

1

2

I N D E X

3

4

DARRELL McBRIDE

5

Direct Examination by Mr. Kellahin 3

6

Cross Examination by Mr. Stogner 19

7

Cross Examination by Mr. Taylor 22

8

9

10

11

Applicant Exhibit One, C-108 4

12

Applicant Exhibit Two, Plat 4

13

Applicant Exhibit Three, Injection Well Data 8

14

Applicant Exhibit Four, Data 4

15

Applicant Exhibit Five, Schematic 10

16

Applicant Exhibit Six, Schematic 10

17

Applicant Exhibit Seven, Schematic 12

18

Applicant Exhibit Eight, Schematic 12

19

Applicant Exhibit Nine, Schematic 13

20

Applicant Exhibit Ten, Schematic 14

21

Applicant Exhibit Eleven, Schematic 15

22

Applicant Exhibit Twelve, Water Analysis 15

23

Applicant Exhibit Thirteen, Water Analysis 16

24

Applicant Exhibit Fourteen, Tabulation 18

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. STOGNER: Call next Case
Number 8843.

MR. TAYLOR: The application of
Chaveroo Operating Company for salt water disposal,
Roosevelt County, New Mexico.

MR. STOGNER: Call for
appearances.

MR. KELLAHIN: If the Examiner
please, I'm Tom Kellahin of Santa Fe, New Mexico, appearing
on behalf of the applicant, and I have one witness to be
sworn.

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

(Witness sworn.)

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

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

1 A I'm Darrell McBride. I'm operations en-
2 gineer for Chaveroo Operating, Houston, Texas.

3 Q Mr. McBride, have you previously testi-
4 fied before the Division as a petroleum engineer and had
5 your qualifications accepted and made a matter of record?

6 A Yes, I have.

7 Q And pursuant to your employment by Chav-
8 eroo Operating Company have you prepared or caused to be
9 prepared certain exhibits in this case?

10 A Yes.

11 MR. KELLAHIN: Mr. Stogner, we
12 tender Mr. McBride as an expert petroleum engineer.

13 MR. STOGNER: Mr. McBride is so
14 qualified.

15 Q Mr. McBride, if you'll turn past Exhibit
16 One, which is the Form C-108, let me direct your attention
17 to Exhibit Number Two, which is the plat of the area in
18 question.

19 First of all, sir, would you identify for
20 Mr. Stogner the proposed disposal well by name and by well
21 location?

22 A Okay. If you'll look in Section 24, the
23 legal is 310 from the south line and 1310 from the west
24 line. It's Tucker No. 5. That map there would probably
25 help you (not clearly understood.)

1 MR. STOGNER: Thank you.

2 A I have a half mile radius circle drawn
3 around the proposed salt water disposal well and --

4 Q The Tucker Well No. 5, is that an exist-
5 ting well that at one time produced in the Chaveroo-San
6 Andres Pool?

7 A It was a well that was drilled last year.
8 I drilled and completed it. We had -- after acidizing the
9 well we had -- it produced high rates of water so we just
10 decided to temporarily abandon the well.

11 Q You propose to utilize this well as a
12 disposal well for water produced from what formation?

13 A San Andres.

14 Q And the wells that produce the San Andres
15 water that will be disposed of in the well are located
16 generally where, Mr. McBride?

17 A All the producing wells in this area are
18 from the San Andres. The closest well, probably, that would
19 be producing from any other interval would be at least over
20 three miles.

21 Q And is this a disposal well for water
22 produced by Chaveroo Operating Company --

23 A Yes, sir.

24 Q -- on its San Andres wells?

25 A Yes, sir.

1 Q All right. Within the half mile area of
2 review, Mr. McBride, have you made a tabulation of all the
3 wellbore information from wells that penetrate this zone?

4 A Yes, I have.

5 Q And how have you shown that to us?

6 A Okay. We can go to Exhibit Four.

7 Q All right.

8 A On Exhibit Four here I have nine wells
9 that -- that are either temporarily abandoned or still pro-
10 ducing from the San Andres interval.

11 Q Have you located on the ownership plat by
12 number the wells that are shown on Exhibit Number Four?

13 A Yes, I have.

14 Q All right. Let's start with the first
15 well, Mr. McBride, on Exhibit Number Four, and have you go
16 through each of the wells and describe whether or not in
17 your opinion they are adequately cased and cemented with re-
18 gards to the potential that fluids disposed of in the San
19 Andres formation in the disposal well could use any of those
20 wells as a method to migrate into some other formation?

21 A Okay. If you'll notice the first well
22 there is a well that we presently operate, Tucker No. 1.
23 Perforated interval on all these wells will basically be the
24 same subsea depths. The elevation in this area does not
25 change over ten feet and the producing interval does not

1 change over ten feet, so we can -- I don't think there'll be
2 any problems that we're all producing from the San Andres
3 interval; all zones -- it's all in a confined area.

4 If you'll notice, we had 8-5/8ths set
5 here at 363.61 feet; cement circulated and on the long
6 string they ran 4-1/2 and it's set at 4495. Calculated top
7 on it was 29.41.

8 Okay, the next well would be the Shell
9 Oil Company Shell Brookfield Federal No. 1. It had 8-5/8ths
10 set at 368 feet and cement circulated on it.

11 The producing -- producing string had --
12 was set at 4677 feet and cement circulated on it, 675 sacks.

13 The Atlantic Tucker No. 3 had 347 feet of
14 surface set and it circulated 225 sacks. The long string
15 was 5-1/2 set at 4465 and they used 700 sacks there and it
16 calculated that it circulated.

17 The Tucker No. 2, the surface was set at
18 361 feet, cement circulated, 250 sacks. The 4-1/2 was set
19 at 4483, calculated top on it is 2893.

20 Humble Federal No. 8, surface was set at
21 330 feet, that being our most shallow surface set in the
22 area. Cement was circulated, 225 sacks. The long string at
23 5-1/2 set at 4499 and 650 sacks were used and it calculated
24 that it circulated.

25 Humble Federal No. 7, the surface was set

1 334 feet, circulated 225 sacks, long string at 5-1/2 set at
2 4497. It calculated to be circulated, 650 sacks.

3 Tucker Well No. 4, set at 334 feet and
4 circulated 225 sacks, long string, 5-1/2, set at 4499, used
5 300 sacks. Calculated top on it's 2,387.

6 The Federal A No. 1, surface was set at
7 362 feet and calculated -- well, it circulated with 250
8 sacks. Long string, 4-1/2, set at 4430, calculated top on
9 it was 3653.

10 The Federal A No. 3, surface was set at
11 356. It circulated with 250 sacks. Long string set at
12 4422, top calculated to be at 3645, with 150 sacks.

13 Q Would you go through the tabulation on
14 Exhibit Number Four, now, and identify which of the nine
15 wells listed is a plugged and abandoned well at this time?

16 A None of these nine. These are all --

17 Q These are all producing wells?

18 A These are all producing or temporarily
19 abandoned.

20 Q You subsequently have prepared wellbore
21 schematics on all plugged and abandoned wells.

22 A Yes, sir.

23 Q Let's go back now to Exhibit Number
24 Three, which is the injection well, Mr. McBride, and have
25 you describe the method that you -- in which this well is

1 completed and would be utilized for disposal.

2 A Okay, the 8 and 5 was set at 1754 and
3 circulated cement with 16 -- was 660 sacks of cement.

4 The long string was 4-1/2. It was set at
5 4530. Was cemented with 300 sacks of 50/50 POZ and the top
6 of the cement, according to bond log, was calculated to be
7 at 2000 feet.

8 It is our intentions to run 2-8ths tub-
9 ing, plastic lined tubing, to 4000 feet, use a tension-type
10 Baker packer, set at -- the perforating interval is from
11 4137 to 4464, and we've already done a light acid job on
12 this well with 10 point injection packer, and our maximum --
13 want me to go over the maximum data now?

14 Q Sure, what is the maximum rates that you
15 propose to dispose of in the well?

16 A Maximum daily rates will be about 400
17 barrels a day. We have a closed system. Our maximum injec-
18 tion pressure should be 850 pounds according to 0.2 pounds
19 per foot.

20 Q The 850 psi stays within the 0.2 guide-
21 lines of the Division.

22 A Yes, sir. We expect the well to take it
23 on vacuum.

24 Q Let's turn now, Mr. McBride, to the sche-
25 matics of the plugged and abandoned wells and have you go

1 through each of those, starting with Exhibit Number Five,
2 identifying for us the well location and describing for us
3 whether or not, in your opinion, each of these wells has
4 been properly plugged and abandoned so that they will not be
5 a source by which fluids disposed of in the disposal well
6 could migrate into some other formation.

7 A Okay. The Atlantic Tucker No. 1, if
8 you'll notice it on your map it's No. 10, is in very close
9 proximity to the injection well. This well had 344 feet of
10 surface set and circulated with 225 sacks. Upon plugging
11 they set a 25-sack plug from 350, that's right below the
12 shoe, up into the surface pipe.

13 All right, they shot the casing off at
14 1,013 and they set a 35-sack plug on top of the 5-1/2, and
15 below they circulated 10-pound mud and set a cast iron
16 bridge plug at 4000 feet, and then put 5 sacks of cement on
17 top of that.

18 The long string had 300 sacks of cement.
19 Well, it had 600 sacks of cement circulated on it and
20 according to calculations it would have circulated.

21 Q Are you satisfied that that one has been
22 properly plugged?

23 A Yes, sir.

24 Q All right, let's turn to Exhibit Number
25 Six and have you identify the location of this well and

1 describe whether or not in your opinion this well has been
2 properly plugged.

3 A Okay. There's one point I'd like to
4 bring out that we ought to keep in mind, that our water pro-
5 ducing interval is 125 feet.

6 Q For fresh water?

7 A For fresh water.

8 Q All right.

9 A 125 to 135 feet, and all of our surface
10 pipe has covered that, and they've all circulated cement.

11 Q All right, sir.

12 A The Atlantic Tucker No. 2 -- I'm starting
13 from the bottom and coming up -- they had -- they set 5-1/2
14 at 4460 and they cemented with 500 sacks and that calculates
15 that it circulated.

16 All right, they came up the hole during
17 plugging. They set a cast iron bridge plug at 4000 feet
18 with 5 sacks of cement on top of it. They circulated 10-
19 pound mud above that. They shot the casing off at 1202 with
20 35 sacks of cement on top of stub. They moved up and set 35
21 sacks across the shoe.

22 All right. We had 8-5/8ths set at 335
23 feet. They circulated cement with 225 sacks.

24 And set a 10-sack plug at the surface.

25 Q (Some words lost at turning of tape) and

1 identify the location of this well and describe the method
2 in which it's been plugged.

3 A Okay. Tucker No. 3 is another well in
4 very close proximity to the wells on the northeast corner of
5 Tucker 5.

6 This well was cemented with 300 sacks of
7 cement on the long string; calculated top on that cement
8 would be about 3500 feet.

9 When they came back in to plug it they
10 set the cast iron bridge plug at 3508, circulated 10-pound
11 mud above that and shot the casing off at 1322; spotted 35
12 sacks on top of the stub. They come up and set 35 sacks
13 across the base of the shoe at the surface pipe.

14 The 8-5/8ths circulated cement at 381
15 feet, and they put 10 sacks at the surface.

16 Q Okay, are you satisfied this well's been
17 properly plugged?

18 A Yes, sir.

19 Q All right, let's turn to Exhibit Eight
20 and identify where this well is.

21 A This is the Federal 24 No. 1. You need
22 to note on this that there are 2 Federal 24 No. 1's. This
23 one is No. 13, and I've got it noted on your map.

24 The long string was cemented with 325
25 sacks of cement. That brings cement up to about 3200 feet.

1 Plugging this well they spotted cement at
2 a 50-sack plug of H (sic) at 4000 feet.

3 The top perforation was 4131. They shot
4 the casing off at 3100, plug shot and spotted 50 sacks
5 across the top of the stub and they set 50 sacks across the
6 shoe.

7 The surface pipe was 7-inch and it was
8 set at 1780 and cement circulated on it, and they set 10
9 sacks at the surface.

10 This well has been plugged properly.

11 Q All right, let's to to the next exhibit,
12 which is Number 9?

13 A 24.

14 Q The 24 Well.

15 A 24 No. 1.

16 Q Yes.

17 A Same name but different location. It's
18 close to being outside of our half mile radius but I went
19 ahead and included it, too.

20 The long string was cemented with 150
21 sacks of cement and during plugging, the top perforation
22 being at 4152, they came up and set a 50-sack plug from 4000
23 to 4162.

24 They moved up the hole, shot casing off
25 at 3300; spotted 50 sacks across the stub.

1 The 7-inch was set at 1824. They set 50
2 sacks across the shoe and the 7-inch is set for surface at
3 1824; the cement was circulated from there to surface.

4 They set 10 sacks on top.

5 I'm satisfied that this one has been
6 plugged properly, too.

7 Q All right, sir, let's go to Exhibit Num-
8 ber Ten.

9 A This is the Federal 24 No. 2. They
10 reached a total depth of 4700, set 4-1/2.

11 Q This is Well No. 15 on the plat?

12 A Yes, sir.

13 Q Okay.

14 A They cemented with 150 sacks on the long
15 string. This brought it up to about 3000 feet on the --
16 evidently cement did not come up that far because of the
17 shallow 3640.

18 Top perforation being about 4150. They
19 set 50-sack plug from 4160 to 4000 feet.

20 Show the casing off at 3640 and spotted
21 50 sacks across the stub; moved up to the base of the sur-
22 face, which was at 1817, and they spotted 50 sacks across
23 the shoe.

24 The surface pipe, the 7-inch, set at 1817
25 and surface -- cement did circulate on this.

1 They did a top job with 10 sacks.

2 This again protected the water zones.

3 Q Are you satisfied that this well has been
4 properly plugged?

5 A Yes, sir.

6 Q All right, let's go to Exhibit Number
7 Eleven.

8 A This is the Humble Federal No. 6. This
9 is a well that's on one of our leases at this time. This
10 well was P & A'd. They have set 5-1/2 to 4499, cemented
11 with 650 sacks, cement did circulate on the long string.

12 Top perforation is at -- was at 4080.
13 They put a cast iron bridge plug at 4000 feet; put 5 sacks
14 on top of that.

15 They moved up the hole and set 25-sack
16 plug from 2900 to 3000 feet.

17 They moved up the hole and shot the cas-
18 ing off at 1088; spotted 35 sacks across the stub; put 35
19 sacks across the shoe, which was -- of the surface pipe at
20 338 feet.

21 Cement on surface did circulate.

22 And spot topped off with 10 sacks.

23 I'm satisfied that all water sands are
24 protected on this one, too.

25 Q Let's turn now to a water analysis, Mr.

1 A Do you see the fresh water well located
2 in the Tucker Pond?

3 MR. STOGNER: Tucker Pond, yes,
4 okay.

5 A That's the only producing water well that
6 we know of within about a four or five mile area.

7 Q Do you have an opinion, Mr. McBride,
8 whether or not the utilization of the Tucker 5 as a disposal
9 well in the San Andres formation would endanger any fresh
10 water sands?

11 A No, sir. This being the only sand in the
12 area that's been productive in -- this a ranching area and
13 they've been looking for water there for years. This is one
14 of the only producing wells in the area and at 125-135 feet
15 we -- the shallowest surface pipe we have set at 330 feet,
16 and it circulated cement, so I feel that everything there
17 has been -- should be sealed off; no problem.

18 Q Mr. McBride, are you aware of any geolo-
19 gic features or open faulting or any hydrologic connections
20 by which water disposed of in the San Andres formation could
21 migrate up through and into the shallow fresh water sands?

22 A The only way they could migrate vertical-
23 ly would be through another wellbore and I think all these
24 wells have been sufficiently plugged and if they did, they
25 would have a hard time circulating up that -- if cement was

1 circulated properly on the back side of all the 8 and 5 sur-
2 face pipes.

3 Q Exhibit Number Fourteen is a tabulation
4 of operators and owners within the half mile radius.

5 Mr. McBride, other than Chaveroo Oper-
6 ating Company, can you identify for us any other operators
7 within the half mile area?

8 A Mr. Graham - well, no, the only other
9 operator, Shell Oil Company, has temporarily abandoned their
10 well, and it's highlighted as being No. 2. It's up in the
11 northwest quarter, northwest corner of our circle.

12 And Homer J. Kyle operates two wells down
13 here, the No. 10, or correction, No. 8, and that's all.
14 That's the only other two operators. We -- we operate all
15 the rest.

16 Q The other leases identified on the plat,
17 Yates and the others, are all leases operated by Chaveroo?

18 A Well, those leases are inactive at this
19 time.

20 Q All right. Who is the owner at the sur-
21 face of the proposed disposal well location, to the best of
22 your knowledge, Mr. McBride?

23 A Okay, these are fee leases. Surface
24 grazing rights are owned by Tommy Tucker.

25 Q And have you provided notice to Mr.

1 Tucker of your application?

2 A Yes. Yes, I have.

3 Q Okay. Mr. McBride, were Exhibits One
4 through Fourteen either prepared by you or caused to be pre-
5 pared under your direction and supervision?

6 A Yes.

7 MR. KELLAHIN: We move the in-
8 troduction of Exhibits One through Fourteen, Mr. Stogner.

9 MR. STOGNER: Exhibits One
10 through Fourteen will be admitted into evidence.

11 MR. KELLAHIN: That concludes
12 our examination of Mr. McBride.

13

14 CROSS EXAMINATION

15 BY MR. STOGNER:

16 Q Mr. McBride, let's go back to Exhibits
17 Number Six, Seven, Eight, Nine, Ten, and Eleven. Those are
18 the schematics of the plugged and abandoned wells.

19 I noticed on Exhibit Number Six and Exhi-
20 bit Number Eleven, for those particular wells there was at
21 least 500 sacks of cement used to cement the 5-1/2 and in
22 the well described in Exhibit Number Eleven there was in ex-
23 cess of 500 sacks; however, both casings were shot off.

24 A You going to calculate tops we have?

25 Q Yes, could you explain that a little bit?

1 A Well, a lot of times when you're cement-
2 ing the San Andres will take -- will take cement, you'll
3 lose returns and your cement will not -- will you'll exceed
4 frac gradient at times.

5 That was one of the problems in the area
6 when we first started producing these wells. They were
7 cementing and the hydrostatic got too -- well, it was too
8 high for the formation to hold it and you'd break the forma-
9 tion down.

10 Q That leads me up to the wells in between
11 these two where you are using 3, 325, and even 150 sacks
12 through this same interval.

13 A If you'll notice -- okay, on my injection
14 well, I've drilled in this area 12 wells for Chaveroo Oper-
15 ating, and we've found that 300 sacks would always bring it
16 up to around 2000 feet.

17 Q I'm sorry, 200 sacks would bring it
18 where?

19 A 300 sacks. 300 sacks would bring it up
20 to 2000 feet.

21 Q 2000 feet.

22 A I had -- I had a policy in this area be-
23 fore I would cement it, I would sweep the hole with fresh
24 water just to lower the hydrostatic. Of course, you know, a
25 lot of these wells were drilled back in the sixties and

1 seventies. They were drilling with 10-pound mud and they
2 started pumping 14-pound cement, 16-pound cement, and with
3 that 10-pound mud on top of it, you -- there's no way you
4 can circulate the hole.

5 Q Did Chaveroo plug and abandon these wells
6 or did the other operator?

7 A No, sir, Monument Energy plugged and
8 killed those wells.

9 Q Okay, was there any data in the record
10 showing that --

11 A Calculated tops or tops of bond logs?

12 Q No, showing where they had --

13 A Circulated cement or --

14 Q No.

15 A I've got all the records here.

16 Q Show that they run a 4-point before they
17 --

18 A Oh, 3-point?

19 Q Yeah, 3-point, rather, before they shot
20 off the casing?

21 A Carroll Neely shot all these casing --
22 shot these wells and pulled the casing and his policy was to
23 go in and start at 2000 feet and he'd shoot it. He'd come
24 up to 1500, and then he'd come up to 1200 and 1000.

25 And he'd shoot it and if he could pull

1 it, well, he'd pull it, and if he couldn't, well, he just
2 kept moving up the hole.

3 Q Okay, when you say 2000 foot off bottom
4 he would shoot it there.

5 A He would shoot from 2000 feet.

6 Q Okay.

7 A And if you'll notice, just about where
8 this casing is pooled is probably within a 200-foot area of
9 how far cement was actually holding.

10 Q Okay.

11 A To run a 3-point or bond log, to run a
12 bond log you have to have a hole full of fluid. There's no
13 way you can do that in this area unless you somehow squeeze
14 the perforations off and to run a 3-point, it's just more
15 expense. It's cheaper to run in a shot and shoot it.

16

17 CROSS EXAMINATION

18 BY MR. TAYLOR:

19 Q Mr. McBride, we're just slightly unclear
20 on your notice again.

21 On Yates and MTM Energy, are you oper-
22 ating the leases for MTM Energy?

23 A Yes, sir, those are our leases at this
24 date.

25 Q Okay, and how about Yates?

1 A No, sir, those wells, 13 and 15, have
2 both been plugged.

3 Q Do you know if the leases have expired on
4 them? I notice you have given --

5 A I have no idea, sir. I'm sure the -- I
6 can give you plugging dates on those wells.

7 Q Would you check that and if necessary
8 give them notice because we don't want to run into a problem
9 with Yates if --

10 A Sure, okay.

11 Q -- they -- if they're still operating or
12 if they still have leases on that and they didn't get no-
13 tice.

14 So either notify Yates if it's -- if they
15 hold the leases or, I guess, the U. S. if they -- have the
16 leases have expired or is that who owns this section, the U.
17 S.?

18 A Western States Producing Company is the
19 --

20 Q Well, it looks to be Federal leases, is
21 that correct?

22 A Hold on just a second. They're Federal
23 leases, yes, sir.

24 Q Well, could you either, could you figure
25 it out and just submit --

1 A All right.

2 Q -- something for the file showing that
3 you either sent a notice to Yates or what is the role of
4 Western States here? Does Yates have the -- something from
5 them? They're the original lessee?

6 A Well, the last people that operated the
7 -- they plugged the well out was SEECO (sic) Production Com-
8 pany out of Midland.

9 Q Okay, if you could just --

10 MR. KELLAHIN: We'll inquire
11 and --

12 Q -- sometime try to figure out what's
13 going on there, because we dont' want to have a problem.

14 A Okay.

15 Q We've had those before.

16 MR. STOGNER: And as the proof
17 of notice requires that all leasehold operators within a
18 half mile of the well be notified.

19 I'll hold the record open until
20 you provide us some information on that, Mr. Kellahin.

21 MR. KELLAHIN: Be happy to.

22 MR. STOGNER: Is there anything
23 further in this case, 8843?

24 There being none, this witness
25 may be excused and, as I mentioned earlier, I'll hold the

1 record open on Case Number 8843 pending the notification
2 question.

3

4

(Hearing concluded.)

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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 record of the proceedings in the Examiner hearing of Case No. _____, heard by me on _____ 19____.

_____, Examiner
Oil Conservation Division