

ATTACHMENT NO. 1

BLOOMFIELD FIELD EVALUATION
WELL SUMMARY

<u>Well Name & Number</u>	<u>Unit</u>	<u>Sec.</u>	<u>Ind.</u>	<u>Rge.</u>	<u>Spud Date</u>	<u>1st Delivery</u>	<u>Completion</u>	<u>Formations</u>	<u>D A K O T A</u>		<u>M E S S A V E R D E</u>		<u>C H A C R A</u>	
									<u>Daily Rate</u>	<u>Cum Prod.</u>	<u>Daily Rate</u>	<u>Cum Prod.</u>	<u>Daily Rate</u>	<u>Cum Prod.</u>
Bunce Com 1	C	19	29	10	9-22-80	6-81	Dual	MV/CH	---	---	S.I.	1,779	78	66,332
Valdez Gas Unit A 1E	G	24	29	11	1-4-82	5-82	Dual	DK/CH	222	43,987	---	---	166	55,451
Valdez Com B 1	O	24	29	11	8-6-81	11-81	Single	CH	---	---	---	---	234	118,150
Elvin Payne A 1E	N	19	29	10	10-22-80	6-81	Triple	DK/MV-CH	98	115,580	76	34,251	61	62,889
Sullivan Frame Gas Unit A 1E	A	30	29	10	10-11-80	1-82	Triple	DK/MV-CH	344	105,828	66	38,570	84	48,477
Sullivan Frame Com B 1	D	30	29	10	9-15-80	12-81	Dual	MV/CH	---	---	16	7,843	102	47,195
Marquis Eaton A 1E	B	25	29	11	9-4-80	6-81	Triple	DK/MV-CH	154	74,151	71	91,369	80	104,787
Bruce Sullivan Com B 1 C	C	25	29	11	11-16-80	10-81	Dual	MV/CH	---	---	10	4,918	222	120,155
Sullivan Gas Unit A 1E	M	25	29	11	12-15-80	1-82	Triple	DK/*MV-CH	241	129,790	20	7,506	20	8,234
Eaton Com B 1	P	25	29	11	8-14-80	10-81	Dual	*MV-CH	---	---	---	---	---	28,679

* Pumping Unit

BEFORE EXAMINER
OIL CONSERVATION DIVISION

Remco EXHIBIT NO. 6

CASE NO. 8262

ATTACHMENT NO. 1
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WELL SUMMARY

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STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BLDG.
SANTA FE, NEW MEXICO
26 March 1980

EXAMINER HEARING

IN THE MATTER OF:

Application of Tenneco Oil Company) CASE
for dual completions and downhole) 6847
commingling, San Juan County, New)
Mexico.)

BEFORE: Richard L. Stamets

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation Division: Ernest L. Padilla, Esq.
Legal Counsel to the Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

For the Applicant: W. Thomas Kellahin, Esq.
KELLAHIN & KELLAHIN
500 Don Gaspar
Santa Fe, New Mexico 87501

Exhibit 7
Case 8262
Tenneco

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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CAROLYN PEAVEY

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PAUL A. DOYLE

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SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 435-7409

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SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

SALLY W. BOYD, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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MR. STAMETS: We'll call next Case 684

MR. PADILLA: Application of Tenneco Oil Company for dual completions and downhole commingling, Sa Juan County, New Mexico.

MR. STAMETS: Call for appearances in 1 case.

MR. KELLAHIN: Tom Kellahin of Santa Fe New Mexico, appearing on behalf of the applicant, and I have two witnesses.

MR. STAMETS: I'd like to have them start and be sworn, please.

(Witnesses sworn.)

CAROLYN PEAVEY

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Would you please tell us your name, by whom you're employed, and in what capacity?

A It's Carolyn Diane Peavey. I'm employed by Tenneco Oil Company and I'm a Senior Geological Engineer

Q Ms. Peavey, have you previously testified

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before the Oil Conservation Division?

A. No, I have not.

Q. Will you describe for the Examiner when and where you obtained your degree?

A. I graduated in 1974 from Stephen F. Austin State University, it's in Nacogdoches, Texas, with a BS in geology.

Q. Subsequent to graduation where have you been employed as a geologist?

A. I spent four and a half years with Sun Oil Company and the first year and a half was as a research geophysicist; the next three years were as a production geologist, and then I joined Tenneco Oil Company a year and a half ago as a geological engineer, and as of December of this year I was a senior geological engineer.

Q. Pursuant to your employment as a geologist with Tenneco, have you made a study of and are you familiar with the geological facts surrounding this particular application?

A. Yes, I am.

MR. KELLAHIN: We tender Ms. Peavey as an expert geologist.

MR. STAMETS: The witness is considered qualified.

Q. Would you please refer to what we've

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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SALLY W. BOYD, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
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marked as Exhibits One, and I think it might be helpful if we also looked at the same time at Exhibit Number Two.

And, Ms. Peavey, if you'll begin your testimony by looking at Exhibit Number Two and identifying for us, first of all, how the wells you propose to complete as Chacra-Mesaverde downhole commingled wells, how those wells are identified and where they are located.

A Okay. The Mesaverde-Chacra commingled are the locations that are just a single dot. That would be the northwest quarter of Section 19, Township 29 North 10 West; the northwest quarter of Section 30, Township 29 North, 10 West; southeast quarter of Section 34, 29 North 11 West; the northwest quarter of Section 25, 29 North, 11 West; and the southeast quarter of Section 25, 29 North 11 West.

Q And each of those five wells for which you propose a program for the downhole commingling of the Mesaverde and Chacra are identified specifically on Exhibit Number One, are they not?

A Yes, they are, the first five wells, the second five wells.

Q All right. What is identified by those wells with the well dot and the circle around the well dot

A Those are wells that we intend to drill to the Dakota and dual it with the Mesaverde-Chacra comm

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1 mingled.

2 Q Now let's start off with the spacing
3 the Chacra for this area. What will be the spacing for
4 Chacra wells?

5 A The spacing on the Chacra is 160's.

6 Q Okay. What is the spacing for each
7 to be completed in the Dakota formation?

8 A Okay, they will be on 320's. The well
9 well, the -- it's 320 spacing now. Section 19 will be the
10 west half, and the spacing in the well, the Dakota well.
11 Section 30 will be in the north half. Going to Section
12 29 North, 11 West, it will be the east half. Going to S
13 tion 25, it's split, east half/west half.

14 Q All right. Now, the five Dakota well
15 involved, are these original Dakota wells on a proration
16 unit or are these infill Dakota wells?

17 A These will be infill wells.

18 Q So on each of the five proration unit
19 there already exists an original Dakota producer.

20 A This is true.

21 Q And where would the Dakota producer be
22 located?

23 A They are at the time located where the
24 single dots are, where we propose to have the Mesaverde
25 Chacra commingled wells. They're in the same quarter se

SALLY W. BOYD, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
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Q All right. What is the spacing for the Mesaverde formation?

A Right now the Mesaverde is in the undesignated Mesaverde and it will be on 160's.

Q To orient the Examiner, where does this area lie in reference to the Blanco Mesaverde Pool?

A It lies about two and a half miles southeast of the existing Blanco Mesaverde Pool.

Q Are there any other wells in the immediate area located on Exhibit Number Two, which are operated by another operator and which produce either from the Chacra or Mesaverde formations?

A No, all the wells that produce are on this map.

Q All right, what about the Getty wells located to the north? What kind of wells are those?

A Okay. Map 3, or your Exhibit Three, shows the existing Mesaverde completions. There are four of them at this time that I've included in the undesignated Mesaverde.

Q Would you identify the four wells that are completed in the undesignated Mesaverde?

A Okay. The one in the northeast quarter of Section 13, 29 North, 11 West, is the Hawk B No. 1.

The one in the northwest quarter of Sec-

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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tion 18, 29 North, 10 West, is the Hanley A No. 1.

The southwest quarter of Section 18, 29 North, 10 West, is the Hanley B No. 1.

And the Duntz A No. 1 is the one in the northeast quarter of Section 18, 29 North, 10 West.

Q Do any of those wells produce from any other formation other than the Mesaverde?

A They are at this time cased with the Chacra.

Q If I correct, I believe you've already said it, but am I correct in understanding that each of the Getty Wells are dedicated to 100-acre spacing and proration unit, dedicated to an undesignated Mesaverde formation?

A Yes sir.

Q Would you now turn to what we've marked as Exhibit Number Four and have you identify that?

A Okay. Exhibit Number Four is the Hanley B No. 1. It is the well, Getty's well that is closest to our acreage in question. That is cased in the Mesaverde and the Chacra. This is a type log of the Chacra. They encountered about 8 to 10 feet of pay with average porosity of 12 percent, and their IP was 781 Mcf a day. Their shut-in casing pressure was 1012.

Q Why have you chosen this particular log as a type log for the Chacra completion in each of the wells

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SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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ject wells?

A. This well is the closest to Tenneco's acreage and I think -- I believe typifies what we will be encountering if we drill the well. We have a cross section, the next exhibit is the cross section of the Chacra.

Q That's Exhibit Number Five?

A. Right.

Q Let's look at that.

A. This is a southeast/northwest trending cross section. The type log is the well that is situated at A'. It extends southwest of Tenneco's acreage. As you can see, the Chacra is developed. We anticipate about 8 to 10 feet of pay in Tenneco's wells that we drill.

Q Will you start with A and continue through A' and describe briefly each of the wells you've placed on your cross section?

A. Okay. Starting in the southwest quarter, we have the Delo No. 2 and it has two stringers that are developed in the Chacra. Estimated pay again is about 9 feet.

Moving towards the northeast we have the two stringers that are developed more as one sand with a slight shale indication. Probably pay would be about 10 to 12 feet.

Moving farther northeast to the Valdes

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
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A No. 1 we lose -- it appears we lose the resistivity in the first stringer, so production is probably only from the second stringer, and I anticipate a pay of about 6 to 8 feet.

Moving farther northeast, we do lose the first stringer and the second stringer is the production zone. Pay is about 6 feet.

And moving up to the Hanley B. No. 1 we have the first stringer again -- or second stringer again as production, and pay is about 8 feet.

Q Okay. Would you turn to what we've marked as Exhibit Number Six and discuss the characteristics of the Mesaverde formation encountered in this area?

A Okay, this is the Mesaverde formation. In this particular well, this is the Hanley B No. 1. The Point Lookout and the Menafee are the only two producing members of the Mesaverde.

Point Lookout had 18 feet of net pay and the Menafee had 32 feet of net pay, and the isolated stringers.

This well was perforated; initial potential was 2 barrels of condensate and 2.1 million cubic feet of gas a day. Shut-in tubing pressure was 1200.

Q And why have you chosen this particular well as a type log for the Mesaverde?

A Again, this is the well that is closest

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to Tenneco's acreage and gives us a feel for what we may anticipate as far as what is the most production.

Q Go to the cross section marked Exhibit Number Seven and describe for us generally the -- how the Mesaverde formation appears through the cross section?

A Starting from the northeast, we have the Hanley B No. 1. As we progress southwest we encounter -- we get up-dip of structure.

 Is you know, the Menafee is -- was a plutal (sic) depositional environment. Most of the sand developments are not continuous throughout the area. There are isolated sand stringers.

 The Cliff House in the Hanley B No. 1 encountered about 18 feet of pay again, and most of the production, I believe, is coming from the Menafee where you have 32 feet of pay.

 As you move -- well, what is colored in this map in yellow is what I anticipate as being productive stringers, and what is in blue is what I calculated to be water productive.

 As you move to the southwest, you're going up structure. You're encountering more of the stringers in the Menafee, becoming water productive, due to hydrodynamics, and also probably due to the fact that the stringers are not continuous from one well to another.

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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Q As a generalization, Mr. Peavey, which of the two zones is generally going to be the better producing formation in each of the subject wells?

A Typically in the San Juan Basin the Point Lookout is; however, taking the Hanley B No. 1, the Menafee, I believe, is the main producing horizon from this, and I -- as you move farther southwest you do not see the Menafee as productive across Tenneco's acreage.

The interval of the Menafee is from about 3550 down to about 4100.

Q As a geologist would you recommend to your management the drilling and testing of the Mesaverde formation alone in this area?

A Not for the reserves that we see here, no.

Q Would you turn to Exhibit Number Eight and identify that?

A Okay. This is a graph showing the -- each of the four wells that are presently completed, Getty's wells completed in the Mesaverde on Mcf per day basis.

As you can see, they start out at a fairly decent rate per Mcf a day, but within nine months they've dropped of 60 percent. Production in this area, I do not believe, is very significant in the Mesaverde, as you can see by the rapid decline.

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Q Based upon your study of the geology, Ms. Peavey, in your opinion would a prudent operator complete these wells as a downhole commingled well or as a dual completion?

A Based on the reserves in the Mesaverde and the Chacra, I believe the only way to do it would be to commingle the two zones.

Q Do you have any opinion with regards to the spacing of the Mesaverde formation? I realize that some of the -- or all of the Getty wells to the north are spaced on 160 acres for Mesaverde. Is that a reasonable and logical spacing for the Mesaverde in this area?

A I believe it is. First, the reserves that we're looking at are not significant with the rapid decline. 160 acres is sufficient to -- for drainage, and again, it lies about two and a half miles southeast of the existing Blanco Mesaverde where they found that the infills should be on 160's.

Q From the information contained on Exhibit Number Eight, do you have any opinion as to any potential risk of cross flows because of the pressure differential between the Mesaverde and the Chacra formations?

A I believe that the pressures are in agreement with each other. I don't think you will have cross flow. We do have about 200, 210 pounds pressure

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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1 higher in the Mesaverde; however, we don't anticipate en-
2 counteracting the same quality of rock in the Mesaverde, and I
3 anticipate the pressures to be more like the Chacra is.

4 Q If this area is developed as Tenneco
5 proposes, with the Chacra and the Mesaverde on 160-acre
6 dedication, will the ownership be common between the Mesa-
7 verde and the Chacra formations?

8 A Yes, they will.

9 Q If the Mesaverde is developed on 320's,
10 would the ownership be in common?

11 A No, they would not.

12 Q Would you turn to Exhibit Number Nine
13 and Exhibit Number Ten and discuss those two exhibits?

14 A Okay. This is the gas analysis on the
15 Hanley B No. 1. For the first Exhibit Number Nine is for
16 the Chacra. Exhibit Number Ten is for the Mesaverde. And
17 as you can see, the BTU's are not that different. The
18 Chacra is 1173 and the Mesaverde is 1274.

19 Q Based upon your study of the gas analysis
20 of the Getty Well, do you have an opinion as to whether the
21 gas composition of the two formations are compatible with
22 each other?

23 A I believe they're compatible.

24 Q Were Exhibits One through Ten prepared
25 by you directly, except for the information from the Getty

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Santa Fe, New Mexico 87501
Phone (505) 455-7409

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wells, compiled under your direction and supervision?

A. Yes, they were.

Q. And where did you obtain the gas analysis on the Getty wells?

A. From Mr. Dana, who had approval to release them from Getty.

Q. In your opinion, Mr. Peavoy, will approval of this application be in the best interests of conservation, the prevention of waste, and the protection of correlative rights?

A. I believe it will.

MR. STAMERS: That concludes our examination of this witness.

CROSS EXAMINATION

BY MR. STAMERS:

Q. Mr. Peavoy, let's just take, for example, Section 19. You show two wells there on your Exhibit Number Two, one is just simply a dot and the other is a dot with a circle around it. I believe that you indicated that ones with the circles are infill wells in the Dakota?

A. Right.

Q. And would that mean that the other well that is just a single dot is the original Dakota well?

A. No. The single dot is where we propose

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Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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the Mesaverde-Chacra commingling; however, it is also the same core section where we have an existing Dakota well.

Q I see, so the original Dakota well is not shown on this particular map?

A Right, yes, sir.

Q And each one of these wells that we've discussed here will be a new well drilled?

A Uh-huh.

Q Okay. So the single dots will only be Mesaverde-Chacra downhole commingles.

A Right.

Q And that the other five wells will be drilled and commingled.

A Uh-huh.

MR. STAMERS: Will your next witness talk about an allocation?

MR. KELLAMIN: Yes.

MR. STAMERS: Okay.

Q You've indicated in a couple of cases that we're talking about pressures, say, 1000 pounds, 1100 pounds, in the Chacra, and maybe 1200 pounds in the Mesaverde. Do you anticipate that that will be true over this entire area?

A I believe for the most part our Mesaverde that we will encounter will not be -- the development of

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1 the Mesaverde is not as well developed as it is in Getty's
2 wells, so our pressures, I believe, will probably be some-
3 what lower and more in agreement with the Chacra.

4 Q Do you anticipate any liquid production
5 from either of the two zones, the Chacra or the Mesaverde?

6 A At the time the four Getty wells, they
7 are making some condensate. On the average it's 3 to 4
8 barrels of condensate a day.

9 Q Do you feel that would be any problem
10 in producing these wells?

11 MR. STAMETS: Will the next witness ad-
12 dress that?

13 MR. KELLAHIN: Our next witness will talk
14 of that.

15 MR. STAMETS: Any other questions of
16 this witness? She may be excused.

17
18 PAUL A. DOYLE
19 being called as a witness and having been duly sworn upon
20 his oath, testified as follows, to-wit:

21
22 DIRECT EXAMINATION

23 BY MR. KELLAHIN:

24 Q Would you please state your name, by whom
25 you're employed, and in what capacity?

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Santa Fe, New Mexico 87501
Phone (505) 455-7409

1 Exhibit Number Eleven and describe for us how the proposed
2 Mesaverde-Chacra commingled wells are going to be drilled
3 and completed?

4 A See, on these type wells we plan to drill
5 a 250-foot hole with 12-1/4 inch bit and set surface pipe
6 cementing over this area. Then we plan to drill through the
7 Chacra formation at about approximately to a depth of ap-
8 proximately 3100 feet with mud and set 7-inch casing through
9 this zone. We then plan to drill out below the 7-inch,
10 through the Mesaverde formation to a depth of approximately
11 4500 feet, with gas, log the well, and set a 4-1/2 inch
12 liner and cement it in place over the Chacra formation.

13 Inasfar as our completion is concerned,
14 we plan to drill the well out to the total depth, perforate,
15 acidize, and frac the Mesaverde formation, and we plan to
16 do this in only one stage because we do not feel that it
17 would be sufficient development to frac in two stages, which
18 we have done in the past, because of such thick net pays.

19 We then plan to run our tubing back in
20 the hole, clean the well out, let the -- return the frac
21 fluid, and shut the well in for eight days and run an AOF
22 test on the Mesaverde formation.

23 We then plan to pull -- clear the well,
24 pull the tubing, set our retrievable bridge plug between
25 the Chacra and the Mesaverde, complete the Chacra formation

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1 by perforating, acidizing, and fracing this zone. Then
2 to clean -- then we plan to retrieve our retrievable bri
3 plug, clean up both zones, and run an AOF test on the co
4 bined Mesaverde-Chacra well.

5 Q While we're talking about how you're
6 to complete these zones, describe for us how you would pr
7 pose to come up with a method of allocating the productio
8 between the Chacra and the Mesaverde formations?

9 A We plan to do this in a similar method
10 as we've done with Farmington -- with Fruitland-Pictured
11 Cliffs, where we will AOF the first well -- the first zone
12 in the well, which is the Mesaverde formation, get that A
13 then complete the well in the Chacra, and then AOF the we
14 in both -- with both the Chacra and Mesaverde zones pro-
15 ducing, giving us an AOF of the cumulative zones between
16 them.

17 With the information from both zones and
18 the information from one zone, by subtracting the first A
19 from the second, we'll get an implied AOF in the Chacra
20 formation, and we plan to use this AOF to allocate pro-
21 duction between zones.

22 Q Tenneco has used that method for deter-
23 mining allocation between commingled zones in other wells?

24 A Yes, sir. The example of this is our
25 recent method that we used between the Fruitland and the

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1 Pictured Cliffs formations, which is a similar circumstance,
2 where the Fruitland in that case, as the Mesaverde in this
3 case, was a relatively weak producer, and we felt that it
4 would be necessary just for prudent operating to have the
5 wells commingled to make sure that that would keep -- keep
6 the Fruitland producing, and this is the method we used on
7 these wells, and this is what we propose to do here.

8 Q Was the method of completion on the
9 Fruitland-Pictured Cliffs commingled production one approved
10 by the Oil Conservation Division?

11 A Yes, sir, it was.

12 Q Would you turn to Exhibit Number Twelve
13 and identify that schematic for us?

14 A This is a downhole schematic of our
15 proposed Mesaverde-Chacra commingled wells, showing a 9-5/8th
16 casing set through 200 to 250 feet; 7-inch casing set
17 through 3100 feet, and a 4-1/2 inch liner set from 2900
18 feet to 4500 feet, and both zones will be produced up
19 2-3/8ths tubing, set approximately the top of the Mesaverde
20 formation.

21 Q Let me address a question to you that was
22 asked of the last witness. What, if any, liquids are pro-
23 duced from either of these zones?

24 A We do not anticipate significant liquid
25 production as far as condensate is concerned. There is a

1 possibility, if the Mesaverde is a weaker producer, as was
2 mentioned, that there may be some water production from the
3 Mesaverde. We don't anticipate it being significant, but
4 if it should become a problem in either zone, we feel the
5 commingling of zones having a higher gas volume, because
6 both zones will be coming up the same string of tubing, we
7 feel that we'll get better removal of our liquids from the
8 wellbore by commingling the wells.

9 Q All right, let's turn to Exhibit Number
10 Thirteen and have you talk about that exhibit, and in addi-
11 tion, at the same time, if you'll look at Exhibit Number
12 Fourteen, which is the schematic. Go through your comple-
13 tion procedure for those wells that will also include
14 dualing the Dakota.

15 A Okay. These wells, again, we'll set
16 250 feet of surface pipe. Then we'll drill out with an
17 8-3/4 inch hole, using mud, drill through the Mesaverde to
18 approximately 4500 feet. We'll then set 7-inch casing and
19 cement the 7-inch casing in place with a two-stage cement
20 job with a DV tool being placed just below the Chacra forma-
21 tion in order to cover that interval with cement.

22 After this is done we'll drill out below
23 the 7-inch, through the Dakota formation to approximately
24 6400 feet, we'll run our logs, and we'll set 4-1/2 inch
25 liner across the Dakota formation and cement it in place.

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Phone (505) 455-7409

1 For our completion we will drill out to
2 plug back total depth and then perforate and acidize and
3 frac the Dakota formation in a manner similar to the method
4 in which we complete all our Dakota wells in the San Juan
5 Basin. We will flow this zone to clean up for a couple days.
6 We will not run an AOF test at that time until the well has
7 been completed and the tubing has been -- final tubing
8 string has been landed in the Dakota.

9 But after we flow some of the water off
10 the formation we'll set a Model F packer with an expendable
11 plug above the Dakota formation, which will then isolate
12 the Dakota formation.

13 We'll then perforate the Mesaverde form-
14 ation, perforate, acidize, and frac the Mesaverde formation,
15 clean it up, and flow the well until it is cleaned up. We
16 will then shut it in for eight days, perform an AOF test
17 on that zone.

18 After that is completed we'll set a
19 retrievable bridge plug between the Chacra and Mesaverde,
20 and we'll complete the Chacra by perforating, acidizing,
21 and fracing the Chacra.

22 We'll then remove the retrievable bridge
23 plug, flow both zones to clean up, and run an AOF test --
24 excuse me, at that time we'll run in the hole and land our
25 long string in the Model F packer to produce the Dakota

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Phone (505) 455-7409

1 formation and we'll run in the hole and land our short
2 string to produce the Mesaverde-Chacra up the short string.

3 Then flow the well to clean up in both
4 zones; we'll then shut the well in and run an AOF test in
5 the Dakota formation and in the commingled Chacra-Mesaverde
6 formations.

7 Then next --

8 Q If I understood you correctly, then the
9 method for determining the allocation between the Chacra
10 and the Mesaverde in those wells that also contain a dual
11 with the Dakota will be the same way as you've done with
12 the other five wells that do not contain Dakota production?

13 A That is correct.

14 The next exhibit is just a schematic of
15 the bottom hole assembly that we've just described with
16 9-5/8ths casing set to 250 feet, 7-inch casing set to 4500
17 feet, and a 4-1/2 inch liner set from 4300 feet to 6400
18 feet. In the 7-inch casing a DV tool will be placed at
19 2950 just below the Chacra formation to insure that we get
20 cement both across the Mesaverde and the Chacra formations.

21 The well -- the Dakota formation will be
22 produced through the Model F packer that will be set just
23 above the Dakota formation and up the 2-3/8ths tubing. The
24 Chacra and Mesaverde formation will be produced commingled
25 through the 2-3/8ths tubing, that second string of 2-3/8ths

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Phone (305) 455-7409

1 tubing that we will set just above the Mesaverde formation.

2 MR. STAMETS: While we're on the subject
3 of that string of tubing, your exhibit shows the Mesaverde
4 tubing to be set above the DV tool at 2950 feet.

5 A. Yes, sir, that is incorrect.

6 MR. STAMETS: Okay.

7 A. Diagrammatically incorrect.

8 MR. STAMETS: Well, I'll fix my copy.

9 A. Thank you.

10 Q. Mr. Doyle, do you have an opinion as to
11 whether or not the optimum spacing for the development of
12 these ten wells in the Mesaverde is 160 acres?

13 A. Just from the fact that the ownership
14 would be different between the wells, it would cause a prob-
15 lem if we were not spaced on 160, but as far as --

16 Q. Have you made any reserve calculations
17 for each of the three zones which would demonstrate the
18 profitability of any of those zones?

19 A. Yes, I have.

20 Q. All right. Let's look at Exhibit Number
21 Fifteen, then, and have you explain how you reached those
22 numbers.

23 A. Okay, the Exhibit Fifteen gives what we
24 estimate to be the reserves to be produced from the three
25 formations in this particular area.

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1 For the Chacra formation we anticipate
2 170-million cubic feet. IN the Mesaverde formation we ant
3 cipate 160-million cubic feet, and for the Dakota formatio
4 we anticipate 1,350-million cubic feet.

5 Q Would you summarize for us briefly what
6 kind of data you used in order to get to those numbers?

7 A Well, the way we achieved these numbers
8 is we looked at the wells in the surrounding area, both the
9 Chacra and the Mesaverde wells. We looked at the initial
10 rates from these wells, how -- what the initial turn-on
11 rates were for the wells, how much they produced. We looke
12 at the decline curves for these wells to see just what kind
13 of a decline percentage -- percentage decline they exper-
14 ienced every year, and what maybe their stabilized decline
15 rate was at some point in time.

16 By then, having these initial production
17 and the decline rates for the Chacra and Mesaverde wells,
18 we ran it through a computer simulator that gives you an
19 estimated lifetime production history of the well, and
20 cums up your ultimate recovery from the wells.

21 As far as the Dakota formation is con-
22 cerned, the way we achieved these reserve numbers is there
23 are other Dakota wells in the area that have extensive
24 production histories, cumulative data, and anticipated ulti
25 mate cumulative data. The figure that we're using to achie

SALLY W. BOYD, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

1 reserves, to estimate reserves in our Dakota infills right
2 now, is by taking the performance of these original wells
3 and multiplying their production, and therefore, obviously,
4 their cumulative production, by a factor of 60 percent, as-
5 suming that our infill wells will produce 60 percent of what
6 the original wells have produced.

7 Q Would you turn to Exhibit Number Sixteen
8 and explain that exhibit for us?

9 A Okay. In order to analyze the different
10 options we had for recovering reserves from all three of
11 what we felt were the potentially productive zones in this
12 area, the Chacra, Mesaverde, and Dakota, we put together
13 cost estimates for individual wells and even several differ-
14 ent types of wells to see just how much these different
15 types of wells would cost.

16 The first option that we have is a single
17 completion in any one of the three zones and the costs on
18 here are all given in thousands of dollars.

19 The Mesaverde, single Mesaverde comple-
20 tion in the area we estimated would cost \$263,000.

21 A single Dakota completion would be
22 \$347,000.

23 And a single Chacra completion would be
24 \$140,000.

25 Q Am I correct in assuming from the exhibit

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1 that it is uneconomic to drill a single completion to test
2 either the Mesaverde or the Chacra formation, based upon the
3 reserve information you compiled?

4 A. Based upon the reserves, the costs of the
5 wells, and the operating costs of the wells, these wells are
6 uneconomic by Tenneco's standards, yes.

7 Q. Now, let's compare the costs of a dually
8 completed Mesaverde and Chacra to a situation, as you pro-
9 pose, where those two zones are commingled.

10 A. Okay, well, going further on Exhibit
11 Sixteen here, we estimated the costs of dualing the wells --
12 in making a dual completion without commingling; otherwise,
13 with two strings of tubing and with a packer isolating the
14 zones.

15 The dual Mesaverde-Dakota well we esti-
16 mated would run \$449,000.

17 The Mesaverde-Chacra dual well would run
18 \$349,000, and the Dakota-Chacra dual well would run \$401,000.

19 Now, then we also analyzed the estimated
20 cost of a well that was commingled, a commingled Chacra-
21 Mesaverde well, and the costs we estimated for this was
22 \$327,000.

23 And then we also have the cost on here
24 for the proposed -- the wells that we are proposing of the
25 type where the Dakota is produced up one string of tubing

SALLY W. BOYD, C.S.R.

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Phone (505) 435-7409

1 and then the Chacra and Mesaverde are commingled and the
2 estimated cost for this type of well is \$461,000.

3 Q Let's focus for a moment on those five
4 wells in which you do intend to test the Dakota.

5 Is there an acceptable way of completing
6 a Dakota producer in such a fashion that you could -- I guess
7 what I'm asking is, is it feasible to triple complete the
8 well?

9 A Well, I --

10 Q To have a triple completion with the
11 Dakota, Chacra, and Mesaverde?

12 A In our opinion it's unfeasible to have
13 a triple completion because of the requirement of having
14 three strings of tubing in the hole and the size of the hole
15 that you would have to drill for this makes the costs ex-
16 cessive to where we would not want -- we would not feasibly
17 do anything like that.

18 We have approximately 500 wells in the
19 San Juan Basin, Tenneco does, and close to ten percent of
20 those wells are dually completed wells, and of those 500
21 wells we do not have any triple completions. We just consi-
22 der it an unfeasible, unacceptable method of completing the
23 wells, because it just creates operating problems and bottom
24 hole difficulties become such plumbers headaches that they
25 are just -- we consider them unfeasible.

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Phone (505) 455-7409

1 Q All right. If the Division should deny
2 your application to commingle the Mesaverde and Chacra for-
3 mations, what would your alternative be?

4 A Okay, if you'll look at the Exhibit
5 Number Seventeen, the proposed completion costs for a well
6 that is commingled in the Mesaverde and Chacra, is \$327,000.
7 The only -- the alternative to this method of completion is
8 to dually complete the Chacra and Mesaverde. As we said,
9 this has a cost of \$349,000, or an additional cost of
10 \$22,000, and these additional costs stem from the necessity
11 of installing a bottom hole packer to isolate the zones,
12 an additional string of tubing, a dual wellhead, which is
13 more expensive than a single wellhead, and having two
14 separators on the surface, which is obviously more expen-
15 sive than one separator.

16 And we've also -- we've run some economics
17 on these two alternative cases, and that is shown in Exhibit
18 Eighteen.

19 Q All right, let's look at that.

20 A Okay, the two types of wells are shown
21 here, the commingled Mesaverde-Chacra and the dual Mesaverde-
22 Chacra.

23 The after tax rate of return, the dis-
24 counted profit, reserves that we expect, and the payout in
25 years for each of these wells is presented.

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Phone (505) 455-7409

1 The -- I'd like to point out on here
2 this discounted profit number is for the 100 percent working
3 interest, so for instance, if the well was only 50 percent
4 ownership by Tenneco or another company, that you'd have to
5 divide these numbers in half, but these economics are run
6 with a working interest owner of 100 percent.

7 Okay, using your different intial ex-
8 penses to complete the wells, as I said, it's \$22,000 more
9 expensive to complete the dual, and then using also, you
10 have a more expensive operating cost, because, if you have
11 a dual well, because of the fact that you have two separators
12 on surface.

13 We again ran through a simulated history
14 of these wells, looking at production expenses, and calcu-
15 lated what our rates of return would be on these wells.

16 The commingled Mesaverde-Chacra well had
17 a rate of return, after tax rate of return of 22.6 percent,
18 which is a number that Tenneco feels is acceptable for an
19 investment at this time.

20 The dual completion had an after tax rate
21 of return of 14 percent, which is a number that Tenneco
22 feels is an unacceptable rate of return on any project with
23 borrowing money for a capital investment at interest rates
24 of -- in excess of 18 percent. We do not feel that 14
25 percent rate of return is an acceptable return on our money,

SALLY W. BOYD, C.S.R.

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Phone (505) 453-7409

1 and we would not drill a well of this type.

2 Another thing that I think is significant
3 on this exhibit is the fact that we feel the commingled well
4 will produce an additional 30-million cubic feet of reserves
5 because of the fact that when one zone gets weak and pos-
6 sibly starts producing liquids, it will -- between both
7 zones coming up the tubing, the life of the well will just
8 be longer. With the more efficient flow regime, we'll just
9 be able to keep it on longer.

10 Q All right, would you describe for us Ex-
11 hibit Number Nineteen?

12 A Okay. Exhibit Number Nineteen is our
13 options, this time looking at the comparison of drilling --
14 well, our objective is to recover gas from all three zones.

15 One way in which we can do this is the
16 way we have proposed, the first proposal here, which is
17 dualing the Dakota with commingled Mesaverde-Chacra, for
18 a cost of \$461,000.

19 Should we want to recover the reserves
20 from all the wells without -- without commingling those two
21 zones, we would have several other alternatives that we
22 could follow, and these are listed in Group Two there.

23 The first alternative, of course, would
24 be to drill three single completions. Now this would cost
25 \$750,000. Both the Mesaverde and the Chacra under our econ-

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Phone (505) 455-7409

1 omic standards are uneconomic, so this is not what we -- this
2 is not really a consideration for us.

3 A more feasible consideration, as far as
4 costs are concerned, would be the next three options, and
5 this is essentially, drill one dual well and one single
6 completion, and I should also mention that these options
7 would be considered far superior and of less cost than
8 drilling a triple completion.

9 Q But am I correct in understanding, under
10 all the other alternatives, the total ultimate recovery from
11 both the formations is going to be less than if they were
12 commingled?

13 A We believe that to be the case, yes.

14 The second alternative on here is to
15 drill a dual Mesaverde-Dakota well, for a cost of \$449,000,
16 and drill a single Chacra well for \$140,000, for a total
17 cost of \$589,000. This would be \$128,000 more expensive
18 than our initial alternative, but because of the fact that
19 the Chacra well is economically unfeasible, we would not
20 drill that well, and therefor, we would not recover the
21 reserves in that zone.

22 The third alternative is to drill a dual
23 Mesaverde-Chacra well and a single Dakota well, with the
24 dual Mesaverde-Chacra well costing \$349,000 and the single
25 Dakota, \$347,000, total cost would be \$696,000, which again

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Phone (505) 455-7409

1 is -- which is \$235,000 more expensive than our initial
2 alternative.

3 But again in case three, we have a dual
4 Mesaverde-Chacra well, which I have just showed on the pre-
5 vious page, only has a rate of return of 14 percent, which
6 we consider unacceptable, so we would not drill a well of
7 that type.

8 The fourth alternative is to drill one --
9 to drill a dual Dakota-Chacra well for \$401,000, and then
10 a single Mesaverde well for \$263,000. That would give you
11 a total cost of \$664,000, which is \$203,000 more than our
12 initial -- than our proposed alternative, but again here we
13 would have a single Mesaverde well, which is far from being
14 anywhere near economically acceptable with what we believe
15 the reserves to be, and we would not drill a well of that
16 type, and therefor, we would not recover any reserve from
17 the Mesaverde in that alternative.

18 Q Were Exhibits One -- I'm sorry, Exhibits
19 Eleven through Nineteen prepared by you or compiled under
20 your direction?

21 A Yes.

22 Q And in your opinion, Mr. Doyle, will
23 approval of this application be in the best interests of
24 conservation, the prevention of waste, and the protection
25 of correlative rights?

SALLY W. BOYD, C.S.R.

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Santa Fe, New Mexico 87501
Phone (505) 455-7409

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A. Yes.

MR. KELLAHIN: We move the introduction of Exhibits One through Nineteen.

MR. STAMETS: These exhibits will be admitted.

Any questions of this witness?

MR. PADILLA: I have.

CROSS EXAMINATION

BY MR. PADILLA:

Q. Mr. Doyle, on Exhibit Eighteen you were comparing the after tax rate of return. I believe you testified that the 14 percent rate of return would be unacceptable because of your interest costs.

If that is an after tax rate of return would you have already taken into account your interest costs?

A. I don't really understand the question. Now, if the -- the after tax -- I believe the answer to the question is no. We do not consider, you know, in our economic evaluations we do not consider the, you know, the 18 percent cost of that money. We do discount the money that we have to -- that we spend. All our economics are discounted to present value of 10 percent, but as far as the cost of borrowing the money, we -- we have a present value,

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

1 I would say, of the money, but there is no value pre-tax,
2 you know, there is no cost figured in for the -- for the cost
3 of capital, no, that is not in the economic analysis as we
4 run them.

5 I don't know if that really answered your
6 question.

7 Q Well, I don't know, it just seems to me
8 that in computing your tax you would be deducting the interest
9 cost.

10 A No, we are not.

11 Q In arriving at a net --

12 A No, in this particular computer simula-
13 tion we do not.

14 Q Then this really isn't an after tax rate
15 of return, is it?

16 A Okay, well, we -- when we go through this
17 computer program, it takes a net lease operating income, or
18 profit, from each year, and then it takes Federal income
19 tax from that, and that is subtracted from our cash flow.
20 That is how that after tax comes out. It's a reduction in
21 our profitability because of Federal taxes. That's where
22 our tax consideration comes in.

23 MR. PADILLA: Okay. Mr. Kellahin, did
24 anyone testify as to whether the nature of the ownership
25 in each of the commingled -- or proposed commingled zones?

SALLY W. BOYD, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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MR. KELLANIN: Yes, Ms. Peavey did. She indicated that if the Mesaverde is continued to be developed on 160 acres, and a Chacra 160-acre unit is dedicated, that the interest between the two zones is common.

The only time the interest is different is if the Mesaverde is developed on 320, and then we have a problem. We couldn't downhole commingle because of the difference in ownership.

MR. PADILLA: No further questions.

MR. STAMETS: The witness may be excused. Anything further in this case?

The case will be taken under advisement.

(Hearing concluded.)

SALLY W. BOYD, C.S.R.
Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

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REPORTER'S CERTIFICATE

I, SALLY W. BOYD, C. S. R., DO HEREBY CERTIFY that the foregoing Transcript of Hearing before the Oil Conservation Division 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, C.S.R.

Rt. 1 Box 193-B
Santa Fe, New Mexico 87501
Phone (505) 455-7409

I do hereby certify that the foregoing is a complete and correct transcript of the hearing held before me on _____, 19____, at _____, New Mexico, and that the same was heard by me on _____, 19____, at _____, New Mexico.

Oil Conservation Division, Examiner