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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION  
CASE 9896

EXAMINER HEARING

IN THE MATTER OF:

Application of Siete Oil & Gas Corporation  
for a Waterflood Project, Eddy County,  
New Mexico

TRANSCRIPT OF PROCEEDINGS

BEFORE: MICHAEL E. STOGNER, EXAMINER

STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO

March 21, 1990

**ORIGINAL**

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FOR THE DIVISION:

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1 EXAMINER STOGNER: This hearing will come  
2 to order. Call next case, No. 9896.

3 MR. STOVALL: Application of Siete Oil &  
4 Gas Corporation for a waterflood project, Eddy County,  
5 New Mexico.

6 EXAMINER STOGNER: Call for appearances.

7 MR. PADILLA: Mr. Examiner, I'm Ernest L.  
8 Padilla, Santa Fe, New Mexico, for the Applicant, and  
9 I have one witness to be sworn.

10 EXAMINER STOGNER: Since there's no one  
11 else in the room, I'll assume there are no other  
12 appearances. Will the witness please stand and be  
13 sworn.

14 ROBERT LEE  
15 the witness herein, after having been first duly sworn  
16 upon his oath, was examined and testified as follows:

17 EXAMINATION

18 BY MR. PADILLA:

19 Q. Mr. Lee, please state your full name.

20 A. Robert Lee.

21 Q. Where do you live, Mr. Lee?

22 A. Roswell, New Mexico.

23 Q. Do you work for Siete Oil & Gas?

24 A. Yes, I do.

25 Q. What do you do for them?

1 A. I'm a senior reservoir engineer.

2 Q. How long have you been a senior reservoir  
3 engineer?

4 A. With Siete, for one year.

5 Q. Have you previously testified before the  
6 Oil Conservation Division?

7 A. No, I have not.

8 Q. Tell us about your educational background  
9 in petroleum engineering?

10 A. Okay. I got a bachelor's degree from the  
11 University of Missouri in Raleigh in 1979, and I  
12 worked for Tenneco Oil & Gas in San Antonio for the  
13 last nine years before going to work for Siete.

14 Q. Mr. Lee, have you prepared the C-108 and  
15 otherwise made a study of the waterflood project under  
16 consideration here today?

17 A. Yes, I have.

18 MR. PADILLA: Mr. Examiner, we tender Mr.  
19 Lee as a reservoir engineer.

20 EXAMINER STOGNER: Mr. Lee is so qualified.

21 Q. Mr. Lee, would you briefly tell us what  
22 this hearing is about?

23 A. This is an application to convert our  
24 Scottsdale #2 to an injection well and to recover  
25 additional oil that would otherwise not be recovered

1 by our Scottsdale 1 and Scottsdale 3.

2 Q. Mr. Lee, I would like for you to go up to  
3 what we have marked as Exhibit 1. And, in that regard  
4 I would like for you to generally describe what that  
5 exhibit is and also tell us what it intends to show in  
6 connection with this application.

7 A. Okay. This is a stratigraphic  
8 cross-section running from the west to the  
9 east-northeast. Two of our wells are on it, the  
10 Scottsdale #1, the second well from the left-hand side  
11 will be a producing well, and the Scottsdale #2, which  
12 is in the middle of the cross-section, is our proposed  
13 injection well.

14 This cross-section appears to demonstrate  
15 continuity of pay fans throughout the area,  
16 particularly between our two wells. It also shows the  
17 perforated interval of our wells. The Scottsdale 1 is  
18 perforated in the Penrose and the Grayburg. The  
19 Scottsdale 2 is perforated in the Yates, the Penrose  
20 and down in the San Andres.

21 Q. Mr. Lee, let me refer you to the little map  
22 that you have on the right side of that exhibit and  
23 tell us generally who are the offset operators and  
24 what wells produce from the same horizon as your  
25 proposed injection interval?

1           A.       Chevron operates the Littlefield lease to  
2 the north in Section 22, and they produce out of the  
3 Queen horizon. Meridian has the Hinkle lease directly  
4 to the west of our lease, and they produce out of the  
5 Penrose, Grayburg and San Andres horizons. Westall  
6 Mask has the leases to the east of our lease, and they  
7 produce out of the Grayburg horizon.

8           Q.       Mr. Lee, starting up in the Chevron acreage  
9 and going clockwise around your proposed injection  
10 well, would you tell us what the operators in those  
11 properties are doing insofar as injection or what the  
12 method of production is that they're employing in  
13 producing their oil and gas leases?

14          A.       Right. In the Chevron lease, they are  
15 currently waterflooding the Queen horizon. Westall  
16 Mask, they do not have any waterflood or any secondary  
17 recovery procedures going on at this time. Of course,  
18 we do not, either. Meridian, they are also  
19 waterflooding their Hinkle lease.

20          Q.       Are they waterflooding the same horizons  
21 that you plan to waterflood?

22          A.       Yes.

23          Q.       Would the waterflood that you propose have  
24 a tendency to benefit the Westall Mask leases?

25          A.       It's possible, yes.

1 Q. Have you received any objection from them?

2 A. No, we have not.

3 Q. Any communications from Westall Mask?

4 A. No. We sent them notification of what  
5 we're doing with the waivers and we've not heard  
6 anything from them.

7 Q. How about Chevron?

8 A. No complaints there.

9 Q. How about Meridian?

10 A. No, they didn't have any problem with our  
11 project.

12 Q. In fact, you intend to use some of  
13 Meridian's facilities in order to do your waterflood;  
14 is that correct?

15 A. Yes, we will.

16 Q. You'll get into that a little later?

17 A. Yes.

18 Q. Let's get back into the cross-section  
19 itself and tell us, your application covers what  
20 vertical limits?

21 A. In the application, we ask for permission  
22 to inject from the Yates down to and including the San  
23 Andres. The reason for doing this is because  
24 initially we proposed to only inject into the Penrose  
25 horizon because that's the only horizon to have common



1 perforations from our injection well to our producing  
2 well.

3           If that's successful, what we will then do  
4 is go in and open up the Grayburg in our injection  
5 well, Scottsdale 2, and we would open up the Yates in  
6 our producing well, the Scottsdale 1, and may also  
7 open up some of these other sand stringers throughout  
8 the Bowers formation. And that's why we ask for such  
9 broad, vertical limits of the flood.

10           Q.     Have you discovered since making the  
11 application that the San Andres is not part of the  
12 Shugart pool?

13           A.     Yes, we have.

14           Q.     What are your plans in regard to the San  
15 Andres?

16           A.     I would be willing to drop it off of this  
17 application; and later on, if we want to flood the San  
18 Andres, we would come back and either have another  
19 hearing or try to get it approved administratively.

20           Q.     Is there any problem with getting approval  
21 to do the San Andres now that you see, in terms of  
22 having that as a separate pool or a separate  
23 waterflood in connection with this application?

24           A.     No, I don't think there would be a problem  
25 with that.

1 Q. What are the producing capabilities of  
2 wells in that area for the San Andres formation?

3 A. I don't have a structure map, but it is to  
4 the southeast. Our #2 well was wet in the San  
5 Andres. Our #1 well did not penetrate the San  
6 Andres. The Southland Royalty leases on the Hinkle  
7 lease produce out of the San Andres, so we have  
8 basically discovered the down-dip limits of the San  
9 Andres right in through here, in the area of our  
10 Scottsdale #2.

11 Q. Mr. Lee, when you say "right in through  
12 here," what do you mean by that? What area are you  
13 talking about?

14 A. Probably in a line running  
15 northeast-southwest through our Scottsdale #2, would  
16 be the established down-dip productive limits of the  
17 San Andres. If there's additional drilling in the  
18 area that would prove that the San Andres would be  
19 productive in our Scottsdale #1, what we would do at  
20 that time would be to go in and deepen the #1 and  
21 still possibly use our #2 as as an injection well in  
22 that zone.

23 Q. Your plans now, as I understand them, are  
24 not to inject into the San Andres, is that correct?

25 A. That's correct.

1 Q. But you would simply want to have authority  
2 to inject should that become feasible at a later time?

3 A. That would be advantageous, yes.

4 Q. Does your cross-section show any type of  
5 anomaly that would separate your waterflood from any  
6 of the surrounding properties?

7 A. No, it does not.

8 Q. Do you have any opinion as to whether or  
9 not your waterflood might impair the producing  
10 capabilities of surrounding properties?

11 A. It would not impair the producing  
12 capabilities of surrounding properties. It should  
13 enhance them, if anything.

14 Q. Can you give us an estimate of what type of  
15 additional or enhanced production you will encounter  
16 as a result of your waterflooding?

17 A. Yes. Currently our Scottsdale lease is  
18 producing 10 to 12 barrels a day. With this one  
19 injection well, we anticipate the rates to go up to 50  
20 to 60 barrels a day and recover an additional 40- to  
21 50,000 barrels of oil which otherwise would not be  
22 recoverable.

23 Q. What is the nature, what kind of margins do  
24 you have in terms of economics for the current  
25 situation that you have in your wells out there?

1           A.       Our lease is getting very marginal. In  
2 fact, we're pumping only every other day now. In  
3 probably another year to year and a half it would be  
4 uneconomic and we would be looking at plugging these  
5 wells.

6           Q.       Do you have anything further concerning  
7 Exhibit No. 1, Mr. Lee?

8           A.       No, I do not.

9           Q.       Let's go on now, you can resume your seat  
10 and let's go on to what we've marked as Exhibit No. 2  
11 and please identify what that is, please.

12          A.       This is the form C-108, our application to  
13 inject into the Scottsdale #2.

14          Q.       Let's jump right into that, Mr. Lee and  
15 let's take each page that you have in that C-108 and  
16 have you tell the Examiner what that is.

17                    Let me refer you to the second page, which  
18 is a schematic.

19          A.       Okay. This is our proposed wellbore  
20 schematic once the work is completed. In reviewing  
21 this schematic, we found an error here in that over on  
22 the left-hand side, where I'm telling you the packer  
23 that we're going to be using and the setting depth, I  
24 have 2,600 feet on the schematic and it should be  
25 3,600 feet. That will be right above the Penrose

1 which will isolate the Yates, and I will not inject  
2 into the Yates at this time.

3 Q. In other words, that really should be  
4 between Zone 4 and Zone 1?

5 A. That's correct.

6 Q. Tell us, since I've mentioned zones, you  
7 have in that schematic identified certain zones that  
8 are not numerically in order. Would you explain why  
9 you have done that?

10 A. The zones were identified in the order of  
11 completion or attempted completions.

12 Q. So Zone 1 would be the first priority?

13 A. Exactly. That was the first zone that we  
14 completed, and Zone 5 being the last zone that we  
15 completed in.

16 Q. What else do you have to tell the Examiner  
17 concerning this schematic?

18 A. Nothing. This is just part of the well  
19 data that was required on the C-108.

20 Q. How about the schematic that is shown on  
21 the next page?

22 A. This is the current wellbore schematic, how  
23 things sit currently. We have tubing in the hole; the  
24 well is temporarily abandoned. It's uneconomic to  
25 produce at this time. It's notable that there's a

1 cast-iron bridge plug at 4,100 feet, which will  
2 effectively isolate our San Andres zone also.

3 Q. Is that all you have concerning that?

4 A. Yes, it is.

5 Q. Let's go on now to the next page. Tell us  
6 what that is?

7 A. This is the tabular data for our injection  
8 well. This data lists the lease name, location, the  
9 casing program that our injection tubing will be  
10 internally plastic coated.

11 Once again, on our packer there's an  
12 error. The packer's depth is 2,600 feet on this page  
13 and it should be 3,600 feet.

14 I list the formations that I would like  
15 permission to inject into; Yates, Seven Rivers, Queen,  
16 Penrose, Grayburg and San Andres. I describe the  
17 perforated interval in the proposed injection well,  
18 state the well was originally drilled as a producing  
19 oil well, and that within the area of the Scottsdale  
20 Federal #2 there are no higher producing horizons.

21 Q. Is that all you have on that page?

22 A. Yes, it is.

23 Q. Let's go on now to the next page, and what  
24 is that?

25 A. This is a listing of wells within the

1 half-mile radius area of review. This is a table  
2 listing the well names, operators, location of the  
3 wells, types of wells, when it was spud and completed,  
4 where the wells were completed, what formations  
5 they're in and the casing programs.

6 Q. Mr. Lee, looking at the casing programs,  
7 have you looked at all the casing programs in all of  
8 the wells identified in this portion of this exhibit?

9 A. Yes, I have.

10 Q. In your opinion, is there anything here  
11 with regard to the method in which these wells were  
12 completed or plugged and abandoned that would indicate  
13 that there would be some lack of integrity as far as  
14 migration of water?

15 A. No, there is not. The tops of cement are  
16 above the zones that we planned to inject into.

17 Q. What is the kind of casing that you find  
18 out there? Is that type of casing adequate to  
19 prevent--

20 A. Yes, it is. It prevents any kind of fluid  
21 from escaping the wellbore or entering the wellbore  
22 and contaminating the fresh water zone.

23 Q. What is the map that you have attached in  
24 here now?

25 A. This is a--

1 Q. Which is the next page?

2 A. Right. This is a land plat of the area  
3 with the half-mile area of review circle drawn around  
4 our proposed injection well, the Scottsdale #2.

5 Q. You've talked about everything else  
6 concerning what surrounds this well through your map  
7 on Exhibit 1, is that correct?

8 A. That's correct.

9 Q. Now you have on the next page a schematic  
10 of the well. Tell us what that shows.

11 A. Yes. It's required in the form C-108 to  
12 include a schematic of any plugged and abandoned wells  
13 in the area. This is the Hinkle-F #2 originally  
14 drilled by V. S. Welch. It was originally plugged by  
15 V. S. Welch in 1965. It apparently had a bad plug or  
16 it started leaking in 1981, because it was then  
17 replugged by Southland Royalty at that time. I've  
18 also included the two plugging reports for the  
19 plugging of that well.

20 Q. And those are the two pages that follow, is  
21 that correct?

22 A. Yes, sir.

23 Q. Do you know why this well was replugged by  
24 Southland Royalty?

25 A. Not for sure, no.



1 Q. Do you have an opinion as to whether it  
2 might have been replugged because of Southland  
3 Royalty's, and now Meridian's, waterflood project?

4 A. I suspicion that that is the reason that it  
5 had to be replugged.

6 Q. Let's go on now to the last two pages of  
7 your C-108 and have you tell the Examiner what  
8 information is contained in that.

9 A. These pages contain injection type data.  
10 It states that my proposed daily rate will be 300  
11 barrels a day, with a maximum rate of 500 barrels of  
12 water per day.

13 It states we will use Meridian's injection  
14 station, which is a closed system. It contains our  
15 injection pressures. My experience in the area tells  
16 me that the injection pressure will probably get up to  
17 about 500 pounds. Using a .2 psi for fluid injection  
18 pressure rate, my maximum daily injection pressure  
19 will be 520 psi. If later, on as my flood matures, it  
20 becomes necessary to increase that pressure, I will  
21 perform a step-rate test and have it dually witnessed  
22 by the proper authorities.

23 Q. Mr. Lee, does Siete operate other  
24 waterflood projects in Eddy County?

25 A. Yes, we do. We have the Blackhawk

1 waterflood project about a mile to the east of this  
2 well.

3 Q. How have you increased, from time to time,  
4 the pressures that you inject water?

5 A. Yes, we have.

6 Q. How do you do that?

7 A. We perform a step-rate test and demonstrate  
8 where the fracture pressure of the formation is,  
9 showing that our injection pressure was below that  
10 fracture pressure, and then come up with some safety  
11 factor below the fracture pressure, and call that our  
12 maximum injection pressure.

13 Q. Do you do that testing in coordination with  
14 the Artesia office of the Oil Conservation Division?

15 A. Yes, we do.

16 Q. Does the order that allows increase in  
17 pressures allow you to administratively increase  
18 pressures?

19 A. Yes, it does.

20 Q. In that other waterflood?

21 A. Yes, it does.

22 Q. Do you desire to have the same type of  
23 authority in this case?

24 A. Yes, I would.

25 Q. Would you continue now with your testimony

1 regarding these pages.

2 A. Okay. I'm stating here also that my  
3 injection water will be coming from Meridian's  
4 waterflood facility on their Hinkle lease. They are  
5 injecting produced water in their waterflood, which is  
6 from the same formations that I will inject into, so  
7 compatibility will not be a problem. And the water  
8 injection is currently into a zone that was productive  
9 of oil and gas.

10 Q. Okay.

11 A. We also move down into the geologic data,  
12 where I state what intervals I'm going to inject into  
13 in the Scottsdale #2, give approximate depths and tops  
14 of the various formations and thicknesses.

15 Q. Let's go on now to the last page in your  
16 exhibit, and tell us what this contains.

17 A. Okay. It states that I've performed a  
18 search of the area within one mile around our proposed  
19 injection well and there are no fresh water wells. We  
20 went over to the State Water Board there in Roswell  
21 and looked through their records. We plan no  
22 additional stimulation to do this initial injection  
23 here into the Penrose.

24 Q. Why aren't you doing any additional  
25 stimulation?

1           A.       The zones were already frac'd upon primary  
2 completion.

3           Q.       It's your opinion you'll need further  
4 stimulation?

5           A.       That's correct.

6           Q.       Simply inject water into it?

7           A.       Exactly right.

8           Q.       How about the logs? Have you submitted a  
9 log with the application?

10          A.       No, sir. The logs were submitted when the  
11 wells were drilled.

12          Q.       Okay. What kind of water are you going to  
13 inject?

14          A.       We're going to be injecting produced water  
15 from Meridian's lease, which will come out of the  
16 Penrose-Grayburg horizons.

17          Q.       How are you going to work with Meridian in  
18 this project?

19          A.       The economics on this are a little bit  
20 slim, so we had to keep our costs down as much as  
21 possible. So what we've proposed to Meridian is to  
22 tie into their water station and get pressurized water  
23 from them and, in turn, give them our produced water.

24                    Currently they don't have enough injection  
25 water on their lease to properly flood their

1 reservoir, so they're in need of water, so we're going  
2 to give them water and take pressurized water from  
3 them.

4 Q. Have you determined whether or not the  
5 water that you're going to give them would be injected  
6 from their water station is compatible with the water  
7 that exists in the reservoir?

8 A. Yes, it will be compatible.

9 Q. Are you proposing a closed system?

10 A. Yes, the system is closed.

11 Q. What does that do?

12 A. It keeps any oxygen out of the system,  
13 prevents growth of bacteria, helps keep your formation  
14 from getting a sour, corrosive environment.

15 Q. You said you found no potable water within  
16 a mile, is that correct?

17 A. That's correct. At the State Water Board  
18 they had one shallow well listed in Section 27. It  
19 was originally drilled by Southland Royalty, but it  
20 had chlorides of nearly 39,000 parts per million.  
21 Once again I suspect this was a source well they  
22 drilled either for a flood or drilling fluid when they  
23 drilled their wells.

24 Q. Assuming there's a fresh water aquifer that  
25 has not been discovered or may exist in the area, do

1 you feel that the casing programs and the wells  
2 surrounding the project that you have identified as  
3 part of your C-108 are adequate to protect those fresh  
4 water sources?

5 A. Yes, I do.

6 Q. How about migrating up to the surface  
7 itself?

8 A. No. The current casing programs will  
9 prevent that.

10 Q. Mr. Lee, have you sent notice of the C-108  
11 or have you sent your C-108 to all offsetting  
12 operators in accordance with the rules of the Oil  
13 Conservation Division?

14 A. Yes, we have.

15 Q. And to whom have you sent those notices?

16 A. I've sent them to Meridian Oil, Chevron,  
17 Amoco, Westall Mask, and the Bureau of Land  
18 Management. I sent it to the Bureau of Land  
19 Management because they are the surface owners.

20 MR. PADILLA: Mr. Examiner, I've noticed  
21 that Mr. Lee's attachment was not part of the copies  
22 of the return receipts were not attached to that  
23 exhibit, so I'll hand you copies of those C-108s.

24 In addition to that, Mr. Examiner, I have  
25 what we have identified as Exhibit No. 3, showing that

1 our office has sent notices to those same individuals,  
2 as well as the notice of this hearing, and we've  
3 simply identified that as Exhibit No. 3.

4 Q. Mr. Lee, have you, in your opinion,  
5 complied with all of the itemized requirements of the  
6 Section C-108 in connection with your C-108?

7 A. Yes, I have.

8 Q. And in connection with the application for  
9 waterflood?

10 A. Yes, I have.

11 Q. Mr. Lee, would approval of this application  
12 be in the best interests of conservation of oil and  
13 gas?

14 A. Yes, it would be.

15 Q. Do you have an opinion as to whether or not  
16 you're going to impair or enhance the correlative  
17 rights?

18 A. We'll probably enhance correlative rights.

19 Q. How would you do that?

20 A. With the injection of water into this zone,  
21 some of the offset operators may get a slight  
22 production buzz.

23 Q. Mr. Lee, do you have anything further to  
24 testify about concerning this application?

25 A. No, I do not.

1 MR. PADILLA: Mr. Examiner, we'll pass Mr.  
2 Lee for questioning; and I'll move the admission of  
3 Exhibits 1 through 3.

4 EXAMINER STOGNER: Exhibits 1 through 3  
5 will be admitted into evidence at this time.

6 EXAMINATION

7 BY MR. STOGNER:

8 Q. Mr. Lee, let's first talk about your  
9 injection water here. You said it's coming off of the  
10 Meridian waterflood facility and it's going to be  
11 pressurized?

12 A. Yes, we do.

13 Q. What pressure is that water?

14 A. Their injection pressure, as I recall, is  
15 around 6- to 800 psi, but we will be able to choke  
16 that down to less than 520 psi at our wellhead.

17 Q. So you propose to do this at the wellhead?

18 A. Oh, yes.

19 Q. Let's look at the Scottsdale Federal lease,  
20 which I'm assuming takes in the northeast quarter of  
21 Section 27, is that correct?

22 A. That's correct.

23 Q. How many wells are presently, with the  
24 exception of your #2 well, presently completed in that  
25 particular zone?



1           A.       Two wells; the Scottsdale #1 and the  
2 Scottsdale #3.

3           Q.       What is their present production rate?

4           A.       Both wells combined, 10 to 12 barrels a  
5 day.

6           Q.       And those are on beam pump, I assume?

7           A.       Yes, sir.

8           Q.       How old are those wells?

9           A.       The Scottsdale #1 was drilled in 1984, the  
10 Scottsdale #2 was drilled in 1986, and the Scottsdale  
11 #3 was drilled in 1985.

12          Q.       Do you know offhand what their initial  
13 production rate was from this zone?

14          A.       The #1's initial production rate was in  
15 excess of 100 barrels of oil a day. The #2 was 40  
16 barrels of oil a day, and I cannot recall what the #3  
17 initial production rate was.

18          Q.       You have the #1 well on your cross-section,  
19 is that correct?

20          A.       Yes, I do.

21          Q.       And the perforated interval is shown on  
22 that particular exhibit?

23          A.       Yes, it is.

24          Q.       And there seems to be just two sets, one in  
25 the Penrose and one in the Grayburg as you show it, is

1 that correct?

2 A. Yes, sir.

3 Q. Are these the original perforations?

4 A. Yes, they are.

5 Q. And have you been able to isolate which  
6 zone has more production attributed to it?

7 A. No, I have not.

8 Q. Now, I noticed on your injection well, do  
9 you plan to later on come back in and perforate in the  
10 Grayburg portion of that well that would attribute  
11 production enhancement to the #1?

12 A. Yes, sir. If the Penrose horizon works  
13 out, if our flood is successful there, we have plans  
14 to go in and add perfs in our #2 and also add perfs in  
15 our #1 in the Yates formation to establish horizontal  
16 conformance between the two wells.

17 Q. What is the name of that Meridian  
18 waterflood that has taken place over to the west?

19 A. They list it as the Hinkle-F waterflood, or  
20 Hinkle-F lease.

21 Q. Have you had a chance to study it for this  
22 particular project that you're doing?

23 A. To a degree. They're seeing some benefit  
24 from their waterflood. Like I said, they really don't  
25 have as much injection water as they really need to

1 really do an efficient flood. They also have plans to  
2 come in and convert some more wells and try to get  
3 their flood in better shape.

4 Q. Other than notifications, have you  
5 contacted Chevron or have you talked to Chevron?

6 A. Yes, I have. Initially I was talking to  
7 Chevron trying to get pressurized water from them,  
8 also, and they were agreeable to providing pressurized  
9 water, also. I decided to go with Meridian because of  
10 other business contacts that we have with them.

11 Q. Is Chevron presently injecting in their  
12 wells in Section 22?

13 A. Yes, they are. Once again, they have a  
14 water supply problem in that they don't have enough  
15 water, and they also plan to come in and do some  
16 additional drilling and additional conversions of  
17 wells.

18 Q. And those injection wells in Section 22, in  
19 particular the south half of 22, can they be spotted  
20 easily on your map supplied with your C-108?

21 A. No, they cannot.

22 Q. Do you know which ones they are by chance?  
23 I'm looking in the southeast quarter, Wells Nos. 12,  
24 13 and 14, in particular. Are any of those injection  
25 wells?

1           A.       I'm not sure, Mr. Examiner. I would need  
2 to go check. I think the 14 is, but I'm not  
3 positive. I would need to check that.

4           Q.       That won't be necessary. Our records will  
5 reflect that.

6                    But Chevron had no problem when you talked  
7 with them on this particular conversion that you're  
8 proposing at this time?

9           A.       No, they did not.

10                   EXAMINER STOGNER: Are there any other  
11 questions of this witness?

12                   MR. STOVALL: No.

13                   EXAMINER STOGNER: If there are none, you  
14 may be excused. Mr. Padilla, do you have anything  
15 further?

16                   MR. PADILLA: Nothing further.

17                   EXAMINER STOGNER: In that case, Case No.  
18 9896 will be taken under advisement, and the hearing  
19 adjourned.

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