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MR. CATANACH: We'll call next  
Case 8798.

MR. TAYLOR: Application of  
Amerind Oil Company for contraction of the horizontal limits  
of the Casey-Strawn Pool, pool creation and special pool  
rules, Lea County, New Mexico.

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

MR. BRUCE: Yes, Mr. Examiner.  
My name is Jim Bruce, from the Hinkle Law Firm in Santa Fe,  
and I have two witnesses to be sworn.

MR. CATANACH: Are there any  
other appearances in this case?

(Witnesses sworn.)

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

DIRECT EXAMINATION

BY MR BRUCE:

Q Would you please state your name, city of  
residence, and occupation?

1           A           Bill Seltzer. I'm an independent landman  
2 in Midland, Texas.

3           Q           And what is your relationship to Amerind  
4 Oil Company in this case?

5           A           I'm a landman doing this work for Amerind  
6 Oil Company.

7           Q           On a consulting basis?

8           A           On a consulting basis.

9           Q           Have you previously testified before the  
10 OCD as a petroleum landman and had your credentials accepted  
11 as a matter of record?

12          A           Yes, I have.

13          Q           Are you familiar with Case 8798 and the  
14 land matters involved therein?

15          A           Yes, I am.

16                   MR. BRUCE: Mr. Examiner, are  
17 the witness' credentials acceptable?

18                   MR. CATANACH: Mr. Seltzer,  
19 when was the last time you testified before the Commission,  
20 do you recall?

21          A           I would say last spring, wasn't it?

22                   MR. CATANACH: The witness is  
23 considered qualified.

24          Q           Briefly, Mr. Seltzer, what does Amerind  
25 seek by its application?

1           A           Amerind seeks the creation of a new oil  
2 pool for the Strawn production to be named Casey-Strawn West  
3 Oil Pool.

4                   The new pool would be comprised of the  
5 west half of the northeast quarter of Section 33, 16 South,  
6 Range 37 East, Lea County, New Mexico.

7                   Amerind requests special rules be promul-  
8 gated for the new pool including 80-acre spacing and desig-  
9 nated well locations.

10                   As a part of this application Amerind re-  
11 quests that horizontal limits of the Casey-Strawn Pool be  
12 contracted by deleting the northeast quarter of Section 33.

13           Q           Would you please now refer to Exhibit  
14 Number One and identify the offset operators to the proposed  
15 new pool?

16           A           Exhibit Number One is a land map showing  
17 by arrow the -- land plat surrounding the Shipp No. 1 Well,  
18 which is the new pool's discovery well. The Shipp No. 1  
19 Well is indicated by the red arrow.

20                   The offset operators are Texaco, John  
21 Cox, Union Texas Petroleum, Mesa Petroleum and Yates Petro-  
22 leum.

23           Q           And have the offset operators been pro-  
24 vided with a copy of the Form C-109, the Application for  
25 Discovery Allowable and Creation of a New Pool?

1           A           Yes. Exhibit Number Two there, Jim, is a  
2 copy of a letter dated December 17, 1985, which was sent to  
3 all offset operators, which provided them each the Form C-  
4 109, and the certified return receipts are attached thereto.

5           Q           Have Forms C-104, C-105, and C-109 been  
6 filed with the appropriate OCD Offices?

7           A           Yes.

8           Q           And were Exhibits One and Two compiled  
9 from Amerind's company files?

10          A           Yes.

11          Q           In your opinion will the granting of this  
12 application be in the interest of conservation and the pre-  
13 vention of waste?

14          A           Yes, sir.

15                           MR. BRUCE: Mr. Examiner, at  
16 this time I move the admission of Exhibits One and Two.

17                           MR. CATANACH: Exhibits One and  
18 Two will be admitted into evidence.

19                           MR. BRUCE: I have no further  
20 questions of this witness.

21                           MR. CATANACH: I have no ques-  
22 tions of this witness.

23

24

25

1 ROBERT C. LEIBROCK,  
2 being called as a witness and being duly sworn upon his oath,  
3 testified as follows, to-wit:

4

5

## DIRECT EXAMINATION

6

BY MR. BRUCE:

7

Q Will you please state your name, city of  
8 residence, and occupation?

9

A My name is Robert C. Leibrock of Midland,  
10 Texas. I am Vice President of Amerind Oil Company.

11

Q And have you previously testified before  
12 the OCD and had your credentials accepted?

13

A Yes.

14

Q In what specialty?

15

A Okay, I was a petroleum engineer.

16

Q And are you familiar with Case 8798 --

17

A Yes.

18

Q -- and the matters related thereto?

19

A Yes.

20

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

22

MR. CATANACH: The witness is  
23 considered qualified.

24

Q Why has Amerind requested this hearing,  
25 Mr. Leibrock?

1           A           We have requested this hearing for two  
2 reasons.

3                       First, to present evidence that the  
4 Amerind Shipp No. 1 Well has discovered a new Strawn reser-  
5 voir and should therefore be considered a new field  
6 discovery.

7                       Secondly, to propose field rules for well  
8 spacing and location.

9           Q           Would you please refer to Exhibit Number  
10 Three and discuss it for the Examiner?

11           A           Exhibit Three is a subsurface map con-  
12 toured on top of the Lower Strawn. The Amerind Shipp No. 1  
13 Well is near the center, noted by the red arrow.

14                       The map covers a portion of the Lovington  
15 Strawn trend, including the Casey-Strawn, Shipp, Lovington  
16 Penn East, and part of the Lovington Penn Northeast Fields.

17                       The approximate horizontal limits of each  
18 field are shown in green. Names of all the wells which pro-  
19 duce from or tested the Strawn are noted.

20                       In addition, the Strawn field discovery  
21 wells of the referenced fields are highlighted with red cir-  
22 cles.

23                       The wells identified by the smaller cir-  
24 cles produce from the paddock, Abo, San Andres, or Drinkard  
25 formations.



1 Pennzoil Viersen No. 1 was the Shipp field discovery.

2 Exhibit Number Five, cross section B-B',  
3 begins at the left with the Tidewater State "P" No. 1-D  
4 Well, which is in the abandoned Lovington Penn East Field in  
5 Section 32.

6 The Tidewater Meyer Well had no Strawn  
7 porosity.

8 Next is the Amerind Shipp No. 1 Well,  
9 followed by the C&K Shipp "28" which, as noted in blue col-  
10 oring on the cross section, produced only water from the  
11 Strawn porosity.

12 The C & K Shipp "27" NO. 1-B produced as  
13 small amount of oil from the Strawn and was plugged.

14 The last well on the cross section is the  
15 C&K Shipp "27" No. 1, which discovered the Casey-Strawn  
16 Field.

17 Although the well density is insufficient  
18 to determine precisely the reservoir limits, the green areas  
19 shown on Exhibit Three indicate approximate reservoir limits  
20 and the cross sections which I have discussed demonstrate  
21 the horizontal separation between the reservoirs.

22 Q Mr. Leibrock, would you please look at  
23 Exhibits Six and Seven and discuss their significance?

24 A Exhibit Seven, excuse me, Exhibit Six is  
25 highlighted in yellow and Exhibit Seven, in green.

1           The primary evidence for a new field dis-  
2           covery is comparison of the pressures recorded in the dis-  
3           covery well in the Lovington Penn Field with the Amerind  
4           Shipp Well.

5           The Tidewater well in the southeast of  
6           Section 2, which I noted previously was completed in 1951,  
7           was the first well in the area completed in the Strawn for-  
8           mation, so there was no possibility of any pressure deple-  
9           tion from any other well.

10           Exhibit Six is a Record of Drill Stem  
11           Tests in that well submitted by the operator to the OCC.

12           Drill Stem Test No. 13, which is high-  
13           lighted in yellow, was a test of the Strawn zone in which  
14           the well was completed and produced some 456,000 barrels of  
15           oil before being abandoned. Although the drill stem test  
16           charges from this test are not available, it is clear that  
17           the zone had excellent permeability, as evidenced by the  
18           final flowing pressure of 2,575 pounds.

19           Even though the 3600 psi shut-in pressure  
20           was obtained after only fifteen minutes, it probably very  
21           nearly reached the true reservoir pressure, as comparison  
22           with the Amerind Shipp drill stem test will show.

23           Exhibit Seven is a record of the drill  
24           stem test of the Amerind Shipp No. 1 Strawn producing zone.

25           Note that the one-hour final flowing

1 pressure of 1966 psi is the same order of magnitude as the  
2 Tidewater final flowing pressure.

3 The Amerind Shipp shut-in pressure 15  
4 minutes into the final shut-in period was about 3,580 psi,  
5 whihc is only 2 percent less than the reservoir pressure of  
6 3658 pounds, which was determined from the analysis of the  
7 -- of the drill stem test pressures.

8 Comparison of the drill stem tests on  
9 these two wells therefore indicates that a fifteen minute  
10 shut-in pressure gives a value reasonably close to the true  
11 reservoir pressure.

12 Furthermore, the shut-in pressures of  
13 these two wells at a -7300 foot datum are virtually identi-  
14 cal, 3600 psi.

15 Since the drill stem pressure of the  
16 Tidewater well was clearly the original reservoir pressure,  
17 it seems reasonable to conclude that the same prssure recor-  
18 ded 35 years later in the Amerind Shipp Well is a very  
19 strong indication that a new reservoir has been discovered.

20 Q What special pool rules does Amerind re-  
21 quest?

22 A Amerind requests 80-acre spacing and per-  
23 mission to locate wells not closer than 330 feet from the  
24 boundary of a governmental quarter quarter section.

25 Q Are other Strawn pools in the Lovington

1 Strawn trend also spaced on 80 acres?

2 A Yes, and the Shipp No. 1 Well already has  
3 an 80-acre unit dedicated to it under Casey Strawn Pool  
4 rules.

5 Q Please discuss your reason for the well  
6 location request.

7 A The second request we make is for field  
8 rules which specify that a well may be drilled at any point  
9 in a standard 40-acre unit no closer than 330 feet to the  
10 unit edge.

11 The usual Strawn field rules allowing on  
12 ly a 150-foot variance from the center of a 40-acre unit are  
13 unduly restrictive in the Lovington Strawn trend because the  
14 reservoirs in this trend are known to grade into dense  
15 facies very abruptly at the reservoir edges.

16 Although well control is insufficient to  
17 demonstrate this conclusively, the fact that most all of the  
18 good wells are offset by very poor wells or dry holes,  
19 demonstrates the importance of well location.

20 Exhibit Three also gives strong evidence  
21 of abrupt structural changes, two of which can be noted in  
22 Section 21 on the north edge of the map. Note the Pennzoil  
23 State 21 Well in the northwest of the northwest and the Tom  
24 Brown Monteith 21 well in the southeast of the southwest.

25 Notice the abrupt structural re-entrant

1 there showing that both of those wells are much lower than  
2 the offset producers.

3 So close well spacing would undoubtedly  
4 show that the actual top of the Lower Strawn changes more  
5 abruptly than Exhibit Three would indicate and again refer-  
6 ring back to cross sections A-A' and B-B', you'll notice,  
7 referring on A-A' the Shipp No. 1 Well is relatively much  
8 higher than the Yates Burton Well to the left.

9 And again, though there is not sufficient  
10 well control to prove this conclusively, it's pretty clear  
11 that the -- that the structure changes very abruptly between  
12 these wells.

13 Q Do you wish other field rules to conform  
14 to statewide rules?

15 A Yes.

16 Q And have you met with the OCD District  
17 Geologist in Hobbs and discussed this case with him?

18 A Yes.

19 Q Do you request an expedited decision on  
20 this matter and why?

21 A Yes, we do. We wish to drill a well com-  
22 mencing within two or three weeks in the north half of the  
23 northwest quarter of Section 33 at a location permitted by  
24 the proposed new pool rules.

25 If we cannot obtain approval, we must

1 seek approval of an unorthodox well location, which will de-  
2 lay our drilling program.

3 Q In your opinion is the granting of this  
4 application in the interest of conservation and the preven-  
5 tion of waste?

6 A Yes.

7 Q Were Exhibits Three through Seven pre-  
8 pared by you or under your direction or compiled from Amer-  
9 ind company records?

10 A Yes.

11 MR. BRUCE: Mr. Examiner, I  
12 move the admission of Exhibits Three through Seven at this  
13 time.

14 MR. CATANACH: Exhibits Three  
15 through Seven will be admitted as evidence.

16 MR. BRUCE: I have no further  
17 questions of the witness at this time.

18

19

#### CROSS EXAMINATION

20 BY MR. CATANACH:

21 Q Mr. Leibrock, did you obtain any pressure  
22 data from wells located in Section 5, the two Tidewater  
23 wells?

24 A In 5, we have them in our company files  
25 but I do not have them with me today, but previous investi-

1 gation, we have convinced ourselves that the four wells  
2 shown here are all in the same reservoir, which is now aban-  
3 doned.

4 Q Do you by any chance remember what those  
5 pressures might have been, approximately?

6 A They, well, let me first note back to the  
7 well we discussed here, the Tidewater well in the south of  
8 32. The evidence submitted to the Commission soon after the  
9 well was placed on production indicated the reservoir pres-  
10 sure of about 3100 psi, which was roughly 500 pounds below  
11 the drill stem test pressure after withdrawal of only a few  
12 thousand barrels of oil at most, and the -- as I say, I  
13 don't recall exactly what the other three wells to the south  
14 were, but I did not enter them into the testimony here be-  
15 cause they're farther from the subject well than the Tide-  
16 water "P" Well in 32.

17 Q Do you have any idea how the original re-  
18 servoir pressure in the Casey-Strawn compares to the reser-  
19 voir pressure in your Amerind --

20 A Yes, sir, at the same datum, -7300 feet,  
21 the original pressure in the C&K Well, the discovery well  
22 circled in red there in Section 27, was roughly 41-or-4200  
23 psi.

24 Q Mr. Leibrock, in your opinion is -- could  
25 there be any pressure depletion from your well from the

1 Casey-Strawn Pool?

2 A Yes, that is a possibility that we do not  
3 think can be proven conclusively one way or the other.

4 We -- we think the primary evidence that  
5 this is a new field rests with the fact that the original  
6 pressure in our well appears to be identical with the  
7 discovery well in the abandoned Lovington Penn East Field  
8 that I discussed.

9 Q Mr. Leibrock, can you state once more the  
10 location, the well location requirements that you're asking  
11 for?

12 A Yes. We request permission to locate  
13 wells not closer than 330 feet from the boundary of a  
14 governmental quarter quarter section.

15 Q Okay, and you're also requesting a  
16 discovery allowable for your well?

17 A That's correct.

18 Q Do you have a recommended figure for  
19 that?

20 A We would just recommend that the state-  
21 wide rules be applied.

22 Q Do you know the depth of your topmost  
23 perforation on the well --

24 A Yes, it's --

25 Q -- from ground level?

1           A           It's 11,259 minus 14. Let me see what  
2 that is. I need to put that back on ground level, which  
3 would be 11,245 below ground level.

4           Q           Just for the record, that would be 56,225  
5 barrels, is that correct?

6                           MR. CATANACH: Are there any  
7 other questions of the witness?

8                           MR. BRUCE: I have a question,  
9 Mr. Examiner.

10                           MR. CATANACH: Mr. Bruce.

11

12                           REDIRECT EXAMINATION

13 BY MR. BRUCE:

14           Q           Mr. Leibrock, regarding the Casey-Strawn  
15 Pool, how do you explain the difference between the Amerind  
16 Shipp No. 1 Well and the discovery well in the Casey-Strawn?

17           A           Let me note the pressures in all of the  
18 reservoirs on Exhibit Three surrounding the proposed new  
19 field.

20                           First of all, as I have noted, the  
21 Lovington Penn East Field to the southwest is an abandoned  
22 field, so the reservoir pressures at present are a few hun-  
23 dred pounds, at best, and in the Casey-Strawn Field to the  
24 east in Sections 27 and 34, I think the evidence indicates  
25 that this field is about 95 percent or more depleted, also,

1 plus some pressure history that we have indicates that the  
2 reservoir pressures currently are only 200 pounds average in  
3 that reserovir, also.

4 In the north half of Section 28, north of  
5 our well in 33, within the last year or so we've drilled and  
6 completed four wells here in the north half of 28. The  
7 original pressures were on the order of 2500 to 2800 pounds.

8 And also to the south the recently ap-  
9 proved Shipp Field in Section 4 of 17, 37, the reservoir  
10 pressures are also roughly in the order to 25-2600 psi.

11 So you're offset to the north and south  
12 with reservoirs about 2500 pounds and you're offset the  
13 other two directions with reservoirs with much lower pres-  
14 sures.

15 We're sitting in the middle of all this  
16 with pressures about 3700.

17 So I think all the evidence taken to-  
18 gether indicates that if there were any effective communica-  
19 tion between the Amerind Shipp Well and any of these other  
20 four reservoirs, the pressure would probably be at least  
21 down to the -- to the same order of magnitude as the wells  
22 in 28 and 4.

23 MR. BRUCE: I have no further  
24 questions.

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## RE CROSS EXAMINATION

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BY MR. CATANACH:

Q I have one more question for the witness.

Do you know of any objection from any of the operators in the pool, or offset operators to your --

A No, sir.

MR. CATANACH: I have no further questions.

The witness may be excused.

Is there anything further in

Case 8798?

If not, it will be taken under advisement.

(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. 8796 heard by me on Jan 8 1986

David K. Catamb, Examiner  
Oil Conservation Division