

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

17 August 1988

EXAMINER HEARING

IN THE MATTER OF:

Application of Exxon Company, U.S.A.      CASE  
for an unorthodox oil well location      9459  
and simultaneous dedication, Lea  
County, New Mexico, and

Application of Exxon Company, U.S.A.      9460  
for an unorthodox oil well location,  
directional drilling, and simultaneous  
dedication, Lea County, New Mexico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:                      Robert G. Stovall  
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## A P P E A R A N C E S Cont'd

1 2 3 4 5 6 7	For Phillips Petroleum Company:	W. Thomas Kellahin Attorney at Law KELLAHIN, KELLAHIN & AUBREY P. O. Box 2265 Santa Fe, New Mexico 87501
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## I N D E X

8 9 10	W. T. (Bill) DUNCAN, JR.	
11	Direct Examination by Mr. Bruce	6
12	Cross Examination by Mr. Catanach	9
13		
14	ROBERT C. ASREEN, JR.	
15	Direct Examination by Mr. Bruce	10
16	Cross Examination by Mr. Catanach	15
17		
18	LAWRENCE JOHN SOHANEY	
19	Direct Examination by Mr. Bruce	16
20	Cross Examination by Mr. Catanach	27

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21  
22  
23  
24  
25

## E X H I B I T S

Applicants Exhibit One, Map	6
Applicants Exhibit Two, Map	6
Applicants Exhibit Three, Return Receipts	8
Applicants Exhibit Four, Log	11
Applicants Exhibit Five, Map	12
Applicants Exhibit Six, Cross Section	13
Applicants Exhibit Seven, Map	17
Applicants Exhibit Eight, Map	18
Applicants Exhibit Nine A, Plot	19
Applicants Exhibit Nine B, Plot	20
Applicants Exhibit Ten, Data	20
Applicants Exhibit Eleven, Diagram	21
Applicants Exhibit Twelve, Diagram	22
Applicants Exhibit Thirteen, Well Deviations	23
Applicants Exhibit Fourteen, Map	24

1 MR. CATANACH: Call next Case  
2 Number 9459.

3 MR. STOVALL: Application of  
4 Exxon Company, U.S.A. for an unorthodox oil well location  
5 and simultaneous dedication, Lea County, New Mexico.

6 MR. CATANACH: Are there ap-  
7 pearances in this case?

8 MR. BRUCE: Yes, Mr. Examiner.  
9 I'm Jim Bruce with the Hinkle Law Firm in Santa Fe, New  
10 Mexico, appearing on behalf of Exxon, U.S.A. in this case.

11 MR. CATANACH: Are there any  
12 other appearances?

13 MR. KELLAHIN: Yes, Mr. Exa-  
14 miner. I'm Tom Kellahin of the Santa Fe law firm of  
15 Kellahin, Kellahin and Aubrey. We represent Phillips Pet-  
16 roleum Company in this matter.

17 MR. CATANACH: Are there any  
18 other appearances?

19 MR. BRUCE: Mr. Examiner, we  
20 would request that Case Number 9460 be consolidated with  
21 Case 9450 for the purposes of hearing.

22 MR. CATANACH: Call Case 9460.

23 MR. STOVALL: Application of  
24 Exxon, U.S.A, for an unorthodox oil well location, direc-  
25 tional drilling, and simultaneous dedication, Lea County,

1 New Mexico.

2 MR. CATANACH: Mr. Bruce, how  
3 many witnesses do you have?

4 MR. BRUCE: I have three wit-  
5 nesses.

6 MR. CATANACH: Mr. Kellahin?

7 MR. KELLAHIN: We do not in-  
8 tend at this time to call a witness.

9 MR. CATANACH; Will the wit-  
10 nesses please stand to be sworn?

11

12 (Witnesses sworn.)

13

14 W. T. (BILL) DUNCAN, JR.,  
15 being called as a witness and being duly sworn upon his  
16 oath, testified as follows, to-wit:

17

18 DIRECT EXAMINATION

19 BY MR. BRUCE:

20 Q Please state your full name and city of  
21 residence.

22 A William Thomas Duncan, Junior, Midland,  
23 Texas.

24 Q What is your occupation?

25 A I'm a petroleum engineer and I'm Senior

1 Engineer with Exxon Company, U.S.A., involved with regula-  
2 tory affairs.

3 Q Have you previously testified before the  
4 OCD as an engineer?

5 A Yes, I have.

6 Q And are you familiar with the matters  
7 concerning Cases 9459 and 9460?

8 A Yes, sir, I am.

9 MR. BRUCE: Mr. Examiner, is  
10 the witness considered qualified?

11 MR. CATANACH: He is.

12 Q Mr. Duncan, would you please refer to  
13 Exhibit Number One and describe it briefly?

14 A Yes. Exhibit Number One is a map which  
15 locates Exxon's New Mexico K State Lease within the north  
16 central portion of Lea County, New Mexico. The lease is  
17 approximately two miles east of Buckeye and consists of two  
18 half sections, the east half of Section 32 and the diagon-  
19 ally adjacent south half of Section 28.

20 Exxon's proposed Vacuum Glorieta wells  
21 are both locations in the south half of Section 28.

22 Also shown on this map is a shaded area  
23 which is mapped on some of our later exhibits.

24 Q Would you please now refer to Exhibit  
25 Number Two, describe its contents, and would you please

1 summarize what Exxon seeks in these two cases?

2           A           Exhibit Number Two is an enlarged map of  
3 the south half of Section 28. As you can see from this --  
4 well, on this exhibit I'd like to point out some of our  
5 offset operators.

6                   To the north of Exxon's proposed prora-  
7 tion units is Phillips. To the northwest is Phillips. To  
8 the west and southwest is Shell. To the south is Texaco.  
9 Other offsets are Exxon tracts.

10                   This exhibit shows the proposed surface  
11 and bottom hole locations of Exxon's two proposed wells.

12                   Case Number 9459 is the case in which  
13 Exxon seeks to drill Well No. 35 from a surface location  
14 1195 feet from the south line and 2518 feet from the east  
15 line to a bottom hole location within a 240-foot square  
16 window 10 feet from the north and west lines of Unit O.

17                   This location is unorthodox due to the  
18 proximity to interior quarter quarter sections lines. The  
19 location is toward the interior of the lease.

20                   We also seek simultaneous dedication of  
21 Unit O to Well No. 35 and existing Well No. 21 and propose  
22 that the 107-barrel of oil per day Vacuum-Glorieta top  
23 allowable be shared in equal portions between the two  
24 wells.

25                   In Case Number 9460 Exxon seeks to drill



1 Three.

2 MR. CATANACH: Exhibits One  
3 through Three will be admitted as evidence.

4 MR. BRUCE: I have no further  
5 questions of the witness at this time.

6

7

CROSS EXAMINATION

8 BY MR. CATANACH:

9 Q Mr. Duncan, let's go over your offset  
10 operators one more time.

11 To the north is Phillips.

12 A That's correct.

13 Q Northwest is Phillips.

14 A Yes. To the west is Shell in Section  
15 32. To the southwest is Exxon.

16 Q Okay.

17 A Directly to the south of Units M and N  
18 is Texaco and to the south of Units O and P is Phillips.

19 Then also to the north of Units J and I  
20 is Shell.

21 Q And these wells are going to be located  
22 in the Vacuum Glorieta Pool, is that correct?

23 A That's correct. All the wells shown on  
24 this exhibit are Glorieta field wells, Pool wells.

25 Q And why does Exxon want to drill these







1                   This reservoir produces by a combination  
2 solution gas and moderate flank water drive mechanism, with  
3 the water drive being the prevalent drive mechanism on the  
4 east half of the field.

5                   The waterflood front is now encroaching  
6 on the K State Lease from the northwest and also from the  
7 southeast.

8                   Q           Please now describe Exhibit Six for the  
9 Examiner.

10                  A           Okay. Exhibit Number Six is a struc-  
11 tural cross section through the New Mexico K State Lease.

12                  The cross section shows the structural  
13 position of the proposed New Mexico K State Nos. 34 and 35  
14 Wells with respect to surrounding wells.

15                  The wells on the cross section are shown  
16 in the index map on the far righthand side of the exhibit.  
17 The line of section is oriented from northwest to southeast  
18 through the proposed locations. It is also perpendicular  
19 to the axis of the structure.

20                  The vertical scale for the log trace is  
21 shown. It's one inch equals 20 feet. The horizontal scale  
22 is one inch equals 200 feet.

23                  Both the top of the Paddock zone and the  
24 top of the original oil/water transition zone are shown in  
25 lower case print along the log.

1           The operator, lease, and well numbers of  
2 different log traces shown on the cross section are located  
3 at the top in bold print.

4           Shown with shading is the gamma ray,  
5 greater than 50 percent of the maximum gamma ray deflec-  
6 tion and porosity greater than 6 percent.

7           The New Mexico K State 34 and 35 Wells  
8 are shown by dashed lines and these wells will be struc-  
9 turally higher than existing wells in their respective pro-  
10 ration units.

11           Q           In your opinion will the granting of  
12 these two applications be in the interest of conservation,  
13 the prevention of waste and protection of correlative  
14 rights?

15           A           Yes.

16           Q           And were Exhibits Four through Six pre-  
17 pared by you or under your direction?

18           A           Yes, they were.

19                       MR. BRUCE:   Mr. Examiner, I  
20 move the admission of Exhibits Four through Six.

21                       MR. CATANACH:   Exhibits Four  
22 through Six will be admitted into evidence.

23                       MR. BRUCE:   I have nothing  
24 further of the witness at this time.

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CROSS EXAMINATION

BY MR. CATANACH:

Q Mr. Asreen, you said something about two waterfloods. There is a waterflood in this area?

A Well, this is a natural water drive. That's what I was referring to, sir.

Q You said the water drive was approaching from what directions?

A Roughly in the same directions as the ends of the structure, from the north and northwest towards the K State Lease shown in Section 28, and from the southeast in Section -- and also from the southeast direction, too.

So it's roughly mimicking the structure.

Q Has your -- your water production has increased in the No. 21 and 31 Wells?

A Yes, it has. The No. 21, well, those questions will be addressed by Mr. Sohaney.

Q Okay.

MR. CATANACH: Anything further? I don't have any other questions.

Mr. Kellahin, do you have any questions?

1 MR. KELLAHIN: No, sir.

2  
3 LAWRENCE JOHN SOHANEY,

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

6  
7 DIRECT EXAMINATION

8  
9 BY MR. BRUCE:

10 Q Mr. SohaneY, would you please state your  
11 full name and where you reside?

12 A My name is Lawrence John SohaneY. I re-  
13 side in Midland, Texas.

14 Q And by who are you employed and in what  
15 capacity?

16 A I'm employed by Exxon Corporation as a  
17 Staff Reservoir Engineer.

18 Q And have you previously testified before  
19 the OCD?

20 A Yes, I have.

21 Q And are you familiar with the engineer-  
22 ing matters related to Case Numbers 9459 and 9460?

23 A Yes, I am.

24 MR. BRUCE: Mr. Examiner, is  
25 the witness considered qualified?

1 MR. CATANACH: He is.

2 Q Mr. Sohaney, would you please refer to  
3 Exhibit Number Seven and describe its contents?

4 A Exhibit Seven is a cumulative water  
5 production map on the Vacuum Glorieta Pool. We've posted  
6 on this map the cumulative water production on each well  
7 that was active in 1987 in the Vacuum Glorieta Pool.

8 The contour intervals are intervals of  
9 50,000 barrels of water.

10 Looking at the east half of the field we  
11 can see how the flank water drive, the natural flank water  
12 drive, is progressing over time.

13 On the north, to the north of the Exxon  
14 K State Lease, the flank water drive is progressing from  
15 the north direction towards the south to the southeast.

16 And from the east side of the Exxon K  
17 State Lease the flank water drive is progressing in the  
18 westerly or northwesterly direction.

19 Looking at the proration unit that con-  
20 tains Well No. 21, which will be Unit Number O, the direc-  
21 tion that the flank water drive is taking suggests that the  
22 last portion of this proration unit to water out will be  
23 in the northwest corner, which is where we propose to drill  
24 Well No. 35.

25 Looking at Unit L, which contains Well



1                   Looking at Well No. 21, that well in  
2 1987 produced at about an 80 percent water cut. In looking  
3 at the water cut lines it can be seen that the projected  
4 last area to be productive on that proration unit would be  
5 again the northwest corner where we propose to drill Well  
6 No. 35.

7                   Looking at Unit L, which contains Well  
8 No. 31, that well was producing at a 58 percent average  
9 water cut in 1987, and the last portion of that proration  
10 unit to water out is projected to be the southeast corner  
11 where we propose to drill Well No. 34.

12                   Q           And are the wells in the gray area pro-  
13 ducing at relatively low water cuts?

14                   A           Yes, that's correct. For the most part  
15 all of the top allowable wells in the top allowable gray  
16 area are producing at very low water cuts.

17                   Q           Would you please now refer to Exhibits  
18 Nine-A and Nine-B and describe them?

19                   A           Exhibit Nine-A is a production plot on  
20 the New Mexico K State No. 21 Well. The green color is  
21 barrels of oil per day (unclear) and the blue color is  
22 water/oil ratio, barrels of water per barrel of oil.

23                               This well as top allowable from 1964 un-  
24 til about the end of 1977, at which point it went on de-  
25 cline. Beginning in about 1983 the water production became





1 ly unitization is being studied for this pool and it's  
2 quite probable at some point in the future that this pool  
3 will be CO<sub>2</sub> flooded. Wells Nos. 34 and 35 are highlighted  
4 on this exhibit with arrows.

5                   What is show here is an injection and  
6 production pattern based on nominal 20-acre spacing. The  
7 small black circles represent current and future oil pro-  
8 ducers. The open circle represents a future drilled well  
9 for oil. The black triangles represent future conversions  
10 of existing wells to injection. And the open triangles re-  
11 present future injection drilled wells.

12                   As you can see, the proposed locations  
13 of the two wells fit in quite nicely with a possible north-  
14 west/southeast line drive injection pattern on 20-acre  
15 nominal spacing, and, in fact, the two locations occupied  
16 by the two wells are almost perfect 20-acre infill loca-  
17 tions as compared to the offset four wells.

18                   Q            Would you please refer to Exhibit Number  
19 Twelve and discuss other potential injection patterns?

20                   A            Exhibit Twelve is similar to Exhibit  
21 Eleven and Exhibit Twelve shows a possible 5-spot injection  
22 pattern for the field. Again the intent of this exhibit is  
23 the same, is to show that with this injection pattern the  
24 two proposed wells also fit in quite nicely with 20-acre  
25 well spacing.

1                   In fact, there are many other injection  
2 patterns that can be drawn on paper but if you draw these  
3 injection patterns, it will still be quite obvious that go-  
4 ing to 20-acre well spacing will necessitate at some point  
5 the drilling of Wells No. 34 and No. 35 at locations we've  
6 proposed.

7                   Q           Please move on to Exhibit Number Thir-  
8 teen and discuss well deviations, please.

9                   A           Exhibit Thirteen shows wellbore inclina-  
10 tions and the maximum horizontal or straight holes on the  
11 Exxon K State Lease.

12                               The purpose of this exhibit is to show  
13 the reasons for Exxon's bottom hole location windows as  
14 shown on our application and as shown on Exhibit Number  
15 Two.

16                               What's listed on this exhibit are the  
17 eight Exxon K State Wells on Section 28 and the two north-  
18 ernmost wells on Section 32.

19                               In the worst case, which would be K  
20 State No. 25, the maximum possible horizontal deviation is  
21 147 feet.

22                               In the best case the maximum possible  
23 horizontal deviation was 64 feet in the K State No. 19.

24                               Based on these calculations we believe  
25 that the 240 foot by 240 foot box, bottom hole location

1 window for Well No. 35 is a reasonable bottom hole location  
2 window and one that we can attain by drilling that well  
3 non- directionally.

4 Q Would you discuss the surface locations,  
5 and I refer you to Exhibit Fourteen.

6 A Exhibit Fourteen is a surface hazards  
7 map on a scale of one inch to 250 foot. It shows the south  
8 half of Section 28.

9 To this point we've been referring to  
10 this south half as the Exxon K State Lease but it also hap-  
11 pens to be Tract Number 2801 of the East Vacuum Grayburg  
12 San Andres Unit, which is operated by Phillips Petroleum  
13 Company.

14 The wells with the three digits next to  
15 them are wells operated by Phillips Petroleum in the East  
16 Vacuum Grayburg San Andres Unit. The wells with the two  
17 digits next to them are the Vacuum Glorieta Wells operated  
18 by Exxon.

19 The two red areas show the size and  
20 location of the drilling pad that would be necessary to  
21 drill the two wells, Well No. 34 and Well No. 35. Inci-  
22 dentally, the dark triangles are CO<sub>2</sub> injection wells in the  
23 East Vacuum Grayburg-San Andres Unit.

24 Looking at Well No. 34, the surface  
25 location of that well had to be located in Unit N. The

1 reason for that is we wanted originally to put the surface  
2 location of Well No. 34 in the southeast corner of Unit L,  
3 but there is a high pressure water injection pipeline oper-  
4 ated by Phillips that would necessitate moving the surface  
5 location at least 330 feet to the west. That high pressure  
6 water injection pipeline runs from the northwest to the  
7 southeast and has a lateral off it that runs from the  
8 northeast to the southwest.

9 Well No. 34 then will be spudded on Unit  
10 N and directionally controlled to bottom in the Unit L in  
11 the 140 foot by 140 foot bottom hole location window.

12 Looking at Well No. 35 in Unit O, the  
13 intended surface and bottom hole locations are identical  
14 for that well. That well will be drilled as a straight  
15 hole and unless the deviation becomes severe, no downhole  
16 motors will be used to control the direction; however, if  
17 in drilling that well the deviation does become severe and  
18 it appears that the well might possibly leave the bottom  
19 hole location window, then it will be directionally con-  
20 trolled back toward the vertical to bottom within the bot-  
21 tom hole location window.

22 Q Mr. Sohaney, why was Well 34 not located  
23 to the west of the high pressure water pipeline you discus-  
24 sed?

25 A Well, it could be located 330 foot west.

1 That would be bad for two reasons. First of all, it would  
2 be very off-pattern as a 20-acre infill well. The location  
3 that you would want a 20-acre infill well in between Wells  
4 No. 31, 29, 27 and 32 would be at the intersection of those  
5 4 proration units.

6 330 foot to the west is a very long pat-  
7 tern.

8 Second of all, in moving in a westerly  
9 direction we are moving more towards the water drive front  
10 and so the reserves to be captured by that well would be  
11 nowhere near as high as they could be if the well was in  
12 the southeast corner.

13 Q In your opinion are the granting of  
14 these applications in the interest of conservation, the  
15 prevention of waste and are they necessary for Exxon to re-  
16 cover the reserves under its acreage and protect its corre-  
17 lative rights?

18 A Yes, they are.

19 Q And were Exhibits Seven through Fourteen  
20 prepared by you or under your direction?

21 A Yes, they were.

22 MR. BRUCE: Mr. Examiner, I  
23 move the admission of Exhibits Seven through Fourteen.

24 MR. CATANACH: Exhibits Seven  
25 through Fourteen will be admitted into evidence.

1 MR. BRUCE: And I pass the  
2 witness.

3  
4 CROSS EXAMINATION

5 BY MR. CATANACH:

6 Q Mr. Sohaney, when do you anticipate that  
7 you will have to plug the 21 and 31 Wells?

8 A It appears that Wells 31 and 21 could  
9 probably produce at least ten more years at higher and  
10 higher water cuts.

11 Well 31, as I mentioned, has had a his-  
12 tory of casing leaks. A leak was repaired in 1980 and  
13 again in 1985. Whether or not that well will last ten more  
14 years is hard to say.

15 Q Do you know what they're currently pro-  
16 ducing at?

17 A Yes. If you turn back to Exhibits Nine-  
18 A and Nine-B, Well No. 21, the last rate I had for it was  
19 71 barrels of oil per day.

20 Well No. 31, it was 59 barrels of oil  
21 per day.

22 Both of these wells were worked over  
23 early in this year in which we added a fair amount of pay;  
24 we stimulated the wells; we treated for scale; we treated  
25 for paraffin; and we put larger pumping units in the two

1 wells.

2 Q Do you know what the top allowable is  
3 for this pool?

4 A It's 107.

5 Q How would Exxon propose to split the  
6 production between the two, each two wells in the proration  
7 unit?

8 A The two wells would share the 107. What  
9 we would propose to do is to continue to produce Well No.  
10 21 and Well No. 31, and to make up the balance between 107  
11 and the capability of the existing wells with the two new  
12 wells.

13 MR. CATANACH: I have no fur-  
14 ther questions of the witness. Any other questions?

15 MR. BRUCE: Mr. Examiner, Case  
16 Numbers 9459 and 9460 were advertised in the name of Exxon  
17 Company, U.S.A, although the applications were made in the  
18 name of Exxon Corporation, and we would prefer that any or-  
19 ders issued in these cases be in the name of Exxon Corpora-  
20 tion.

21 MR. CATANACH: Okay, thank  
22 you, Mr. Bruce.

23 I have one more question, Mr.  
24 Bruce.

25 When was the notification sent

1 to the offset operators?

2 MR. BRUCE: They were sent on  
3 July 25, 1988. It doesn't show that on Exhibit Three. We  
4 can -- we would ask permission to submit these after the  
5 hearing.

6 MR. CATANACH: That would be  
7 fine. I was just curious as to why the delivery dates were  
8 so far (unclear).

9 But you've had no response  
10 from any offset operators?

11 MR. BRUCE: Mr. Sohaney, I  
12 believe, has had discussion with Phillips on this matter.

13 MR. CATANACH: Okay, is there  
14 anything further in Case 9459 or 9460?

15 If not, they will be taken un-  
16 der advisement.

17  
18 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. 9458, <sup>9460</sup> heard by me on August 17 1958.

David R. Catorch, Examiner  
Oil Conservation Division