

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

6
7 25 May 1988

8 EXAMINER HEARING

9 IN THE MATTER OF:

10 Application of Exxon Corporation for CASE
11 an unorthodox gas well location, down 9387
12 hole commingling, hydrocarbon storage
13 authority and relief from the reporting
14 requirements of Division General Rule
15 1131, Eddy County, New Mexico.

16 BEFORE: Michael E. Stogner, Examiner

17
18 TRANSCRIPT OF HEARING

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

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MR. STOGNER: We'll call next
Case Number 9387.

MR. ROYBAL: Case 9387. Appli-
cation of Exxon Corporation for an unorthodox gas well loca-
tion, downhole commingling, hydrocarbon storage authority,
and relief from reporting requirements of Division General
Order 1131, Eddy County, New Mexico.

MR. STOGNER: Call for appear-
ances in this case.

MR. BRUCE: Mr. Examiner, James
G. Bruce of the Hinkle Law Firm in Santa Fe, New Mexico, re-
presenting the applicant in this matter. I have three wit-
nesses.

MR. STOGNER: Are there any
other appearances?

Will the witnesses please stand
and be sworn?

(Witnesses sworn.)

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

1 DIRECT EXAMINATION

2 BY MR. BRUCE:

3 Q Mr. Jenner, would you please state your
4 full name and city of residence?5 A Gordon Allen Jenner. I'm a resident of
6 Midland, Texas.7 Q And who are you employed by and in what
8 capacity?9 A I am employed by Exxon Corporation as a
10 Senior Geologist.11 Q And have you previously testified before
12 the OCD as a geologist and had your credentials accepted as
13 a matter of record?

14 A I have.

15 Q And are you familiar with the geological
16 matters involved in Case Number 9387?

17 A Yes, I am.

18 MR. BRUCE: Mr. Examiner, are
19 the witness' credentials acceptable?20 MR. STOGNER: Mr. Jenner is so
21 qualified.22 Q Mr. Jenner, would you please state what
23 Exxon Corporation seeks in this case?24 A Exxon Corporation requests an exception
25 to OCD Rule No. 303-A to permit downhole commingling of pro-

1 duction from the Happy Valley Morrow Pool with production
2 from the Sheep Draw Northeast Strawn Pool in Exxon's Happy
3 Valley Fed Com No. 1, located in Unit G of the northern half
4 of Section 28, Township 22 South, Range 26 East, Eddy Coun-
5 ty, New Mexico. Both pools, the Strawn and the Morrow, are
6 nonprorated.

7 In addition, Exxon requests approval to
8 use a small Strawn reservoir for hydrocarbon storage pursuant
9 to Section 70-6-1 of the New Mexico statutes and also an ex-
10 ception from the reporting requirements of OCD Rule 1131.

11 Please note that advertisement in this
12 case is incorrect for the following reasons:

13 First, the advertisement referred to Hap-
14 py Valley B Fed Com No. 1, which is located in Unit K in the
15 southern half of Section 20 -- 28 of Township 22 South,
16 Range 26 East.

17 As I indicated, the proper location is
18 Unit G in the northern half of Section 28.

19 Also, the well location given in the ad-
20 vertisement, 1471 feet from the south line and 1908 feet
21 from the west line of Section 28 is incorrect.

22 The correct location is 1780 feet from
23 the north line and 1830 feet from the east line of the sec-
24 tion.

25 Since Exxon has notified all offset oper-

1 ators with correct information, we request that the case be
2 approved without the necessity of readvertising the case.

3 MR. STOGNER: We'll take about
4 a three minute recess.

5

6 (Thereupon a recess was taken.)

7

8 MR. STOGNER: Mr. Jenner, the
9 way I understand it, this is indeed your Happy Valley Feder-
10 al Com Well No. 1 and not your Happy Valley B Federal Com
11 No. 1, is that correct?

12 A That is correct.

13 MR. STOGNER: Okay, this we'll
14 have to readvertise because of the location on it where the
15 B Federal Well No. 1 is correct, except the wrong well was
16 advertised.

17 A That is correct.

18 MR. STOGNER: So it will have
19 to be readvertised, and the earliest we can get it on will
20 be the 22nd of June.

21 Mr. Bruce, you still going to
22 present testimony today?

23 MR. BRUCE: Yep. The applica-
24 tion by Exxon did correctly describe the well and the unit
25 and, as Mr. Jenner indicated, that was mailed to all offset

1 operators so they had correct notice of what was sought by
2 Exxon. So I do not believe we need to renotify anyone.

3 MR. STOGNER: As far as renoti-
4 fication, then, I agree with you. When was this application
5 sent in?

6 MR. BRUCE: It was filed on, I
7 believe it was May 2nd.

8 MR. STOGNER: Was it called in
9 or was it --

10 MR. BRUCE: I -- it was hand
11 delivered. I hand delivered a copy of Exxon's letter to the
12 OCD on -- it was a Monday. I believe it was May 2nd.

13 MR. STOGNER: Was it a letter
14 dated May 3rd, 1988?

15 A It was dated May 2nd, 1988.

16 MR. BRUCE: It was hand deliv-
17 ered -- it was hand delivered May 3rd, 1988.

18 My letter to the OCD is dated
19 May 3rd and it was hand delivered.

20 MR. STOGNER: On a Tuesday.
21 Continue, Mr. Bruce.

22 Q Mr. Jenner, would you please refer to Ex-
23 xon's Exhibit Number One and describe its contents?

24 A Exhibit Number One is a land plat which
25 locates the Happy Valley Fed Com No. 1 Well in the northern

1 half of Section 28, a proration unit, Township 22 South,
2 Range 26 East.

3 The unit is located approximately five
4 miles southwest of the City of Carlsbad. Both the Strawn
5 and the Morrow Pools in this unit are on 320-acre spacing
6 and ownership of the Strawn and Morrow zones in this well is
7 common.

8 The Happy Valley Fed Com No. 1 Well was
9 originally permitted and drilled as a Morrow test and its
10 unorthodox location was granted by Administrative Order NSL
11 20- -- or NSL-2010, dated March 22nd, 1985.

12 Also with regards to Section 70-6-1, the
13 gas storage, we would like to note that the well is located
14 in no known potash, and there are no injection wells offset-
15 ting the well.

16 Q Approximately how far is it from the pot-
17 ash area?

18 A It would be approximately about ten miles
19 to the potash basin as recognized by the BLM.

20 Q Would you please refer to the cross sec-
21 tion marked Exhibit Number Two and comment on its contents?

22 A If I may, I'll just stand up and can I
23 direct you to Exhibit Two, which is taped up on the wall
24 here.

25 Exhibit Two is a stratigraphic cross

1 section A-A' which runs from southwest to northeast and in-
2 cludes wells offsetting and the Happy Valley Fed Com No. 1.

3 The vertical scale here is 40 feet to an
4 inch and the horizontal scale is irregular; that is, the
5 wells are spaced equally and do not reflect the -- any type
6 of horizontal scale on the cross section.

7 The cross section, I've said is one cross
8 section. It's actually two. What I've done here is shown
9 the Strawn formation from the top of the Strawn to the top of
10 the Atoka. The datum here would be the top of the Atoka,
11 and I've also shown the top of the Morrow formation down to
12 and below the Lower Morrow Shale marker here.

13 The Atoka section has been left out so
14 what you would essentially have is the Strawn, the Atoka
15 left out, and then the Morrow.

16 The furthest well on the left to the
17 southwest is operated by Exxon. It was drilled in late
18 1985. It's our EB State Com No. 1. The well was a Morrow
19 test. It failed to prove productive; produced a little bit
20 of water and some gas; set a bridge plug; came up and pro-
21 duced in some Strawn carbonates. The well is -- has not
22 been a very good well and will probably only produce about
23 60-million cubic feet of gas.

24 The second well on here is the oldest
25 well. It was drilled in the early seventies. It was drill-

1 led by C&K Petroleum. It's the West Airport Fed Com No. 1.

2 It DST'd an interval in the Strawn from
3 10,138 to 10,258, recovered a little bit of gas cut drilling
4 fluid. It also DST'd in the Morrow, a section of Morrow
5 sandstones and also recovered some gas cut drilling fluids.
6 The well completed up in the Bone Spring formation and (un-
7 clear) 5.3-million a day.

8 The next well is the Happy Valley Fed Com
9 No. B-1, which again is located in Section 28 to the south
10 of Fed Com No. 1. It is also operated by Exxon.

11 This well encountered a sandstone in the
12 Morrow formation beneath the Morrow Shale, and was perfor-
13 ated and is presently producing in the interval 11,516 to
14 11,550. And this is the well which we're here to discuss
15 which we're here to discuss today, the Exxon Happy Valley
16 Fed Com No. 1.

17 This well was drilled prior to the B-1.
18 It was the first well we drilled in this area in here and it
19 encountered a -- it was primarily an oil prospect but it en-
20 countered a clean section of Strawn carbonate, here colored
21 blue, with good porosity, continued down and encountered the
22 same sandstone that would later be encountered by the B-1.
23 We offset, tried to offset this well with the B-1 both for
24 the Strawn and the Morrow. It missed the Strawn objective
25 but did get the Morrow objective.

1 We also tried to offset on the furthest
2 well to the northeast, the Tomaine Well, located in the Sec-
3 tion 27 of Township 22 South, Range 26 East. Again, the
4 objectives here were the Strawn and the Morrow. We missed
5 the Strawn again but did encounter this Morrow sand down be-
6 low.

7 The porosity was largely gone in the Mor-
8 row. We did attempt a perforation down here and recovered
9 largely water and a little bit of gas. We set a bridge plug
10 and perforated some thinner Morrow sands in this interval
11 here, and this well will probably be a fairly good well by
12 (unclear) reserves.

13 The point of today's hearing is to per-
14 forate this -- well, when we completed this Strawn interval
15 in here, we completed it prior to the Morrow. The Morrow
16 has not been perforated yet. We completed this because we
17 viewed it as a very potentially competitive pool. It was a
18 new discovery, competitive pool, so we perforated the Upper
19 Strawn first, the upper interval in the Strawn, and left
20 this behind pipe and ran a bridge plug.

21 We would now like to go in, perforate the
22 Morrow Sand down here, produce it up, store it during the
23 winter season in the Strawn and produce at higher rates in
24 the wintertime. The engineer will go through the production
25 in the Strawn and the Morrow.

1 The Strawn currently is depleted. It's
2 at line pressure. It turned out to be smaller than we ori-
3 ginally estimated just based on the pressure drop, which the
4 engineer will talk about.

5 As you can also see, it's not present in
6 the two immediate offset wells and we have also run a seis-
7 mic line over this area and which also indicates that the
8 Strawn indeed is a limited size reservoir.

9 Q Mr. Jenner, in your opinion is the gran-
10 ting of this application in the interest of conservation,
11 the prevention of waste, and the protection of correlative
12 rights?

13 A It is.

14 Q And were Exhibits One and Two prepared by
15 you or under your direction?

16 A Yes, they were.

17 MR. BRUCE: Mr. Examiner, I
18 move the admission of Exhibits One and Two.

19 MR. STOGNER: Exhibits One and
20 Two will be admitted into evidence.

21

22 CROSS EXAMINATION

23 BY MR. STOGNER:

24 Q Mr. Jenner, you stated in your testimony
25 that you believe this Strawn interval in your Happy Valley

1 Federal Com Well No. 1 is a limited size.

2 Could you, or do you have enough evidence
3 or enough seismic data to narrow it down to what size you
4 actually think this limited --

5 A We could not see it on seismic, which
6 would tend to be an indication that it is limited in size.

7 The second piece of evidence will be pre-
8 sented by the reservoir (sic), which is the pressure drop in
9 the reservoir would tend to suggest a limited size reser-
10 voir.

11 And the third reason is the apparent
12 lack, of continuity of the carbonate between the two imme-
13 diate offset wells.

14 Q Has Exxon done any particular work inside
15 the Happy Valley Federal Com No. 1, or proposes to do any
16 work to maybe determine the actual volume that section ac-
17 tually holds?

18 A Yes, we have and the engineer will be ex-
19 plaining that in further detail shortly.

20 Q How would you describe this stringer that
21 is in your Happy Valley in geological terms?

22 A In geological terms I would consider
23 this, based on regional work that I have done in the area,
24 to be a large, well, a thick, not large, a thick accumula-
25 tion of carbonate that does not extend laterally a great

1 distance, horizontally a great distance.

2 It is probably a phyloid algal mound with
3 leached porosity in it and, as I said again, the engineer
4 will explain it. It's going to be limited. It is limited
5 in size so it's essentially a -- just a large, vertical sec-
6 tion of carbonate that does not extend out laterally in
7 either direction very far.

8 Q And its porosity as you show it here on
9 your log is 5 percent?

10 A We used a cutoff of 5 percent that's
11 shaded in to show the porosity development there. It actu-
12 ally reaches up to as high as 14 or 15 percent porosity.

13 Q Okay. Now you show perforations on this
14 particular Exhibit Number Two in the Strawn.

15 A Yes.

16 Q Are those the (unclear) that you plan to
17 use or are you going to extend it out?

18 A Those are the perfs we plan to use.

19 Q Will this need any kind of a stimulation
20 done to it, such as fracturing or any -- any further exten-
21 sive stimulation?

22 A I do not anticipate any; not in our plans
23 right now.

24 Q Okay. And you said the engineer would
25 give us some volumetrics.

1 A Yes. He's got the calculated -- the --
2 based on what we estimate the oil in -- the gas in place to
3 be, estimated the actual size of the reservoir.

4 Q Have you determined any kind of a frac-
5 ture pressure or any kind of pressure or any kind of pres-
6 sure that it would take to fracture this particular zone?

7 A No, we have not.

8 Q Will the engineer also be supplying us
9 with some -- with some more detailed pressure data?

10 A Yes, he will be.

11 MR. STOGNER: Mr. Bruce, at
12 least I'm fortunately going to have a little time before an
13 order can be issued on this.

14 I would like to request, go
15 ahead and request now a rough draft order.

16 I would also like to include
17 his geological evaluation of this particular zone in that,
18 if you would.

19 MR. BRUCE: Okay.

20 MR. STOGNER: I have no further
21 questions of Mr. Jenner. Is there any other questions of
22 this witness?

23 He may be excused for the time
24 being.

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LAWRENCE J. SOHANEY,

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

DIRECT EXAMINATION

BY MR. BRUCE:

A My name is Lawrence John Sohaney. I re-
side in Midland, Texas.

Q And what is your occupation and who is
your employer?

A I work as a petroleum engineer for Exxon
Corporation.

Q Have you previously testified before the
OCD?

A No, I have not.

Q Would you please describe your education-
al and employment history?

A I graduated from Stanford University in
1976 with a Masters in mechanical engineering.

In 1976 I was hired by Exxon Corporation
and went to work as a petroleum engineer in Houston, Texas.

From 1979 through 1984 I worked as a re-
servoir engineer primarily making studies and evaluations of
fields in east Texas and the Gulf Coast area.

1 In 1984 I was transferred out to Midland,
2 Texas, and for the following two years I continued my work
3 as a reservoir engineer reviewing and evaluating fields in
4 the Texas portion of the Permian Basin.

5 In 1986 my duties were switched and I as-
6 sumed the responsibility for Exxon's operations in south-
7 eastern New Mexico.

8 Q And are you familiar with the engineering
9 matters related to Case 9387?

10 A Yes, I am.

11 MR. BRUCE: Mr. Examiner, are
12 the witness' credentials acceptable?

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

15 Q Mr. Sohaney, would you please refer to
16 Exhibit Number Three and describe its contents?

17 A Exhibit Number Three is entitled Monthly
18 Production Tabulation. This is for the Happy Valley Fed Com
19 No. 1 Well in the Sheep Strawn Northeast Pool.

20 What we've listed here is the monthly
21 production since the well was put on production in August of
22 1987.

23 We have listed the monthly gas, conden-
24 sate and water production, as well as the cumulative gas
25 production at the end of each month.

1 The data for this tabulation was from the
2 monthly statistical reports issued by the NMOCC, except for
3 the month of August, which was not contained in that volume.

4 The production on this well began on
5 August 11th, 1987, and during that month it produced
6 163,000, excuse me, 163,000 MCF of gas.

7 The well went on decline in November of
8 1987, and in February of 1988 it only produced 6639 MCF.
9 It's on a very steep decline rate.

10 As a matter of fact, in January of 1988
11 the well actually ceased to produce when the reservoir pres-
12 sure approximately equaled the sales line pressure. Later on
13 in January the sales line pressure dropped and the well was
14 able to resume a certain amount of production.

15 Q Would you please move on to Exhibit Num-
16 ber Four and discuss it?

17 A Exhibit Number Four is entitled P/z ver-
18 sus Cumulative Production on the Happy Valley Fed Com No. 1
19 in the Strawn reservoir.

20 What's shown on the Y axis is P/z in
21 units of psia and on the X axis the cumulative gas produc-
22 tion of the well.

23 The initial point shown on the Y axis was
24 taken in July of 1985 when the well was initially completed.
25 The initial measured pressure was 3693 psia.

1 The well was put on production approxi-
2 mately two years later and in December of 1987 the pressure
3 was measured after a 5-day build-up and it was measured to
4 be 1118 psia.

5 Drawing the line between the two points
6 we're projecting original gas in place in the Strawn reser-
7 voir of approximately 890-million cubic feet of gas.

8 We've also shown on this plot a delta re-
9 serves with compression of 130-million standard cubic feet
10 of gas. This represents the additional recovery that could
11 be achieved from this reservoir if this well is put on pro-
12 duction and it ceases to flow at 900 pounds.

13 The sales line is at approximately 900
14 pounds and when the reservoir pressure reaches approximately
15 900 pounds it will cease to produce.

16 If compression is installed on the well
17 and the well could be produced down to 300 pounds reservoir
18 abandonment pressure, then the additional 130-million cubic
19 feet of gas could be produced; however, at this point in
20 time it is not economically feasible to install compression
21 on this well due to the current gas price market conditions.

22 Q If the application is not granted, would
23 the -- in other words, what you're saying is the compression
24 wouldn't be added for production from the Strawn zone it-
25 self.

1 A That's correct. If the -- if the appli-
2 cation is not granted, the Strawn zone will probably be
3 squeezed off. In such event, down the line it may or may
4 not be possible to come back and recover those Strawn reser-
5 ves that are left behind.

6 There's also the mechanical risk once the
7 zone is squeezed off as to whether or not a good completion
8 could be made again.

9 Q Would you please move on to Exhibit Num-
10 ber Five and discuss the proposed operations of the storage
11 project?

12 A Exhibit Number Five is entitled Operating
13 Schematic for the Happy Valley Fed Com No. 1 Well. The
14 objective here is to show how we plan to operate this well
15 if granted to the application.

16 First I'd like to direct your attention
17 to the lefthand portion of the exhibit, which is entitled
18 Recharging Operations.

19 We show there the wellbore with the
20 Strawn reservoir, the shallower Strawn reservoir, and the
21 deeper Morrow reservoir.

22 Recharging operations will take place
23 whenever the well is shut in or curtailed. We expect that
24 approximately 3.1-million a day of gas will flow out of the
25 Morrow zone up into the Strawn reservoir and recharge the

1 small Strawn reservoir.

2 That is one, one extreme.

3 The other extreme would be maximum peak-
4 ing operations shown on the righthand portion of the exhi-
5 bit.

6 In this case the well would be produced
7 wide open and we would produce approximately 3.1-million a
8 day out of the Morrow together with approximately 10-million
9 a day rate out of the Strawn for a combined total of 13-
10 million cubic feet per day maximum peaking rate.

11 Q Would you please move on to Exhibit Six
12 and discuss the proposed completion of the well.

13 A Exhibit Six is entitled Wellbore Sketch.
14 Again this is of the Happy Valley Fed Com No. 1 Well.

15 The well was drilled to a TD of 11,846
16 foot and plugged back to 11,800 feet.

17 Currently the Strawn perms from 10,294 to
18 10,338 feet are open and we propose no change for those per-
19 forations, as stated earlier.

20 What we will do to complete into the Mor-
21 row is first of all drop the Vann gun off the bottom of the
22 tubing into the rathole, and then we will perforate the pro-
23 posed Morrow interval with a through tubing -- with a
24 through tubing gun. The two zones will then be open to one
25 another. They will be able to cross flow between the two

1 and also to produce up the tubing to the surface.

2 I'd like to point out, too, that this
3 well is cased with 5-inch 20.8 pound P-110 production cas-
4 ing, which has a calculated burst strength of 13,630 pounds.

5 There's also an intermediate string set
6 to protect the Capitan Reef and also the shallow casing to
7 protect shallow surface water.

8 Q Would you please move on to Exhibit Seven
9 and discuss the production capabilities of the commingled
10 well?

11 A Exhibit Seven is entitled Annual
12 Production Capability plot. This is for the Happy Valley
13 Fed Com No. 1. The intent here is to show how this well
14 will probably produce with and without the proposed comming-
15 ling and downhole storage.

16 By looking at the legend first of all,
17 the thin, solid, black line represents production with com-
18 mingling of the two zones.

19 The thin, dashed line represents produc-
20 tion without the proposed commingling.

21 The solid, wide, black line represents
22 the average yearly production with commingling, which we
23 project to be about 2.8-million cubic feet per day, and the
24 wide, dashed line represents the average yearly production
25 without commingling of approximately 1.7-million cubic feet

1 per day.

2 And once again the Morrow capacity that
3 we have calculated is about 3.1-million a day.

4 What we've plotted here on the Y axis is
5 the estimated production rate in millions of cubic feet per
6 day versus the month in a year.

7 We started in February and ended in Jan-
8 uary in this case and you'll see that it is a symmetrical
9 plot about the mid-year point.

10 Let's look first of all at the production
11 with commingling, which is the thin black line. Starting
12 off in February we expect that the well might produce ap-
13 proximately 7-million a day average for the month. It will
14 ramp down in the spring and reach a low point in the middle
15 of the summer at approximately half a million a day rate.

16 Looking at the production without com-
17 mingling, which is the thin dashed line, the well will pro-
18 duce at maximum capacity in February, which is estimated at
19 3.1-million cubic feet per day. Again this production will
20 ramp down to a minimum in the summer months; however, as you
21 can see by the average curves drawn across the plot, the
22 wide, solid line and the wide, dashed line, you will sell
23 considerably more gas on average with the commingling versus
24 without the commingling.

25 Another point to be made by looking at

1 this plot is a higher percentage of the gas will be sold in
2 the winter months and the price received for this gas is
3 much higher than it is in the summer months.

4 Q Would you please move on to Exhibit Num-
5 ber Eight and discuss that exhibit?

6 A Exhibit Number Eight is entitled Morrow
7 Equity Considerations. What we have at the top of this ex-
8 hibit is an equation which represents the producing rate or
9 the flow capacity of the well divided by the gas in place or
10 the gas reserves of the well. It's simply the psuedo-steady
11 state flow equation divided by the volumetric gas in place
12 equation.

13 This whole equation can be simplified in-
14 to terms of Kh over Phi-h times a constant, C1.

15 Kh again represents basically the milli-
16 darcy feet encountered in the well.

17 Phi-h, of course, is the porosity feet.

18 If we look under Item A on this exhibit,
19 where we have listed data for the Happy Valley Fed Com B No.
20 1 Well, which is currently completed in the Morrow, that
21 well has a calculated 92-1/2 millidarcy feet in the Morrow
22 zone and it has approximately 1.94 porosity feet in the
23 zone.

24 By comparison the Happy Valley Fed Com
25 No. 1 has 53.2 millidarcy feet of flow capacity versus 1.91

1 porosity feet.

2 What this means basically is the two
3 wells have about the same amount of gas in place; 1.94 poro-
4 sity feet versus 1.91; however, the B-1 Well to the south,
5 which is currently completed in the Morrow, has a much high-
6 er flow capacity currently than calculated for the No. 1
7 Well which we propose to complete into the Morrow, and in
8 fact, if you take a ratio of the flow capacity divided by
9 the gas in place between the two wells, you would come up
10 with a factor of 1.72.

11 The bottom line as given by the prognosis
12 there, is that basically the Happy Valley Fed Com No. 1 will
13 more effectively capture its share of reserves and prevent
14 drainage by the B-1 Well to the south if the No. 1 Well is
15 allowed to produce at an average rate of approximately 1.7
16 times its expected noncommingled rate.

17 Q Thank you. Would you now discuss the
18 production allocation formula on Exhibit Nine?

19 A Exhibit Number Nine is entitled Produc-
20 tion Allocation Formula.

21 This is the formula that we propose for
22 the Happy Valley Fed Com No. 1 after commingling.

23 First of all the gas allocation for the
24 Happy Valley Morrow Pool, the calculated reserves are 3100
25 million standard cubic feet of gas and the calculated reser-

1 ves for the Sheep Draw Strawn Northeast Pool is 130-million
2 standard cubic feet of gas. That 130-million standard cubic
3 feet of gas was taken from Exhibit Number Four, which was
4 the P/z plot we looked at earlier.

5 Those were the reserves that will even-
6 tually be gained by putting this well on compression.

7 This gives a total calculated reserves of
8 3230-million standard cubic feet of gas and we've allocated
9 the gas between the two pools based on those reserve esti-
10 mates.

11 As far as the condensate allocation is
12 concerned, we propose allocating no condensate to the Happy
13 Valley Morrow Pool.

14 The Happy Valley B-1 Well makes no con-
15 densate and the gas is dry.

16 On the other hand, the Sheep Draw Strawn
17 Northeast Pool does make a little bit of condensate and we
18 propose to allocate 100 percent of the condensate to that
19 pool.

20 Q Would you please now discuss Exhibits
21 Ten-A and Ten-B?

22 A Exhibits Ten-A and Ten-B are simply gas
23 analyses of the two gases from the two separate pools.

24 Ten-A is from the Sheep Draw Strawn
25 Northeast Pool from the Happy Valley Fed Com No. 1, and Ten-

1 B is a gas analysis on the Morrow gas from the Happy Valley
2 Fed Com B No. 1 Well.

3 Basically both gas analyses are very sim-
4 ilar. The specific gravity on the Strawn is approximately
5 other hydrocarbons contained. Both analyses are very low in
6 CO2.

7 Basically neither sample has any detect-
8 able H2S present. The gas from both zones is sold to the
9 same purchaser. The purchase is based on BTU content and so
10 there'll be no devaluation of gas value due to the coming-
11 ling of these two zones.

12 Q Would you please now discuss the esti-
13 mated size of the Strawn reservoir, and I refer you to Exhi-
14 bit Eleven?

15 A Exhibit Eleven is entitled Size of Strawn
16 Reservoir. This concerns the Happy Valley Fed Com No. 1
17 Well.

18 Shown at the top is a cross sectional
19 view designed to depict the wellbore and the Strawn reser-
20 voir.

21 The average porosity of that Strawn
22 reservoir is a little over ten percent with a height encoun-
23 tered, a net height encountered in the wellbore of 46 foot.

24 Using the original gas in place taken
25 from the P/z plot, which is Exhibit Number Four, of 890-mil-

1 lion standard cubic feet, and equating it to the gas in
2 place equation, one would calculate in the area of 22.3 ac-
3 res of size for the Sheep Draw Strawn Northeast Pool.

4 Now assuming that the Happy Valley Fed
5 Com No. 1 is in the center of that reservoir, and assuming
6 that it is disc shaped with an area of 22.3 acres, the rad-
7 ius that one would calculate is 556 foot from the center of
8 the wellbore.

9 Q In your opinion does this confirm the
10 cross section, Exhibit Two, which showed a limited Strawn
11 reservoir size?

12 A Yes, it does.

13 Q Will you please move on to exhibit Twelve
14 and discuss its contents?

15 A Section 70-6-4 of the New Mexico Statutes
16 sets forth the guidelines for hydrocarbon storage and this
17 application meets those guidelines as are summarized on Ex-
18 hibit Number Eleven.

19 First of all, the Strawn reservoir in
20 this well is incapable of producing oil in paying quanti-
21 ties. This is a gas reservoir.

22 The Strawn reservoir was gas productive
23 but is essentially depleted. Recovery of remaining gas re-
24 serves will not be diminished by the proposed storage opera-
25 tions. In fact, the proposed operations will actually in

1 crease the ultimate recovery.

2 There are no known commercial deposits of
3 potash over the Strawn reservoir.

4 The proposed storage operations in the
5 Strawn will not injure surface or underground water resour-
6 ces.

7 There are no other wells used for injec-
8 tion, storage, or withdrawal existing in the Strawn in the
9 Strawn reservoir proposed for the storage operations.

10 And no appropriation of any property is
11 proposed.

12 Q In your opinion is the Strawn reservoir
13 suitable for storage of natural gas?

14 A In my opinion, it is.

15 Q Would you please give a project summary,
16 and I refer you to Exhibit Thirteen?

17 A Exhibit Thirteen is entitled Project Sum-
18 mary.

19 It states very briefly and concisely the
20 objective of the project and the reasons for the project.

21 The objective is to downhole commingle
22 the Sheep Draw Strawn Northeast Pool with the Happy Valley
23 Morrow Pool and to use the Strawn reservoir for hydrocarbon
24 storage.

25 There are six main reasons for performing

1 this project.

2 First of all, the Sheep Draw Strawn
3 Northeast Pool is essentially depleted. Commingling will
4 eventually place the Strawn on compression with the Morrow
5 and increase ultimate Strawn recovery by 130-million stand-
6 ard cubic feet of gas.

7 Secondly, the high peaking capacity will
8 allow this well to better meet the swing demands by the pur-
9 chaser and to make gas more readily available to the domes-
10 tic, commercial and industrial consumers.

11 The project promotes the building of re-
12 serves in the summer for orderly withdrawal in periods of
13 peak demand, which is the winter.

14 More gas will be sold during peak demand
15 when prices are higher. This will result in a higher aver-
16 age sales price for the gas.

17 The fifth reason is the Happy Valley Fed
18 Com No. 1 Well would be better protected from drainage by
19 the Happy Valley Fed Com B No. 1 Well, which is the offset
20 Morrow well to the south.

21 And lastly, the added peaking capability
22 will allow this well to produce at an average annual rate
23 that is close to its Morrow capacity.

24 Q In your opinion will the granting of this
25 application be in the interest of conservation, the preven-

1 tion of waste and the protection of correlative rights?

2 A Yes, I believe it meets all three objec-
3 tives.

4 Q Were Exhibits Three through Thirteen
5 prepared by you, under your direction, or compiled from com-
6 pany records?

7 A Yes, they were.

8 MR. BRUCE: Mr. Examiner, at
9 this time I move the admission of Exhibits Three through
10 Thirteen.

11 MR. STOGNER: Exhibits Three
12 through Thirteen will be admitted into evidence at this
13 time.

14 MR. BRUCE: Exhibits Fourteen
15 and Fifteen are the notice and the certified return receipts
16 mailed out to the offset operators and I would ask that they
17 also be admitted.

18 MR. STOGNER: Exhibit Number
19 Fourteen will be admitted into evidence.

20

21 CROSS EXAMINATION

22 BY MR. STOGNER:

23 Q Let's start with the notice first. Is
24 all this Federal land that you propose to utilize this?

25 A Yes, it is.

1 Q And you are offset on all sides by Fed-
2 eral lands, is that correct?

3 A That is not quite correct. I believe the
4 Happy Valley B Fed Com includes some State acreage.

5 Q That's the south half of 28, is that cor-
6 rect?

7 A That's correct.

8 Q And it looks like Section 32 is for pur-
9 poses of today is also State acreage, is that correct?

10 A That is correct.

11 Q Now, to the best of your ability, as far
12 as trying to find the extent of this reservoir, it's virtu-
13 ally impossible, isn't it? You know the volume of it but as
14 far as its extent to the north, to the south, to the east or
15 to the west, do you have any idea of its actual dimensions?

16 A We know the volume, as -- as we've
17 stated. Looking at the offset wells, we know that to the
18 south it does not extend to the B-1 No. 1 Well, and we also
19 know that it does not extend to the east to the J. A.
20 Tomaino Fed Com No. 1 Well.

21 Those are the two closest offsets.

22 Q Does your seismic data give you any kind
23 of indication of how far north it may go?

24 MR. SOHANEY: The seismic data
25 indicates that it's nonresolvable, which in turn would indi-

1 cate that it's a limited size.

2 Q So you don't know, either one of you
3 doesn't know if it extends up to the ARCO or Amoco acreage
4 to the north.

5 MR. SOHANEY: Where it -- how
6 it lies within that proration unit or to the north, we do
7 not know.

8 Q Have you been in verbal communication
9 with ARCO or Amoco concerning this particular project? I
10 know you've been in communication with them by letter be-
11 cause of your notification but have you talked to them ver-
12 bally?

13 A Yes, we have. I believe Mr. Duncan has
14 talked to them personally.

15 MR. STOGNER: Mr. Bruce, are
16 you going to call Mr. Duncan to the stand?

17 MR. BRUCE: No, but it you want
18 to hear what his conversation --

19 MR. STOGNER: Yeah, I'd like to
20 hear. Let's swear him in. I'd like to get some issues like
21 this resolved before we --

22

23 (Mr. Duncan sworn.)

24

25

1 WILLIAM T. DUNCAN,
2 being called as a witness and being duly sworn upon his
3 oath, testified as follows, to-wit:

4

5 DIRECT EXAMINATION

6 BY MR. STOGNER:

7 Q Would you please state your name and city
8 of residence?9 A My name is William T. Duncan, Jr. I re-
10 side in Midland, Texas.11 Q And what is your occupation and who are
12 you employed by?13 A I'm a petroleum engineer, or a reservoir
14 engineer employed by Exxon Corporation. I work in our Regu-
15 latory Affairs Group in the Southwestern Production Divi-
16 sion.17 Q And are you familiar with Exxon's appli-
18 cation in Case Number 9387?

19 A Yes, I am.

20 Q And did you have conversations with Amoco
21 regarding this case?

22 A Yes, I did.

23 Q Would you please describe those discus-
24 sions?

25 A I discussed with Bruce Rowley (sic) of

1 Amoco in Houston on May 17th, 1988, the proposal. He called
2 me after having received the mail notice and had questions
3 about the proposal. We discussed it. He had no objections
4 at that time; said that he would recommend that Exxon -- ex-
5 cuse me, that Amoco not oppose or appear at the -- at the
6 hearing.

7 The -- two days later, excuse me, three
8 days later, on May 20th. he called me. I was not in the
9 office, I was at another hearing, but he talked to my super-
10 visor and relayed to him, James Howell, that Amoco had no
11 opposition to the downhole commingling application.

12 MR. STOGNER: What I'm leading
13 up to, if Amoco or ARCO decided to drill a well at a stand-
14 ard location, they could do so at a 660 location from the
15 side boundary and was there any kind of mention about that?
16 Was that any kind of an agreement between Exxon and these
17 two parties to the north, and -- or, would Exxon have any
18 objection to them drilling a well at a standard location
19 perhaps penetrating the Strawn formation?

20 A I doubt that we would have an objection
21 to them drilling a well at a standard location because
22 neither we nor Amoco even considered that the reservoir
23 would extend that far to the north. The indications appear
24 very unlikely that it could extend that significant a dis-

25

1 tance to the north.

2 As Mr. Jenner has previously noted, it's
3 not encountered in any of the wells that offset this loca-
4 tion either to the southeast or to the southwest, and as Mr.
5 Sohaney has testified, the areal extent is very limited
6 based upon the volume of the reservoir and the thickness of
7 the reservoir as it was encountered in the subject well.

8 As a reservoir engineer I've also re-
9 viewed it and find it's very difficult to believe that it
10 would extend very far to the north.

11 For my expert opinion I would not expect
12 to see the reservoir encountered by a well drilled in Sec-
13 tion 21.

14 MR. STOGNER: How about Section
15 22, while we're on the subject?

16 A Nor Section 22, especially by a standard
17 location in Section 22.

18 MR. STOGNER: Okay.

19 A That would put it even farther away.

20 MR. STOGNER: Now, the acreage
21 in 27 to the east, that is Exxon operated, is that correct?

22 A That's correct.

23 MR. STOGNER: Okay.

24 A The J. H. Tomaino Fed Com Well No. 1 is
25 operated by Exxon.

1 MR. STOGNER: Okay. Those were
2 the issues I wanted to clear up and he's answered them.

3 I have no further questions of
4 Mr. Duncan.

5 Mr. Bruce, do you have any?

6 MR. BRUCE: No, I don't. Did
7 you have any more questions of Mr. Sohaney?

8 A Excuse me, the return receipts have not
9 been accepted as an exhibit. Should I verify those?

10 MR. BRUCE: Yeah.

11 MR. STOGNER: I thought we did
12 but if we haven't, that's Exhibit Number Fourteen -- Fif-
13 teen?

14 A Fifteen, yes.

15 MR. STOGNER: Exhibit Fifteen
16 will be admitted into evidence at this time.

17 Oh, yes, I do have some more
18 questions for Mr. Sohaney.

19

20 LAWRENCE J. SOHANEY,
21 being recalled and remaining under oath, testified as
22 follows, to-wit:

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RE CROSS EXAMINATION

BY MR. STOGNER:

Q Okay, in looking at your Exhibit Number Four, you propose at this time to produce from the Strawn formation until you hit line pressure, which is 900 pounds, is that correct.

A That is correct, and --

Q At which time you have a cumulative gas production out of there of about 700 MMCF.

A Right at approximately 700.

Q Okay. Thus leaving approximately 190 MMCF still in the Strawn reservoir?

A That is correct.

Q And if I understood your testimony correctly, if this is -- if this is approved and your (unclear) and you produce it the way you propose, that you will put a -- let me back up just a little bit, and you're going to produce the Morrow, when it gets down to an economic limit will there be a compressor put on it and do you propose to go down to a line pressure or a pressure of 300 psi?

A That's exactly what we're proposing, to utilize the compression to produce both zones down to the abandonment pressure of approximately 300 pounds rather than trying to get one zone currently down that far and then come

1 back later and reinstalling the compressor.

2 Q And that would be an additional 130 MMCF
3 from the Strawn formation.

4 A That's correct.

5 Q And that's taken care of in your alloca-
6 tion formula of 4 percent being dedicated to the Strawn and
7 96 percent being allocated to the Morrow.

8 A That's correct.

9 Q With all of the condensate being dedi-
10 cated to the Strawn, and based on your evidence there is no
11 condensate production from the Morrow, is that correct?

12 A That is correct.

13 Q How about your water production? I do
14 show some water production from your Strawn formation. Has
15 there been any indication of water production either now or
16 as you draw down in the Morrow formation?

17 A All these -- all these gas wells do pro-
18 duce water; however, it's fresh water. This is water con-
19 densation, where the water that is in the reservoir in a
20 vapor state containing gas, upon bringing that gas to the
21 surface and cooling it, you've having the water vapor fall
22 out (not clearly understood) and so it is not production of
23 formation water, it's really production of the water that is
24 condensing out of the vapor stage.

25 Q Does that hold true for any water or

1 vapor that comes out of the Morrow?

2 A The same is true for the Morrow.

3 Q Is the Strawn formation water sensitive?

4 A The Strawn is not.

5 Q The Strawn is not, but the Morrow is, but
6 as far as any kind of a back flow, that is not a problem as
7 I read your testimony now.

8 A That's correct. Whether you produce the
9 Morrow with or without the Strawn, of course, you've always
10 got to -- there's always the potential for water condensing
11 out of the gas, and whether or not you commingle these two
12 zones, you do have that potential problem, and this is a po-
13 tential problem on many gas wells that cannot be delivered.

14 As the gas is delivered up the wellbore
15 and it cools, there is always potential for gas -- excuse
16 me, for water to condense out of the vapor stage into the
17 liquid stage, and of course it will contain no salt; it will
18 be fresh water.

19 Q But with your configuration this addi-
20 tional condensate of water from the Strawn formation, as I
21 see it, or according to the (unclear), there's not a parti-
22 cular danger to the Morrow other than what is -- other than
23 what would normally be if you just produced straight out of
24 the Morrow without going through the --

25 A That is correct.

1 Q And you see no situation where that the
2 Morrow producing and condensate forming and going into the
3 Strawn formation it will not be -- there will not be any
4 harm done to the Strawn formation?

5 A There will be no harm done to the Strawn.

6 Q Are you proposing any kind of a stimula-
7 tion to either the Strawn or the Morrow?

8 A No, no stimulation to the Strawn is
9 necessary.

10 The Strawn was capable of producing at
11 least 10-million cubic feet of gas per day. It was not
12 stimulated on original completion.

13 The Morrow would simply be perforated ap-
14 proximately 3000 pounds in a balance and we think that the
15 natural completion will be quite adequate.

16 Q Now in your Exhibit Number Eleven, that
17 is your size of the Strawn reservoir, you showed an h, which
18 is the height, being 46 feet. Does that correspond, and
19 I'll refer back to Exhibit Number Two, that is the cross
20 section, of the blue colored on the right of that particular
21 log, this well?

22 A It corresponds to the shaded porosity on
23 that log.

24 Q The shaded gray portion --

25 A Yes.

1 Q -- to the right of it?

2 A To the right of it, that's correct.

3 Q And that corresponds essentially with
4 your perforations, does it not?

5 A That is correct. There is, if I recall
6 correctly, two feet of pay that we have counted which is not
7 perforated. Let me call off the depth. It's at approxi-
8 mately 10,372 foot.

9 There is also what we have counted 2 foot
10 of net pay (inaudible).

11 Q And that is included in your 46-foot fig-
12 ure.

13 A That is correct.

14 Q Out of curiosity, what I -- if I took a
15 compass and drew a 22.3 acre circle around your wellbore,
16 how far would it extend?

17 I know this is idealistic conditions with
18 the 46 feet, but --

19 A That would --

20 Q That would be a radius of 556 --

21 A -- be 556 foot. It would not cross over
22 the lease boundaries.

23 Q So it's according to your calculations
24 and stuff, it's well confined in the north half.

25 A We believe that to be the case.

1 Q Let's take a look at the reporting re-
2 quirements that we're talking about eliminating. As far as
3 the reporting, you're essentially asking to go ahead and re-
4 port the production on the C-115 and showing the allocation
5 between the Strawn and the Morrow with your 96 percent and
6 40 (sic) percent split, is that correct?

7 A That is correct. What we are asking for
8 exemption from is the reporting requirements as to how much
9 has been injected into the Strawn reservoir and how much has
10 been withdrawn from it because there's no practical method
11 to keep track of what has been put into the Strawn and then
12 removed from the Strawn.

13 Q Technically it's a gas storage; in real-
14 ity you got a storage tank down in your well essentially, as
15 part of your case.

16 A That's correct.

17 Q So as our rules and regulations and the
18 statutes refer to a gas storage and to sort of make sure
19 that we fall within the law, we need to cover it, is this
20 correct, as you see it, in asking for these exceptions?

21 A That is correct.

22 Q At the present time, today, what -- what
23 pressure are you producing the Strawn from? How far away
24 are we from this 900 pound (unclear)?

25 A Well, let's see. Let's refer back to Ex-

1 hibit --

2 Q Four?

3 A -- Number Four -- no, Exhibit Number
4 Three.

5 Q Three.

6 A As of the end of February we had a cumu-
7 lative gas production of 672 and a projected point at which
8 this well will probably cease to flow is right at 700.

9 Today, as we speak, we are probably up to
10 approximately 685 to 690,000 cumulative gas production, so
11 we are very close to the point at which this well would pro-
12 bably cease to produce altogether.

13 The well, the latest report on the well
14 from the field is that it is producing at approximately 170
15 MCF per day but that it's essentially riding the line pres-
16 sure. There's no choke.

17 Q Once you start this work in pulling the
18 tubing out and completing into the Morrow, do you propose to
19 have a single completion in the Morrow before you actually
20 start your commingling operations or do you propose to go
21 right into your commingling?

22 A We propose to go right into it.

23 Q Seeing that there's going to be about a
24 month lag time due to the misadvertisement, is this still
25 the case?

1 A Yes.

2 Q I mean assuming if I could have gotten
3 the order out today.

4 A There are -- there are reasons for not
5 trying to separately test the Morrow.

6 If we were to rerun the string and com-
7 plete in the Morrow first, and separately test the Morrow,
8 and then to come back and commingle the two zones, we would
9 have to kill the well with brine, and we really don't want
10 to do that because there is a risk of losing the Morrow
11 completion by killing it with brine.

12 Q If you hit this 900 pound line pressure
13 before an order is issued, is it Exxon's intention to go
14 ahead and shut the well down or will you put a compressor on
15 the Strawn formation?

16 A The well will be left shut in because the
17 lease is still in the primary term.

18 Q The only completion that needs to be done
19 to be done to the Morrow is just perforating, is that cor-
20 rect?

21 A That's correct.

22 Q Let me ask about the frac pressure in
23 your Strawn formation.

24 Do you know what that might be?

25 A The fracture pressure?

1 Q Yes.

2 A Specifically, for the Strawn I don't know
3 the exact number; however, generally used numbers use a
4 gradient of approximately .65 times the depth. So the depth
5 of the Strawn --

6 Q I believe you see the question I'm
7 leading up to, is the Morrow going to be perforated, is
8 there any danger of fracturing the Strawn formation?

9 A The fracture pressure of the Strawn would
10 be approximately 6700 psi. What we have done is to look at
11 what would be the maximum pressure if the two ones were
12 commingled and left shut in indefinitely, what could that
13 Strawn pressure build up to, and --

14 Q You anticipated my question.

15 A -- and the number I have calculated is
16 3757 psia, which is approximately 50 pounds above the orig-
17 inal encountered pressure in the Strawn. Now that would as-
18 sume 4400 pounds original pressure in the Morrow and that it
19 was shut in indefinitely. I think there's some question
20 that the Morrow is even at 4400 currently because we've had
21 the offset well producing. Chances are the Morrow pressure
22 is more on the order of 4000 to 3800 pounds, and so I think
23 the worst case scenario would be 3757 psia and quite likely
24 lower.

25 Q What was the virgin pressure in your Hap-

1 py Valley Federal Com B No. 1 in the Morrow, do you remem-
2 ber?

3 A The approximate virgin pressure was 4400
4 pounds. I don't recall the exact number that we measured.

5 Q Has that well been shut in since its com-
6 pletion? In other words, what's the pressure of the reser-
7 voir now from that particular well, the Com B No. 1 Well?

8 A The B No. 1 was put on production the
9 same date as the No. 1 Well and it has been producing ever
10 since and continues to produce.

11 The capacity of that well has fallen from
12 about 5.3-million a day to approximately 4.8-million a day.
13 We have not actually measured the pressure in the Morrow on
14 that well but based on the producing rates I think we could
15 use as an estimate the approximate change in capacity, which
16 would say that the pressure is approximately, approximately
17 3980 pounds.

18 Q And of course there would be some
19 pressure drop like in your worst case scenario if you had to
20 shut the Morrow down in just as soon as you perforated.

21 What kind of a pressure drop would we see
22 going into the Strawn?

23 A Well, if the Strawn is currently
24 approximately 1100 pounds and the Morrow is at 4000, we'd be
25 about 2100 pounds differential.

1 This is, incidentally, important in
2 perforating the Morrow with a natural completion, there is a
3 threshold pressure of under balance which you want to
4 achieve to make a good natural completion and that threshold
5 pressure is listed as somewhere between approximately 2700
6 pounds under balanced to about 3300 pounds under balanced,
7 and so this is typically why the Morrow is completed with a
8 Vann gun or with a through-tubing gun completely drawn down.

9 Q What do you mean by a Vann gun?

10 A Vann gun is simply tubing conveyed
11 perforating gun that is attached at the end of the tubing.
12 It is lowered into the wellbore with the tubing. The tubing
13 is latched into the packer and when everything is set a bar
14 is dropped down through the tubing which sets off the
15 charges, and in that manner you can perforate the wellbore
16 totally under-balanced with no fluids in the wellbore.

17 Q Is this Vann gun in place in the tubing
18 at the present?

19 A The used Vann gun from the Strawn
20 reservoir is currently on the end of the tubing and it will
21 be dropped off into the rathole in the well.

22 Q And then you will come in with a wireline

23 --

24 A With a wireline, yes.

25 Q -- and perforate.

1 Q If I refer to your Exhibit Number Six,
2 you show quite a bit of cement behind your production string
3 and do you know what the top of cement is for your lower
4 zone?

5 A We do not know where the top of cement is
6 on the lower zone.

7 Q Do you know how many sacks were run in
8 that first stage?

9 A I don't, I don't recall the figures.
10 Well, the number -- I don't -- I don't know the exact number
11 of sacks; however, they attempted two circulations to the DV
12 tool and circulated twice the amount of cement that's
13 theoretically required and did not get returns through the
14 DV tool.

15 Q So there is definitely cement behind the
16 Morrow and the Strawn. There is no break between the Morrow
17 and the Strawn as far as cement.

18 A That is -- that is correct, and in fact,
19 we -- it was no change -- the well was drilled in 1980 --
20 85, in July of '85. It was completed and shut in. The well
21 was put on production in August of 1987 and in that two year
22 period of shut-in time we saw no decline in the shut-in
23 relative pressure.

24 So we feel that at least the top of
25 cement is above the Strawn and that there's no leakage that

1 took place during those two years that the well was shut in.

2 Q (Unclear) exhibits, there won't be an
3 increase in the cumulative reserves being produced but there
4 won't be a decline, is that correct, from the Morrow or the
5 Strawn?

6 A Well, there will be an increase because
7 by allowing the commingling now we can be assured that the
8 Strawn will eventually be put on compression, so we will at
9 least get those additional reserves, 130-million standard
10 cubic feet.

11 If the commingling is denied there is a
12 good chance that we may never come back to recover that 130-
13 million standard cubic feet of gas out of the Strawn.

14 Q Do you know what your perforation program
15 for the Morrow will be at the present time?

16 A Yes, we do.

17 Q Is that somewhere in the exhibits or am I
18 missing it?

19 MR. JENNER: Total perfed
20 interval is located down there, the (not clearly understood)
21 the proposed Morrow perfs 11,628 to 11,666.

22 MR. STOGNER: 11,666, and
23 that's two shots per foot?

24 MR. JENNER: I believe that is.
25 Is that two shots?

1 A It's either two or four.

2 Q Two or four.

3 MR. JENNER: I think it's four,
4 probably more likely four.

5 Q There will not be any breaks between that
6 --

7 A There will be a break, yes, sir.

8 Q There will be a break there? Can you
9 give me an estimate of where that --

10 MR. JENNER: Sure can. That's
11 an approximate depth of 11,650 feet. It's about a 2 or 3
12 foot shot spread in there.

13 MR. STOGNER: Gentlemen, I have
14 no further questions.

15 Are there any other questions
16 of any of these witnesses?

17 If not, they may all be ex-
18 cused.

19 Mr. Bruce, do you have anything
20 further in this case?

21 MR. BRUCE: Nothing further,
22 Mr. Examiner.

23 MR. STOGNER: Gentlemen, my
24 apologies for the -- for the advertisement problem. This
25 case will have to be continued and readvertised for the June

1 22nd hearing; however, I do not foresee any reason to have
2 any witnesses come back at that time.

3 If there's nothing else in this
4 matter today, we will move on.

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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 CSR

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 9387 heard by me on 25 May 1988.

Michael E. Stogner 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
7
8 22 June 1988

9 EXAMINER HEARING

10 IN THE MATTER OF:

11 Application of Exxon Corporation for CASE
12 an unorthodox gas well location, down- 9387
13 hole commingling, hydrocarbon storage
14 authority, and relief from the report-
15 ing requirements of Division General
16 Rule 1131, Eddy County, New Mexico.

17 BEFORE: Michael E. Stogner, Examiner

18 TRANSCRIPT OF HEARING

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

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

25 For the Applicant:

1 MR. STOGNER: We'll call next
2 Case Number 9387, which is the application of Exxon Cor-
3 poration for an unorthodox gas well location, downhole
4 commingling, hydrocarbon storage authority, and relief
5 from the reporting requirements of Division General Rule
6 1131, Eddy County, New Mexico.

7 This case was previously heard
8 at the Examiner's Hearing held on May 25th, 1988, but had
9 to be readvertised due to an error in the advertisement.

10 Are there any appearances in
11 this case at this time?

12 There being none, Case Number
13 9387 will be taken under advisement.

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15 (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 record of the proceedings in the Examiner hearing of Case No. 9387, heard by me on 22 June 1988.

Michael E. Stogard, Examiner
Oil Conservation Division

8/12/88