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## I N D E X

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## JOHN ROE

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1

2

MR. STOGNER: Call next Case

3

Number 8685.

4

MR. TAYLOR: The application of

5

Dugan Production Corp. for pool creation and special pool  
rules, San Juan County, New Mexico.

6

7

MR. STOGNER: Call for

8

appearances.

9

MR. STOVALL: I'm Robert G.

10

Stovall, appearing on behalf of Dugan Production. I have  
three witnesses.

11

12

MR. STOGNER: Are there any

13

other appearances in this matter?

14

Will the witnesses please stand

15

and be sworn at this time?

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(Witnesses sworn.)

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KURT H. FAGRELIUS,

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being called as a witness and being duly sworn upon his  
oath, testified as follows, to-wit:

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DIRECT EXAMINATION

BY MR. STOVALL:

Q I believe you've stated your name but if you would, please, again for the record, and your place of residence.

A My name is Kurt Fagrelus and I live in Farmington, New Mexico.

Q And how are you currently employed?

A I'm employed as a petroleum geologist for Dugan Production Corp.

Q Have you previously testified before the Commission and had your credentials accepted?

A No, I have not.

Q What is the your educational background?

A I received a Bachelor's of Science in geology from Ft. Lewis College in Durango, Colorado, in 1977, and a Master's of science in geology from the New Mexico Institute of Mining and Technology in Socorro, New Mexico, in 1982.

Q And what is your work experience in the field of geology?

A I have eight years. I've been employed as a geologist for eight years; six years of which have been with Dugan Production Corp.

1 Q Do you have any other special qualifica-  
2 tions which would have any bearing on your testimony before  
3 this Commission?

4 A Yes. I've attended various schools and  
5 seminars put on by professional organizations and service  
6 companies.

7 Q Are you familiar with the application in  
8 this case?

9 A Yes.

10 Q Have you done any geologic studies in the  
11 area proposed to be included in the Good Times Gallup Oil  
12 Pool?

13 A Yes, I have.

14 MR. STOVALL: I offer Mr. Fag-  
15 relius as an expert geologist.

16 MR. STOGNER: Mr. Fagrel-  
17 ius, when were you at Socorro?

18 A I graduated from Socorro in 1982.

19 MR. STOGNER: When did you get  
20 there?

21 A In 1980. December of 1980.

22 MR. STOGNER: Yes, Mr. Fagrel-  
23 ius is so qualified.

24 Q Would you please turn to what has been  
25 marked Dugan Production Corporation Exhibit One and tell the

1 examiner what that is?

2 A It's an Isopach map of the Gallup bar  
3 sands.

4 Q Are the horizontal limits of the area  
5 proposed for inclusion in the Good Times Gallup Oil Pool  
6 shown on the map?

7 A Yes. The boundries of the proposed Good  
8 times Gallup Oil Pool are shaded in purple.

9 Q Are there any other Gallup oil pools  
10 shown on this map?

11 A Yes, the Bisti Gallup Oil Pool. It's  
12 boundaries are shaded in crange.

13 And also there's the White Wash Mancos-  
14 Dakota Pool in the northeast of Township 24 North, Range 9  
15 West, but it's not been colored in.

16 Q Do you have a personal knowledge of the  
17 acreage in which Dugan Production as the operator has an in-  
18 terest or right to earn an interest in the area covered by  
19 the map?

20 A Yes, I do.

21 Q Would you identify that acreage on this  
22 map, please?

23 A The acreage shaded in yellow is acreage  
24 in which Dugan Production has an interest or the right to  
25 earn an interest. Of those 6,960 acres, total acres within

1 the proposed pool, Dugan Production has a right or can earn  
2 the right -- wait a minute, has an interest or can -- the  
3 right to earn an interest on 5,080 of those acres, or a to-  
4 tal of 73 percent total acreage within the pool.

5 Also, we own additional acreage in the  
6 map area totalling 33,200 acres.

7 Q Would you please explain for the Examiner  
8 what the Isopach shows?

9 A It shows the net thickness of what we  
10 call the Good Times bar sand, the primary pay sand of the  
11 proposed Good Times Gallup Oil Pool, and it also shows the  
12 net combined thickness of the Huerfano and Marye primary pay  
13 sands of the Bisti Gallup Oil Pool.

14 Q And what controls were available for you  
15 to draw this Isopach?

16 A Dugan Production has drilled 53 wells  
17 through the Gallup in this area; 13 of which are within the  
18 proposed pool. Electric logs from these wells and those of  
19 other operators in the area were used as control in drawing  
20 this map.

21 Q Can you distinguish the proposed Good  
22 Times Oil Pool from the Bisti Oil Pool?

23 A Yes. Although they share a parallel and  
24 linear relationship, both pools are producing from different  
25 bar sands at different stratigraphic horizons in the Gallup

1 sandstone.

2 Q Is there any other information on this  
3 map that would be relevant to this hearing?

4 A Yes. It shows two lines of cross sec-  
5 tion, line B to B', which is the cross section across trend  
6 of the proposed pool into the Bisti Pool, and line A to A',  
7 which is the cross section parallel to the linear trend of  
8 the proposed pool.

9 Q All right. Now turn to Exhibit Two. Ex-  
10 hibit Two is a little bit larger; if you like, we can tape  
11 it to the wall. Oh, I'm sorry, Exhibit Two is not the one  
12 that's larger, I'm sorry.

13 Would you tell the Examiner what Exhibit  
14 Two is, please?

15 A It is an electric log of Dugan Production  
16 December Dream No. 1 Well on which we have shown the verti-  
17 cal limits of the proposed pool and the perforated inter-  
18 val's colored in red.

19 Q Where is the December Dream No. 1 Well  
20 located?

21 A It's located 1050 feet from the north  
22 line and 1570 feet from the west line of Section 7, Township  
23 23 North, Range 9 West.

24 Q Is that location within the proposed Good  
25 Times Gallup Oil Pool?



- 1           A           Yes.
- 2           Q           What are the proposed vertical limits for  
3 the Good Times Gallup Oil Pool as shown on this exhibit?
- 4           A           From the top of the Gallup sandstone mem-  
5 ber, as shown at 4095 feet, to the base of the Lower Mancos  
6 shale member as shown at 5510 feet on the December Dream No.  
7 1 log.
- 8           Q           And is that vertical limit marked in any  
9 manner on this log?
- 10          A           Yes, it's the blue bar colored.
- 11          Q           Now we'll turn to Exhibit Three, which is  
12 the one I offered to put on the wall if you so desire.
- 13                      We've placed on the wall and you have in  
14 front of you now Exhibit Three. Would you tell the Exami-  
15 ner what that is, please?
- 16          A           It's a north/south cross section from B  
17 to B', which goes from the Bisti Gallup Pool on the left to  
18 the proposed Good Times Gallup Pool on the right.
- 19                      Each of the wells on this cross section  
20 is completed as a producer.
- 21          Q           Does the exhibit show the perforated or  
22 completed zones of each well?
- 23          A           Yes, they're colored in red.
- 24          Q           Does the exhibit show the vertical limits  
25 of the proposed Good Times Gallup Pool?

1           A           Yes.    The uppermost vertical limits of  
2 the pool are shown by the blue bar.

3           Q           Based on the information provided in the  
4 exhibit and based upon your studies of the additional well  
5 logs in the Bisti and Good Times area, do you have an  
6 opinion about the correlation of the producing sands in the  
7 Bisti Gallup Oil Pool and the proposed Good Times Gallup Oil  
8 Pool?

9           A           Yes.    There does not appear to be a  
10 direct correlation between the pools. The primary pay zones  
11 of each pool, colored in yellow, are laterally discontinuous  
12 between the pools and are separated vertically by approxi-  
13 mately 80 feet of stratigraphic section.

14          Q           And which -- which of the wells, would  
15 you identify, are in the Bisti Pool?

16          A           The December Dream Well on the far  
17 righthand --

18          Q           In the Bisti?

19          A           I'm sorry, I thought you said proposed --  
20 in the Bisti are the two wells on the far left.

21          Q           And in the proposed Good Times Pool?

22          A           Is the December Dream Well on the far  
23 righthand.

24          Q           And the other two wells are in between?

25          A           They're in the Bisti.

1           Q           Now turn to Exhibit Four, which we'll al-  
2 so tape to the wall.

3                        Would you identify this exhibit for the  
4 Examiner, please?

5           A           It is a northwest/southeast cross section  
6 from A to A' along a linear trend of the proposed pool,  
7 showing wells which are completed and producing.

8           Q           And what does it show in terms of the --

9           A           It shows the primary pay zone being what  
10 we identify as the Good Times bar sands and it shows that it  
11 continuous and correlative linearly along the trend of the  
12 proposed Good Times Pool.

13           Q           Does it also show the completion inter-  
14 vals in the wells shown on the cross section?

15           A           Yes. They're colored in red again and  
16 the vertical limits of the pool again are shown by the blue  
17 line.

18           Q           And you have stated that there is a cor-  
19 relation across the pool.

20           A           Yes. It's my opinion that the interval  
21 that we've identified as the Good Times bar sand is contin-  
22 uous and correlative along the trend.

23           Q           Have all the wells within this pool been  
24 completed within the same zones which are within the verti-  
25 cal limits of the pool?

1           A           All the wells in this pool have been com-  
2 pleted within a common interval below the Skelly Zone and  
3 all of the wells have been completed within the primary pay,  
4 being the Good Times bar sand; however, two wells are com-  
5 pleted in the zone above the Skelly Zone.

6           Q           And these are all within the vertical  
7 limits of the pool?

8           A           Yes, they are.

9           Q           Do you know why only two of the wells are  
10 completed in the upper portion of the Gallup sandstone?

11          A           Based on log data, mudlogger's descrip-  
12 tions, and our completions of the Witty 2 and December Dream  
13 No. 1, we feel the upper zone has a higher -- higher gas  
14 content than the lower zone.

15                    The reason the other wells are not com-  
16 pleted in this upper zone, also, is because at the time of  
17 their completion we did not have a gas gathering system in-  
18 stalled and we wanted to avoid venting any unnecessary gas.

19          Q           And why are these upper zones proposed to  
20 be included within the vertical limits of the proposed Good  
21 Times Pool?

22          A           The information we have gathered thus far  
23 on the upper zone indicates it is not commercially produc-  
24 tive on its own without the combined production from the --  
25 both the upper gassy zone and the lower oily zone, these

1 wells would be uneconomical to drill.

2 Q Have Exhibits One through Four been pre-  
3 pared by you or under your direct supervision?

4 A Yes.

5 Q And do you know of their accuracy?

6 A Yes.

7 Q In your opinion would the granting of  
8 this application serve to prevent waste, conserve resources,  
9 and protect correlative rights?

10 A Yes.

11 MR. STOVALL: I move the admis-  
12 sion of Exhibits One through Four and I have no further  
13 questions of the witness.

14 MR. STOGNER: Exhibits One  
15 through Four will be admitted into evidence.

16

17 CROSS EXAMINATION

18 BY MR. STOGNER:

19 Q Mr. Fagrelus, how are the wells through-  
20 out the proposed pool, how have they been reported the last  
21 few -- or during their production life?

22 A As undesignated Gallup wells.

23 Q Have you been in contact with the Aztec  
24 District Office on this proposed pool?

25 A Yes, we have.

1 Q And what has been the extent of those  
2 conversations as far as geological speaking?

3 A They're in favor of getting a pool  
4 formed.

5 Q Who did you talk to?

6 A Personally I haven't talked to anyone.  
7 I've talked to Ernie, and I'm not sure of his last name.

8 Q Mr. Ernie Bush.

9 MR. STOVALL: We have other  
10 witnesses who have had more communication with that office  
11 so perhaps you may wish to reserve that question.

12 MR. STOGNER: Okay, in that  
13 case I have no further questions of this witness.

14 Are there any other questions  
15 of this witness?

16 MR. STOVALL: I have none.

17 MR. STOGNER: If not, he may be  
18 excused.

19 MR. STOVALL: I'd like to call  
20 Mr. John Roe.

21  
22 JOHN ROE,  
23 being called as a witness and being duly sworn upon his  
24 oath, testified as follows, to-wit:  
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DIRECT EXAMINATION

BY MR. STOVALL:

Q Would you please state your name and place of residence?

A My name is John Roe and I reside in Farmington, New Mexico.

Q And how are you currently employed?

A I'm employed by Dugan Production as a petroleum engineer.

Q Have you previously testified before the Commission and been qualified and accepted as an expert?

A Yes, I have.

Q And are you familiar with the application in this case?

A Yes, I am.

MR. STOVALL: I offer Mr. Roe as an expert.

MR. STOGNER: He is so qualified.

Q Mr. Roe, would you please turn to what has been marked Dugan Production Corp. Exhibit Five and tell the Examiner what that is?

A The Exhibit Five is a -- consists of two pages.

1                   On the first page of Exhibit Five we have  
2 presented well completion and production data for the thir-  
3 teen wells that have been completed to date within the pool  
4 boundaries.

5                   The second page is the list of fifteen  
6 wells which Dugan Production has plans to drill, ten of  
7 which are within or immediately adjacent to the proposed  
8 pool boundaries of the proposed Good Times Gallup Oil Pool.

9                   Q           And you did say each of the existing  
10 wells is within the pool boundaries?

11                  A           Yes, sir, each of the thirteen that we  
12 have completed and presented on page one is within the boun-  
13 daries of the pool as we have it proposed.

14                  Q           Are there any additional wells not shown  
15 on this exhibit which are operated by Dugan Production with-  
16 in the general area of the proposed Good Times Gallup Pool?

17                  A           Yes. On what was presented as Exhibit  
18 Number One, which is a map of the general area, Dugan Pro-  
19 duction operates 42 additional wells in -- on Exhibit One,  
20 which is all within the general area of our proposed pool.

21                                These 42 are in addition to the 13 that  
22 are within our proposed pool boundary.

23                  Q           Of the wells listed on Exhibit Five, on  
24 the first page of Exhibit Five, which have been completed,  
25 when was the first well on that exhibit completed?



1           A           Okay, the initial well was our December  
2 Dream No. 1, which is located in Unit C of Section 7, 23  
3 North, 9 West, and that well was completed on January 19th,  
4 1984.

5           Q           And when was the last well which has been  
6 completed to date in this proposed Gallup Pool?

7           A           Okay, our most recent completion is the  
8 Witty No. 3, which is located in Unit E of Section 12, Town-  
9 ship 23 North, Range 10 West. This well was completed on  
10 July 5th of 1985.

11          Q           With respect to the proposed wells shown  
12 on Exhibit -- page two of this exhibit, do you have a know-  
13 ledge as to whether or not Dugan Production definitely plans  
14 to drill those wells or are they merely under consideration?

15          A           It is our intention to drill all of the  
16 wells presented on page two of this exhibit. We have loca-  
17 tion made for one of the ten wells that are within the pool  
18 boundary and we have APD's submitted on all of the wells  
19 that are listed with the exception of one that is in the  
20 preparation process at this time, and we're simply waiting on  
21 the availability of the drilling rigs.

22          Q           Based upon your knowledge of Dugan's  
23 operations in the area, would you summarize Dugan Produc-  
24 tion's activity within the proposed Good Times Gallup Oil  
25 Pool and the surrounding area?

1           A           Yes.    This is -- this general area has  
2 been an area that Dugan Production's been fairly active in  
3 for many years.    The activity in the area of our proposed  
4 pool has been within the last year, year and a half.

5                        We've drilled several wells in the gen-  
6 eral area and the average I've indicated on page one of Ex-  
7 hibit Number Five, an average of 209 barrels a day from the  
8 13 wells within the proposed pool boundary during July.

9                        We also produced an average of 400 MCF a  
10 day of casinghead gas, and as I've indicated earlier, our  
11 immediate area of interest, we've drilled 13 wells, have a  
12 proposal to drill 10 additional wells.    We've also been ac-  
13 tive in the area -- because it is a casinghead gas area the  
14 pipeline companies are not overly interested in gathering  
15 this gas.    Dugan Production on its own has installed approx-  
16 imately 80,000 feet of gathering system at a cost to Dugan  
17 Production of approximately \$350,000 in order to have a mar-  
18 ket for our gas production.

19                        It's an area we've got a fairly substan-  
20 tial investment in the form of wells and facilities.

21           Q           Do you know if any other operators are  
22 currently developing any property within the proposed Good  
23 Times Pool?

24           A           There is no current activity by other  
25 operators, just Dugan Production.

1           Q           Do you know if any other operators who  
2 have interests within the proposed boundaries of the pool  
3 have contacted Dugan Production regarding this application?

4           A           Yes, there -- there are other operators  
5 within our proposed pool boundary. Two of those operators  
6 have contacted Dugan Production prior to this hearing re-  
7 garding our application. There's a Mr. Harry Bigbee of San-  
8 ta Fe that has a leasehold interest of 160 acres in the  
9 southwest quarter of Section 6, Township 23 North, 9 West.

10                   And also Amoco Production has 160-acre  
11 lease which comprises the south half of the north half of  
12 Section 2 of 23 North, 10 West.

13                   Both of these operators have been in  
14 contact with us regarding what specifically was the text of  
15 our application and both operators indicated that they felt  
16 that this would be consistent with their plan of  
17 development.

18           Q           Do you know if Dugan Production contacted  
19 them to solicit their opinions or did they contact Dugan  
20 first?

21           A           The initial contact was on their -- was  
22 by them.

23           Q           Mr. Roe, would you now turn to what has  
24 been marked as Exhibit Number Six and identify that for the  
25 examiner?

1           A           Okay.   Exhibit Number Six consists of  
2 four pages.   The top three pages are simply rate/time pro-  
3 duction graphs on which I've presented the productions his-  
4 tory for three wells that are within the proposed pool boun-  
5 dary.

6                       On page one I've presented the production  
7 performance for what we call the December Dream No. 1. This  
8 is located in Unit C of Section 7, Township 23 North, Range  
9 9 West.

10                      On this exhibit we have approximately 18  
11 months worth of production data and I have extrapolated the  
12 production performance to what I've determined to be the  
13 economic limit of 21 barrels of oil per month.

14                      And at the bottom of page one I've indi-  
15 cated that our ultimate recovery is predicted to be 29,200  
16 barrels of oil based upon the production performance to  
17 date.

18                      Page number two of this exhibit is a sim-  
19 ilar presentation of the production history for the Witty  
20 No. 4. This well is located in Unit C of Section 12, 23  
21 North, 10 West.

22                      We don't have quite the length of produc-  
23 tion history for this well; however, utilizing the same pre-  
24 diction of future performance, which is fairly typical to  
25 the Gallup wells in this general area, and extrapolating to

1 an ultimate economic limit of 21 barrels a month, we indi-  
2 cate the ultimate primary recovery for this well to be  
3 33,900 barrels of oil.

4 On the third page of this exhibit is a  
5 similar presentation for the production performance for our  
6 Silver Medal No. 1. This well is located in Unit M of Sec-  
7 tion 27, 24 North, 10 West.

8 Making the same extrapolation to the eco-  
9 nomic limit, the ultimate recovery for this well would be  
10 21,000 barrels of oil.

11 On the last page of this exhibit is a ta-  
12 bulation of the pay data and our drainage calculations for  
13 these three wells.

14 Q Let me stop you there. Why did you  
15 select these particular wells for your production curves?

16 A The three wells that we've presented on  
17 the -- in this exhibit were chosen simply because they have  
18 more production history than any of the other wells we have  
19 on; some of our recent completions have just one month; it  
20 gave us the best chance of determining what will be the pro-  
21 duction trend indicated by the actual performance and help  
22 us in establishing ultimate recovery for the wells.

23 Q What about the locations of the wells?  
24 Did that have any bearing on the selection?

25 A Yes. We chose the Silver Medal because

1 it's located at the northwest end of our pool; the Witty 4  
2 is within the central portion of the pool; and the December  
3 Dream is at the southeastern end of the pool, so we've made  
4 an effort to present production data throughout the length  
5 of our pool.

6 Q Okay, and you have already testified that  
7 you've developed the production potential of the wells on  
8 this exhibit.

9 Based on that have you made any calcula-  
10 tions to determine and appropriate drainage area for that  
11 production potential?

12 A Yes, I have.

13 Q And based upon those calculations, what  
14 would be the proper drainage area on spacing units for wells  
15 in this pool?

16 A Well, based on those calculations, which  
17 are presented on the fourth page of this exhibit, we propose  
18 that the pool be spaced initially on 80 acres per well.

19 With just a brief summary on the last  
20 page of this exhibit, the -- basically we utilized open hole  
21 log data from the wells that we've presented the production  
22 based reserve data on on the first three pages, and we've  
23 also, using the open hole log data, volumetrically calcu-  
24 lated what will be the predicted ultimate recovery in stock  
25 tank barrels of oil per acre. This is presented in the

1 righthand portion of this tabulation. That ranges from 217  
2 to 443 barrels of oil per acre.

3 Utilizing this recovery factor and the  
4 predicted ultimate performance based on production, our pro-  
5 bable drainage ranges from 66 to 97 acres per well.

6 Q Do you have an opinion as to whether the  
7 80-acre spacing units which you recommend should be standup  
8 units, that is the east half and west half of a quarter sec-  
9 tion, or laydown units, that being the north half or south  
10 half of a quarter section?

11 A Based upon what we know about the -- the  
12 thirteen wells we've drilled to date, we see no reason to  
13 dictate which direction the 80-acre unit should be oriented.

14 We feel that it should be left to the  
15 discretion of the operator as to whether it's a standup or  
16 laydown unit.

17 Q Have Exhibits Five and Six been prepared  
18 by you or under your direct supervision and do you know of  
19 their accuracy?

20 A Yes, they have, and I can attest to their  
21 accuracy.

22 Q Do you have an opinion based on the evi-  
23 dence which has been presented as to whether there is suffi-  
24 cient data and control to determine whether or not there's a  
25 different producing sand in the Good Times Pool Area from

1 any of the other pools in the vicinity, specifically the  
2 Bisti Gallup Pool?

3 A Based upon the 42 wells that we operate  
4 that are -- the bulk of which are within the Bisti and the  
5 13 wells that we've drilled that are within the proposed  
6 pool boundary, we believe that the sands that are the pri-  
7 mary producing interval in each of the two pools are unique  
8 to each of the pools.

9 MR. STOVALL: At this time I  
10 would like to move the admission of Exhibits Five and Six so  
11 I don't forget them.

12 I have some additional ques-  
13 tions for the witness.

14 MR. STOGNER: Exhibits Five and  
15 Six will be admitted into evidence at this time.

16 Please continue.

17 Q Mr. Roe, the application asks for spacing  
18 of wells to be not closer than 330 feet to any quarter quar-  
19 ter section boundary. Can you explain why, please?

20 A The selection of 330 is the statewide  
21 spacing for a standard 40-acre unit.

22 At the current time, based upon the cal-  
23 culations we've presented in Exhibits Five and Six, and  
24 based upon the study of all of the information available to  
25 us to date, plus drawing an analogy to the Bisti Pool which



1 has been developed on 80-acre spacing, we believe that the  
2 proper spacing is the 80 acres; however, not losing sight of  
3 the fact that someday dependent on economics, or it may be  
4 determined at a later date that 40-acre spacing would be a  
5 more desirable spacing, so we would like to have the reser-  
6 voir developed in a manner that would allow for that if that  
7 should ever be determined to be the proper spacing.

8 Q The application also asks that the pool  
9 rules give the Director the authority to administratively  
10 approve nonstandard unit sizes or unorthodox well locations  
11 upon meeting certain conditions.

12 Can you explain why Dugan seeks that in  
13 the application?

14 A This is an area -- the topography is not  
15 a real problem; however, there are some considerations that  
16 will have to be given to topography in making well  
17 locations. There's several sand washes and the terrain is  
18 rough in some areas of the pool boundary.

19 In addition, this is an area of known  
20 archaeological importance and so to us it's not that  
21 unlikely that it will be necessary to have locations that  
22 may require unorthodox location approval.

23 In addition, we feel that there may be  
24 occasions that an operator for one reason or another will  
25 not be able to form a standard 80-acre unit, which is the

1 case with our Fairway No. 1, and giving whatever the reasons  
2 being, we feel that rather than tie the Commission up with  
3 unnecessary hearings, given the qualification that all  
4 operators within a half mile of the affected well or loca-  
5 tion receive notice and have no objection, we feel that it's  
6 reasonable to ask the Commission to handle this administra-  
7 tively as opposed to coming to a hearing.

8 Q Now, Mr. Roe, the application also asks  
9 that the Commission grant a nonstandard 40-acre spacing unit  
10 for Dugan Production's Fairway No. 1 Well.

11 First would you please tell the Commis-  
12 sion where that well is located?

13 A Okay. The Fairway No. 1 is located in  
14 the southwest quarter of the southwest quarter of Section 1  
15 of Township 23 North, Range 10 West.

16 It was drilled and completed in 1985,  
17 February 13th, 1985, and was drilled as an undesignated 40-  
18 acre Gallup spacing unit.

19 Q And what -- what acreage does Dugan have  
20 an interest in or control of or operate in connection with  
21 that well?

22 A Dugan Production's leasehold interest is  
23 the 40-acre unit that the well is situated upon. We have no  
24 other leasehold interest within Section 1.

25 Q Do you know if Dugan Production attempted

1 to acquire any interest in adjacent acreage in Section 1  
2 prior to the drilling of the Fairway No. 1 Well?

3 A Yes, we did; in the early part of 1984  
4 we made an attempt to acquire this leasehold interest.

5 Q And what were the results of those ef-  
6 forts?

7 A We were unable to arrive at an agreement  
8 that was satisfactory of all parties involved.

9 Q Has Dugan Production made any attempt  
10 since the well has been completed to obtain any interest in  
11 the adjacent tracts in Section 1?

12 A Yes. During April of 1985 we again ap-  
13 proached the leaseholders of this acreage and they indicated  
14 to us that they weren't interested in making any arrangement  
15 with Dugan Production.

16 Q Mr. Roe, looking at the application as a  
17 whole, do you believe the granting of that application would  
18 be in the interest of preventing waste, protecting correla-  
19 tive rights, and conserving resources?

20 A Yes, Dugan Production, as I've indicated  
21 earlier, completed this well in February, '85, and as of  
22 August 1st --

23 Q No, I'm talking about the whole applica-  
24 tion, not just with respect to that well.

25 A I misunderstood. Yes, I think the appli-

1 cation would be in the best interest of all working interest  
2 owners.

3 MR. STOVALL: I have no further  
4 questions of Mr. Roe.

5

6 CROSS EXAMINATION

7 BY MR. STOGNER:

8 Q Mr. Roe, you might be the person to ask  
9 this.

10 First of all, before I ask that question,  
11 who is the other working interest owners in Section 1 for  
12 that Fairview -- or the Fairway No. 1?

13 A Okay. That approximately 600-acre lease,  
14 net lease, is held jointly by three companies, Champlin Pet-  
15 roleum owning 50 percent, Chorney Oil owning 25 percent, and  
16 then there's a third company, Norcen Energy, Incorporated,  
17 that has a 25 percent interest in that lease.

18 And it's my understanding that they hold  
19 the lease equally.

20 Q Does Dugan Production propose any limita-  
21 tions on whether it be a standup or laydown 80 acres?

22 A Mr. Examiner, it would be our preference  
23 that there not be that orientation of the unit. I realize  
24 that Bisti does have that orientation but we don't see a  
25 reason in our area to establish that and there might be

1 lease situations that would be beneficial to leave that to  
2 the discretion of the operator.

3 Q Where did the name Good Times Gallup --

4 MR. STOVALL: Mr. Examiner, we  
5 have a witness to testify to that.

6 MR. STOGNER: Okay, we'll drop  
7 that one at this time, then.

8 A There's a story to that question.

9 Q Okay, let's see, Mr. Roe, one more ques-  
10 tion to you.

11 Have you been in contact with Mr. Ernie  
12 Bush or Frank Chavez in our Aztec Office?

13 A Yes, we spoke to both and we visited on  
14 two occasions with Mr. Chavez regarding our proposal to es-  
15 tablish this pool.

16 Q And what was the extent of those conver-  
17 sations, may I ask?

18 A Frank recognized the need to -- with 13  
19 wells in an area that was beyond the one-mile extension,  
20 automatic extension to Bisti, Frank recognized the need for  
21 establishing special pool rules, especially if we wanted a  
22 spacing that would be different from the statewide 40-acre  
23 spacing.

24 So we had Frank's encouragement to pro-  
25 ceed with the special pool rules hearing, especially as Du-

1 gan was the only operator with wells in the pool.

2 Q Did Mr. Chavez agree with the vertical  
3 and horizontal limits as you propose today?

4 A I didn't actually -- we did discuss why  
5 there was an orientation in Bisti. I don't think Frank  
6 voiced an opinion to me by what his preference would be in  
7 our area.

8 He did indicate that, you know, he wasn't  
9 real positive of the total reason for Bisti other than it  
10 was oriented along the trend that was initially established.

11 I might mention that in Bisti the sand is  
12 about three times thicker than the primary sand we're deal-  
13 ing with in our area, and so we're relying upon other zones  
14 in addition to the primary zone that we've identified on our  
15 Exhibit One and called the Good Times sand.

16 Q So the answer to the question would be he  
17 did not voice his opinion of your vertical limits outlined  
18 in purple in this pool.

19 A That's correct, as best I recall our con-  
20 versation.

21 Q Thank you.

22 MR. STOGNER: I have no further  
23 questions of Mr. Roe.

24 Is there anything further of  
25 this witness?

1 If not, he may be excused.

2 MR. STOVALL: I'd like to call  
3 Mr. Tom Dugan, please.

4  
5 THOMAS A. DUGAN,  
6 being called as a witness and being duly sworn upon his  
7 oath, testified as follows, to-wit:

8  
9 DIRECT EXAMINATION

10 BY MR. STOVALL:

11 Q Mr. Dugan, would you state your name and  
12 place of residence?

13 A Thomas A. Dugan. I live near Farmington,  
14 New Mexico.

15 Q And how are you employed?

16 A I work for Dugan Production Corp.

17 Q In what capacity?

18 A President.

19 Q And Dugan Production Corporation is the  
20 application in this case?

21 A Yes.

22 Q What is Dugan's primary business?

23 A Producing oil and gas.

24 Q And in what area?

25 A San Juan Basin.

1 Q How long has Dugan been an operator in  
2 the San Juan Basin?

3 A For thirty years.

4 Q And how long have you operated in what  
5 we're calling the Good Times Pool area?

6 A Well, we've operated in that general area  
7 for a good twenty years.

8 Q And within the specific pool boundaries,  
9 I think you have Exhibit One in front of you, how long -- do  
10 you know of any other operators who are active within what  
11 we're calling, or proposing as the Good Times Gallup Pool?

12 A No, there are no other operators that are  
13 active at this time.

14 Q Who selected the name for the proposed  
15 Good Times Gallup Oil Pool?

16 A Well, I guess it was a joint effort by  
17 the Dugan Production staff.

18 Q Is there -- is there a reason that you  
19 selected that particular name for this area?

20 A Of course.

21 Q Would you tell the Commission what that  
22 is, please?

23 A Well, it's far enough from town that you  
24 don't get too much company out there, yet it's not so far  
25 that you're wore out by the time you get there, and the



1 wells are pretty easy to drill. There are not any lost cir-  
2 culation problems and blowout problems and the terrain is  
3 relatively good.

4                   So all of that leant itself to the name,  
5 but the real reason is that, as you can see by Exhibit Five,  
6 they aren't the greatest of wells and so the times have to  
7 be pretty -- pretty good to drill this type of well in that  
8 the price of oil has to be fairly, fairly good, and the  
9 drilling costs low, and so that's the real reason that we're  
10 calling it the Good Times area.

11               Q           When did you originally come up with that  
12 name?

13               A           Well, we've been using it for several  
14 years. I don't really recall the exact date.

15               Q           And Dugan Production commonly uses that  
16 name to refer to this general area, is --

17               A           Yes.

18               Q           -- that correct?

19               A           Uh-huh, and El Paso is using it to refer  
20 to their meter site where we -- the gas is delivered to  
21 their system.

22               Q           So there is -- so it's not just a name  
23 that's used internally at Dugan; other -- other people in  
24 the area, operators --

25               A           Yes.

1 Q -- are familiar with that name?

2 MR. STOVALL: I have no further  
3 questions.

4 Well, I have no further ques-  
5 tions but I would like to ask that the Examiner take admin-  
6 istrative notice of Mr. Dugan as an expert in the art of  
7 naming wells, developing areas.

8 MR. STOGNER: The Division al-  
9 ways recognizes presidents of companies as expert witnesses  
10 and relies upon their testimony.

11

12

CROSS EXAMINATION

13 BY MR. STOGNER:

14 Q Mr. Dugan, have you talked to Mr. Chavez  
15 about the Good Times?

16 A Sure.

17 Q Okay, what was his comments on all this?

18 A Oh, I don't know. I got the idea he liked  
19 it.

20 Q Okay.

21 MR. STOGNER: I have no further  
22 questions of Mr. Dugan.

23 Is there any other questions of  
24 this witness?

25 A If you called it South Bisti, you'd have

1 no imagination whatsoever.

2 MR. STOVALL: Mr. Dugan, one  
3 more question.

4 Would you please say Catclaw  
5 Draw Strawn Gas Pool?

6 A I decline to answer that question.

7 MR. STOVALL: Much easier to  
8 say.

9 MR. STOGNER: Apparently no  
10 further questions of this witness. He may be excused.

11 Anything further in Case Number  
12 8685?

13 If not --

14 MR. STOVALL: I had prepared a  
15 closing statement but I won't bore the Commission with that.  
16 It just summarizes the testimony that has been presented.

17 MR. STOGNER: Okay. Being  
18 none, we'll take Case Number 8685 under advisement.

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20 (Hearing concluded.)

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C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the Oil Conservation Division (Commission) was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability.

Sally W. Boyd CSR

I do hereby certify that the foregoing is a complete and true transcript of the Examiner hearing of Case No. 8685 heard by me, on 28 August 1985.  
Michael J. [Signature], Examiner  
Oil Conservation Division

1 STATE OF NEW MEXICO  
2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
3 OIL CONSERVATION DIVISION  
4 STATE LAND OFFICE BUILDING  
5 SANTA FE, NEW MEXICO

6 2 December, 1987

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Case 8685 being reopened pursuant to CASE  
10 the provisions of Division Order No. 8685  
11 R-8090, San Juan County, New Mexico.

12 BEFORE: Michael R. Stogner, Examiner  
13  
14

15 TRANSCRIPT OF HEARING  
16  
17

18 A P P E A R A N C E S  
19

20 For the Division: Jeff Taylor  
21 Attorney at Law  
22 Legal Counsel to the Division  
23 State Land Office Bldg.  
24 Santa Fe, New Mexico 87501

25 For Dugan Production: Robert G. Stovall  
Attorney at Law  
P. O. Box 129  
Farmington, New Mexico 87499

1  
2 MR. STOGNER: Call next Case  
3 Number 8685, being reopened.

4 MR. TAYLOR: In the matter of  
5 Case Number 8685 being reopened pursuant to the provisions  
6 of Division Order No. R-8090, which order created and  
7 promulgated temporary special rules and regulations for the  
8 South Bisti Gallup Oil Pool in San Juan County, New Mexico.

9 MR. STOGNER: Call for  
10 appearances.

11 MR. STOVALL: Robert G.  
12 Stovall, Farmington, New Mexico, on behalf of Dugan  
13 Production Corp.

14 MR. STOGNER: Are there any  
15 other appearances in this matter?

16 Mr. Stovall.

17 MR. STOVALL: I have two wit-  
18 nesses to be sworn.

19 MR. STOGNER: Will they be --  
20 will they please stand and be sworn at this time?

21

22 (Witnesses sworn.)

23

24 MR. STOGNER: Mr. Stovall.

25 MR. STOVALL: Our first witness

1 is Mr. Kurt Fagrelius.

2

3

KURT FAGRELIUS,

4 being called as a witness and being duly sworn upon his

5 oath, testified as follows, to-wit:

6

7

DIRECT EXAMINATION

8

BY MR. STOVALL:

9

Q Mr. Fagrelius, would you please state

10 your name and place of residence for the record?

11

A My name is Kurt Fagrelius and I live in

12 Farmington, New Mexico.

13

Q And how are you employed?

14

A As a petroleum geologist by Dugan

15 Production.

16

Q Have you ever testified before the

17 Commission and had your qualifications accepted as an

18 expert?

19

A Yes, I have.

20

Q And are you familiar with the matter to

21 be heard today and geological data in connection there with?

22

A Yes, I am.

23

MR. STOVALL: I offer Mr.

24

Fagrelius as an expert petroleum geologist.

25

MR. STOGNER: Mr. Fagrelius is

1 so qualified.

2 Q Mr. Fagrelus, have you prepared exhibits  
3 in connection with this case?

4 A Yes, I have.

5 Q And I'd ask you to turn to Exhibit Number  
6 One and identify that for the Commission, please.

7 A Exhibit Number One is an Isopach map of  
8 Gallup Bar Sand in the vicinity of the South Bisti Gallup  
9 Oil Pool. On the map in a stippled shaded pattern is  
10 Dugan's -- it shows Dugan Production's acreage position. Of  
11 the 8080 acres total in the South Bisti Gallup Oil Pool Du-  
12 gan Production operates 6000 acres, or 74 percent of the ac-  
13 reage.

14 The map also shows wells which have been  
15 drilled, completed, and operated by Dugan Production. Cur-  
16 rently Dugan Production has 36 producing wells, 12 loca-  
17 tions, and one uncompleted well in the area.

18 It also shows a line of east/west cross  
19 section going from A to A' and also shown on the map is the  
20 existing pool boundary shaded in orange with the pending ex-  
21 tension dashed in orange.

22 Q Thank you. I'd now ask you to turn to  
23 Exhibit Number Two.

24 A Exhibit Number Two is a stratigraphic  
25 cross section A to A' going from east to west along the



1 trend of the sand bar trend.

2                   On it our perforations are shown by lines  
3 with circles. The primary pay, herein referred to as the  
4 Good Times Bar Sand, is shaded in yellow and the vertical  
5 pool -- limits of the pool are shaded in blue.

6                   Also shown on the cross section is a,  
7 shaded in red, is a cored interval that we cored in the  
8 Olympic No. 2.

9                   Porosity values derived from the core and  
10 those from the density logs correlate well and are very sim-  
11 ilar.

12           Q           Do you find a correlation across the  
13 cross section within the wells with respect to the Good  
14 Times --

15           A           Yes.

16           Q           -- Bar Sand?

17           A           The Good Times Bar Sand is correlatable  
18 across the field and also additional perforated zones are  
19 correlated across the field.

20           Q           Were you present at the original hearing  
21 at which the South Bisti Pool was created and did you pre-  
22 sent evidence in that?

23           A           Yes, I was. We presented an Isopach map  
24 and a cross section at that hearing.

25           Q           Do you find any significant change from

1 the original information which was presented before the Di-  
2 vision and the information which is being presented today  
3 with respect to the logs?

4 A No, no significant change and there seems  
5 to be good similarity between the exhibits from August of  
6 '85 with those today.

7 Q Are you familiar with the special pool  
8 rules for the South Bisti Gallup Pool?

9 A Yes, I am.

10 Q Are you aware of any problems which are  
11 created or caused by any of the provisions of those rules?

12 A Rule No. 4, which restricts the location  
13 of the well to within 150 feet of the quarter quarter sec-  
14 tion is kind of cumbersome to work with.

15 Q And cumbersome in what way? Geological-  
16 ly, or --

17 A Geologically as far as locating well  
18 sites. It limits my -- the area in which I can stake a  
19 well.

20 Q And is there a -- does that geological  
21 limitation affect the possible probability of success in the  
22 drilling of a well in that area?

23 A Yes, it does.

24 Q Do you have any feeling of what would be  
25 a better location requirement within that pool?

1           A           I'd like standard rules that apply to  
2 most 40 and 80-acre pools in New Mexico, whereby you have a  
3 330 stepout from the section line.

4           Q           From the section lines or from the quar-  
5 ter quarter section line?

6           A           Quarter quarter.

7           Q           Is there any further information which  
8 you wish to add with respect to Exhibits One and Two or  
9 geological information with respect to the pool?

10          A           No, sir.

11          Q           Were Exhibits One and Two prepared by you  
12 or under your supervision and are you aware of their  
13 accuracy?

14          A           Yes.

15                           MR. STOVALL: Move the admission  
16 of Exhibits One and Two.

17                           MR. STOGNER: Exhibits One and  
18 Two will be admitted into evidence at this time.

19                           MR. STOVALL: I'd call Ms.  
20 Barbara Williams.

21  
22                           BARBARA WILLIAMS,  
23 being called as a witness and being duly sworn upon her  
24 oath, testified as follows, to-wit:  
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DIRECT EXAMINATION

BY MR. STOVALL:

Q Ms. Williams, will you state your name and place of residence for the record, please?

A My name is Barbara Williams and I reside in Farmington, New Mexico.

Q And how are you employed?

A I'm a petroleum engineer for Dugan Production Corp.

Q And have you previously testified before the Commission and had your qualifications accepted as an expert?

A No, sir.

Q Would you please state your educational background?

A I received a Bachelor of Science degree in petroleum engineering from New Mexico Institute of Mining and Technology in Socorro, New Mexico, in 1984.

Q And what has been your work experience?

A I am involved in surveying, permitting, drainage analysis, production evaluation, log analysis, and completion procedures.

Q And that's with -- has that all been with Dugan Production Corp.?

1 A Yes, sir.

2 Q And you are in the Engineering Department  
3 at Dugan Production Corp., is that correct?

4 A Yes, sir.

5 MR. STOVALL: I would offer Ms.  
6 Williams as an expert petroleum engineer.

7 MR. STOGNER: Ms. Williams is  
8 so qualified.

9 Q Ms. Williams, have you prepared exhibits  
10 in connection with this case and are you prepared to testify  
11 with respect to those exhibits?

12 A Yes, sir.

13 Q I ask you to turn now to Exhibit Number  
14 Three and identify that, please.

15 A Exhibit Number Three is a tabulation of  
16 well completion and production data that has the wells that  
17 Dugan operates within or adjacent to the existing pool.

18 We have 36 completed wellss, one that's  
19 drilled and waiting on completion, and 12 locations that we  
20 plan to drill and complete in the same Gallup interval.

21 As you can see, there's the -- on the  
22 right -- lefthand column are the well name, the well  
23 location, the completion date. They also have included the  
24 initial potential in barrels of oil per day and a GOR, and  
25 we have current production during October, 1987, in barrels

1 of oil per day at a GOR which was from the C-115 for Octo-  
2 ber. We have cumulative production up until November 1st,  
3 1987, in barrels of oil per day and MCF of gas.

4 On the last page of the exhibit we have  
5 totals for the pool. It's producing approximately 400 bar-  
6 rels of oil per day with a poolwide GOR of 1329. As you can  
7 see, it's produced -- the pool itself has produced nearly a  
8 quarter of a million barrels of oil and 375-million cubic  
9 feet of gas.

10 Q Are you aware of any other operators who  
11 are active within the South Bisti Pool boundaries?

12 A No, sir. There are several around the  
13 area in undesignated pools in the Bisti Lower Gallup, not in  
14 this particular pool.

15 Q And in addition to the actual drilling of  
16 wells, what other additional activity is Dugan Production  
17 engaged in in the South Bisti area?

18 A Could you repeat your question?

19 Q Has Dugan Production, in addition to the  
20 expenditure for the drilling and completion of wells, has  
21 it spent any additional funds in development of the South  
22 Bisti Pool?

23 A Yes, sir. We've constructed an intensive  
24 -- extensive gathering system to transport the casinghead  
25 gas to market. We've installed approximately 157,000 feet

1 of gathering system costing in excess of a Million Dollars.

2 Q Thank you. I now ask you to turn to Ex-  
3 hibit Number Four. Would you identify that, please?

4 A Exhibit Number Four is a tabulation of  
5 well data and drainage area calculations for six wells. We  
6 have the six wells listed on the left, the December Dream  
7 No. 1, the Mary Lou No. 1, the Olympic No. 1, Silver Medal  
8 No. 1, Squaw Valley No. 1, and Witty No. 4.

9 On the second page of the exhibit are  
10 their locations highlighted and the pool boundaries.

11 What we've tried to show with this exhi-  
12 bit is that the ultimate -- at an ultimate recovery and with  
13 perforations with the gross intervals, and the separate  
14 zones of development, that the estimated drainage area of  
15 production is indicated on the right with the probably ac-  
16 reage that is covered.

17 Q Now with respect to the ultimate, ulti-  
18 mate recovery from production, how have you derived that da-  
19 ta? Is there additional information in this exhibit that --  
20 that demonstrates the engineering method used to derive the  
21 ultimate -- estimated ultimate recovery?

22 A Yes, sir. What we have done is we have  
23 divided the zones of development into three different cate-  
24 gories, and that's what we call the Good Times Sand with the  
25 foot -- the net feet of pay with porosity and the shale vol-

1  
2 ume.

3 We also have additional sands that are  
4 thick enough our log analysis indicates they should contri-  
5 bute significantly, and then we have the secondary sands  
6 that are either stringers due to being thin, or shaliness  
7 that may not be likely to contribute but will -- they do  
8 justify completion.

9 Q Now, the -- what you've identified as the  
10 Good Times Sand is the primary pay within the --

11 A Yes, sir.

12 Q And does that correlate to the area  
13 that's been marked on Exhibit Number One as the Good Times  
14 -- as the Good Times Gallup Bar Sand?

15 A Yes, sir.

16 Q Now, looking at -- at the column after  
17 the well names, we talked about ultimate recovery. Have you  
18 made some recovery projections based upon declining produc-  
19 tion or other information to reach those figures?

20 A Yes, sir. The last six pages of the Ex-  
21 hibit Number Four are decline curves which we prepared and  
22 we have prepared and signified the decline rate and an eco-  
23 nomic limit and come up with an ultimate recovery.

24 Q Now based upon that ultimate recovery,  
25 then, you've stated, I believe, that you have calculated a  
drainage area which will be drained by these wells to make



1 that ultimate recovery, is that correct?

2 A Yes.

3 Q And you've indicated in the last pair of  
4 columns in this exhibit the probable recovery from each of  
5 the wells, is that correct?

6 A Yes, sir. We've calculated a volumetric  
7 recovery of standard barrels per acre and as you can see,  
8 the probably ranges from 202 to around 440. With this data  
9 and the ultimate recovery production data we have estimated  
10 a drainage area and the six wells that we chose, one well,  
11 as you can see, the lowest one was 48 and the high was 111.

12 Q Do you happen to have calculated an aver-  
13 age drainage area for the six wells?

14 A Approximately 76 acres.

15 Q Now of the wells selected for this exam-  
16 ple, are -- let me back up and ask you another question  
17 first.

18 Are you familiar with the data and infor-  
19 mation which was presented at the original hearing to estab-  
20 lish the South Bisti Gallup --

21 A Yes, sir.

22 Q -- Oil Pool? And of the wells selected,  
23 were any of those wells a part of the original case?

24 A Yes, sir. The December Dream No. 1, the  
25 Silver Medal No. 1, and the Witty No. 4, were presented in

1 the previous, and they have not changed significantly with  
2 respect to reservoir data, calculated drainage area.

3 Q Now based upon this information, have  
4 you, in your review of the information originally presented,  
5 do you notice any substantially similar or significantly  
6 different from the original information presented to the Di-  
7 vision?

8 A It's substantially similar.

9 Q In looking at the wells which have been  
10 selected, have you picked any particular wells or on what  
11 basis did you pick the wells?

12 A All have significant production data to  
13 get a trend of decline to project the ultimate recovery to  
14 economic limit. We included the three that were used before  
15 in the previous hearing, which we felt had not changes  
16 significantly. We also chose two wells additionally that  
17 followed the trend of the pool, and then we also included  
18 another one that is off to the edge.

19 Q In other words, it's your belief that  
20 these wells are representative of production throughout the  
21 pool and are not selected because they're particularly good  
22 wells or particularly bad wells, or for any other reason  
23 other than they're representative of production --

24 A Yes, sir.

25 Q -- across the pool, is that correct? Do

1 you have an opinion as to what the appropriate drainage and  
2 spacing for the South Bisti Gallup Oil Pool should be?

3 A Yes, sir. After doing these studies and  
4 analyzing the decline curves and the logs and sample  
5 analysis data, we feel that 80 acres would be approximately  
6 the drainage area.

7 Q Ms. Williams, are you familiar with the  
8 special pool rules for the South Bisti Gallup Oil Pool?

9 A Yes, sir.

10 Q Are there any provisions within those  
11 rules that cause you any particular problems?

12 A Yes, sir. Rule No. 4, with the limits of  
13 staking a pool within 150 feet from the center of a quarter  
14 quarter.

15 Q Staking a well within -- within that  
16 location, is that --

17 A Yes, sir.

18 Q And why does that cause you difficulty?

19 A Well, we have several reasons. We feel  
20 that it's restrictive in contrast to the statewide and  
21 adjacent Bisti Pool rules. It is burdensome in respect to  
22 being sure whether or not you're legal or not, with being a  
23 square versus a circle.

24 Q Let me stop you there for a moment. Why  
25 does that particularly cause a problem as a square versus a

1 circle and --

2 A It's difficult to emphasize a 150-foot  
3 radius in a system that has been long traditionally from the  
4 outside or border of a quarter quarter section boundary.

5 Q Now when you're talking about difficulty,  
6 is it difficulty with contractors and field personnel that  
7 you use?

8 A Yes, sir.

9 Q And to the best of your knowledge are  
10 most surveys done from corners and side lines and survey  
11 tracts rather than from the center?

12 A Yes, sir.

13 Q In addition to the problems caused, the  
14 difficulties in establishing a legal location, are there any  
15 practical considerations in the field that cause difficulty,  
16 that this rule causes difficulty with?

17 A Well, the area borders the Bisti tight  
18 Badlands. We have archaeological areas. It's approximately  
19 10 to 15 miles from the area that's known as the Chaco Can-  
20 yon National Park.

21 The archaeology in the area has been es-  
22 timated from 10 to 12 sites per section. We have current  
23 Indian residents plus we have historic Navajo sites invol-  
24 ved, also.

25 Q And what -- what has -- let's look for a

1 moment at the archaeological considerations. What are the  
2 requirements with respect to those considerations as far as  
3 building location and drilling a well?

4 A We are required to have an on-site ar-  
5 chaeological survey done on the well pad with a 100 foot  
6 buffer on each side of the pad and any area of impact that  
7 we will --

8 Q And if some archaeological finding is  
9 made, what's (unclear)?

10 A We -- if it is a significant archaeologi-  
11 cal find, we have to be at least 100 feet away from it.

12 Q From -- from the periphery of the --

13 A Yes, sir.

14 Q -- of the find.

15 A Yes, sir, from the site, yes, sir.

16 Q And you stated also that there are people  
17 who have houses, live, actually live in the area? What are  
18 the requirements with respect to that?

19 A I believe that's around 400 feet.

20 Q Have you prepared an exhibit in connec-  
21 tion with -- to demonstrate the problems caused by Rule 4?

22 A Yes, sir, our Exhibit Number Five is a  
23 section with the scale being 660 feet per inch and the first  
24 row, Plat 1, Plat 2, and Plat 3, I have tried to show with  
25 the 150-foot radius that if a site were found, a significant

1 site were found in that radius, there would be virtually no  
2 place that we could move our pad to remain standard.

3 Q Is the red circle the -- the 100-foot ra-  
4 dius legal location?

5 A Yes, sir.

6 Q Is that what that identifies?

7 A Yes, sir.

8 Q And what is the solid square?

9 A The solid square is a typical Dugan loca-  
10 tion, which is 300 by 300 for a Gallup well and the dashed  
11 line is the 100-foot buffer required for the archaeological  
12 survey.

13 The area of the actual well pad, which  
14 would be the impacted, would be 9 -- 90,000 square feet com-  
15 pared to the 70 -- almost 71,000 square feet that is con-  
16 tained in the circle.

17 Q In other words, if I look at this exhibit  
18 correctly, if you would -- were confined at an archaeologi-  
19 cal site or if there were a residence within the legal loca-  
20 tion, it would be virtually impossible to build a location  
21 and drill a well without impacting either the archaeological  
22 site or the residence.

23 A Yes, sir.

24 Q And that doesn't even take into account  
25 any topographical considerations which you'd mentioned pre

1 viously.

2 A No.

3 Q Now the Plat 4, what does Plat 4 show?  
4 What's the blue area?

5 A Plat 4, the blue area indicates the  
6 statewide rules and also those that are in effect for the  
7 adjacent Bisti Pool. That would be 330 feet from any boun-  
8 dary of the quarter quarter.

9 What I have tried to show there is that  
10 if there were a significant site found, or if there were a  
11 historical site or even a current residence, we would be  
12 able to avoid the area.

13 Q You heard Mr. Fagrelus testify that  
14 there are also some geological reasons why this 150-foot  
15 radius is -- is perhaps too restrictive. Looking at Plats 5  
16 and 6 what are you attempting to show there which might also  
17 impact on the geology?

18 A In 5 and 6 what I was trying to show was  
19 the difference in area.

20 The circle, the 100 foot -- 150-foot rad-  
21 ius from the center of the quarter quarter involves an area  
22 that is 4 percent of the area of the quarter quarter; how-  
23 ever, the statewide pool rules and the Bisti, adjacent Bisti  
24 Pool rules, would cover 25 percent of the area of the quar-  
25 ter quarter.

1 Q And in other words, in -- in Bisti and  
2 under the statewide rules you can locate a well in approxi-  
3 mately 4 -- 6 times as much area as -- as in the South Bisti  
4 Gallup --

5 A Yes, sir.

6 Q -- Pool?

7 A And what would you request that the Com-  
8 mission do to alleviate the problem?

9 A Well, we would request that the standard  
10 statewide pool rules and the Bisti Gallup Pool rules would  
11 apply also to the South Bisti Gallup.

12 Q And those rules require a setback of 330  
13 feet, I believe you said?

14 A Yes, sir.

15 Q From the edge of the quarter quarter sec-  
16 tion rather than measuring from the center.

17 A Yes.

18 Q Are there any additional rules which you  
19 would suggest modifying and which are perhaps more restric-  
20 tive than need be with respect to well locations?

21 A If the radius of 150 were even changed to  
22 a square it would facilitate our --

23 Q That would primarily go towards the ques-  
24 tion of actually measuring for your surveyors and --

25 A Yes.



- 1 Q -- other contractors --
- 2 A Yes.
- 3 Q -- measuring from the outside, is that
- 4 right?
- 5 A Yes.
- 6 Q It would not significantly --
- 7 A Rather than finding the center and then
- 8 going from the center.
- 9 Q So they would now be able to go from the
- 10 outside and measure in but it would not -- would it signifi-
- 11 cantly improve your flexibility as far as the location?
- 12 A Yes.
- 13 Q Having a 300-foot square would be --
- 14 A Yes.
- 15 Q -- as acceptable as having the 330/330
- 16 circle?
- 17 A The square, as you can see even from our
- 18 -- that would give us a greater flexibility to move the lo-
- 19 cation if need be.
- 20 Q But your preference would be to go to the
- 21 330-foot section --
- 22 A Yes, because of the archaeology in the
- 23 area and the Indian residents, plus there's the topography
- 24 in the area is "ify" at best and it would greater enhance
- 25 that.

1 Q Now with respect to drilling of an unorthodox location, I believe Rule No. 5 authorizes administrative approval of an unorthodox location for topographical reasons, is that correct?

2 A Yes, sir. We feel that it would also be to our benefit and any other operator in the area to have the Rule No. 5 to also include nonstandard location administrative approval for archaeological reasons.

3 We also feel that this might not be a bad rule to include into all of the statewide rules as reasons for nonstandard location.

4 Q Base upon your experience in the field, are the archaeological reasons as compelling as topographical reasons for relocating a well, well pad?

5 A Yes. The archaeology has a large significance in the San Juan Basin. There are thousands of sites that are recorded and several thousand, I'm sure, that are unrecorded.

6 Q And I believe you indicated earlier there are as many as -- how many, what was the density of sites that you found in --

7 A The density of sites in this particular area is from 8 to 12 per section. We're approximately a mile and a half from a section that has a known density of sites of 40 sites in that section.

1 We're approaching the west portion of the  
2 pool. We have what they call the Anasazi Chaco North-South  
3 Road, which is sites which run along from Chaco Canyon up to  
4 Aztec Ruins.

5 Q Were Exhibits Three through Five prepared  
6 by you or are you familiar with the exhibits and now of  
7 their accuracy?

8 A Yes, sir.

9 MR. STOVALL: We'd move the ad-  
10 mission of Exhibits Three through Five.

11 MR. STOGNER: Exhibits Three  
12 through Five will be admitted into evidence.

13 Q Is there anything else? Are there any  
14 other matters with respect to the South Bisti Gallup Pool  
15 rules that Dugan Production would like to see modified?

16 A Yes, sir. Mr. Dugan would like a change  
17 of pool name and he feels that it is important and he re-  
18 grets he is not here today to testify in person.

19 Q And have you prepared an exhibit in con-  
20 nection with that request?

21 A Yes, sir, Exhibit Number Six.

22 Q And would you identify Exhibit Number  
23 Six, please?

24 A Exhibit Number Six is a poem written by  
25 Cheri Gunn of Dugan Production, which is also known as our

1 Good Times Rhyme.

2 MR. STOGNER: So we can save  
3 some time here, Mr. Stovall, I'll take notice of all this,  
4 but let's move on. We've got a lot of cases today.

5 MR. STOVALL: I was just about  
6 to say, Mr. Stogner, I'm going to allow the Examiner to read  
7 the exhibit at his convenience, and I would move the admis-  
8 sion of Exhibit Number Six and I have nothing further.

9 MR. STOGNER: Okay, Exhibit  
10 Number Six will be taken under advisement.

11

12 CROSS EXAMINATION

13 BY MR. STOGNER:

14 Q Ms. Williams, let's go to your Exhibit  
15 Number Four at this particular time and in the reservoir pay  
16 data you show several interval thicknesses on there. You  
17 show your Good Time Sands, additional primary sands, and  
18 secondary sands in feet. What particular H value did you  
19 use in your calculation in 3 to calculate the recovery fac-  
20 tors?

21 A What particular H value?

22 Q Yeah, the H value, the thickness.

23 A Those were the -- taken in -- in the Good  
24 Times Sand the net pay thickness in H were figured in the  
25 feet thicknesses there. Then the primary sands, the feet,

1 the H was figured at -- say, in the December Dream No. 1 it  
2 was 9 feet and the secondary sand was the 19 feet.

3 Q So the figures in column 3 are a combina-  
4 tion of -- of each one of those H values or did you just --

5 A Column 3?

6 Q Yeah.

7 MR. STOVALL: He's referring to  
8 the volumetric recovery column.

9 A Oh, over here?

10 Q Yes.

11 A Yes, sir.

12 Q Okay, so you added up all the thicknes-  
13 ses, pay thicknesses.

14 A Yes, sir, but we used a different recov-  
15 ery value. The probable recovery value that we used in the  
16 Good Times was 10 percent; the primary 5 percent; and the  
17 secondary was approximately 1-1/2 for the probable.

18 Q All righty. How about the -- the poros-  
19 ity? Did you also take an average or how did you do it?

20 A Yes, sir, the porosities were averaged in  
21 the area, in the different zones.

22 As you can see, there's separate inter-  
23 vals that we have perforated and those were taken individ-  
24 ually and then added together and averaged.

25 Q And the same is also your Vsh values.

1 A Yes, sir, that's (unclear).

2 Q And so if I look at the December Dream  
3 No. 1, you added up 6 feet plus 9 feet plus 19 feet to get  
4 your -- to get your H value?

5 A No, sir, those were taken separately and  
6 then each column is attributed to -- each primary -- the  
7 Good Times Sand, the primary sand, and the secondary sand  
8 were done invididually and then added together for the volu-  
9 metric recovery.

10 Q What is the average age of most of these  
11 wells out here?

12 A Well, we started with the December Dream  
13 No. 1, which was January 19th of 1984. The last well that  
14 we completed was the Witty No. 6, which was in August of  
15 '87.

16 They're approximately, oh, maybe 15-16  
17 months.

18 Q Okay. Now, when I look at your Exhibit  
19 Number Three, your production during October of 1987, there  
20 are some relatively small figures per day production there.

21 A Yes, sir.

22 Q 3.8, 2.4, 2.6. Looks like your best one  
23 up here is the 39.4, your Mary Lou No. 4?

24 A Well, that, as you can see, was only com-  
25 pleted in July. It's a typical Gallup area where the ini-

1 tial production is higher and then drops off rather steeply.

2 Q Oh, yeah, the Calgary No. 88 was a 72.9

3 --

4 A Yes, sir.

5 Q -- and that was also completed in July.

6 A Yes, sir, so it's only had approximately  
7 five months of production.

8 Q So it appears they drop off fairly fast.

9 A Yes, sir, and some of them are better  
10 than others.

11 Q What type of stimulation is required out  
12 here on these wells?

13 A Well, we perforated and stimulate with  
14 acid and then fracture them with sand and water.

15 Q Upon initial completion or --

16 A Yes, sir.

17 Q Are there any sections in here that have  
18 two wells on a proration unit?

19 A No, sir.

20 Q Okay. Let's take a look at your Exhibit  
21 Number Five, and this is the location question.

22 If we did give that 330 feet rules, let's  
23 visualize that we have four 80-acre proration units coming  
24 together at one particular point, it's foreseeable that you  
25 could have four wells bunched up together, is that not

1 right?

2 A It is foreseeable that could happen, yes,  
3 sir.

4 Q And would that be a prudent --

5 A Well --

6 Q -- operation at that well pad?

7 A Since we are recommending that 80 acres  
8 be used, at the maximum there would only be two.

9 Q Well, let me rephrase that.

10 A Oh, right.

11 Q When I look at -- let's say that I have  
12 four 80-acre proration units, all stand-up --

13 A Right.

14 Q -- coming together, we could have four of  
15 them --

16 A All right, yes.

17 Q -- four wells bunched up.

18 A Yes.

19 Q Is that a prudent operation or would be  
20 be defeating our purposes?

21 A In our opinion, as you say, that could  
22 happen, but I don't feel that we would be developing in that  
23 geological --

24 Q Is there something that we might could  
25 put in the rules to -- to head that off, that particular



1 situation?

2           A           The problem that I foresee with that  
3 would be that they -- if you would use offsetting forties,  
4 then there may be geological failure, or archaeologically  
5 significant homes, roads, topography that would not let you  
6 drill in offsetting forties.

7           Q           Presently with the way the pool stands  
8 now, it's -- it's fairly well developed. Do you foresee  
9 that the main portion of the pool will be developed any  
10 further?

11          A           Well, we have some acreage that will be  
12 developed, or we hope to develop, to the west, but as the  
13 pool stands right now, we still have acreage that we would  
14 like to be developed.

15                   MR. STOGNER: Are there any  
16 other questions of this witness?

17                   MR. STOVALL: No.

18                   MR. STOGNER: All right, she  
19 may be excused.

20                   Are there any questions of Mr.  
21 Fagrelius?

22                   If not, he may also be excused,  
23 too.

24                   And, Mr. Stovall, do you have  
25 anything further.

1 MR. STOVALL: Just briefly, I'd  
2 like to state that Dugan Production, as the sole active  
3 operator in the pool at this time and the owner of three  
4 quarters of the acreage in the pool, would like to see the  
5 pool rules 80-acre spacing continued. We believe that the  
6 evidence supports the well in that area will drain 80 acres.  
7 As you can see from the exhibits, the pay sands are rela-  
8 tively thin. While production are not high, Dugan Produc-  
9 tion has been able to make -- make money in the area, and it  
10 intends to continue to develop the area and 80-acre spacing,  
11 if believes, is appropriate.

12 For the reasons stated, Dugan  
13 Production would encourage the Division to modify Rule 4 to  
14 allow a well to be drilled at a legal location 330 feet from  
15 the quarter quarter section line. The problem which you've  
16 identified with respect to drilling by closeology, if you  
17 will, is one which Dugan Production recognizes would not,  
18 unless justified by particular considerations in a particu-  
19 lar location, constitute a practice which would normally be  
20 undertaken. Again, as the sole operator and owner of such a  
21 substantial portion of the pool, they feel at this time  
22 there there would be no reason to impose any limitation  
23 other than the standard 330/330 setback.

24 And finally, I would ask that  
25 you please read Exhibit Number Six and it is -- while we

1 make light of it, it is a fairly serious matter for Mr.  
2 Dugan.

3 MR. STOGNER: Thank you, Mr.  
4 Stovall.

5 Does anybody have anything fur-  
6 ther in Case Number 8685?

7 If not, this case will be taken  
8 under advisement.

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(Hearing concluded.)

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C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the Oil Conservation Division (Commission) was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability.

Sally W. Boyd

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 8685, heard by me on 2 December 1987.

Michael S. Stogrow, Examiner  
Oil Conservation Division