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I N D E X

CRAIG HUBER

Direct Examination by Mr. Padilla	3
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E X H I B I T S

Applicant Exhibit One, Application etc.	20
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MR. CATANACH: Call next Case  
9033.

MR. TAYLOR: Application of  
Challenger Energy, Incorporated, for salt water disposal,  
Eddy County, New Mexico.

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

MR. PADILLA: Mr. Examiner, Er-  
nest L. Padilla, Santa Fe, New Mexico, for the applicant.

I have one witness to be sworn.

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

Will the witness please stand  
and be sworn in.

(Witness sworn.)

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

DIRECT EXAMINATION

BY MR. PADILLA:

Q Mr. Huber, will you please state your

1 name and where you reside?

2 A My name is Craig Huber. I reside at Ar-  
3 tesia, New Mexico.

4 Q Mr. Huber, what is your connection with  
5 Challenger Energy, Inc.?

6 A I'm an officer of the corporation.

7 Q And what is that capacity, what officer  
8 are you?

9 A Vice President in charge of engineering.

10 Q Can you briefly tell us what the nature  
11 of this application is today?

12 A Application for the disposal of produced  
13 water in the Brushy Draw-Delaware Pool.

14 Q Mr. Huber, have you previously testified  
15 before the Oil Conservatio Division and had your credentials  
16 accepted as a matter of record?

17 A No, I haven't.

18 Q Tell us, sir, what your educational back-  
19 ground is.

20 A I have a BA from McMurry College in Abi-  
21 lene, Texas.

22 Q And what's your degree in?

23 A In political science.

24 Q What is your background in the oil and  
25 gas industry?

1           A           I worked for Tidewater Petroleum Services  
2 from 1975 to 1978 as a staff engineer and for the Harvey E.  
3 Yates Company from -- till 1982, and since that, since 1982  
4 I've been an officer of Challenger.

5           Q           Did you cause this application to be pre-  
6 pared or the information contained in the exhibits that we  
7 are going to introduce today?

8           A           Yes, I did.

9                       MR. PADILLA: Mr. Examiner, we  
10 tender Mr. Huber as a practical oil person to testify in  
11 this hearing today.

12                      MR. CATANACH: Mr. Huber is con-  
13 sidered qualified.

14                      MR. PADILLA: Mr. Examiner we  
15 have also taken the application itself and we're going to  
16 tender that as a -- and mark it as Exhibit Number One and  
17 our testimony for purposes of this hearing is going to be  
18 generally following that application.

19                      MR. CATANACH: Okay.

20           Q           Mr. Huber, let's turn now to page three  
21 of that application and tell us what is contained on that  
22 page.

23           A           Okay. Page three is a response to Items  
24 7 and 8 of the application, for the proposed average and  
25 daily rate of injection pressures and the geological data

1 for the injection zone.

2 Q Briefly tell us what kind of pressures  
3 and what kind of injection rates you're going to have.

4 A Well, we anticipate pressures from 3-to-  
5 600 psi based on our acidation (sic) of this zone and treat-  
6 ment for -- we tested the zone for commercial oil produc-  
7 tion.

8 Q Mr. Huber, is this application going to  
9 be used for -- or the disposal well going to be used for  
10 commercial production?

11 A Yes, it will.

12 Q Will it be used also for your own private  
13 water production?

14 A Yes.

15 Q Primarily?

16 A Right.

17 Q And it's going to be a closed system?

18 A Yes, it will be a closed system.

19 Q Let's go on now to page four of the ap-  
20 plication and tell us what that is.

21 A This is just the well data for the pro-  
22 posed injection well.

23 Q Can you tell us what -- generally what is  
24 shown on this page four?

25 A Generally it indicates that we will in-

1 ject into the Ramsey Sand at approximately 3300 feet. It  
2 gives the casing and cement data for -- for this well to in-  
3 dicate that we have -- the well was cemented properly with  
4 no exposure to potential water zones.

5 Q Does the schematic on the following page  
6 describe the cementing program for the well?

7 A Yes, it does.

8 Q Can you tell us what that is?

9 A Well, essentially it was the production  
10 string which will cover the zone of injection was cemented  
11 and a temperature survey indicated the top approximately  
12 2500 feet, which would be well above the proposed zone of  
13 injection and the only water sand in the area was covered by  
14 a secondary cementing on the intermediate stage.

15 Q Mr. Huber, I notice a retrievable bridge  
16 plug at -- in that schematic at 3850 feet. What if that  
17 bridge plug fails? What -- what would happen?

18 A It should pose no particular problem to  
19 the disposal well. It would be easily indicated by our sur-  
20 face pressure monitoring.

21 Q And that could be remedied at that time.

22 A Yes, it could.

23 Q Now what else is contained with respect  
24 to the description of this well and the injection zone in  
25 your application?

1           A           Essentially it's just geological data for  
2 the proposed zone of injection and the well file data from  
3 the Eddy County OCD for wells that are within the one-half  
4 mile radius of the proposed disposal well.

5           Q           Okay, on page six you have a water analy-  
6 sis. Tell us why you have that in here.

7           A           This is a water analysis for the wells  
8 that we operate in the immediate area and propose to dispose  
9 of this water in the disposal well, and it's essentially in-  
10 dicating that the -- the water that we will be disposing of  
11 is primarily compatible with the water from the zone of in-  
12 terest that we are disposing into.

13          Q           Okay. On page seven what do you have?

14          A           It's a segment of the well log that's on  
15 file with the OCD in Eddy County.

16          Q           And does this show the injection inter-  
17 val?

18          A           Yes, it does.

19          Q           Okay, and let's go on to page number  
20 eight.

21          A           This is just a mud log of the -- a seg-  
22 ment of the zone that we propose to dispose in giving addi-  
23 tional geologica data.

24          Q           Now, this geologic data, just what is  
25 that intended to show? Is that intended to show that the

1 zone is capable of -- has sufficient permeability to dispose  
2 of the water?

3 A Yes.

4 Q Okay. What do you have now on pages nine  
5 to seventeen?

6 A These are just sundry notices of work  
7 that was done on this -- on the proposed well from the time  
8 it was originally drilled for -- to test for commercial oil  
9 and gas production.

10 Q And these are the true and correct copies  
11 of the records of the Oil Conservation Division --

12 A Yes, they are.

13 Q -- well files? Okay. Let's go on now to  
14 skip to page number eighteen and have you tell us what that  
15 is.

16 A A land map of the area indicating the  
17 one-half mile and two-mile radius from the proposed disposal  
18 well.

19 Q What's inside the one-half mile circle?

20 A There are -- there are three wells that  
21 are currently in that half mile radius; two are plugged and  
22 abandoned; one is a disposal well, which disposes into the  
23 same zone that we propose to dispose into.

24 Q Are these the wells that are labeled A,  
25 B, and C?

1           A           Yes.

2           Q           Have you prepared data with this  
3 application that shows the condition of these wells?

4           A           Right, we have schematics of the plugged  
5 wells and all the information that was recorded in the Eddy  
6 County, New Mexico, OCD office.

7           Q           Okay, you also have a well there labeled  
8 D. Tell us about that.

9           A           It falls right on the half mile radius  
10 but it does not penetrate the zone that we propose to  
11 dispose into.

12          Q           Mr. Huber, what kind of production is  
13 found within the two mile circle?

14          A           Okay, there are -- there are wells that  
15 produce from the Delaware Mountain Group, which is within  
16 our -- our proposed zone of injection. The primary producer  
17 from the zone that we propose to inject into is Hankamer and  
18 they operate the disposal well in there.

19                    There's one other well that produces from  
20 the Wolfcamp formation that's 12,800 feet, which is  
21 considerably deeper than our proposed zone at 8200 feet.

22          Q           That well that is -- which is that well  
23 that has commercial disposal?

24          A           It's Well C.

25          Q           Inside the one-half mile circle?

1           A           Yes.

2           Q           Okay. Do you have further data on that  
3 well?

4           A           Yes. There are well diagrams, also, in  
5 the application.

6           Q           Do you have anything further concerning  
7 this map?

8           A           No, I don't.

9           Q           Let's go on to the next page and tell us  
10 what you have there.

11          A           It's just a schematic of the reference  
12 Well A, which is approximately a quarter mile south of our  
13 proposed zone. It's plugged and abandoned so the schematic  
14 is attached to the application.

15          Q           Mr. Huber, that's, as I see that schema-  
16 tic, that has open hole in the bottom of the -- or in some  
17 of the hole. Tell us how -- does that -- well, let me ask  
18 you, does that pose any threat to any potential oil and gas  
19 bearing formations?

20          A           No, in my opinion it doesn't. The --  
21 it's been in existence for a good while, approximate to the  
22 disposal well that's being operated down there, and it's  
23 been plugged and abandoned and the perforations squeezed,  
24 which are in the same zone, and two cement plugs set on top  
25 of that.

1 Q Mr. Huber, is there any oil and gas pro-  
2 duction within that interval within the one-half mile cir-  
3 cle?

4 A Is there any fresh water within that  
5 zone?

6 A No, there isn't.

7 Q What is the -- are these still records  
8 following that schematic for this A Well?

9 A Yes, sir.

10 Q And those are true and correct copies of  
11 the well records of the Oil Conservation Division --

12 A Yes, sir.

13 Q -- for this well?

14 A Yes, sir.

15 Q Okay, let's go on to page twenty-seven  
16 and tell us what that is.

17 A This is the -- another schematic of a  
18 well that's plugged and abandoned within the half mile rad-  
19 ius of the proposed disposal well.

20 Q Is there anything significant about this  
21 well that is shown by this schematic?

22 A No. It just indicates that it's ade-  
23 quately plugged and abandoned and should pose no problems  
24 with -- in relationship to our disposal.

25 Q What follows this schematic?

1           A           The well file or sundry notices that are  
2 on record with the New Mexico OCD in Eddy County.

3           Q           Okay. Let's move on to page thirty-five  
4 and have you identify what that contains.

5           A           This is just a tabulation of the well  
6 data for reference Well C, which is the active disposal well  
7 approximately a quarter mile south of where we -- of the  
8 proposed disposal well that we'll operate.

9           Q           Mr. Huber, do you have a schematic for  
10 this well?

11          A           Well, I have submitted the schematic that  
12 they have on record with New Mexico OCD in Eddy County.

13          Q           Who is "they", Mr. Huber?

14          A           It's Curtis Hankamer, Houston, Texas.

15          Q           Okay, that's the operator of this well?

16          A           Yes, it is.

17          Q           Where is that schematic?

18          A           On page -- I think it's page forty.

19          Q           Okay. How does the schematic in this  
20 well -- this is the current commercial disposal well there  
21 now?

22          A           Yes, it is.

23          Q           And how far away is that from the well  
24 that you propose?

25          A           It's one -- a little -- slightly over a

1 quarter mile to the south of our proposed injection well.

2 Q How does your injection well compare to  
3 -- to this well?

4 A Well, I think that -- I know they've done  
5 some work since this well -- since this schematic was -- was  
6 filed, but it's not a record at the time that I submitted  
7 the application, but essentially ours -- our propose injec-  
8 tion well is much better cemented than this one.

9 We, as a matter of record, have  
10 circulated cement on both the intermediate and surface  
11 casings.

12 Q Your well.

13 A Yes.

14 Q Okay. So the integrity of your well is a  
15 lot better than this one.

16 A In my opinion.

17 Q Okay. What pressures are -- what's the  
18 injection pressure? Do you know the injection pressure for  
19 this particular well?

20 A Not -- not actually. They're a little  
21 bit close with their information, but we understand that  
22 it's in the neighborhood of 900 psi at a rate of, maybe,  
23 four barrels a hour.

24 Q Do you know what the fracture gradient  
25 for the disposal zone is?

1           A           It's been indicated to us. We don't know  
2 as a matter of fact. We haven't treated this zone in this  
3 area, but from reports and recommendations from Halliburton  
4 and other service companies, we anticipate it's  
5 approximately .5 psi per foot.

6           Q           Were these recommendations made to you by  
7 Halliburton at your request?

8           A           Yes.

9           Q           In connection with wells --

10          A           To the north of this location  
11 approximately a mile.

12          Q           Same formation?

13          A           Yes.

14          Q           Let's go on now to page forty-four and  
15 have you identify that.

16          A           This is the -- this is a schematic that I  
17 included in the application which is within the half mile  
18 radius but did not penetrate the zone of interest. It's a  
19 shallow well that was drilled in 1957.

20          Q           Just merely included this for --

21          A           Yes.

22          Q           -- informational purposes?

23          A           Included it because it was within the  
24 half mile radius.

25          Q           Okay. Let's move on to page fifty-one

1 and tell us what that is.

2 A This is a copy of a letter which we sent  
3 to the mineral interest owners in the two-mile radius of the  
4 proposed injection well.

5 Q Who are those mineral interest owners?

6 A They are Ron's Drilling Company, Yates  
7 Drilling Company, Penta (sic) Exploration, Curtis Hankamer,  
8 and Celeste Grynberg, and Gulf Oil Corporation.

9 Q Are those shown on pages fifty-two and  
10 fifty-three, or what is shown on pages fifty-two and fifty-  
11 three and fifty-four?

12 A Yeah, they are just copies of the -- of  
13 the receipt for the certified letters sent to these.

14 Q Who owns the surface on these -- on this  
15 land, Mr. Huber?

16 A It's Federal surface, Bureau of Land Man-  
17 agement.

18 Q What notification have you given to the  
19 surface owner?

20 A Currently we're operating under the ori-  
21 ginal APD surface use plan, submitted with the original APD  
22 when the well was drilled.

23 Q Have you been in touch with the Minerals  
24 Management Service concerning this application?

25 A Yes, I have and was directed to submit a

1 sundry notice upon approval from the New Mexico OCD.

2 Q Do you intend to comply with that re-  
3 quest?

4 A Yes, we will.

5 Q What -- what is contained on the last  
6 page of this application?

7 A It's an Affidavit of Publication indicat-  
8 ing that we, in compliance with regulations, publicized our  
9 application for -- to convert this well to a disposal well.

10 Q Mr. Huber, would approval of this appli-  
11 cation be in the best of the conservation of oil and gas?

12 A I believe it would.

13 Q How do you make that conclusion?

14 A Well, I believe it would provide for hte  
15 economical production of wells in the immediate area for --  
16 as access to economical disposal of produced waters.

17 Q How about premature abandonment of some  
18 of these wells?

19 A They would be prematurely abandoned with-  
20 out this approval.

21 Q Does Challenger Energy have any wells  
22 currently shut-in due to water disposal problems?

23 A Currently we have two wells shut in im-  
24 mediately north of this proposed disposal well.

25 Q And you would use this well to dispose

1 produced water from those wells?

2 Mr. Huber, the Oil Conservation Division  
3 has a policy that requires pressures not to exceed .2 psi  
4 per foot of depth in a well. You've testified also that you  
5 consider the pressure gradient to be what -- what was that?

6 A Well, currently from our initial treat-  
7 ment of this zone, would be less than .2, approximately .15,  
8 or something like that.

9 We have hearsay that -- that Hankamer is  
10 disposing at pressures higher than the .2 psi per foot, so  
11 until we really get into operation, we'll have to monitor  
12 this to determine what the actual pressures will be.

13 Q Assuming you exceed the -- I'm sorry, I  
14 think I said pressure gradient awhile ago. I meant fracture  
15 gradient.

16 A Uh-huh.

17 Q Assuming that you exceed the .2 limita-  
18 tion, would you be amenable to working with the Oil Conser-  
19 vation Division in Artesia in order to solve any problems  
20 with regard to -- the Division may have concerning this po-  
21 tential excess?

22 A Yes. We'd be quite willing to work with  
23 them.

24 Q And you would comply with any require-  
25 ments that the Oil Conservation Division would have as far

1 as reporting of disposal in this well?

2 A Yes.

3 MR. PADILLA: Mr. Examiner, we  
4 offer Exhibit Number One and we tender the witness for cross  
5 examination.

6 MR. CATANACH: Exhibit Number  
7 one will be admitted into evidence.

8

9 CROSS EXAMINATION

10 BY MR. CATANACH:

11 Q Mr. Huber, I'm sorry, what did you say  
12 about the fracture gradient that you've experienced in the  
13 well?

14 A Well, we -- our experience is fairly  
15 limited. We're just basing -- we're basing our .5 psi frac  
16 gradient from -- from information we're received from  
17 Halliburton and other service companies that have given us  
18 recommendations for completions on other wells in that area.

19 MR. CATANACH: I have nothing  
20 further of the witness. He may be excused.

21 Is there anything further in  
22 Case 9033?

23 If not, it will be taken under  
24 advisement.

25

(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. 9033, heard by me on Nov 19, 1986.

David R. Catovack, Examiner  
Oil Conservation Division