

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO

20 January 1988

EXAMINER HEARING

IN THE MATTER OF:

Application of Penroc Oil Corporation CASE  
for salt water disposal, Lea County, 9297  
New Mexico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:

For the Applicant:

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## I N D E X

## MOHAMMED YAMIN MERCHANT

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1  
2 MR. CATANACH: Okay, we'll call  
3 next Case 9297, which is the application of Penroc Oil  
4 Corporation for salt water disposal, Lea County, New Mexico.

5 Are there appearances in this  
6 case?

7 MR. KELLAHIN: Yes, Mr. Exam-  
8 iner. I'm Tom Kellahin of Santa Fe, New Mexico, appearing  
9 on behalf of Penroc Oil Corporation and I have one witness  
10 to be sworn.

11 MR. CATANACH: No other appear-  
12 ances. Will the witness please stand and be sworn in?

13  
14 (Witness sworn.)

15  
16 MOHAMMED YAMIN MERCHANT,  
17 being called as a witness and being duly sworn upon his  
18 oath, testified as follows, to-wit:

19  
20 DIRECT EXAMINATION

21 BY MR. KELLAHIN:

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

24 A My name is Mohammed Yamin Merchant. I'm  
25 consulting as well as practicing petroleum engineer based

1 out of Hobbs, New Mexico.

2 Q What is your relationship with the  
3 applicant, Penroc Oil Corporation, Mr. Merchant?

4 A I am president and 100 percent  
5 stockholder of Penroc Oil.

6 Q Have you previously testified before the  
7 Division as a petroleum engineer?

8 A Yes, sir, I have.

9 Q And pursuant to your ownership interest  
10 in Penroc and your professional degree, have you made a  
11 study of the facts surrounding this application for a salt  
12 water disposal well in Lea County, New Mexico?

13 A Yes, sir, I have.

14 MR. KELLAHIN: We tender Mr.  
15 Merchant as an expert petroleum engineer.

16 MR. CATANACH: He is so quali-  
17 fied.

18 Q Mr. Merchant, for informing the Examiner  
19 of where this well is located, would you please utilize the  
20 plat which I've marked as Exhibit Number One and describe  
21 for the Examiner where this well is located?

22 A The subject well, State "AF" No. 3, is  
23 located in the northwest quarter of the southwest quarter of  
24 Section 8, Township 18, Range 35, Lea County, New Mexico, as  
25 marked inside the half mile radius on the map.

1 Q The advertisement for this case generally  
2 identifies this well as being approximately three miles  
3 southeast of Buckeye, New Mexico. Is that about right?

4 A Yes, sir, it is correct.

5 Q And what is the identification of the  
6 highway or the roadway that lies to the east of the well lo-  
7 cation? Is that a road?

8 A Yeah, that's the highway which runs from,  
9 oh, that's just a highway. I can't remember the highway  
10 number.

11 Q It's not a pipeline or anything. It's --

12 A No, no.

13 Q -- a highway right-of-way?

14 A No, I believe it's Highway 8.

15 Q All right.

16 A Yeah, it's Highway 8.

17 Q On this plat you've identified two cir-  
18 cles. One is the 2-mile radius circle and the other is the  
19 1/2-mile radius circle?

20 A That is correct.

21 Q Did you prepare yourself or cause to be  
22 prepared the Commission Form C-108 and the attachments?

23 A Yes, sir, I did.

24 Q Let me direct your attention then, Exhi-  
25 bit Two is the Commission Form C-108. Let's refer to Exhi-

1 bit Three, which is the Commission Form C-103. Would you  
2 identify that for us?

3 A Yes. C-103, Form C-103, which is a  
4 requirement by the OCD, shows our intent to rework this well  
5 to a disposal well from its current status and basically  
6 outlines the steps of what we need to do to get to that sta-  
7 tus.

8 Q Summarize for the Examiner what has been  
9 the history of the State "AFE" No. 3 Well.

10 A The "AF" No. 3 was drilled and completed  
11 as an East Vacuum Wolfcamp producer by Texas Pacific Oil  
12 Corporation and it has produced over 50,000 barrels of oil  
13 when it was temporarily abandoned in the early seventies be-  
14 cause of too much water.

15 It has been in that status ever since  
16 then until last Thanksgiving we tested it to see what it  
17 would do, and it tested 8 barrels of oil and 1000 barrels of  
18 water on a submersible pump out of the Wolfcamp.

19 And that's where it stands today.

20 Q Do you have an opinion as to whether or  
21 not this wellbore can be further utilized for commercial oil  
22 or gas production?

23 A Not in this zone. The well, as we can  
24 see, is watered out in the Wolfcamp formation. The Devonian  
25 is not very structurally low and the Abo, which is up above,

1 which is above the Wolfcamp zone was tested and was noncom-  
2 mercial by the previous operator.

3 Q How do you propose to utilize this  
4 wellbore for disposal purposes?

5 A Explain to me a little bit.

6 Q Yes, sir. What formation will you put  
7 the water in?

8 A We will be putting the water in the Wolf-  
9 camp formation, which -- where it is presently completed.

10 Q And is this an open hole completion or  
11 through perforations?

12 A No, it is a cased hole.

13 Q Let's turn to Exhibit Number Four and  
14 have -- and I believe that's Part 3-A to the C-108. Would  
15 you identify that information?

16 A Yes. This exhibit shows different casing  
17 sizes which were set, like 13-3/8ths at 360 feet; 9-5/8ths  
18 at 3876; and 5-1/2 production casing set at 10,387, cemented  
19 with 2440 sacks; the top of cement approximately at 1780  
20 feet from surface.

21 Like I mentioned earlier, the well was  
22 tested in the Abo from 8714 to 8770 and it was noncommercial  
23 and the perforations were squeezed with 150 sacks.

24 The well was later completed in the Wolf-  
25 camp from 9883 to 9927 and, again, like I mentioned earlier,

1 it has made over 50,000 barrels of oil and currently we do  
2 about 8 barrels of oil and 1000 barrels of water and it's  
3 TA'd.

4 Q Turn to Exhibit Number Five, Mr. Mer-  
5 chant, and have you describe the current wellbore schematic  
6 as well as the proposed wellbore schematic.

7 A The wellbore sketch for the current shows  
8 the casing, different casing depths, 13-3/8ths, 9-5/8ths,  
9 and 5-1/2.

10 It also shows the perforations in the  
11 Wolfcamp from 9883 to 9927, which -- where we propose to  
12 inject, and it also shows the squeezed perforations from  
13 8714 to 8770.

14 The proposed wellbore sketch shows 2-  
15 7/8ths plastic-coated tubing set at 9700 with a plastic-  
16 coated 2-7/8ths Model AD-1 packer, and we'll be injecting  
17 into the presently open perforations in the Wolfcamp.

18 Q Do you have an opinion, Mr. Merchant, as  
19 to whether the cement jobs in this well adequately and  
20 efficiently tie back the cement from the perforations on up  
21 to the surface?

22 A As is evident from these sketches of  
23 where the 9-5/8ths casing is set and it's cemented with 2300  
24 sacks circulated, and even on the production string, the  
25 long string, the cement is at 1780 feet from surface, I



1 don't see any problem.

2 Q Okay. In your opinion is the proposed  
3 method for utilization of this wellbore for disposal purpose  
4 one which confines the disposable fluids to the perforated  
5 interval and then into the Wolfcamp formation?

6 A That is correct.

7 Q Do you see any potential for  
8 contamination of fresh water sources if there are any in the  
9 area?

10 A We're not aware of any fresh water sour-  
11 ces in the area. Even if there was to be one, since it's  
12 almost 10,000 feet deep, there is no problem.

13 Q Let's turn now, sir, to Exhibit Number  
14 Six, which is the written summary of additional information  
15 for the C-108. Would you -- you've already talked about  
16 some of the information on this exhibit. Would you describe  
17 for the Examiner the approximate daily volumes you propose  
18 to dispose of in this well?

19 A Yes. We'r'e looking at approximately 2-  
20 to-3000 barrels a day. I would say 2000 and that came from  
21 the offsetting producer where we were producing 24 -- 1800  
22 to 2400 barrels of water a day.

23 Q What will be the source of that water to  
24 be disposed of in this well?

25 A The source of the water is the well in

1 the lease, Well No. 1, which is one location due south of  
2 the proposed disposal well. It's called the State "AF" No.  
3 1, which approximately four months ago was completed as a  
4 Devonian producer.

5 Q So it's produced Devonian water that will  
6 be disposed of into the perforations in the disposal well.

7 A That is correct.

8 Q What is the approximate maximum injection  
9 pressure to be used?

10 A Well, we -- we ran injectivity tests down  
11 the back side and it was on strong vacuum throughout the  
12 test at 2-1/2 barrels a minute. Again, not having any ex-  
13 perience in what the Wolfcamp will do, and looking at the  
14 data during the injectivity test of maximum of 500 pounds  
15 should be plenty at a later date. Initially I don't think  
16 we'll see any pressures.

17 Q Have you satisfied yourself, Mr. Mer-  
18 chant, that there are no geologic or engineering information  
19 available by which the shallow fresh water sands, if there  
20 are any, might be connected to the Wolfcamp formation?

21 A Yes, sir, I have.

22 Q And what have you found?

23 A We found that first of all, there are no  
24 fresh water wells in the area. Fresh water is present  
25 between 2-to-300 feet from surface and once again, we're in-

1 jecting at approximately 9900 feet. So that shouldn't be a  
2 problem with the well properly cemented.

3 Q I believe the next exhibit, and I've lost  
4 track of the exhibit numbers, perhaps it's Six, is a copy of  
5 the portion of the log showing the Wolfcamp interval and  
6 then the perforations in the disposal well.

7 All right, sir, would you identify and  
8 describe for us that portion of the log that's before you as  
9 Exhibit Number Six?

10 A Mr. Examiner, this is a copy of the  
11 acoustic log through the Wolfcamp section. The perforations  
12 are marked from the interval 9883 to 9927, and that's the  
13 only log available on that lease to my knowledge.

14 Q Let's now direct your attention, Mr. Mer-  
15 chant, to Exhibit Eight, Nine, and Ten, which are simply  
16 three separate pages upon which you have listed the various  
17 informations of those wells that are within the half mile  
18 radius of the disposal well?

19 A That is correct. Starting with the Pen-  
20 roc Oil Corporation State "AF" No. 1, the Devonian producer,  
21 it basically lists the casing, where the casing is set and  
22 the weight and the cement, and some cementing information on  
23 all the wells within the half mile radius with the exception  
24 of two wells which I wasn't -- I did not know that we have  
25 not furnished the information with this package.

1                   One of them is in Section 10 -- I'm get-  
2     ting ahead of myself, I think, what exhibit have you marked  
3     this last page?

4                   You want me to go through each well?

5                   This exhibit basically gives all the  
6     details, like I said, for cement, cement jobs, casing, and  
7     perforations for the producing wells as well as the plugged  
8     wells.

9                   Q           All right. Let's take the producing  
10    wells. Have you identified within the half mile radius all  
11    the current producing wells that penetrate through the Wolf-  
12    camp formation?

13                  A           We've not only identified all the wells  
14    which penetrate through the Wolfcamp formation but also  
15    which do not penetrate through the Wolfcamp formation.

16                  Q           Okay. You mentioned that you thought  
17    there had been two wells omitted from the tabulation?

18                  A           There are in the tabulation after the  
19    sketches, Mr. Examiner.

20                  Q           All right, let's come to those in a  
21    minute, then, Mr. Merchant.

22                  A           Okay.

23                  Q           By looking at Exhibits Eight, Nine, and  
24    Ten, based upon that information on those exhibits, do you  
25    find any of that information to cause you to believe that

1 any of those wells are completed in such a way that they  
2 will serve as a source by which water disposed of in the  
3 Wolfcamp can migrate out of the Wolfcamp and go up into some  
4 shallower zone, perhaps in the Ogallala, at the 2-to-250  
5 foot interval?

6 A No, I don't. Once again, reviewing all  
7 the casing and cementing information on present producing as  
8 well as plugged wells, all the cement jobs have been done  
9 properly, so I do not feel that that will be any problem.

10 Q Do you find any of the wells -- identify  
11 for us any wells that produce from the same interval as the  
12 disposal interval.

13 A There aren't any.

14 Q Okay. So do you have an opinion as to  
15 whether or not there is any potential to have the disposal  
16 water adversely affect production from the Wolfcamp?

17 A No. The Wolfcamp in the State "AF" No. 2  
18 was tested and it was dry and that was the only well we know  
19 which was tested in the Wolfcamp besides the "AF" No. 3.  
20 It's a one-well reservoir, to my knowledge.

21 Q Okay. Let's turn, then, to the schematic  
22 on Exhibit Eleven, which is the Getty Oil Company State "AN"  
23 No. 8 Well. This is one of the plugged and abandoned wells  
24 within the half mile radius?

25 A This is one of the plugged and abandoned

1 wells. It's located southwest of our proposed disposal well  
2 and it was originally a Devonian well as shown on the  
3 sketch, completed from 11,615 to 11,660. It has watered out  
4 and it was later plugged, and it has been plugged properly.

5 Q Turn now to Exhibit Twelve, which is the  
6 Getty Oil Company State "AN" No. 9 Well.

7 A State "AN" No. 9 Getty Oil Company have a  
8 similar history; was completed in the Devonian, produced and  
9 it watered out, and it was plugged and abandoned properly by  
10 Getty.

11 Q Now let's turn to Exhibit Thirteen, which  
12 identifies three wells and have you provide the Examiner  
13 with the supplemental information as to two of those wells.

14 First of all, what's the purpose of Exhi-  
15 bit Thirteen?

16 A Okay, the Exhibit Thirteen shows the ad-  
17 ditional three wells which is within that half a mile radius  
18 of -- the ARCO Oil and Gas Company Well, Lea 407 State No.  
19 4, which is two locations south of our proposed disposal  
20 well and one location south of our presently producing  
21 Devonian well.

22 It's producing from the Abo Reef perfora-  
23 tions 8807 to 8882.

24 The other two wells listed on the same  
25 exhibit, the first one, Getty Oil Company State "AN" No. 10,

1 has been plugged and abandoned, and the second one, Bishop  
2 Canyon Uranium Corporation Hookin Bull No. 1, it has also  
3 been plugged and abandoned right after it was drilled.

4 Q These are two P&A'd wells that are within  
5 the half mile radius?

6 A They are within the half a mile radius.  
7 We failed until about three hours ago, failed to include any  
8 information in terms of sketches and what not on these two  
9 wells. Right before the hearing I called the Oil Commission  
10 office in Hobbs and got all the details on the drilling and  
11 completion as well as plugging information.

12 MR. KELLAHIN: With your per-  
13 mission, Mr. Examiner, may we subsequent to the hearing sub-  
14 mit the schematics on each of these?

15 MR. CATANACH: Yes, sir.

16 Q We should have you do that later, Merch.

17 A Okay.

18 Q Let's turn to Fourteen, sir, and have you  
19 identify this exhibit for us.

20 A This exhibit is a water analysis done by  
21 Halliburton in Hobbs.

22 The first one is from a fresh water well.  
23 It's not within the area but that's the closest one on the  
24 Lee Ranch, and the second one is from the Devonian well,  
25 State "AF" No. 1, which we'll be injecting, or the water

1 from the Devonian will be disposing from the Wolfcamp forma-  
2 tion.

3 Q This again comports with requirements of  
4 the C-108 for submission of water analysis.

5 A That is correct.

6 Q All right, and finally, identify for us  
7 Exhibit Fifteen, which is certified return cards.

8 A Exhibit Fifteen is barely a copy of the  
9 certified mail sent to all the offset operators, as well as  
10 the surface owner, on this lease.

11 Q And for the record, who is the surface  
12 owner?

13 A The surface owner on this lease is Lee  
14 Cattle Company, which is R. D. Lee and Bill Lee of  
15 Lovington, New Mexico.

16 Q Have you obtained documentation to your  
17 satisfaction, Mr. Merchant, that allows you to utilize this  
18 well for the disposal of produced water?

19 A From the landowners?

20 Q Yes, sir.

21 A A certified copy of this application was  
22 furnished to the Lees. We have not obtained any written  
23 permission, but I don't see that as a problem because  
24 they've already given me approval and if a written  
25 permission is required, we will do so.



1 MR. KELLAHIN: That concludes  
2 my examination of Mr. Merchant.

3 We would move the introduction  
4 of Exhibits One through Fifteen.

5 MR. CATANACH: Exhibits One  
6 through Fifteen will be admitted into evidence.

7

8 CROSS EXAMINATION

9 BY MR. CATANACH:

10 Q Mr. Merchant, you intend to use the well  
11 only for disposal of your Devonian produced water?

12 A That is correct.

13 Q Do you know of any problems that you  
14 might encounter mixing the Devonian and Wolfcamp produced  
15 water?

16 A I don't know of any. I really don't see  
17 why we would have a problem. Of course, there might be a  
18 little scale associated with it, which is pretty typical  
19 when you mix two waters, and we'll have continuous scale in-  
20 hibition going downhole, like we do any other place.

21 Q Now you listed all the wells on Exhibit  
22 Number Nine and those are wells within a half mile that  
23 don't penetrate the Wolfcamp, I guess.

24 Did you look at the well construction,  
25 those well constructions, casing and cementing and all?

1           A           Yeah, we don't have a sketch, as such, on  
2 each one of them but we do -- we did look at the -- all the  
3 casings and way they're set and the cementing information in  
4 each one of them.

5           Q           I don't have that. It's the one that's  
6 got the Texaco, Phillips, Energy Reserves --

7                       MR. KELLAHIN: These are all  
8 too shallow.

9                       MR. CATANACH: Well, I realize  
10 that.

11          A           Okay, I see what you're saying.

12          Q           I was just making sure you looked at them  
13 and --

14          A           Yeah, we -- we have -- I did look at it,  
15 or we did look at it, and they all have been properly cemen-  
16 ted. They are mostly -- most of them are fairly new wells.

17          Q           Okay.

18          A           They're a lot newer than the "AF" lease  
19 and because of the history of problems in the Buckeye area,  
20 almost everybody has cemented casing to surface.

21          Q           Okay.

22          A           Or brought it up pretty high.

23          Q           And there's probably little chance of --  
24 of water going from the Wolfcamp into the Abo. What's your  
25 opinion on that?

1           A           First of all, on the "AF" 3, the proposed  
2 disposal well, again we are very confident on our cement job  
3 and second, the offsetting Abo wells do have proper cement  
4 job through the pay interval.

5                   And the cement, like I mentioned earlier,  
6 cement is brought -- has been brought up substantially  
7 higher. I don't see that as a problem.

8           Q           Looking at your Exhibit Number Eleven,  
9 which is the Getty State "AN" No. 8, it seemed to me that  
10 the annulus down below 5190 would be open. Is that how you  
11 perceive that completion?

12          A           Yes, from -- from 5100 feet up, from 3458  
13 to 5190, except you got cement plugs stubs below the base of  
14 the 9-5/8ths and above the 4-1/2 casing stub.

15          Q           But you would still have an open annulus  
16 from 5190 down to, well, at least across your injection  
17 interval, is that right?

18          A           Well, no, because you have -- let me see  
19 for a second here. Well, it's cemented; your casing -- the  
20 casing on both 2-7/8ths and 4-1/2 is cemented from that  
21 depth from 5190 down. That's why they didn't pull it.

22                   See you had 2-7/8ths, 6.4 --

23          Q           Okay, I hadn't noticed that.

24          A           That's 1490 sacks of cement.

25                   MR. CATANACH: I think that's

1 all the questions I have of the witness.

2 Is there anything further in  
3 Case 9297?

4 MR. KELLAHIN: No, sir.

5 MR. CATANACH: If not, it will  
6 be taken under advisement.

7  
8 (Hearing concluded.)  
9

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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 correct record of the proceedings in  
the oral hearing of Case No. 9897,  
heard by me on Jan 20 1988.

David R. Catarach, Examiner  
Oil Conservation Division