STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT 1 OIL CONSERVATION DIVISION STATE LAND OFFICE BUILDING 2 SANTA FE, NEW MEXICO 3 31 August 1988 4 5 EXAMINER HEARING 6 7 IN THE MATTER OF: 8 Application of Conoco Inc. for down-CASE 9 hole commingling, Lea County, New 9471 Mexico. 10 11 12 BEFORE: Michael E. Stogner, Examiner 13 14 TRANSCRIPT OF HEARING 15 16 APPEARANCES 17 For the Division: 18 19 For the Applicant: W. Thomas Kellahin 20 Attorney at Law KELLAHIN, KELLAHIN & AUBREY 21 P. O. Box 2265 Santa Fe, New Mexico 87504 22 For Amoco: Scott Hall 23 Attorney at Law CAMPBELL and BLACK 24 P. O. Box 2208 Santa Fe, New Mexico 87501 25

INDEX HUGH INGRAM Direct Examination by Mr. Kellahin Cross Examination by Mr. Stogner EXHIBITS Conoco Exhibit One, C-105 Conoco Exhibit Two, Area Map Conoco Exhibit Three & Three A, Well Tests Conoco Exhibit Four, Schematic Conoco Exhibit Five, Schematic Conoco Exhibit Six, Schematic Conoco Exhibit Seven & Seven A, Decline Curves 11 

3 1 MR. Call next Case STOGNER: 2 Number 9471, which is the application of Conoco, Incorpor-3 ated for downhole commingling, Lea County, New Mexico. 4 Call for appearances. 5 KELLAHIN: MR. Mr. Examiner, 6 I'm Tom Kellahin of the Santa Fe law firm of Kellahin, 7 Kellahin & Aubrey. I'm appearing on behalf of Conoco, 8 Inc., and I have one witness. 9 STOGNER: MR. Are there any 10 other appearances? 11 There being none, will the 12 witness please stand and raise your right hand? 13 14 (Witness sworn.) 15 16 Mr. Kellahin. 17 MR. KELLAHIN: Thank you, Mr. 18 Kellahin. 19 20 HUGH INGRAM, 21 being called as a witness and being duly sworn upon his 22 oath, testified as follows, to-wit: 23 24 25

4 1 DIRECT EXAMINATION Z 3 BY MR. KELLAHIN: 4 Ingram, for the record would you Mr. 0 5 please state your name and occupation? 6 А My name is Hugh Ingram. I'm Conserva-7 tion Coordinator for Conoco, Inc., for our Hobbs Division, 8 all of New Mexico. 9 Ingram, have you previously guali-Mr. 0 10 fied as an expert before the Oil Conservation Division in 11 matters such as downhole commingling? 12 Yes, I have. А 13 Q And have you made a study and prepared 14 certain exhibits for review by the Examiner in this case, 15 9471? 16 Yes, I have. А 17 MR. KELLAHIN: We tender Mr. 18 Ingram as an expert, Mr. Stogner. 19 MR. STOGNER: Mr. Ingram is so 20 qualified. 21 Ingram, would you take a moment and 0 Mr. 22 first of all describe in a general way what Conoco seeks to 23 accomplish with this application? 24 In Case 9471 Conoco seeks to commingle Α 25 production in the wellbore for its State F-1, Well No. 9,

5 1 producing from the Hardy Blinebry and Hardy Tubb-Drinkard 2 Pools. 3 Q What is the current status of the well, Mr. Ingram? 5 The current status of the well is a Α 6 single Blinebry producing well. 7 Let me direct your attention to Exhibit Q 8 Number One and would you identify and describe the informa-9 tion contained on that exhibit? 10 Exhibit Number One is OCD Form C-102. Α 11 It was filed with the Commission in 1980 when this well was originally drilled. The purpose for the exhibit is to show 12 13 the location of the State F-1 Well No. 9 to be 330 feet 14 from the south and west lines of Section 1, Township 21 15 South, Range 36 East, Lea County, New Mexico. 16 Q What is the spacing unit assigned to the 17 well? 18 40 acres, both zones. А 19 Are you aware of any opposition to this Q 20 application by either offset operators or other interested 21 parties? 22 There's only one offset operator, А No. 23 being Amoco, and Amoco was mailed a copy of the application 24 when we originally filed for administrative application and 25 they made no objection.

6 1 Let me direct your attention to Exhibit Q 2 Number Two and would you identify and describe that exhi-3 bit? 4 Exhibit Number Two is an area map А 5 showing the offset operator to the well of this applica-6 You will note that Amoco operates the offsetting tion. 7 wells, being their State C Tract 11 Well No. 11, which is a 8 west offset; their --9 0 All right, let me go back, in Section 2, 10 then, the west offset to your Well No. 9 --11 That's right. А -- is the Amoco Well 11? 12 Q That's correct. 13 А And what is the status of that well? 14 0 15 That well is a producing well in the А 16 Blinebry and Tubb-Drinkard Pools it is presently downhole 17 commingled in those two. 18 And that's the same type of relief that Q 19 you seek from Mr. Stogner today? 20 That's correct. А 21 All right. Are there any other wells in Q 22 this immediate vicinity that are similarly downhole com-23 mingled? 24 Yes. Looking to the south in Section Α 25 11, Amoco operates two wells in the north half of the

7 northeast guarter. Well No. 3, let me check my notes here 1 to be sure, Well No. 3 produces from the Blinebry and Tubb-2 Drinkard Pools and is also downhole commingled. 3 Well No. 4 is currently producing only 5 from the Blinebry Pool. 6 And over in Section 12 Well No. 5 is producing from the Blinebry and Tubb Drinkard pools and 7 that well is also downhole commingled. 8 How was this matter finally placed upon 9 Q the examiner docket, Mr. Ingram? 10 In my absence from the office an appli-А 11 cation was made for administrative approval for downhole 12 commingling and --13 14 0 When was that -- when was that filed, do you recall the approximate date? 15 That was filed June 17th, 1988. А 16 In filing the administrative application 17 Q 18 did your office cause a copy of the letter and application 19 to be sent to Amoco in Odessa? 20 Α Yes, we did. Describe for us why it was you were not 21 Q able to successfully obtain administrative approval for 22 23 your application. There is regulation in the statewide 24 Α 25 rule which states that in downhole commingling if either

8 1 zone produces more water than the combined oil allowable 2 for both zones, then it cannot be approved administrative-3 ly. Let's look at Exhibits Three and Three-A Q 5 and see your production from the well. 6 Exhibit Number Three is the most recent Α 7 well test for the State F-1 Well No. 9, producing from the 8 Blinebry zone. This well test shows in 24 hours the well 9 made 16 barrels of water, 15 barrels of oil, and 112 MCF 10 gas. Exhibit Number Three-A is a similar test 11 12 for the Tubb-Drinkard zone. That test showed in 24 hours the well made 88 barrels of water, 6 barrels of oil and 58 13 14 MCF gas. 15 What do you anticipate the combined Q 16 water production from the Tubb and Drinkard zones? 17 Α We estimate the combined water produc-18 tion to be somewhere around 100 barrels, maybe a little bit 19 more, anywhere from 100 to 105 or 10. 20 And under the regulations for this depth Q 21 what would be your oil allowable for the combined produc-22 tion? 23 Α The oil allowable for this depth would 24 be 40 barrels for both zones. 25 And what do you anticipate to be the Q

9 1 combined potential for the oil production from the two 2 zones? 21 barrels. 3 Α Do you have any pressure information 4 Q 5 with regards to either or both of the zones? 6 Α Yes. Based on static fluid levels when 7 both zones were producing we estimated the pressure would be 1660 psi from the Blinebry and about 1800 psi for the 8 9 Tubb Drinkard. Have you and the engineering staff of 10 0 Conoco reviewed that information to determine whether or 11 not Conoco as operator can expect cross flow to occur be-12 tween those two zones? 13 14 А Yes, we have. We don't expect cross to be any problem at all. As a matter of fact, we 15 flow 16 install producing equipment on this well that was will originally used in the Drinkard, for the Drinkard forma-17 18 tion and we expect that that producing equipment will keep 19 this fluid level pumped down below the Blinebry perfs for 20 sure and probably below the Drinkard, Tubb-Drinkard perfs, as well. 21 Both these zones, then, do require addi-22 Q 23 tional lift. 24 That's correct. Α 25 And are both zones currently capable of Q

1 producing?

A Yes, both zones are capable of producing
at this time; however, we are not producing the Tubb-Drinkard zone, and I will explain that in reference to future
exhibits.

Q All right. Let's turn to Exhibit Four
and have you identify and describe that exhibit.

8 A Exhibit Number Four is a downhole schem9 atic showing how this well was designed during the time
10 that it was produced as both a Blinebry and a Tubb-Drinkard
11 well with separation between the two zones.

12 Q Let's turn to Exhibit Number Five and
13 have you identify and describe that exhibit.

14 A Exhibit Number Five is how the well is 15 presently equipped. We found in reviewing our cost state-16 ments and net lease operating statements that we were los-17 ing money producing the Tubb-Drinkard zone and so we set a 18 retrievable bridge plug between the two zones and since 19 March of this year we've produced it as a single Blinebry 20 producer.

21 Q Turn to Exhibit Six and identify that.
22 A Exhibit Number Six is a wellbore diag23 ram showing how we propose to equip the well after down24 hole commingling is approved, showing the tubing anchor set
25 above the Blinebry perfs and both sets of perfs, the Bline-

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bry and the Tubb-Drinkard perfs both being open to production.

Q Now, Exhibit Seven and Seven-A, Mr. In4 gram.

5 Exhibit Number Seven is a production de-Α 6 cline curve drawn for the Blinebry zone. You can see there 7 the well began producing, it was drilled in 1980. In 1983 where you see a pretty sharp decline in production there, 8 in 1983 we installed artificial lift equipment and since 9 seen a decline of somewhere in the 10 time we have 11 neighborhood of 10, between 10 and 11 percent annual natural decline. 12

Exhibit Number Seven-A is a similar exhibit for the Tubb-Drinkard zone and we see very similar characteristics of production for the Tubb-Drinkard, declining at a very similar rate of 10, between 10 and 11 percent.

18 Do you have a recommendation to the Exa-Q 19 miner as to an allocation formula between the two pools? 20 Based on production history and А Yes. 21 actually based on the production decline curves, rather than Exhibits Three and Three-A, which is simply the most 22 23 recent tests for these two zones, I believe that an allo-24 cation based on Exhibits Seven and Seven-A will be more representative of the production from each zone, and based 25

on these two exhibits I recommend that the oil production be allocated 62 percent to the Blinebry, 38 percent to the Tubb-Drinkard, and breaking it down into barrels and looking at Exhibit Number Seven, I've chosen about 13 barrels barrels of oil per day for the Blinebry and 8 barrels of oil per day for the Tubb-Drinkard, giving us 62-38 percent breakdown.

8 For the gas, using the same two exhi9 bits, I recommend 57 percent allocation to the Blinebry,
10 which is about 160 MCF, and 43 percent gas allocation to
11 the Tubb-Drinkard, which is approximately 120 MCF per day.

12 Q Why have you recommended to the Examiner 13 he use the decline curves as a basis to make the allocation 14 as opposed to having each zone tested separately and then 15 making the allocation based upon current tests?

16 Α I believe that production history for 17 the two zones, which is what we're looking at in Exhibits 18 Seven and Seven-A, is more representative of what those 19 formations will give up in the way of oil and water, and 20 rather than a single 24-hour well test that might have been 21 taken before commingling and even after commingling. I 22 think that the production decline curve would be a very 23 accurate allocation method.

24 Q Do you and the engineering staff for
25 Conoco have an opinion as to what is the likely source of

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**1** the water produced?

2 Α At this point in time we have not de-3 termined exactly where the water is coming from but before 4 we actually downhole commingle, we will probably run a log 5 and make that determination. If we find that the water 6 zone is isolated pretty much, say, toward the bottom perfs 7 in the Drinkard zone, then we would take steps to shut off 8 that -- that high water producing zone.

9 But at this point in time we really
10 don't know for sure where the water is coming from. His11 torically it's been there and we don't have any logs at
12 this point in time to show where it's coming from.

13 Q Have you determined whether offset oper14 ators such as Amoco with their commingled wells experience
15 similar water production problems?

16 Α In reviewing the -- Amoco's records in 17 the Oil Conservation Division Office in Hobbs, I found that 18 in some of their wells the water production is not as high 19 ours, and in one well that I looked at, and I don't reas 20 call now exactly which well it was, the water production 21 from that well was similar, maybe not quite as high, but 22 very similar, to the water production in our Drinkard zone. 23 Does your official lift equipment desig-Q 24 nated for the well have the capacity to lift all the

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fluids?

NATIONWIDE 800-227-0120

A Yes. As I stated before, we will use
the same producing equipment that was used -- that was installed for the Drinkard zone back in 1983. In looking at
the production decline curve you can see very easily that
we were moving more fluid at that point in time than we
will be moving from both zones at this time.

7 Q So regardless of the source of the 8 water, then, the lift equipment will have the capacity to 9 move the oil and the water out of the wellbore and not let 10 water cross migrate or flow into any of the producing 11 zones.

Α That's correct. We, what we plan to do 12 is we will -- of course you never want too much pump sub-13 14 mergence, anyway, and so we want to keep the fluid level pumped down probably below the Drinkard perfs. We'll set 15 16 the pump maybe, oh, 75 to 100 feet below the Drinkard 17 perfs, and then we will keep the fluid level pumped down to 18 -- we'd like to keep it somewhere in the neighborhood of 50 19 to -- between 50 and 100 barrels above the pump setting 20 depth.

21 Q Are both ownerships in both formations
22 identical, Mr. Ingram?

A Yes, they are.

24 Q And what about the gravity and the price25 of the oil produced from each zone?

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A The gravity of oil from both zones is
about 44.4 degrees and the price per barrel for both zones
is identical.

Do you have an opinion, Mr. Ingram, as 0 5 to whether approval of this application will prevent waste? 6 In doing the well -- and referring А Yes. 7 to Exhibit Seven-A, we have estimated the remaining reserves in the Drinkard zone to be somewhere around 22,000 8 barrels; that is, following a straight line decline to an 9 economic limit of about 3 barrels a day, and so that --10 that gives us an estimated 22,000 barrels of reserves that 11 we feel will be produced under downhole commingled condi-12 tions that would not be produced under separation condi-13 tions. 14

15 Q And do you have an opinion as to whether 16 approval of this application would violate the correlative 17 rights of any of the interested parties?

18 A I don't believe they would violate cor-19 relative rights of any party.

20 MR. KELLAHIN: That concludes21 my examination of Mr. Ingram, Mr. Stogner.

We move the introduction ofConoco Exhibits One through Seven-A.

24 MR. STOGNER: Exhibits One25 through Seven-A will be admitted into evidence at this

16 1 time. 2 3 CROSS EXAMINATION 5 BY MR. STOGNER: 6 Q Mr. Ingram, would you run that gas allo-7 cation by me again, both the percentage and the production figures? 8 9 Α The recommended gas allocation is Okay. for the Blinebry 57 percent; that's 160 MCF. For the Tubb-10 11 Drinkard, we're recommending 43 percent, which is about 120 12 MCF per day. And the oil allocation is 52 percent for 13 0 14 the Blinebry and 38 percent for the Tubb-Drinkard, is that 15 correct? 16 А Yes, sir. 17 Okay. Just for a little historical Q 18 data, when was this well drilled? 19 This well was drilled in 1980. Α 20 And it was dually completed until what Q 21 time? 22 It flowed until 1983 at which pumping А installed in both zones and it was produced 23 equipment was 24 as a separate dual well until March of this year when the 25 Tubb-Drinkard zone was isolated and no longer produced.

17 1 When I refer to your Exhibit Q Okay. 2 Number Four, that's your previous dual completion wellbore 3 diagram? Uh-huh. 4 А 5 What's that small tubing over to the Q 6 right? 7 I'm not -- that small what? А 8 You've got three strings of tubing run-Q 9 ning from --10 Oh, oh, that's a vent string. Α 11 A vent string. Q Uh-huh, to relieve some of the pressure 12 Α 13 from the lower zone. 14 Would that be gas production? 0 Well, yes, it would just be mostly a 15 А 16 vapor, a vent, no --17 No production from the vent. Q No production, right. 18 А 19 Okay. Do you have an idea of what per-Q centage of the water is coming from the Drinkard? 20 21 I haven't calculated percent but I think Α 22 the -- the one test that's shown on Exhibits Three and 23 Three-A are fairly representative of water, one of them 24 being, I think, 16 barrels from the Blinebry and 88 barrels 25 from the Tubb-Drinkard, and I think that is fairly repre-

18 1 sentative, but it might be slightly different, but not 2 enough to be significant. 3 MR. Okay, I have no STOGNER: 4 further questions of this witness. 5 Are there any other questions 6 of Mr. Ingram? 7 MR. KELLAHIN: No, sir. 8 MR. STOGNER: He may be ex-9 cused. 10 Anything further in Case 11 Number 9471? 12 MR. HALL: Mr. Examiner, my is Scott Hall from the Campbell & Black law firm on 13 name 14 behalf of Amoco Production Company. 15 It's my understanding that 16 Amoco opposes the application. We ask that the record be 17 kept open until the next Examiner hearing for Amoco to have 18 an opportunity to present some testimony. 19 MR. KELLAHIN: I'd object, Mr. 20 They were provided notice; obviously Mr. Hall Examiner. 21 was able to come today. Today's the day of the hearing. 22 We'd ask that you take the 23 case under advisement and enter an appropriate order. 24 MR. STOGNER: What is the 25 basis of your objection, Mr. Hall?

19 1 MR. HALL: Instructions from 2 the client. I don't have much more information than that. 3 MR. STOGNER: I have records 4 that Amoco was notified. Is that an issue? 5 MR. HALL: I don't believe so. 6 STOGNER: Well, Mr. Hall, MR. 7 it appears to me that Amoco was notified and you're ob-8 viously here today. I'm going to take this case under ad-9 visement. 10 Your objection will be so 11 noted. Anything further, or do you 12 13 have any questions of this witness? 14 MR. HALL: No, sir. 15 MR. STOGNER: The case will be 16 taken under advisement. 17 18 (Hearing concluded.) 19 20 21 22 23 24 25

20 1 2 3 4 CERTIFICATE 5 6 7 I, SALLY W. BOYD, C. S. R. DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the 8 Oil Conservation Division (Commission) was reported by me; 9 that the said transcript is a full, true and correct record 10 of the hearing, prepared by me to the best of my ability. 11 12 13 14 Sally W, Boyd COR 15 16 17 18 I do hereby certify that the foregoing is 19 a complete record of the proceedings in the Examiner hearing of Case No. 9417/. 20 heard by me on 31 longust 1988. 21 6, ), Examiner shir 22 Oil Conservation Division 23 24 25