability of the Howell E
12 number 2R and the Howell number 2A.

13 Q. Those are the two vertical wells?

14 A. The Howell Number 2R is the high-angle
15 well, and the Howell E 2A is the infill Mesa Verde
16 well.

17 Q. Under the commission order that was
18 approved for the allowable formula for that well,
19 you had three options, did you not?

20 A. Yes. We had three options on that drill
21 block as we do on the Riddle number 1R drill block.
22 The options are to take the deliverability of the
23 two vertical wells, to take the deliverability of
24 the high-angle well, and one vertical well, and the
25 third option was to take the deliverability of the

1 high-angle well and the vertical well in the
2 opposite quarter section if that well bore would not
3 have penetrated the quarter section line.

4 Q. Okay. Are you seeking the same flexibility
5 in determining the selection of wells by which you
6 will take deliverabilities and ultimately calculate
7 the allowable pursuant to the Blanco-Mesa Verde pool
8 rules?

9 A. Yes, we are. We would like the same
10 allowable to be calculated as in the case of the
11 Howell E 2R and the Riddle number 1R.

12 Q. Do you see any potential violation of
13 correlative rights to continue the practice of
14 allowing the operator such as Meridian to make that
15 selection among those three possible choices for
16 that calculation?

17 A. No, we do not.

18 Q. What is the status of the Riddle well?

19 A. The Riddle well was drilled, and is
20 currently being completed.

21 Q. Do you plan to modify the horizontal
22 drilling technology with regards to the Sunray well
23 from what was utilized for either the Riddle or the
24 Howell well?

25 A. No. The technology used to drill the well

1 will be the same.

2 Q. Summarize for us what that drilling program
3 was.

4 A. The drilling program on these wells is to
5 drill to an intermediate casing point and set
6 casing, and drill with gas below that point to a
7 total depth in the Mesa Verde interval.

8 Q. For the Sunray well, do you have a surface
9 location that you're proposing to commence the
10 horizontal well?

11 A. For the Sunray G number 2R that's shown on
12 the C102 and that location is 995 from the south
13 line, 1755 feet from the east line, and that is an
14 orthodox surface location.

15 Q. Do you know at this point whether that
16 surface location, in fact, has been approved and
17 would not alter from the location advertised?

18 A. The location should not alter. It is an
19 approved location.

20 Q. Let's turn to the display after Exhibit 4,
21 and have you describe for us then, the plan for
22 drilling the well vertically to a certain point and
23 then the azimuth or direction that you intend to go
24 within the spacing unit.

25 A. Okay. The exhibit labeled Exhibit number 5

1 is a profile view of the well, and what it shows is
2 the well bore being drilled vertically to a kickoff
3 point of approximately 4766 feet. That's right at
4 the top of the Mesa Verde group. At that point --
5 actually at a point above that -- we'll be setting
6 an intermediate casing string at approximately 3500
7 feet. We'll drill vertically to the kickoff point
8 with gas, and drill directionally from that point at
9 a billed rate of approximately 10 degrees per 100
10 foot into the Point Lookout interval, and drill
11 laterally across the Mesa Verde interval to a total
12 depth of 5600 measured or true vertical depth at
13 8700 feet measured depth. The azimuth on that is
14 shown on the display on the well, and it's
15 approximately north 15 degrees to the east.

16 MR. KELLAHIN: Mr. Examiner, the display on
17 the wall for purposes of the record will be marked
18 as Exhibit Number 7. I'd neglected to do that.
19 Let's take it in parts, Mr. Falconi. When we look
20 at the first portion of the drilling, you're going
21 to drill a vertical well to a certain total depth?

22 A. Yes. The well will be drilled vertically
23 to an intermediate casing point at approximately
24 3500 feet. Intermediated casing will be set at that
25 point. That is not depicted on the display on the

1 wall.

2 Q. (By Mr. Kellahin) Do you desire to have the
3 examiner provide you the authority to have the
4 flexibility of choice then in determining the
5 ultimate direction that this lateral portion of the
6 drilling will take?

7 A. Yes. What we have shown in the second
8 exhibit under Exhibit 5, the first exhibit there.
9 Is the profile view of the well bore, and the second
10 exhibit is the plan view of the well bore, and what
11 we are asking for is a drilling window which is
12 790-foot setback on all boundaries of the proration
13 unit.

14 Q. Your proposed entire vertical and
15 horizontal extent of the well bore then would be
16 within the drilling window shown on the display
17 following Exhibit 4. You're going to honor all
18 those 790 setbacks?

19 A. Yes. Well will take directional surveys and
20 honor the drilling window which we have shown there,
21 and we'll honor the 790 foot setback.

22 Q. Okay. So were Exhibits 2, 3, 4, 5, prepared
23 or compiled under your direction and supervision
24 Mr. Falconi?

25 A. Yes, they were.

1 MR. KELLAHIN: That concludes my examination
2 of Mr. Falconi. We move the introduction of
3 Exhibits 2 through 5 at this point.

4 MR. STOGNER: If there are no objections
5 Exhibits 1 through 5 will be admitted into evidence
6 -- I'm sorry -- 2 through 5 will be admitted into
7 evidence at this time. Miss Smith, your witness.

8 MISS SMITH: We're not presenting any
9 cross-examination of this witness.

10 MR. STOGNER: Mr. Carr, do you have any
11 questions?

12 MR. CARR: We have no questions.

13 MR. STOGNER: Miss Smith, are you going to be
14 asking any questions of any of the witnesses?

15 MISS SMITH: I don't know that yet.

16 MR. STOGNER: Okay.

17 You mentioned one of the wells as being
18 shut in due to overproduction at this time. Which
19 one was it?

20 A. Actually both wells in the proration unit,
21 I think, are currently shut in, overproduced. We
22 are currently 8.7 times overproduced on that
23 proration unit

24 MR. STOGNER: 8.7?

25 A. Yes. And we're trying to -- Meridian is

1 trying to keep all their wells at least below the
2 six times overproduced limit.

3 MR. STOGNER: You mentioned one of the two
4 factors for a horizontal in this formation was the
5 remaining reserves, but I don't think I caught those
6 remaining reserves. Do you have that figure on that?

7 A. Yeah. I don't believe I mentioned the
8 actual amount of remaining reserves. I have
9 calculated the remaining reserves for that drill
10 block to be approximately 2.5 bcf of gas.

11 MR. STOGNER: Now that's the remaining
12 reserves with this third well bore, or I should say,
13 produceable reserves?

14 A. That is a figure that I calculated as a
15 minimum remaining reserve for the drill block for
16 the proration unit.

17 MR. STOGNER: Obviously you've done quite a
18 bit of reservoir work. Let's go back. With the two
19 vertical wells, what is the recoverable reserves at
20 the present rate at which those two wells produced
21 until their economic limit?

22 A. The remaining reserves for the two wells in
23 the proration unit are approximately 3.3 bcf.

24 MR. STOGNER: And the remaining reserves for
25 these three wells with the horizontal -- hold it --

1 let's back up. Mr. Kellahin asked you a question
2 about a third vertical well. Do you have any
3 figures on the remaining reserves for a third
4 vertical well?

5 A. I would estimate that the third vertical
6 well would produce the reserves of the well that it
7 would be replacing which for the G number 2 my
8 calculations indicate there are approximately 2.2
9 bcf left for that well, and approximately 1.1 bcf
10 left for the G number 2A.

11 MR. STOGNER: With all three wells going on
12 the same time you expect it to go up to the
13 remaining reserves of 2.5?

14 A. Yes, that's correct.

15 MR. STOGNER: Or an additional 2.5, I should
16 say.

17 A. It's an additional 2.5, sir.

18 MR. STOGNER: Did you get some testimony on
19 the Howell wells, Howell 2, 2A, and 2R? All three
20 of those wells are producing at this point?

21 A. I can't answer that at this time. I believe
22 we are producing the 2R and the 2A, but I believe
23 the parent well, the E2, is shut in.

24 MR. STOGNER: You said the Howell 2R was
25 producing at a rate of about 1100 ncf a day?

1 A. Yes, sir.

2 MR. STOGNER: Do you remember, or do you have
3 figures on the -- what the initial production for
4 the well 2 was?

5 A. I don't recall the figure on the number 2.

6 MR. KELLAHIN: I'd be happy to supply those to
7 you, Mr. Examiner.

8 MR. STOGNER: How about for the 2A, any figure
9 on that?

10 A. Again, I don't recall the initial
11 production figures for those wells.

12 MR. STOGNER: Are there any further questions
13 of this witness at this time?

14 MR. STOVALL: Yeah. I've got a couple of them .

15 Now does the Howell 2R penetrate both
16 quarter sections?

17 A. Yeah. The Howell E2R penetrated both
18 quarter sections. We started in the south quarter
19 of that proration unit and drilled to the north
20 limit of the window. I believe it went to the limit
21 of the window.

22 MR. STOVALL: Same thing with the Riddle?

23 A. Yes. We had the same situation in the
24 Riddle.

25 MR. STOVALL: The commission order that's

1 there actually incorporates and adopts the examiner
2 order with the exception of the calculation of the
3 delivery for the GPU; is that correct?

4 A. That is correct, Mr. Stovall.

5 MR. STOVALL: I don't have a copy of that
6 examiner order in front of me; is it correct? Does
7 that examiner order address the question of how many
8 wells in the proration unit can be produced? Are
9 you permitted to produce all three of the wells in
10 the proration unit?

11 A. Yeah.

12 MR. STOVALL: Okay.

13 MR. KELLAHIN: For your information,
14 Mr. Stovall, Examiner Catanach in that case approved
15 multiple wells. He provided that the method for
16 determining the deliverability would be to select
17 either the deliverability of the horizontal well, or
18 the combined deliverabilities of two vertical wells,
19 the original infill. The commission adopted this
20 order that provided further flexibility where they
21 had more items to select from.

22 MR. STOVALL: And just so I understand, the
23 net of all -- what you're saying, if I understood
24 you correctly, that by drilling the horizontal well
25 it will recover an additional two and a half bcf,

1 between two and a half bcf, over what the two wells
2 or even a third vertical replacement well could
3 drill; is that correct?

4 A. That's correct.

5 Q. Okay. That's all I have.

6 MR. STOGNER: If there are no other questions
7 of Mr. Falconi, you may be excused.

8 EXAMINATION

9

10 BY MR. KELLAHIN:

11 Q. Mr. Hornbeck, for the record, would you
12 please state your name and occupation?

13 A. My name is James Hornbeck and I'm a senior
14 staff geologist with Meridian Oil.

15 Q. Mr. Hornbeck, on prior occasions have you
16 testified as a petroleum geologist before the
17 division?

18 A. No, I have not.

19 Q. Summarize your educational experience for
20 us.

21 A. I have a bachelor's of science, in geology
22 from the University of Long Island in New York in
23 1973, and then I continued to get my master's in
24 geology at the State University of New York, and I
25 completed that in 1976.

1 Q. Summarize your employment experience as a
2 petroleum geologist.

3 A. I began my career in Farmington with
4 El Paso Natural Gas as a development geologist in
5 the San Juan Basin, worked for them for three
6 years. At that time I began work for five years for
7 Mountain Hills Supply Company as an exploration
8 geologist in the four corners area, and for the past
9 five years I've been an exploration geologist with
10 Meridian Oil.

11 Q. Are you familiar with exploration geology
12 with regard to the Blanco-Mesa Verde Reservoir?

13 A. Yes, I am.

14 Q. And have you participated on behalf of your
15 company in analyzing the geology for this particular
16 application for the high angle horizontal well?

17 A. Yes, I have.

18 MR. KELLAHIN: We tender Mr. Hornbeck as an
19 expert petroleum geologist.

20 MR. STOVALL: Are there any objections?
21 Mr. Hornbeck is so qualified.

22 Q. (By Mr. Kellahin) Mr. Hornbeck, let me ask
23 you to do this. If you'll go to the display on the
24 wall, it's Exhibit 7. Let me give you a pointer and
25 let me ask you some questions about your geologic

1 conclusions.

2 A. Okay.

3 Q. First of all, show the Examiner on
4 Exhibit Number 7 what you have indicated on each end
5 of the display when you have put logs on the right
6 margin and left margin.

7 A. We've depicted the stratagraphic section
8 across the drill block and, what we have are the
9 formation tops picked in the Blanco-Mesa Verde
10 producing reservoir. This is the Mesa Verde group
11 in general with the Cliffhouse sandstone Menefee
12 formation, and then the main pay in the pool, the
13 point without sandstone.

14 Q. What are the two wells identified on the
15 display?

16 A. They are the Sunray G number 2A in the
17 southeast of section 21, and also the Sunray G
18 number 2, the parent well, in the northeast of
19 section 21, and here is a depiction of where they
20 are with relationship to the proposed high-angle
21 well.

22 Q. Give us the summary of the log correlation
23 between the two wells.

24 A. Well, it's pretty straightforward. There's
25 a Cliffhouse sandstone present throughout the drill

1 block, likewise a thin bedded shale and sandstone
2 interval in the Menefee on both sides of the drill
3 block, and then we're to the Point Lookout
4 sandstone, which is also continuous throughout the
5 drill block.

6 Q. When we look at this portion of the Mesa
7 Verde reservoir, what type of reservoir are we
8 dealing with?

9 A. We're dealing with a section of tight
10 sandstones in the Cliffhouse and Point Lookout
11 sandstone -- the upper part of Point Lookout is a
12 bar barrier section with low porosities and
13 permeabilities, and in addition, the thinly bedded
14 sands of the Menefee end several hundred feet of the
15 lower Point Lookout which are thinly bedded sands
16 and silts and shale which are fairly discontinuous,
17 and relatively tight on water in logs.

18 Q. Is there a fracture component to the
19 reservoir that is involved in your analysis of the
20 geology for this particular prospect?

21 A. Yes, there is. This area of the pool in the
22 San Juan Basin, in general, suggests that there is a
23 fractured element to production out of the pool in
24 the reservoir. These thinner, tight sands
25 especially seem to be enhanced by some fracture

1 permeability in addition to just their matrix
2 porosity.

3 Q. Does there seem to be a geologic
4 explanation to the productivity of the Mesa Verde
5 wells in this immediate area?

6 A. Well there is a fractured element to the
7 wells' production in this area, and there's not an
8 obvious basement structure or flecture within the
9 area, but as with most parts of the San Juan Basin
10 in the Cretaceous sandstone. Natural fracturing
11 enhances production to some degree. There is not an
12 obvious structure within this area, but there is
13 evidence of some fracture enhancement of production.

14 Q. What are you hoping as a geologist to
15 accomplish with the horizontal well that you won't
16 be able to achieve with another vertical well?

17 A. Well, the advantage of a horizontal well in
18 this drill block will be to penetrate, in
19 particular, the extremely thinner bedded sandstones
20 in the Point Lookout which are discontinuous and by
21 penetrating them with a horizontal well bore and
22 capture reserves in this tighter, less permeable
23 section.

24 Q. Simply because of the distance of the
25 lateral you'll have a greater opportunity to

1 encounter more of those lenses than you would if you
2 had a vertical well?

3 A. Yes, that is correct.

4 Q. Is there any particular explanation to the
5 orientation of the proposed lateral portion of the
6 well?

7 A. There is several factors played into our
8 orientation for the well bore. Geologically we have
9 been analyzing numerous types of data trying to
10 depict the prevalent fracture direction within the
11 basin in this area, and some fracture-finder logs
12 that we have run in the last several months have
13 indicated there are some fracture directions that
14 intersect, that occur within this area of the Basin
15 which would be optimized by this direction of
16 lateral well bore.

17 Q. Let me have you return to your seat, sir.
18 If you go back with me and look at the display
19 following Exhibit Number 6. You should find a
20 structure map. Would you identify and describe that
21 display for me?

22 A. This is a nine-section structure map drawn
23 on the top of the Point Lookout sandstone. The
24 contour interval is 25 feet, and a section is one
25 mile to scale.

1 Q. Any major geologic conclusions to be drawn
2 from analyzing the structure?

3 A. I would say that the structure within the
4 area of the proposed Sunray well is fairly normal
5 for regional structure within the basin, and there's
6 no obvious difference from any other drill block
7 within the pool.

8 Q. Okay.

9 MR. KELLAHIN: That concludes my examination
10 of Mr. Hornbeck, Mr. Examiner. We move the
11 introductions of Exhibits 6 and 7.

12 MR. STOGNER: Exhibit 6 and 7 will be admitted
13 into evidence at this time. Miss Smith, any
14 questions?

15 MISS. SMITH: Thank you, Mr. Hearing
16 Examiner. We have no questions of this witness.

17 MR. STOGNER: Mr. Carr?

18 MR. CARR: No questions.

19 MR. STOGNER: Mr. Hornbeck, when I look at the
20 Point Lookout sandstone in this particular block,
21 does it look fairly homogeneous. And I'm talking
22 about the vertical portion of it throughout the
23 vertical extent of this formation, or least your
24 production interval in which you hope to cross on
25 your horizontal well bore.

1 A. It is continuous through the drill block.
2 It is certainly easily mapable and distinguishable
3 on water line logs. By homogeneous, I'm not sure I
4 understand what you're asking me. It is thinly
5 bedded, has fairly uniform thickness as a package of
6 sandstones and shales. In that regard it is
7 homogeneous, but as you can see, there's a mass of
8 sand on the top of roughly between 100 and 150 feet
9 on both ends of the drill block, and then it is made
10 up of thinner bedded sands and shales for the rest
11 of its productive interval.

12 MR. STOGNER: Do you see much of a change
13 inside the porosity and permeability between the two
14 wells and also in the vertical portion?

15 A. No. There really isn't any.

16 MR. STOGNER: I guess that's what I meant by
17 homogeneous.

18 A. No. Water line logs -- water porosity logs
19 on both ends of the drill block are very similar;
20 show very similar reservoir style.

21 MR. STOGNER: Isn't it normal to fract in this
22 particular zone after you've completed a vertical
23 well bore?

24 A. Yes, it is.

25 MR. STOGNER: And do you know if these two

1 well bores were fractured?

2 A. I believe they were. Those are resistivity
3 and gamma ray, I believe, for water line logs.

4 MR. STOGNER: And I don't see the perforated
5 interval on either one of these. They're in the
6 Point Lookout; is that correct?

7 A. They're in all three zones in the Mesa
8 Verde. Both wells were completed in all three
9 zones, the Cliffhouse, Menefee sandstones, and Point
10 Lookout tape.

11 MR. STOGNER: But your major zone of interest
12 as far as the horizontal portion is the Point
13 Lookout?

14 A. Yes, sir.

15 MR. STOGNER: Will some of the Menefee be
16 perforated?

17 A. We plan to complete the entire well bore in
18 through casing.

19 MR. STOGNER: Out from underneath the drilling
20 liner?

21 A. Let me check and make sure I'm with you
22 here.

23 MR. STOGNER: Maybe I need to be asking your
24 drilling engineer this. I don't know.

25 A. We plan to perforate and fracture,

1 stimulate all three zones in the well bore.

2 MR. STOGNER: Okay. Did you do the geology
3 work or take into account the Howell project?

4 A. No, sir. I did not.

5 MR. STOGNER: Is the Mesa Verde, about the
6 same, I mean we're talking about a six mile
7 difference?

8 A. Yes. It's very similar. If there was a
9 difference, I would say that the Point Lookout in
10 this well in this drill block is probably thinner
11 bedded and less uniform at the top, less continuous.

12 MR. STOGNER: Are there any other questions of
13 Mr. Hornbeck? All right. You may be excused at
14 this time. Mr. Kellahin.

15 EXAMINATION

16 BY MR. KELLAHIN:

17 Q. I'd like to call Mr. Danny Boone.
18 Mr. Examiner, Mr. Boone is the drilling engineer.
19 Mr. Boone, please state your name and occupation.

20 A. My name is Danny Boone and I'm a drilling
21 engineer for Meridian Oil in Farmington, New Mexico.

22 Q. And that's where you currently reside?

23 A. Yes, sir.

24 Q. Have you testified before the division
25 before as a drilling engineer?

1 A. No, sir, I have not.

2 Q. Summarize your educational background and
3 your employment experience?

4 A. Okay. I obtained my bachelor of science
5 degree from Texas State University in petroleum
6 engineering in 1985, and upon my graduation I
7 started my employment with Meridian Oil in
8 Farmington, New Mexico, as a reservoir engineer for
9 approximately three years, and over the past two
10 years I've worked as a drilling engineer.

11 Q. Were you involved in any of the drilling
12 issues for either the Howell or the Riddle well?

13 A. Yes, sir. I was the drilling engineer for
14 both of those projects.

15 Q. Okay. And you're proposed to be the
16 drilling engineer for the Sunray horizontal well?

17 A. Yes, sir, I am.

18 MR. KELLAHIN: We tender Mr. Boone as an
19 expert drilling engineer.

20 MR. STOGNER: Are there any objections?
21 Mr. Boone is so qualified.

22 Q. (By Mr. Kellahin) Mr. Boone, let me have
23 you turn to the exhibit book and let's take a
24 moment. If you'll look at the vertical section
25 display behind Exhibit Number 5, it shows the plan

1 for the well. Give us a summary of your drilling
2 program for the summary well.

3 A. Okay. Our intent on the summary well would
4 be to drill plus or minus 500 feet in surface casing
5 at that point. Below surface casing we would drill,
6 again, with mud into an intermediate casing point at
7 3495 and set our intermediate string at that point.
8 We would then blow the well down or dry up the well
9 bore, and drill out from underneath the intermediate
10 casing shoe with gas to a kickoff point 4766.

11 At that point in time we would trip out of
12 the hole and pick up a motor assembly that would
13 allow us to deviate the well bore at that point in
14 time, and in a northeasterly direction. We will mist
15 up the hole, and drill from zero degrees to
16 approximately 85 degrees. Depending on hole
17 conditions and drilling program at that point in
18 time, we propose that we would have the option of
19 setting a drilling liner if conditions necessitate
20 it. Past the -- at 85 degrees we would then drill,
21 maintaining an 85-degree angle to our true vertical
22 depth tdv's at 5607, which would give us measured
23 depth of approximately 8725 feet.

24 Q. Once you have deviated the well and
25 finished the curve, established the 85-degree

1 deviation and continued for that extent of the
2 lateral, how will you complete that?

3 A. Our intent right now would be to complete
4 that with preperforated or slotted liner to allow
5 the well to blow open the hole.

6 Q. Once you've done that, is there any kind of
7 treatment or stimulation to the well?

8 A. No, sir. There would not be, but we would
9 choose to stimulate the well if conditions required.

10 Q. Okay. Let's go back now, having explained
11 the drilling and completion prospects for the
12 Sunray, go back and tell us what you did for the
13 Howell well.

14 A. For the Howell well, our program was to set
15 surface casing and drill out from underneath surface
16 casing, and build our curve on mud and set casing at
17 the end of our curve at approximately 71 degrees.
18 Below that point we attempted to drill out the hole
19 with gas, and were unsuccessful. We got out to
20 about 6300 feet before our torque and drag became
21 excessive and we were required to mist up the hole.
22 Once we went to mist, then we were successful in
23 drilling the well to total depth.

24 Q. Upon drilling the Howell well, how did you
25 complete it for production?

1 A. That was -- our production string was
2 cemented in place and then we fracture-stimulated
3 the well.

4 Q. How did you handle the drilling program for
5 the Riddle well?

6 A. Much in a similar manner except due to
7 drilling conditions up hole. We set an intermediate
8 string in the vertical section of the hole, drilled
9 out from underneath the intermediate string with mud
10 to the end of our build section and then attempted
11 to dry up the well and continue to drill the well
12 with gas, but were unsuccessful in drying up the
13 well bore, and so we continued drilling ahead with
14 mist for our total depth.

15 Q. Summarize for me what are going to be the
16 major changes in the drilling and completion program
17 for the Sunray well that are different from the
18 Riddle and the Howell wells?

19 A. The major difference in the Sunray well is
20 that we will be attempting to drill the curve in an
21 air mist environment, and that is the major
22 difference in this particular well.

23 MR. KELLAHIN: That concludes my examination
24 of Mr. Boone. We pass him for examination.

25 MR. STOGNER: Thank you, Mr. Kellahin. Any

1 questions?

2 MISS SMITH: No questions.

3 MR. CARR: No questions.

4 MR. STOGNER: Mr. Boone, on this proposed
5 well, what size of surface casing are we talking
6 about?

7 A. Mr. Stogner, we have not completed our
8 drilling program at this time. We're looking at
9 optimizing our drilling program with regard to our
10 casing program, and that has not been determined.
11 It will be in the range from 13 and 3/8 to 20-inch
12 casing though.

13 MR. STOGNER: How about your slotted liner?
14 Is that predetermined yet at this point?

15 A. That would be a five-and-a-half-inch
16 production strength.

17 MR. STOGNER: That will be five and a half.
18 And you do not know if you're going to use the -- I
19 believe you show the drilling liner configuration
20 attached to your intermediate?

21 A. Yes, sir. And that would be an option that
22 we would choose to either set or not set depending
23 upon drilling conditions or the drilling program
24 itself.

25 MR STOGNER: If you had to go with that

1 configuration, would that be a 7 inch?

2 A. It would be somewhere between a 7-inch and
3 9 and 5/8-inch drilling liner.

4 MR. STOGNER: And that would, of course,
5 increase your intermediate string --

6 A. Yes, sir.

7 MR. STOGNER: -- size to probably what, a 13
8 and 3/8 with a 20-inch surface if this configuration
9 --

10 A. Again, anywhere from 9 and 5/8 to 13
11 intermediate string.

12 MR. STOGNER: If this configuration is not
13 followed, and you do set your surface and your
14 intermediate, and you do not use the drilling liner,
15 will you have a production liner, or are you going
16 to have a production string all the way back up to
17 surface?

18 A. The choice there would be to have a
19 production liner set back up into the intermediate
20 casing string.

21 MR. STOGNER: With the lower portion being
22 the--

23 A. Open hole preperforated slotted liner
24 portion.

25 MR. STOGNER: Would that preperforated liner,

1 would that start, or, I'm sorry, the preperforation
2 part, would that start in the Menefee, or are you
3 going to go back on up to the Cliffhouse?

4 A. That would be dependent upon the shows that
5 we encounter while we are drilling the well.

6 MR. STOGNER: Okay. So you're coming in after
7 your kickoff with a misdrill with your mud motor;
8 what type of motor are you going to be using?

9 A. It would be a motor that has been adapted
10 for an air mist environment, a positive-type
11 displacement motor with a deflected sub on it for
12 controlling or angle and deviation.

13 MR. STOGNER: You say "adapted." What do you
14 mean, "adapted"? How is it going to be adapted?

15 A. Well, it is a motor that has the
16 configuration of the rotor and the stator is then
17 adapted to allow it to, I guess, more flow through
18 the motor without allowing the motor to run away,
19 and by run away, I mean, overspin itself.

20 MR. STOGNER: Now this wasn't used on the
21 Howell, that was a mud motor?

22 A. That was a mud motor, and all of our
23 assemblies below the end of our curve section in the
24 Howell and the Riddle were rotary assemblies, and in
25 this particular well we intend to continue our

1 85-degree angle with a motor at that point in time.

2 MR. STOGNER: Using the mist?

3 A. Yes, sir.

4 MR. STOGNER: This is relatively new; isn't
5 it?

6 A. Yes, sir.

7 MR. STOGNER: At least in this area, I assume.
8 How many days did it take you on the Howell number
9 2R?

10 A. The Howell number 2R was 52 days.

11 MR. STOGNER: How many days are you expecting
12 on this one?

13 A. Approximately 33.

14 MR. STOGNER: Were you expecting 52 on the
15 Howell?

16 A. No, sir. We were not.

17 MR. STOGNER: How many days were you expecting
18 on it?

19 A. About 23.

20 MR. STOGNER: Is this on Federal land or state
21 or fee?

22 MR. KELLAHIN: We may have to ask
23 Mr. Alexander. I'm not sure I know.

24 MR. STOGNER: My question was leading up,
25 regardless of what surface casing or casing program

1 you plan to run, I guess it will be --

2 A. It is federal.

3 MR. STOGNER: It is federal land.

4 A. Yes, sir.

5 MR. STOGNER: It's going to meet with the
6 requirement, I would assume?

7 A. Yes, sir. I will meet with all state and
8 federal requirements.

9 MR. STOGNER: When you come in with your
10 production liner in your production liner, how will
11 that be cemented in, or will it be?

12 A. What we would do, Mr. Stogner, is to set an
13 nct or some type of isolation tool immediately above
14 the part of the liner that we plan to leave as open
15 hole with a stage tool set directly above that
16 isolation tool, and cement above that back into the
17 lap of our upper casing string.

18 MR. STOGNER: Did you do any stimulation on
19 the Howell well?

20 A. Yes, sir.

21 MR. STOGNER: What kind of stimulation was
22 done on it?

23 A. I was not directly in charge of the
24 stimulation work. I'm just familiar with the type
25 of work that was done. It was basically a

1 sand-water-gel-type fract.

2 MR. STOGNER: I assume it was completed, or
3 cemented about the same way you've just described, a
4 station tool above the preperforated interval?

5 A. No, sir. Now that one, the Howell, was not
6 a preperforated liner. It was essentially a blank
7 liner that was cemented in place and then shot after
8 being run. And then, again, in this case right here
9 in this section, if conditions necessitated, we
10 would choose to do that in this well as well.

11 MR. STOGNER: Do you know what the perforated
12 interval on the Howell well was?

13 A. I can't answer that question, but I can get
14 that data for you.

15 MR. STOGNER: I was just curious to see how
16 many perforating guns you used?

17 A. Lots.

18 MR. STOGNER: Okay. I don't have any other
19 questions of Mr. Boone. Are there any other
20 questions of this witness? Mr. Boone, you may be
21 excused. Mr. Kellahin.

22 MR. KELLAHIN: We call Mr. Alan Alexander for
23 brief questions on the offsetting operatorship.

24 EXAMINATION

25 BY MR. KELLAHIN:

1 Q. Mr. Alexander, please state your name and
2 occupation.

3 A. My name is Alan Alexander. I'm employed as
4 a senior land advisor with Meridian Oil in their
5 Farmington, New Mexico, office.

6 Q. You've testified before the division on
7 prior occasions as a petroleum land man?

8 A. I have.

9 Q. And either you personally or under your
10 direction and supervision, employees under your
11 control have determined the offset ownership
12 surrounding the spacing unit in question?

13 A. Yes, sir, that's correct.

14 MR. KELLAHIN: We tender Mr. Alexander as an
15 expert petroleum landman.

16 MR. STOGNER: Are there any objections?
17 Mr. Alexander is so qualified.

18 Q. (By Mr. Kellahin) Mr. Alexander, let me
19 have you go to the information behind
20 Exhibit number 1. Would you identify that
21 information for me, please?

22 A. Yes, sir. Exhibit Number 1 consists of the
23 letter to the commission setting this application.
24 Behind the letter is the application itself for the
25 Sunray well.

1 Q. Turn to the last page before we get to
2 Exhibit number 2. It says "offset operator plant."

3 A. Yes.

4 Q. Was that prepared by you or under your
5 direction?

6 A. Under my direction.

7 Q. What do your records report to be the
8 offsetting operators of spacing units for the Mesa
9 Verde production that adjoin the east half of
10 section 21?

11 A. That would be Amoco Production Company and
12 Texaco, Inc.

13 Q. And how is the location of their interest
14 identified on that display?

15 A. They're identified by corresponding those
16 names with numbers, and the numbers are in the
17 squares offsetting the outlined spacing proration
18 unit.

19 Q. Okay. Apart from Amoco and Texaco,
20 inclusive of Meridian, there are no other operators
21 for Mesa Verde production offsetting your spacing
22 unit?

23 A. That is correct.

24 MR. KELLAHIN: That concludes my examination
25 of Mr. Alexander.

1 Q. Turn to the last page before we get to
2 Exhibit number 2. It says "offset operator plant."

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4 Q. Was that prepared by you or under your
5 direction?

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9 Verde production that adjoin the east half of
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12 Texaco, Inc.

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14 identified on that display?

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16 names with numbers, and the numbers are in the
17 squares offsetting the outlined spacing proration
18 unit.

19 Q. Okay. Apart from Amoco and Texaco,
20 inclusive of Meridian, there are no other operators
21 for Mesa Verde production offsetting your spacing
22 unit?

23 A. That is correct.

24 MR. KELLAHIN: That concludes my examination
25 of Mr. Alexander.

1 MR. STOGNER: Thank you, Mr. Kellahin. Miss
2 Smith?

3 MISS SMITH: No questions.

4 MR. STOGNER: Mr. Carr?

5 MR. CARR: No questions.

6 MR. STOGNER: Mr. Stovall?

7 MR. STOVALL: No questions.

8 MR. STOGNER: You may be excused,
9 Mr. Alexander. Mr. Kellahin, anything further?

10 MR. KELLAHIN: That concludes our presentation
11 in this case, Mr. Stogner.

12 MR. STOGNER: I believe, Mr. Carr, you had a
13 statement you would like to make after the --

14 MR. CARR: If it please, Mr. Examiner.
15 Mr. Bill Hawkins of Amoco is here, and I request
16 that he be given permission to provide Amoco's
17 closing statement.

18 MR. STOGNER: Mr. Kellahin, do you have any
19 problem with that?

20 MR. KELLAHIN: No, sir.

21 MR. STOGNER: Miss Smith?

22 MISS SMITH: No, sir.

23 MR. HAWKINS: Bill Hawkins with Amoco
24 Production Company.

25 MR. STOVALL: Mr. Hawkins, why don't you come

1 up to the table where it's easier for the court
2 reporter to hear, as you can see.

3 MR. HAWKINS: I'm Bill Hawkins with Amoco
4 Production Company. Amoco has no objection to the
5 application by Meridian for this high
6 angle/horizontal well in the Mesa Verde. We are in
7 agreement with their request for allowable to be
8 consistent with the previous cases that have been
9 heard by the NMOCD, and we would like to see this
10 well drilled and get some information on whether
11 this is going to be an appropriate or applicable
12 technology throughout the Basin.

13 MR. STOGNER: Thank you, Mr. Hawkins.

14 MR. STOVALL: Mr. Carr, just for the record,
15 Mr. Kellahin talked about the technically improper
16 notice, but I assume by your appearance that any
17 deficiencies in notice are waived by the virtue --

18 MR. HAWKINS: That's correct. I reviewed this
19 application with Texaco. Texaco advised me they
20 have no objection to it. They do request, however,
21 that I enter an appearance in the case. I'm also
22 appearing for Amoco, and Amoco has no objection, so
23 we are not raising an objection to the notice. We,
24 in fact, have had actual notice according to our
25 appearing on this proceeding.

1 MR. STOGNER: Thank you. Mr. Carr. Are there
2 any closing remarks, Miss Smith?

3 MISS SMITH: Yeah. Mr. Stogner, if I could
4 make a brief remark. As you and counsel probably
5 know, the Gas Company of New Mexico and Suntera Gas
6 Gathering Company entered an appearance and stated
7 an initial objection to the proposal by Meridian
8 that special allowables were set. That was based on
9 the assumption that that request for special
10 allowables might deviate from standard commission
11 practice on setting allowables.

12 After that time we were able to secure a
13 copy of the entire text of Meridian's application,
14 and after reviewing that application and hearing the
15 testimony of their witnesses today, we are satisfied
16 that the procedure that Meridian is seeking is
17 indeed consistent with commission practices, and so
18 therefore, we withdraw any objection that was stated
19 earlier on the record. Thank you.

20 MR. STOGNER: Miss Smith, did you get a copy
21 of order number R9037 that was the Howell
22 application commission de novo case?

23 MISS SMITH: I don't believe so, but thank
24 you.

25 MR. STOGNER: Here's another copy.

1 MR. STOVALL: You're also going to have to get
2 9037, the original, too, because it's incorporated
3 in there.

4 MR. STOGNER: I just pointed that out as maybe
5 more for your information than anything. Thank you,
6 Miss Smith. We heard from Amoco. Mr. Kellahin, do
7 you have anything further?

8 MR. KELLAHIN: No, sir.

9 MR. STOGNER: Does anybody else have anything
10 further in case number 10324 at this time? If not,
11 this case will be taken under advisement.

12 (Recess taken at 10:05 a.m.)
13
14
15
16
17

18 I do hereby certify that the foregoing is
19 a complete and correct record of the proceedings in
20 the Examiner hearing of Case No. 10324
21 heard by me on 13 June 1991
22 Michael E. Stagner, Examiner
23 Oil Conservation Division
24
25

1 STATE OF NEW MEXICO)
) ss.
2 COUNTY OF BERNALILLO)


3 REPORTER'S CERTIFICATE

4 BE IT KNOWN that the foregoing transcript of
5 the proceedings were taken by me, that I was then
6 and there a Certified Shorthand Reporter and Notary
7 Public in and for the County of Bernalillo, State
8 of New Mexico, and by virtue thereof, authorized to
9 administer an oath; that the witness before
10 testifying was duly sworn to testify to the
11 whole truth and nothing but the truth; that the
12 questions propounded by counsel and the answers of
13 the witness thereto were taken down by me, and that
14 the foregoing pages of typewritten matter contain a
15 true and accurate transcript as requested by counsel
16 of the proceedings and testimony had and adduced
17 upon the taking of said deposition, all to the best
18 of my skill and ability.

19 I FURTHER CERTIFY that I am not related to
20 nor employed by any of the parties hereto, and have
21 no interest in the outcome hereof.

22 DATED at Bernalillo, New Mexico, this day
23 July 29, 1991.

24 My commission expires
25 April 24, 1994


LINDA BUMKENS
CCR No. 3008
Notary Public