

1 NEW MEXICO OIL CONSERVATION DIVISION

2 STATE LAND OFFICE BUILDING

3 STATE OF NEW MEXICO

4 CASE NO. 10558

5  
6 IN THE MATTER OF:

7  
8 The Application of Meridian Oil,  
9 Inc., for an Unorthodox Coal Gas  
10 Well Location, San Juan County,  
11 New Mexico.

12  
13  
14  
15 BEFORE:

16 DAVID R. CATANACH

17 Hearing Examiner

18 State Land Office Building

19 September 17, 1992

20  
21  
22 REPORTED BY:

23 CARLA DIANE RODRIGUEZ  
24 Certified Shorthand Reporter  
25 for the State of New Mexico

ORIGINAL

## A P P E A R A N C E S

FOR THE NEW MEXICO OIL CONSERVATION DIVISION:

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FOR THE APPLICANT:

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BY: **W. THOMAS KELLAHIN, ESQ.**

FOR AMOCO PRODUCTION COMPANY:

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Santa Fe, New Mexico 87504-2208  
BY: **WILLIAM F. CARR, ESQ.**

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## Certificate of Reporter

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1                   EXAMINER CATANACH: Call the hearing  
2 back to order at this time and call Case 10558.

3                   MR. STOVALL: The application of  
4 Meridian Oil, Inc., for an unorthodox coal gas  
5 well location, San Juan County, New Mexico.

6                   EXAMINER CATANACH: Are there  
7 appearances in this case?

8                   MR. KELLAHIN: Mr. Examiner, I'm Tom  
9 Kellahin of the Santa Fe law firm of Kellahin and  
10 Kellahin, appearing on behalf of the Applicant,  
11 and I have three witnesses to be sworn.

12                  MR. CARR: May it please the Examiner,  
13 my name is William F. Carr with the Santa Fe law  
14 firm Campbell, Carr, Berge & Sheridan. I would  
15 like to enter my appearance on behalf of Amoco  
16 Production Company.

17                  Amoco submitted a letter yesterday and  
18 asked it be included in the case file. Other  
19 than that, I do not intend to call any  
20 witnesses.

21                  EXAMINER CATANACH: I see. Do we have  
22 that letter in the case file?

23                  MR. CARR: I have a message that it was  
24 faxed yesterday.

25                  EXAMINER CATANACH: I do not have the

1 letter in the case file.

2 MR. CARR: Would you like a copy of the  
3 letter to put in the case file?

4 EXAMINER CATANACH: Sure.

5 [The witnesses were duly sworn.]

6 MR. KELLAHIN: I would like to call Mr.  
7 Alan Alexander.

8 ALAN ALEXANDER

9 Having been first duly sworn upon his oath, was  
10 examined and testified as follows:

11 EXAMINATION

12 BY MR. KELLAHIN:

13 Q. Mr. Alexander, would you please state  
14 your name and occupation?

15 A. My name is Alan Alexander. I'm  
16 currently employed with Meridian Oil, Inc., in  
17 the Farmington, New Mexico office. I'm a senior  
18 staff landman.

19 Q. On prior occasions have you testified  
20 in that capacity before the Oil Conservation  
21 Division?

22 A. Yes, I have.

23 Q. Pursuant to your employment, have you  
24 made yourself knowledgeable about the ownership  
25 with regards to the coal gas within the area of

1     this particular application?

2             A.     I have.

3             Q.     In addition, are you generally informed  
4     on the proration and spacing units and the  
5     unorthodox well locations that have been approved  
6     by the Division for others within this area?

7             A.     Yes.

8                     MR. KELLAHIN: We tender Mr. Alexander  
9     as an expert petroleum landman.

10                    EXAMINER CATANACH: Mr. Alexander is so  
11     qualified.

12             Q.     Mr. Alexander, let me have you turn to  
13     the package of Meridian's exhibits. Commencing  
14     with the documents after Exhibit Tab 1, would you  
15     identify and describe those documents?

16             A.     Yes. The first document is Meridian's  
17     application for approval of this unorthodox well  
18     location for our EPNG D Com No. 301 well.  
19     Attached to that application are exhibits which  
20     show the nine-section area through a land plat.  
21     Exhibit A and Exhibit B is the offset operator  
22     plat that was attached to the exhibit.

23             Q.     Let's turn to the information behind  
24     Exhibit Tab No. 2, and discuss your knowledge  
25     about the offsetting ownership of coal gas rights

1     that adjoin your spacing unit.

2                 When we look at the display which is  
3     the only display behind Exhibit Tab No. 2, what  
4     are we looking at?

5             A.     We're looking at an offset operator  
6     plat which shows that the offset operators  
7     surrounding our proposed wellbore include  
8     Meridian and Amoco Production Company.

9             Q.     When you look at the address for Amoco  
10    Production Company, before Mr. Stovall spots it,  
11    we've got some typos in there, don't we?

12            A.     Yes, we do.

13            Q.     We misspelled production and misspelled  
14    Denver?

15            A.     That's correct.

16            Q.     But we've got the parties right, don't  
17    we?

18                   MR. STOVALL:   What about the "O" in  
19    front of the 800?

20            Q.     When you look at the Section 30 plat,  
21    what is the proposed spacing unit for what is  
22    identified as EPNG D Com 301 well?   What's the  
23    spacing unit?

24            A.     The spacing unit for that well is the  
25    north half of Section 36 of 30 North and 8 West.

1           Q.       The numbering offsetting spacing units  
2 correspond to either Meridian's operatorship or  
3 Amoco's operatorship?

4           A.       Yes, that's correct.

5           Q.       And you caused notification of this  
6 hearing to be sent to Amoco?

7           A.       Yes, that's correct.

8           Q.       Let's turn now to the display behind  
9 Exhibit Tab No. 3 and look at the first document,  
10 which is an area plat of Section 36 in the  
11 center. The display is complicated, and give us  
12 a second to see the information. Start, first of  
13 all, and tell us what the various well symbols  
14 mean in terms of the type of well indicated by  
15 the well symbol.

16          A.       The types of wells that are  
17 additionally indicated at the bottom of the  
18 exhibit. There are three types of wells,  
19 basically, that we wanted to display. The round  
20 symbol with the spokes in the middle represents a  
21 Mesaverde well. The square symbol represents a  
22 Dakota well, and the triangle represents a  
23 Fruitland Coal well.

24          Q.       Let's turn to the next display after  
25 that and look at an enlargement of only Section



1     36.   Within Section 36, identify for us the  
2     wells.

3           A.     The wells that are shown within Section  
4     36 include, basically, four producing Mesaverde  
5     wells.   The round symbols, a plugged and  
6     abandoned Mesaverde well in the south half of the  
7     northeast quarter, two Fruitland Coal wells being  
8     up in the northeast quarter and the southwest  
9     quarter, and our proposed Fruitland Coal well  
10    over in the northwest quarter of that section.

11          Q.     When we look at the exhibit and look at  
12    Section 36, the south half of the section, is  
13    that dedicated to a coal gas well?

14          A.     It is.   It's dedicated to the State Gas  
15    Com AA No. 1 well.

16          Q.     And that is the well symbol for the  
17    well located in the northeast of the southwest of  
18    36?

19          A.     That's correct.

20          Q.     And that's an Amoco-operated well?

21          A.     That's correct.

22          Q.     In the north half of 36, does Meridian  
23    currently have a producing coal gas well in the  
24    north half?

25          A.     Yes, sir, we do.

1 Q. Where is it?

2 A. It's located in the northeast quarter  
3 of the northeast quarter, and it's designated by  
4 the No. 300, and it is our EPNG D Com No. 300  
5 well.

6 Q. What is Meridian seeking to do with  
7 this application, Mr. Alexander?

8 A. We're seeking to replace the existing  
9 300 well with a new well to be drilled in the  
10 northwest quarter, which is the proposed well of  
11 this application.

12 Q. What is the proposed location of the  
13 replacement well which is identified as the 301  
14 well?

15 A. It is proposed to be located 1175 feet  
16 from the north line and 1115 feet from the west  
17 line of Section 36, of 30 North, 8 West.

18 Q. That well will be within the standard  
19 790 setback from the outer boundaries of the  
20 spacing unit, but requires an exception from Rule  
21 7 of the pool rules because it is in the wrong  
22 quarter section?

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

24 Q. Let's turn now and look at the  
25 topographical display that is the third document

1 behind Exhibit Tab No. 3. Identify that topo  
2 display for us.

3 A. The topographic map is a map of Section  
4 36. It's been enlarged to show the various  
5 details. As you will see, the north half of the  
6 section is quite busy with a number of existing  
7 power lines and pipelines. Those are denoted by  
8 the legend at the top of the page, which you can  
9 refer to. Also, they're marked in circles and  
10 with numeric numbers on that map, documented  
11 archaeological sites that exist across the north  
12 half.

13 As we see, there's also a wash, a sand  
14 wash running basically through the north half,  
15 and we also, if you'll look over in the northwest  
16 quarter, you'll see the main project canal for  
17 the Napi Irrigation System indicated by the two  
18 dashed lines. There's also a major power line  
19 running through the northwest quarter. It's a  
20 two-pole power line.

21 Q. When you look at the Napi project main  
22 canal, what is the setback or offset from that  
23 canal in which you cannot locate a well?

24 A. We cannot cause any surface disturbance  
25 within 300 feet of the centerline of that canal.

1           Q.       Within the area defined as the  
2 northwest quarter, there is a rectangular area  
3 described in that quarter section?

4           A.       Yes, sir.

5           Q.       What does that represent?

6           A.       That represents the legal setbacks and  
7 footage for a Basin Fruitland Coal well.

8           Q.       Identify for us the proposed location  
9 for the 301 replacement well.

10          A.       You'll see that location as a circle  
11 just north and west of the word "canal" on the  
12 topographic map.

13                 MR. KELLAHIN: Mr. Carr, it's this spot  
14 here.

15                 MR. CARR: I found it. Thank you, Mr.  
16 Kellahin.

17                 MR. STOVALL: It appears in green in  
18 Mr. Kellahin's copy of the exhibit, is that  
19 correct?

20                 THE WITNESS: Yes, sir, that's correct.

21          Q.       Have you obtained the necessary surface  
22 clearances for locating this well at the proposed  
23 unorthodox location?

24          A.       Yes, sir, we have.

25          Q.       Are there any other alternative

1 locations available to Meridian in the northwest  
2 quarter for the drilling of this well?

3 A. No, sir, not at a legal location there  
4 are not any available drill sites, other than  
5 what we have picked.

6 Q. Where is the existing 300 well in the  
7 northeast quarter on this exhibit?

8 A. If you'll refer to the exhibit, on the  
9 northern boundary of the setback, the square  
10 that's described in that quarter, clear up on the  
11 north and east corner of that, you'll see a round  
12 circle that's intersected by the setback line.

13 MR. KELLAHIN: Let's make sure we've  
14 found the right spot. Have you figured it out,  
15 Mr. Carr, or do you want me to show you?

16 MR. CARR: I'm comfortable with this,  
17 Mr. Kellahin.

18 MR. STOVALL: In dark blue on Mr.  
19 Kellahin's exhibit copy, is that correct?

20 THE WITNESS: That's correct.

21 Q. In reviewing the development of coal  
22 gas wells in this area, have you located other  
23 spacing units that have wells that are exceptions  
24 to Rule 7 as you seek that exception?

25 A. They would be exceptions to Rule 7 in

1     that they're off pattern. Most of these wells,  
2     however, were drilled before the field rules were  
3     put into effect and were grandfathered in, but  
4     they do represent the exact same case that we  
5     have before us today.

6           Q.     Let me turn to the next display  
7     following the topo map, and have you identify for  
8     us what you're trying to represent with this  
9     document?

10          A.     The plat immediately behind the topo is  
11     a land plat that has darkened sections outlined  
12     on it. You'll notice that there are three coal  
13     wells represented on those plats. At least one  
14     of those wells has been plugged and abandoned or  
15     temporarily abandoned, and a new coal well has  
16     been drilled to replace it.

17          Q.     For example, when we look on the  
18     display and find--I've lost track of the section  
19     numbers here. Perhaps it would be easy to start  
20     in the northwest corner and look at Section 6.  
21     Describe for us why that area is outlined in a  
22     darker black outline.

23          A.     The reason it is outlined is because  
24     you'll see a No. 300 well located in the  
25     northwest quarter. You'll also see a No. 3 well

1 located in the northeast quarter, and a No. 103  
2 well located in the southeast quarter.

3 Q. As you move over into Section 5, what  
4 do we see in that section?

5 A. You see exactly the same scenario. You  
6 see a well in the northwest quarter, a well in  
7 the northeast quarter, and a well in the  
8 southeast quarter.

9 Q. And then you go over into Section 4,  
10 and what happens in that section?

11 A. In Section 4 we have a well in the  
12 northeast quarter, a well on the southeast  
13 quarter and a well on the southwest quarter of  
14 that section.

15 Q. Who operates those particular wells?

16 A. The wells in all six sections, insofar  
17 as it relates to the east half, are operated by  
18 Amoco Production Company.

19 Q. What is your knowledge of the  
20 particular reasons as to why those patterns are  
21 being developed in these coal gas spacing units?

22 A. Originally, we drilled the original  
23 wells in the three sections that we just  
24 discussed, and they were drilled before the field  
25 rules were put into existence.

1           Amoco later drilled or recompleted  
2   their wells and found those wells to be marginal,  
3   at best, or noneconomic as the case may be, and  
4   redrilled their spacing unit to find a better  
5   location for the coal production.

6           Q.     Is that the process you're seeking to  
7   accomplish with your application in this case?

8           A.     Yes, it is.

9           Q.     Let's turn to the last display within  
10   Exhibit No. 3 and have you identify and describe  
11   that document.

12          A.     This display is also a land map. It  
13   shows the township known as Township 31 North,  
14   Range 8 West. It shows a like example of where  
15   we have three coal wells that, at one point in  
16   time, were located on the section. One of those  
17   wells has been plugged and, of course, a  
18   subsequent well was drilled, and we now have two  
19   coal wells in each of the sections.

20                 MR. KELLAHIN: Thank you. That  
21   concludes my examination of Mr. Alexander. We  
22   move the admission of his Exhibits 1 through 3.

23                 EXAMINER CATANACH: Exhibits 1 through  
24   3 will be admitted as evidence.

25                 Mr. Carr?



1 MR. CARR: No questions.

2 EXAMINATION

3 BY MR. STOVALL:

4 Q. Mr. Alexander, is this area out east of  
5 Bloomfield and north of 44? Is that the general  
6 vicinity?

7 A. I'm not exactly sure the geographic  
8 location of this area. I didn't look at it  
9 before we came to the hearing this morning. One  
10 of the other witnesses may be able to tell you  
11 more precisely where it's located.

12 Q. Farmington is about 30 and 12, isn't  
13 it?

14 A. Yes, sir, I believe that's correct.

15 MR. STOVALL: That's all.

16 EXAMINATION

17 BY EXAMINER CATANACH:

18 Q. Mr. Alexander, the reason for the  
19 replacement well will become evident through  
20 other testimony?

21 A. Yes, sir, I believe that it will.

22 Q. Your 301 is at a legal location as far  
23 as setbacks are concerned, is that correct?

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

25 EXAMINER CATANACH: Okay. I have

1 nothing further of the witness.

2 MR. STOVALL: I do have one other thing  
3 I forgot to ask.

4 FURTHER EXAMINATION

5 BY MR. STOVALL:

6 Q. Looking at your topo map, just kind of  
7 having to guess at the scale, it appears that  
8 just kind of southwest of that two-pole power  
9 line there's another power line perpendicular to  
10 it in the southeast corner of that legal location  
11 box?

12 A. Yes, sir.

13 Q. Do you see where I'm talking about?

14 A. Yes, sir.

15 Q. I assume you're trying to say that's  
16 too small a space in there to try and get a well  
17 in, you need to get further east of that well?

18 A. Yes, sir. In addition to having to be  
19 300 feet from the centerline of that canal, we  
20 also cannot build within 150 feet of that double  
21 pole power line or the other power lines that are  
22 in the area.

23 Q. Not having a scale on this map, it's a  
24 little hard--I couldn't tell exactly what the  
25 distances were there.

1           A.       The scale is approximately 812 feet to  
2 the inch.

3           Q.       112?

4           A.       812 feet to the inch.

5           Q.       The area I'm talking about, I guess  
6 it's sandwiched between three different lines?

7           A.       Yes, sir, and then you have the edge of  
8 the wash to deal with in there, also.

9           MR. STOVALL: That's all.

10                   FURTHER EXAMINATION

11 BY EXAMINER CATANACH:

12           Q.       In essence, Mr. Alexander, you're  
13 saying that's the only legal location you could  
14 drill in the northwest quarter, as far as  
15 topographic conditions are concerned?

16           A.       Yes, sir, that is correct.

17           EXAMINER CATANACH: Nothing further.

18           MR. KELLAHIN: Call Mr. John Clayton at  
19 this time.

20                   JOHN CLAYTON

21 Having been first duly sworn upon his oath, was  
22 examined and testified as follows:

23                   EXAMINATION

24 BY MR. KELLAHIN:

25           Q.       Mr. Clayton, would you please state

1 your name and occupation?

2 A. My name is John Clayton. I'm an  
3 engineer with Meridian Oil in Farmington, New  
4 Mexico.

5 Q. Mr. Clayton, on prior occasions have  
6 you testified as an engineer?

7 A. Yes, sir, I have.

8 Q. What are your particular duties with  
9 regards to this application by your company?

10 A. I'm the reservoir engineer that worked  
11 on this project.

12 MR. KELLAHIN: Mr. Examiner, we tender  
13 Mr. Clayton as an expert reservoir engineer.

14 EXAMINER CATANACH: The witness is so  
15 qualified.

16 Q. Let me have you turn to Exhibit Tab 4,  
17 and the first display after that tab.

18 A. Yes, sir.

19 Q. In executing your responsibilities as a  
20 reservoir engineer for this area, are you  
21 familiar with the production and the capacity to  
22 produce coal gas in your number 300 well?

23 A. Yes, I am.

24 Q. Have you compared that capacity and the  
25 current rate with the offsetting production

1 around you?

2 A. Yes, sir.

3 Q. What have you discovered with regards  
4 to the spacing unit in the north half of 36 that  
5 is now dedicated to the 300 well?

6 A. The north half of Section 36, in my  
7 opinion, will suffer drainage in the northwest  
8 quarter by the offset wells.

9 Q. Is the No. 300 well currently able to  
10 adequately protect and develop the north half of  
11 36 as it competes with the offsetting wells?

12 A. In my opinion it's not.

13 Q. What are the offsetting wells that  
14 expose the north half of 36 to drainage?

15 A. The northwest quarter of Section 36 is  
16 of primary concern. The three wells that border  
17 the well, I believe on the map that is displayed,  
18 is producing at 1588 Mcf per day; the well to the  
19 west producing at 2666 Mcf per day, and the well  
20 in Section 36, the south half, producing at 1816  
21 Mcf per day, are the wells of concern.

22 Q. Who operates those wells?

23 A. Amoco Production Company.

24 Q. From what information do you determine  
25 the producing rate?

1           A.       These rates were taken off the latest  
2 Dwight's information that we have.

3           Q.       Reliable information that's reported to  
4 the industry and utilized by reservoir engineers  
5 to have production rates for wells?

6           A.       That's correct.

7           Q.       And these producing rates are set forth  
8 in Mcf of gas per day?

9           A.       That's correct.

10          Q.       There are some contour lines on the  
11 display. What do those represent?

12          A.       The contour line furthest east  
13 represents a contour of 1000 Mcf per day. The  
14 contour line to the west represents a contour of  
15 2000 Mcf per day.

16          Q.       Having identified an area of wells that  
17 produce two to three times what your well is  
18 producing, did you attempt to investigate, as a  
19 reservoir engineer, why that was occurring?

20          A.       Yes, we did. These wells actually  
21 produce 30 times what our well is producing.

22          Q.       Have you provided production plots of  
23 each of these wells that are in question with  
24 regards to the issues involved in this case?

25          A.       Yes, sir. They follow the exhibit

1 we're looking at.

2 Q. Let's look at each of the production  
3 plots and have you identify the well and show us  
4 the information.

5 A. These production plats are listed in  
6 gas production per month. The value you see on  
7 the left, or the Y axis, is a monthly  
8 production. The first exhibit is the EPNG Com D  
9 No. 300. That's the well that's in the northeast  
10 of Section 36 and operated by Meridian. That  
11 well is currently producing at 2158 Mcf per  
12 month, or about 71 Mcf per day.

13 Q. All right. The next display?

14 A. The next display is the State Gas Com  
15 AA No. 1. That well is operated by Amoco  
16 Production Company. It's the well located in 30  
17 and 8, Section 36. That well currently produces  
18 5500 or, excuse me, 55,206 Mcf a month, or about  
19 1.8 million a day.

20 Q. Has the State Gas Com AA well  
21 established a decline in gas production?

22 A. To the contrary. The data we have  
23 actually shows the well on a continued incline.

24 Q. Let's turn to the next gas production  
25 plot. For what well is that?

1           A.       This well is the Florence P No. 3.  
2       This well is operated by Amoco Production  
3       Company. It's located in 30 and 8, Section 35.  
4       This well is producing 2.66 million per day.

5           Q.       Again, does the information establish  
6       an inclining production rate or a declining  
7       production rate?

8           A.       This well is inclining.

9           Q.       The next display?

10          A.       The next and last display is the  
11       Florence K No. 3. This well is operated by Amoco  
12       production. It's located in 30 and 8, Section  
13       25. This well is currently producing 1.6 million  
14       per day, and, there again, the production data we  
15       have displays an incline.

16          Q.       Having determined that your spacing  
17       unit is offset on three sides by high  
18       productivity coal gas wells, and plotting that  
19       production to see each of those wells is still on  
20       an inclining gas rate, did you examine your well  
21       to see if there was any mechanical or completion  
22       reason to explain the dramatic difference in the  
23       performance of your well as you compare to the  
24       Amoco wells?

25          A.       Yes, sir, we did.



1           Q.       Let's turn to Exhibit 5 and look at the  
2 first display behind that exhibit tab. Before we  
3 describe the details, tell us what we're looking  
4 at.

5           A.       We're looking at the same nine-section  
6 plat that showed the production contours, with  
7 Section 36 located in the center. The well names  
8 are identical to the wells that were displayed on  
9 the previous nine-section plat.

10          Q.       You're spotting four coal gas  
11 completions?

12          A.       Yes, sir. These are only the coal gas  
13 wells located in these nine sections.

14          Q.       When we look at the outlying triangles  
15 that are open and not colored in, what do those  
16 represent?

17          A.       Those wells represent wells that are  
18 currently producing naturally from the Fruitland  
19 Coal.

20          Q.       What does that mean?

21          A.       That means they did not require any  
22 artificial stimulation to bring them to the  
23 production rates we've seen.

24          Q.       Are these open hole completions or  
25 perforated completions?

1           A.       Open hole completions.

2           Q.       All those triangles are unstimulated  
3 open hole completions in the coal gas?

4           A.       That's correct.

5           Q.       When you move to the four wells that  
6 are completely colored in with shaded triangles,  
7 what do those represent?

8           A.       There are five wells where the  
9 triangles are completely colored in. Those wells  
10 were also initially completed open hole.  
11 However, the difference in those wells is that  
12 they required fracturing to get the production  
13 rates we've seen.

14          Q.       Let's take the 300 as an example. How  
15 was it drilled and completed initially?

16          A.       That well was drilled and completed in  
17 the same capacity as the open triangle wells.  
18 However, the gas we saw after an open hole  
19 completion was 88 Mcf a day flowing to  
20 atmosphere.

21          Q.       How would that compare to a  
22 high-capacity well that is naturally completed?

23          A.       That would compare to the wells to the  
24 west that produce in excess of two million a day.

25          Q.       What then did you do?

1           A.       Keeping in mind that the rates shown as  
2 actual production rates are flowing into line  
3 pressures, and the 88 we experienced after our  
4 open hole completion technique was flowing to  
5 atmosphere.

6           Q.       What did you try to do, then, to  
7 improve the performance of the 300 well?

8           A.       The EPNG D Com 300 well was then cased,  
9 cemented, perforated and fractured.

10          Q.       With what result?

11          A.       The first frac screened out due to high  
12 treating pressures. We then subsequently frac'd  
13 the well again, and on the second time the well  
14 screened out.

15          Q.       How did you finally establish  
16 production in the well?

17          A.       Cleaned up the wellbore after both  
18 fracs and put the well on line, and it's  
19 currently producing at 71 Mcf per day.

20          Q.       Why have you colored in the other four  
21 wells in addition to the 300?

22          A.       Those wells have also been tried open  
23 hole, same completion techniques as the wells to  
24 the northwest, and have not experienced the  
25 success of those wells. They've subsequently

1     been fractured also to increase productivity of  
2     the wells.

3             The two wells located in Section 31 of  
4     Township 30 and 7, due east of our 300 well, also  
5     experienced screenouts on the fracs.

6             Q.     Having reviewed all that information,  
7     what was your engineering conclusion about the  
8     mechanics of drilling and completing these wells  
9     as explaining the differentials between the  
10    low-performing and the high-capacity wells?

11            A.     The EPNG D Com No. 300 was completed in  
12    the same technique as the open hole wells that  
13    produce at the higher rates to the west.  
14    However, our completion showed that our gas rates  
15    were extremely lower than the wells that are to  
16    the west.

17            Q.     Is the difference attributable to the  
18    completion techniques, then?

19            A.     No, sir, it is not.

20            Q.     Does it have anything to do with the  
21    mechanics of the well and how it was drilled and  
22    completed?

23            A.     No, sir.

24            Q.     As part of your investigation of the  
25    reservoir, did you quantify the gas in place in

1 each of the spacing units in the area?

2 A. Yes, sir, we did.

3 Q. Have you reduced that calculation to a  
4 conclusion about the gas in place for each of the  
5 spacing units in the area?

6 A. The gas in place for our EPNG D Com No.  
7 300 well is located, is similar to the gas in  
8 place in the wells that produce at the higher  
9 rates that offset our drill block.

10 Q. Let's turn to the next document in this  
11 tab section and have you identify and describe  
12 that document.

13 A. Here again we're looking at the same  
14 nine-section plat with only Fruitland Coal wells  
15 located on that plat.

16 Q. What do the numbers mean adjacent to  
17 the coal gas symbols?

18 A. The numbers in the center of the drill  
19 block are what we've calculated to be the gas in  
20 place for that 320-acre drill block on a Bcf.

21 Q. For example, in the north half of 36,  
22 you have 13.4 Bcf gas in place?

23 A. That's correct.

24 Q. Give us a summary of the parameters  
25 that you have used in order to calculate the gas

1 in place.

2 A. We use volumetrics and multiply the net  
3 feet of pay found in the Fruitland Coal interval,  
4 by the density of the coal in the Basin in this  
5 area, times our gas content which was taken from  
6 desorption canisters of the cuttings in each  
7 individual well. We applied a 320-acre spacing  
8 unit to that to calculate gas in place.

9 Q. Did you follow that methodology for all  
10 the calculations that are summarized on this  
11 display?

12 A. Yes, sir, it's consistent.

13 Q. As a reservoir engineer, now, you have  
14 seen the performance differential between your  
15 well and the offsetting Amoco wells, you've  
16 examined the mechanics of completion, you've now  
17 looked to see that you have gas in place in your  
18 spacing unit. What do you attribute the  
19 difference in the productivity of these wells?

20 A. We feel that the difference in the high  
21 productivity to the northwest in these nine  
22 sections, compared to the productivity of our  
23 well in the northwest--excuse me, northeast of  
24 Section 36, is related to a permeability  
25 transition between our well and the wells to the

1 northwest.

2 Q. Are there gas in place reserves in your  
3 spacing unit, particularly in the northwest  
4 quarter, that you cannot protect and recover with  
5 your existing well, that are going to be drained  
6 by the offsetting Amoco wells?

7 A. Yes, there are.

8 Q. What's the solution?

9 A. Our solution is to redrill the EPNG D  
10 Com 300 from its current location in the  
11 northeast, and locate it in the northwest of  
12 Section 36, to provide an opportunity to get into  
13 an area that has a higher permeability trend in  
14 the coal than our well does. Thereby it will  
15 allow us to drain the reserves that would not be  
16 recovered from our well in the northeast.

17 Q. If you don't do that, what happens?

18 A. Those wells will be drained by the  
19 offset wells.

20 Q. Let me ask you to turn to Exhibit 6.  
21 Identify and describe this display for us.

22 A. This display is, once again, the same  
23 nine sections in question. This display has all  
24 the wells located in these nine sections. The  
25 symbols are located at the bottom; the circular

1 symbol for the Mesaverde wells, the squares are  
2 the Dakota wells, and the triangles are the  
3 Fruitland Coal wells.

4 We have large stars on this map and we  
5 also have relative smaller stars. The large  
6 stars are wells which display gas influx while  
7 they were drilled through the Fruitland Coal.  
8 These are Mesaverde wells which essentially took  
9 kicks while drilling through the coal.

10 The smaller stars are wells which  
11 required the stimulation techniques. They were  
12 all tried open hole and did not have the gas  
13 rates that the wells to the west had. They were  
14 then fractured.

15 There's also arrows next to three of  
16 the star wells, and those wells all screened out  
17 on the frac. There's also the same two  
18 production contour lines that give us these nine  
19 sections. The contour to the east is the 1000  
20 Mcf per day line, and the contour to the west is  
21 the 2000 Mcf per day line.

22 Q. How does this information help you, as  
23 a reservoir engineer, attempt to locate the  
24 transition and permeability as you examine this  
25 area?



1           A.       Currently we have no way of qualifying  
2 the permeability in these Fruitland Coal wells  
3 that we feel is something that would be  
4 representative of the actual reservoir downhole.  
5 We've tried to identify other ways to find out if  
6 there's permeability in one location relative to  
7 the other.

8                   The large stars represent what we feel  
9 are gas influx that were taken while the  
10 Fruitland Coal had hydrostatic pressure on it,  
11 i.e., drilling mud, which would display a flow of  
12 gas against a back pressure.

13                   The small stars, we feel that those  
14 five wells were attempted open hole; they were  
15 blown down in the Fruitland Coal, subject to no  
16 hydrostatic, and the production rates failed to  
17 perform like the other wells, exemplifying to us  
18 that the coal in these wells is extremely tight,  
19 compared to the other coals.

20                   The three wells with the arrows on them  
21 not only displayed poor production when the coal  
22 was open to atmosphere, but when they were  
23 treated, when horsepower and energy was  
24 mechanically put on the coal, they failed, after  
25 breakdown, to continue an influx of frac fluid.

1 And subsequent high pressures were reached and  
2 they could not even be mechanically opened up.  
3 We feel this is an example of the coal in these  
4 wells being tight.

5 Q. How does that information fit with the  
6 contour line on producing rates that has been  
7 reproduced from the earlier production map and  
8 superimposed on this display?

9 A. They correlate all the wells that  
10 displayed what we call a lower perm, when  
11 compared to the wells in the northwest, fall in  
12 our lower or are below the 1000 a day production  
13 line.

14 All the wells that experienced gas  
15 influx in the Mesaverde when we were drilling it,  
16 in the Fruitland Coal we were drilling a  
17 Mesaverde well, all fall to the high side of the  
18 1000 Mcf per day line.

19 Q. If the Examiner approves your location  
20 in the northwest quarter, is this going to give  
21 Meridian an advantage over Amoco and its  
22 offsetting wells?

23 A. No, sir. It would allow us to  
24 effectively drain our north half drill block  
25 without having any interference into the reserves

1 located in Amoco's drill blocks.

2 Q. If your well is successful and put into  
3 this position, what happens in the reservoir as  
4 these wells complete for these gas reserves?

5 A. If you look in the northwest quarter of  
6 Section 36, there is a large star located there.  
7 That was some gas influx taken in the Mesaverde.  
8 That's also pretty close to the EPNG D Com 301  
9 proposed location.

10 If we assume that our new location is  
11 going to be producing down line at about two  
12 million Mcf per day, that's a rate very similar  
13 to the drill blocks that we feel are draining our  
14 section. If the rates produce at the same rates,  
15 they should draw down the reservoir pressure  
16 equally and establish a no-flow boundary  
17 somewhere between our proposed location and the  
18 three wells that we feel are draining our drill  
19 block. That no-flow boundary, as long as we're  
20 producing at this same rate, should be somewhere  
21 right along the section lines.

22 Q. Were the exhibits we discussed in  
23 Exhibit Tabs 5 and 6, as well as the information  
24 behind Exhibit Tab No. 4, documents that you have  
25 prepared yourself or were prepared under your

1 direction and supervision?

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

3 MR. KELLAHIN: That concludes my  
4 examination of Mr. Clayton. We move the  
5 introduction of his Exhibits 4, 5 and 6.

6 EXAMINER CATANACH: Exhibits 4, 5 and 6  
7 will be admitted into evidence.

8 Any questions, Mr. Carr?

9 MR. CARR: I have no questions, Mr.  
10 Catanach.

11 EXAMINATION

12 BY MR. STOVALL:

13 Q. Is my description of where this well is  
14 correct, up east of Bloomfield and north of 44?

15 A. That's correct.

16 Q. The canal that was on the topo map, is  
17 that the one that comes across the highway?

18 A. I'm not familiar with where the  
19 canal--it is associated with the Napi project,  
20 that's correct.

21 MR. STOVALL: I was just trying to  
22 picture the countryside.

23 EXAMINATION

24 BY EXAMINER CATANACH:

25 Q. Mr. Clayton, is the volumetric

1 calculation valid in the coal? Is this something  
2 that you're able to do effectively?

3 A. We have an inconsistency when we try to  
4 calculate volumetrics with the droppings of gas.  
5 The best volumetric calculation we can make are  
6 with the parameters that we put the gas in place  
7 calculations on. These are numbers that we feel  
8 are consistent among all wells.

9 Q. Have you calculated, at the current  
10 producing rate of the No. 300 well, have you  
11 calculated what that well might recover if it's  
12 able to produce or if you left it producing?

13 A. The well is producing now and we're  
14 estimating 168 million cubic feet of gas.

15 Q. That it will recover before it's  
16 plugged?

17 A. That's our current estimate right now.

18 Q. Is it Meridian's intention to plug the  
19 No. 300 well?

20 A. If we were to drill a well, which we  
21 would recommend to protect our rights in our  
22 drill block, we would make a pressure observation  
23 well out of the EPNG D Com 300 to further  
24 understand the change in permeability.

25 Q. Meridian wouldn't have any intention of

1 producing both wells at the same time?

2 A. No, sir.

3 Q. On your production contour lines, you  
4 did have sufficient data to construct those  
5 lines?

6 A. Yes, sir. They were taken from  
7 Dwight's, and they're consistent among all  
8 operators in those nine sections.

9 Q. Okay. Referring to--

10 A. I would like to elaborate on that. All  
11 the production figures, with the exception of one  
12 well, the well located in the west half of 31, 30  
13 and 7, where it has in parenthesis pito next to  
14 it, that well is a pito gauge and not an actual,  
15 reported gauge. That well has not yet been tied  
16 in.

17 FURTHER EXAMINATION

18 BY MR. STOVALL:

19 Q. Did you do that area-wide or just for  
20 the nine sections?

21 A. We've done it in several areas to  
22 identify drainage.

23 Q. One goes off the edge and the others  
24 kind of go to the edge. Did you follow those  
25 out? Have you done work on the adjacent--

1           A.       Yes, sir, you can.

2           Q.       --to the north and west?

3           A.       Yes, sir, and they do follow a trend.

4                   FURTHER EXAMINATION

5       BY EXAMINER CATANACH:

6           Q.       Were these contour lines drawn  
7       subsequent to the drilling of the 301?

8           A.       Both contour lines were drilled with  
9       the data we have on this map right here.

10          Q.       At the time you drilled the 300, you  
11       did not have this data available to indicate that  
12       there might be a barrier of some kind in there?

13          A.       No, we did not. This data is recent.  
14       If you look at the--the 300 was drilled in  
15       February of 1990. If you look at the production  
16       plots following this map, you will see that the  
17       three wells of concern that are draining our  
18       drill block all came on in production in 1991.

19                 MR. STOVALL: You believe the ones  
20       immediately to the east would indicate you might  
21       get a halfway decent well out of it, wouldn't  
22       they? That becomes a halfway economic well,  
23       doesn't it? 200 to 300 well?

24                 THE WITNESS: The 217 is a pitot gauge.  
25       There again, that flows to a pressure of 15 psi.

1 MR. STOVALL: I would have wanted the  
2 505 and the 545. That's what I meant. I'm  
3 sorry.

4 THE WITNESS: Yes, sir. The concern we  
5 have in the 300, we've attempted twice to  
6 hydraulically fracture that well. It's displayed  
7 that its permeability is relatively low, even to  
8 the fracture results we've had on those wells.

9 Q. (BY EXAMINER CATANACH) Do you have an  
10 estimate on what kind of reserves the No. 301 may  
11 recover if it's drilled?

12 A. Yes, I do. It should recover about 4  
13 Bcf of gas; that's 4,012 million. There again  
14 that's an estimate, and the results of that well  
15 will be how far we can move to the west and get  
16 into an area of better permeability.

17 Q. That's a recovery rate of about 25  
18 percent or something like that? Is that typical?

19 A. The well in the east half of Section  
20 35, we're anticipating, and here again it's an  
21 estimate, that's not operated by Meridian and  
22 we're limited on data, our estimate on that well  
23 is about 75 percent of the gas in place.

24 Q. Why does that drastically change in  
25 Section 36?



1           A.       They have a slightly lower gas content  
2       in their drill block based off of the, you know,  
3       calculations that we've made that are consistent  
4       with all the wells. We're anticipating on that  
5       somewhere around 10 Bcf, 9918. Strictly an  
6       estimate.

7                    If you look back at the production  
8       history in the curve of that well, it's hard to  
9       figure out when that well is going to stop its  
10      incline.

11          Q.       So, by replacing the 300 well, you're  
12      slightly more than doubling your reserves?

13          A.       Right now we're only estimating  
14      recovery of 68 million out of our existing well.

15                   EXAMINER CATANACH: Okay. I believe  
16      that's all I have at this time.

17                   MR. KELLAHIN: Thank you. Call Mr.  
18      Greg Jennings.

19                   GREGORY JENNINGS

20      Having been first duly sworn upon his oath, was  
21      examined and testified as follows:

22                   EXAMINATION

23      BY MR. KELLAHIN:

24          Q.       Mr. Jennings, for the record, would you  
25      please state your name and occupation?

1           A.       Gregory Jennings. I'm a senior  
2 geologist with Meridian in the Farmington office.

3           Q.       Mr. Jennings, on prior occasions have  
4 you testified about coal gas geology?

5           A.       Yes, I have.

6           Q.       Pursuant to your employment as a  
7 geologist with Meridian, have you made a study of  
8 the coal gas in this particular area?

9           A.       Yes, I have.

10           MR. KELLAHIN: We tender Mr. Jennings  
11 as an expert petroleum geologist.

12           EXAMINER CATANACH: He's so qualified.

13           Q.       Mr. Jennings, Mr. Clayton, as a  
14 reservoir engineer, was exploring explanations  
15 concerning the low productivity of the 300 well  
16 and its relationship to the high capacity wells  
17 that offset the spacing unit. Have you also  
18 looked, from a geologic perspective, to see if  
19 there were geologic explanations to why your 300  
20 well was such a more low-rate producer?

21           A.       Yes, I have.

22           Q.       As part of that study, did you isopach  
23 the net coal thickness in the Fruitland formation  
24 in this particular area?

25           A.       Yes, I did.

1           Q.       Let me ask you to turn to Exhibit Tab 7  
2 and look at the first display, which is the  
3 isopach. Identify and describe the isopach for  
4 us.

5           A.       This is, once again, a nine-section map  
6 around the section of interest. These values by  
7 the wells are the net or total Fruitland Coal in  
8 those wellbores as identified by wire line logs  
9 or mud logs, whatever data we had available.

10                   On that map you can see that the data  
11 values range from the mid-thirties to the  
12 mid-forties; basically, a fairly continuous coal  
13 thickness throughout the area of interest.

14           Q.       Can you explain the differences in  
15 productivity of the Amoco wells to your 300 well,  
16 based upon coal thickness?

17           A.       No. In fact, we found that coal  
18 thickness generally, while it's a positive  
19 factor, coal thickness is not the key to  
20 production.

21           Q.       Have you prepared a structure map to  
22 see if there was a structural explanation that  
23 would account for the differences in the  
24 productivities of the wells?

25           A.       Yes, I have.

1           Q.       Let's turn to that display, which is  
2 the next document behind the exhibit tab, and  
3 have you identify and describe the structure map.

4           A.       Once again, the same nine-section  
5 area. This is a structure map on the base of the  
6 Fruitland Coal, 20-foot contour interval.  
7 Nothing anomalous shows up.

8                   Basically, we have a regional downdip  
9 to the northeast. Nothing--no evidence of any  
10 faults, any significant flexures that would cause  
11 any permeability barriers or cause any increased  
12 fracturing that might account for the differences  
13 in production.

14          Q.       So, you've examined coal thickness and  
15 distribution, and that doesn't explain the  
16 difference. You've looked at structure and that  
17 doesn't explain the difference.

18                   You prepared a cross-section?

19          A.       Yes.

20          Q.       Give us the line of cross-section, and  
21 then we'll look at the cross-section itself.

22          A.       The cross-section A to A' is marked on  
23 the nine-section maps we just looked at, and it's  
24 also in the exhibit book. We'll talk from the  
25 one on the wall. But essentially it includes the

1 three offset producing coal wells that are so  
2 prolific that surround Meridian's drill block in  
3 the north half of 36, and it also includes our  
4 EPNG D Com No. 300 well.

5 Q. Let me have you go to the cross-section  
6 on the wall, and describe for us the  
7 similarities, if you will, among all four wells,  
8 and see if you can identify any geologic  
9 difference that explains the high capacity wells  
10 in relation to the 300 well.

11 A. I'll try and do it just from back  
12 here. I apologize, it's a big cross-section and  
13 it's probably too cumbersome to pull out of your  
14 packet right now, but the EPNG D Com 300 is the  
15 second well from the right. It's a mud log, and  
16 as you can see, the line of cross-section  
17 essentially loops around our spacing in the north  
18 half of 36.

19 In this area there are two basic coal  
20 packages. I've described them as the upper coals  
21 and the lower coals and highlighted them with  
22 pink and yellow. Aside from some minor  
23 variations in the coal zones, the two coal  
24 packages are very continuous and very uniform;  
25 once again in the neighborhood of 40 feet total

1 thickness.

2           Now, if you look closely at the  
3 cross-sections, you can see that while there's no  
4 major difference in coal thickness or coal zones,  
5 we do see some subtle differences on the two mud  
6 logs. The well that's second from the left,  
7 which would be the No. 1 well in the southwest of  
8 Section 36, they encountered a 10-foot flare when  
9 they drilled the first coal zone, 30-foot flare  
10 when they drilled the second coal zone, and then  
11 the well continued to improve as they drilled it  
12 to TD.

13           The coals are described as bright and  
14 very well cleated. Then you go over to our well,  
15 and these wells were both drilled with water, you  
16 go over to our well and look at the sample  
17 description of that well, and we essentially had  
18 no flare after we drilled through the entire coal  
19 interval. The samples are described as dull and  
20 poorly cleated. There's definitely a difference  
21 in the sample description and in the natural  
22 productivity that we encountered in the  
23 wellbore.

24           We are somewhat limited in our ability  
25 to explain or predict where these permeability

1 variations will occur. There is evidence of  
2 depositional variations within our drill block,  
3 and this is fairly common. The Fruitland Coal is  
4 a very heterogeneous reservoir and can change  
5 rapidly in short distances; some coals being more  
6 prone to fracturing and cleating than others.

7 Our conclusion from all the data, after  
8 we've eliminated coal thickness, structural  
9 variations which might have affected the  
10 permeability, and looking at the cross-section,  
11 is that the major difference is significantly  
12 better permeability as we move to the west.

13 MR. KELLAHIN: That concludes my  
14 examination of Mr. Jennings. We move the  
15 introduction of his cross-section in the back of  
16 the exhibit package, as well as his geologic  
17 displays shown behind Tab No. 7.

18 EXAMINER CATANACH: Exhibit 7 will be  
19 admitted into evidence.

20 EXAMINATION

21 BY EXAMINER CATANACH:

22 Q. Mr. Jennings, this data was all  
23 obtained from mud logs?

24 A. No. Two of these logs are old gamma  
25 ray neutron wire line logs, and the two in the

1 center are from mud logs. Our well, the EPNG D  
2 Com 300, does have wire line logs which confirm  
3 the coal thicknesses I've shown on the  
4 cross-section.

5 Unfortunately, this area, like many  
6 areas in the Fruitland Coal, we don't have a lot  
7 of modern wire line logs. That's why I've used  
8 the old gamma ray neutron logs here. Actually,  
9 gamma ray neutron logs are pretty accurate at  
10 identifying coal.

11 EXAMINATION

12 BY MR. STOVALL:

13 Q. Is it not true that--my understanding  
14 is that the coal permeability and cleating is far  
15 more significant than thickness? You can get a  
16 much better well out of a thin coal bed with good  
17 cleating than you can out of a thick coal bed  
18 with poor cleating permeability, is that correct?

19 A. Yes, that's definitely the case.

20 Q. That's your conclusion? You don't have  
21 the cleating and permeability in that well  
22 location? It seems to be better as you go  
23 further west?

24 A. That's correct.

25 Q. Would that also account for the fact



1     that, even though you have similar gas in place,  
2     between, say, the north half of 36 and the east  
3     half of 35, that you're going to get a lower  
4     total percentage recovery out of 36 than 35?

5           A.     Yes. The gas is in place, and--

6           Q.     If you can't get it out of the coal you  
7     can't get it, right?

8           A.     That's right.

9                   FURTHER EXAMINATION

10          BY EXAMINER CATANACH:

11           Q.     Mr. Jennings, are you pretty confident  
12     that a well in the northwest quarter will  
13     encounter the better permeability and cleating  
14     system?

15           A.     Yes. There's always some risk. The  
16     coal is a tough reservoir to explore and to  
17     predict, but we are confident and that's why  
18     we're recommending a well. In fact, we feel that  
19     we're being drained and will be drained if we  
20     don't drill a well in the northwest quarter.

21           MR. STOVALL: You'll have a better  
22     well, you're just not sure how much better?

23           THE WITNESS: Right.

24           EXAMINER CATANACH: I have nothing  
25     further.

1 MR. KELLAHIN: That concludes my  
2 examination and presentation of Mr. Jennings.  
3 The last item is Exhibit 8, which is our  
4 certificate of notification. The only operator  
5 in the area affected is Amoco, and Mr. Carr is  
6 here in their behalf.

7 EXAMINER CATANACH: Is there anything  
8 further in this case?

9 MR. KELLAHIN: No, sir.

10 MR. STOVALL: Closing statement, Mr.  
11 Carr?

12 MR. CARR: No closing statement.

13 EXAMINER CATANACH: There being nothing  
14 further, Case 10558 will be taken under  
15 advisement.

16 (And the proceedings concluded.)  
17  
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I do hereby certify that the foregoing is  
a complete record of the proceedings of  
the Examiner's hearing on Case 10558  
heard by me on September 17, 1992  
David R. Catanch, Examiner  
Oil Conservation Division

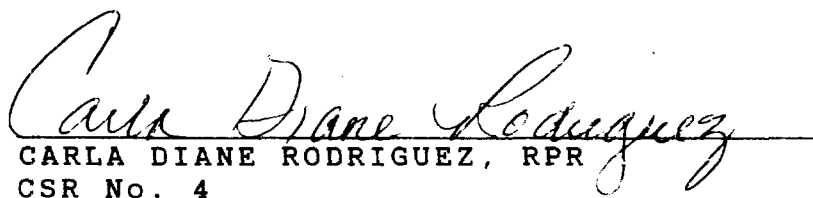
## CERTIFICATE OF REPORTER

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

I, Carla Diane Rodriguez, Certified  
Shorthand Reporter and Notary Public, HEREBY  
CERTIFY that the foregoing transcript of  
proceedings before the Oil Conservation Division  
was reported by me; that I caused my notes to be  
transcribed under my personal supervision; and  
that the foregoing is a true and accurate record  
of the proceedings.

I FURTHER CERTIFY that I am not a  
relative or employee of any of the parties or  
attorneys involved in this matter and that I have  
no personal interest in the final disposition of  
this matter.

WITNESS MY HAND AND SEAL October 5,  
1992.

  
CARLA DIANE RODRIGUEZ, RPR  
CSR No. 4