

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

2 December 1987

EXAMINER HEARING

IN THE MATTER OF:

Application of Mewbourne Oil Com-
pany for downhole commingling,
Lea County, New Mexico.

CASE
9269

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

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I N D E X

BRYAN MONTGOMERY

Direct Examination by Mr. Kellahin	4
Cross Examination by Mr. Stogner	12

E X H I B I T S

Mewbourne Exhibit One, Application	5
Mewbourne Exhibit Two, List	6
Mewbourne Exhibit Three, Log Section	6
Mewbourne Exhibit Four, Letter	7
Mewbourne Exhibit Five, Allowable Recommended	10
Mewbourne Exhibit Six, Economic Evaluation	10
Mewbourne Exhibit Seven, Notices	12

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MR. STOGNER: Call next Case
Number 9269.

MR. TAYLOR: The application of
Mewbourne Oil Company for downhole commingling, Lea County,
New Mexico.

MR. STOGNER: Call for appear-
ances.

MR. KELLAHIN: If the Examiner
please, I'm Tom Kellahin of the Santa Fe law firm of Kella-
hin, Kellahin & Aubrey. I'm appearing on behalf of the ap-
plicant and I have one witness to be sworn.

MR. STOGNER: Are there any
other appearances in this matter?

Will the witness please stand
and be sworn?

(Witness sworn.)

MR. KELLAHIN: Mr. Examiner, my
first witness is Bryan Montgomery. He's a petroleum engine-
er with Mewbourne Oil Company.

1 BRYAN MONTGOMERY,
2 being called as a witness and being duly sworn upon his
3 oath, testified as follows, to-wit:

4

5

DIRECT EXAMINATION

6

BY MR. KELLAHIN:

7

8

Q Mr. Montgomery, for the record would you
please state your name and occupation?

9

10

A My name is Bryan Montgomery and I'm a
petroleum engineer for Mewbourne Oil Company.

11

12

Q Mr. Montgomery, would you summarize your
educational background for the examiner?

13

14

15

A I graduated from the University of Okla-
homa with a petroleum engineering degree, Bachelor of
Science in 1984.

16

17

Q Subequent to graduation would you summar-
ize your employment experience as a petroleum engineer?

18

19

20

A Worked for Mewbourne Oil Company for the
last three years in offices in Woodward, Perryton, and now
in the home office in Tyler, Texas.

21

22

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25

Q Mr. Montgomery, as part of your respon-
sibilities as an engineer for your company, have you made a
review of the application your company has filed for down-
hole commingling of the Gulf State No. 1-E Well in Lea Coun-
ty, New Mexico?

1 A Yes, I have.

2 Q And have you made a tabulation of exhi-
3 bits and information pursuant to the Division Rule 303-C?

4 A Yes, I have.

5 MR. KELLAHIN: At this point,
6 Mr. Examiner, we tender Mr. Montgomery as an expert petro-
7 leum engineer.

8 MR. STOGNER: Mr. Montgomery is
9 so qualified.

10 Q Let me direct your attention at this
11 point, Mr. Montgomery, to what is marked as Exhibit Number
12 One and before we explain the information in Exhibit Number
13 One, would you simply identify that for me?

14 A Yes.

15 Q Yes, sir, what is this?

16 A This is a compliance for application for
17 downhole commingling for the rules and regulations, I be-
18 lieve, 303-C.

19 Q And did you prepare this application for
20 the signature of Mr. Gayland Thompson?

21 A That's correct. Miss Gayland Thompson is
22 a production secretary.

23 Q I see. let's turn now to the plat that's
24 attached after the cover letter and using that plat as a re-
25 ference, would you locate as -- locate for us the spacing

1 unit and the section, township, and range in which this well
2 is located?

3 A Mewbourne Oil Company assigned rights,
4 southwest quarter, the northwest quarter, Section 36 in 20
5 South, 38 East, Lea County, New Mexico, from surface down to
6 7520 feet, and all the spacings of the four zones we intend
7 to try to get authorization to commingle are 40 acres; all
8 ownership from the surface down to that 7520 is the same.

9 Q Would you identify for the Examiner the
10 four formations for which you seek approval to downhole com-
11 mingle production?

12 A Those would be the Blinebry, Drinkard,
13 Tubb, and Abo.

14 Q Let's turn to Exhibit Number Two at this
15 point, Mr. Montgomery, and have you identify and describe
16 this exhibit.

17 A This is current production as of November
18 17th, the last three weeks, or so, to show stabilized pro-
19 duction of all four zones commingled after the load has been
20 recovered. As you can see, the well is averaging 9 barrels
21 of oil per day, 36 barrels of water, and 21 MCF per day.

22 Q Let's turn now, sir, to Exhibit Number
23 Three and have you identify this exhibit.

24 A This is a log section of the Gill (sic)
25 State No. 1. The tops shown on there are from our geolo-

1 gist. We do have Mr. Kautz tops picked from the Jerry Sex-
2 ton division that are very close to our tops here.

3 Q All right. Let's take a moment, sir, and
4 then have you identify Exhibit Number Four.

5 A That would be a letter from Jerry Sexton
6 explaining the procedure for the commingling, and listing
7 the New Mexico division, their tops from their division geo-
8 logist.

9 Q Let me have you take a moment and de-
10 scribe in a summary way the history of this particular well.

11 A We initially completed this well in
12 1972, I believe. We did perforate the Abo first, tested it,
13 tested marginal. Set a plug approximately 6800 feet, a cast
14 iron bridge plug, and moved up the hole and completed in the
15 Blinebry.

16 Since then we've produced something
17 40,000 barrels of oil and at this time the Blinebry alone is
18 a marginal and plugging candidate.

19 Q What is the current status of the well-
20 bore in terms of being perforated in all the formations?

21 A The current status is as shown on the
22 log. Some of the perforations I've shown on there are over-
23 all perforations in one of the -- in the first exhibit
24 there's a sundry notice that lists the exact perforations
25 and treatments. Right now the -- all perforations are open

1 and there's a pump set at approximately 7300 feet, pumping
2 oil from all four zones.

3 Q Would you describe for the Examiner what
4 your information is on bottom hole pressures for the various
5 zones?

6 A Our information is limited. We have done
7 some work on the bottom hole pressures for each zone based
8 on after acidizing treatments, initial fluid levels, and
9 shut-in tubing pressures. After those calculations were
10 made, they were included as part of Exhibit One.

11 Q Do you have an opinion as an engineer as
12 to whether or not there is a sufficient pressure
13 differential between any zone to cause fluids to migrate out
14 of one formation into another?

15 A No, there is no evidence of that
16 whatsoever.

17 Q Do you see any evidence of fluid
18 incompatibility among any of the zones to be commingled?

19 A No. There are no precits (sic) have
20 formed to date. We've had no trouble with anything of that
21 sort forming or -- all the API gravity, I believe, is
22 between 36 and 38. It's all similar production.

23 Q I notice from Exhibit Number Two that you
24 do produce some water with the oil production along with
25 some gas production.

1 Do you have an opinion as to what the
2 source of that water is, as to which formation produces the
3 water?

4 A I believe most of the water comes from
5 the initial -- the Blinebry, the zone that was initially
6 produced. Some extra water is coming from the other zones.

7 Q Does the water production cause you any
8 concern as an engineer in terms of its adverse impact, if
9 any, upon the commingled production?

10 A None whatsoever.

11 Q Your original application, Exhibit Number
12 One, sets forth a proposed allocation formula of, I believe,
13 25 percent --

14 A That's --

15 Q -- for each fo the four zones?

16 A That's correct.

17 Q Subsequent to presenting that application
18 have you had an opportunity to make further study of a pro-
19 posed allocation formula?

20 A We have. The well is only producing 9
21 barrels of oil per day, but after the production had stabi-
22 lized and we had gotten our load back, I did make an attempt
23 to better split up this production and as one of our exhi-
24 bits I'm showing that. I believe it's Exhibit Five.

25 Q All right, let's turn to Exhibit Five.

1 Yes, sir, you're correct.

2 Summarize for the Examiner what is the
3 basis upon which you have made this recommendation on allo-
4 cation of production?

5 A Well, as I said, it's averaging 9 barrels
6 of oil per day now. Previous to any of the other zones
7 being opened, the well was about 3 barrels of oil per day,
8 so consequently, that's the percentage we use for the Blin-
9 bry.

10 For the other three zones, they were
11 treated. Two of the zones were treated and swab tested to-
12 gether and the third was separate and after the treatment,
13 the swabbing, testing, it was felt that the Abo and the
14 Drinkard was the better zone, as indicated by logs and ini-
15 tially when we first drilled this well, so not a quantita-
16 tive but a qualitative measure led me to believe that -- to
17 use this percentages that show here on Exhibit Five.

18 Q Do you have an opinion as to whether it's
19 economically feasible at this time to separately production
20 test each of the zones?

21 A We don't feel it is, and with this the
22 type of production we're talking about, don't think it's
23 necessary.

24 Q Let me turn your attention now, Mr. Mont-
25 gomery, to Exhibit Number Six and have you identify and

1 describe that exhibit.

2 A This, I believe, is the economic evalua-
3 tion exhibit. It was made back in August when we were de-
4 ciding what to do with this well.

5 The well has had about seven pump changes
6 in six years and the production was falling off in the mid-
7 dle of '87 and it was felt that we need to change the pump
8 again.

9 Q Without going through the details of the
10 economic evaluation, what is your ultimate conclusion?

11 A The conclusion is that the Blinebry alone
12 would not support any more major expenditures and even a
13 pump change would be questionable at this time, and so ef-
14 forts were made by a geologist to find other reserves to
15 help to keep this well producing and deplete the Blinebry
16 and these other zones.

17 Q Will approval of this application in your
18 opinion allow the operator to prolong the economic life of
19 this well and to recover reserves that would not otherwise
20 be recovered?

21 A That is correct.

22 Q In the absence of approval of the down-
23 hole commingling, what, in your opinion, will the operator
24 have to do?

25 A We will plug the well.

1 Q Let me direct your attention now to the
2 package of notices that have been stapled together and form
3 Exhibit Number Seven.

4 A Uh-huh.

5 Q Have you notified and obtained waivers
6 from all offset operators that might be affected?

7 A We have notified all offset operators and
8 have obtained five out of six waivers to date. The sixth
9 one we have called and they just had not responded yet.

10 Q Except for the correspondence, Mr. Mont-
11 gomery, were Exhibits One through Six prepared by you or
12 compiled under your direction and supervision?

13 A That is correct.

14 MR. KELLAHIN: That concludes
15 my examination of Mr. Montgomery.

16 We move the introduction of Ex-
17 hibits One through Seven.

18 MR. STOGNER: Exhibits One
19 through Seven will be admitted into evidence at this time.

20
21 CROSS EXAMINATION

22 BY MR. STOGNER:

23 Q Mr. Montgomery, in researching out your
24 application I found that in some cases you were within a
25 mile of a certain pool; in particular, the Undesignated War-

1 ren Tubb Gas Pool.

2 A Uh-huh.

3 Q Do you anticipate that the Tubb zone is a
4 gas zone in your particular well?

5 A We feel that the Tubb zone is one of the
6 weaker zones in our well. It's questionable whether to per-
7 forate it or not, but it is the gaseous zone.

8 There's not much gas at all from all
9 zones. In fact, the Blinebry was producing some of that gas
10 originally. I believe I've got the GOR written down here
11 somewhere, but I don't feel that the gas from the Tubb zone
12 is of any great measure.

13 Q Okay. Now, what -- what is the Warren
14 Tubb Gas Pool proration unit sizes?

15 A All the proration unit sizes I found
16 would be 40 acres.

17 Q Okay, a gas pool in that part of the
18 world is 160 acres for that particular zone, and I believe
19 that was my next question, but let's cover the Blinebry
20 first.

21 Was this a Blinebry oil well or a gas
22 well?

23 A Blinebry oil well.

24 Q So that had 40-acre dedication.

25 A That's correct.

1 Q All right. As far as your lease out
2 there, how -- how large is your lease.

3 A It's 40 acres.

4 Q Okay, now if this is a 160-acre gas
5 proration unit, who owns the other 120 acres? Is that
6 common throughout?

7 A I believe it is. I'm not prepared to
8 tell you exactly at this time.

9 Q Because that will make a difference if --
10 if that is put into the Tubb Gas Pool. You may need to
11 request a nonstandard proration unit or submit me some
12 evidence showing that it's common throughout, and if it is
13 not, we'll have to cover that in the order.

14 A Okay. Let me tell you, I did look into
15 the oil proration schedules and found all these to be
16 40-acre spacing, and I'm aware you're talking about a gas
17 pool now, but I wasn't aware that that was covered under our
18 -- that was the Yates production we were talking about, and
19 I, like I say, it's the weakest zone out there. I don't
20 believe we're getting a whole lot of production from that
21 zone, from that interval.

22 Q Okay. Let's talk about the gas
23 production.

24 Now you give me a 35, 15/15 and 35 per-
25 cent split.

1 A Right.

2 Q Does that cover both gas and oil or --

3 A That really just covers the oil.

4 Q Okay. Do you have a knockout or a split
5 up of gas production?

6 A I don't have it at this time. We can --
7 we can definitely get something like that. I'm trying to
8 find -- I did have a gas/oil ratio for the Blinebry to see
9 what the Blinebry was producing.

10 Q Now, if you'd provide me with that evi-
11 dence subsequent to the hearing, so we can come up with some
12 sort of formulation between the gas zones, or the gas pro-
13 duction in this.

14 A That -- that could be done.

15 Q All right.

16 MR. KELLAHIN: Perhaps you'd
17 also, Mr. Examiner, give us an opportunity to re-examine
18 that Tubb zone to see whether or not it truly qualifies as a
19 gas well and it may turn out that it's an oil well in a gas
20 pool and we'd like to submit that information to you if it
21 becomes available.

22 MR. STOGNER: All right. We
23 will subsequent -- we will supplement the hearing with any
24 evidence you come up with --

25 MR. KELLAHIN: All right, sir.

1 MR. STOGNER: -- on those par-
2 ticular items.

3 A I do have -- I do have here, what I was
4 trying to find, the Blinebry was producing 3700 standard
5 cubic feet per barrel and it was down to 3, like I said, 3
6 or 4 barrels a day. That would be 11 MCF. That's almost
7 half of the production now between all four zones.

8 So this -- that will help me provide the
9 information you need, but I do have that much at this time.

10 Q Are any of the offsetting Drinkard or Abo
11 wells, are they producing any gas that you know of?

12 A Not that I'm aware of. I'm sure they're
13 producing some.

14 Q How long have you had this well essen-
15 tially perforated in all four zones?

16 A Since August or September, let's see what
17 the date is. We, at the time we talked to Jerry Sexton and
18 said that, go ahead with it and that we'd set up a hearing.
19 That would be August 26th that we began perforating other
20 zones.

21 Q So prior to that you were in contact with
22 Mr. Jerry Sexton on those zones.

23 A That's correct.

24 Q At that time did he mention anything or
25 did you all have any --

1 A No. I tried to feel him out on just what
2 to expect and nothing came up. He felt like because there
3 wre four zones it would take a hearing and -- but that be-
4 cause of the nature of the amount of the production that we
5 would probably have to work something out.

6 Q But did he specifically say anything
7 about the Tubb gas zone or did you all discuss that?

8 A No, he did not.

9 Q Okay. Do you know how the well was
10 actually completed out there?

11 A Yes, I do.

12 Q Okay. Is that production, do you know
13 the depth of the production string?

14 A Yes. Seat nipple is set at 7304 feet;
15 the total of the rods and pump, 7290 feet, set a the bottom
16 of the intervals.

17 Q And what size of production string is
18 that?

19 A That's 2-3/8ths, 4.7 pound mixed grade.

20 Q Okay, that's your tubing and how about
21 your casing?

22 A Casing? That's 4-1/2 inch casing, 11.6
23 pound, set at 7428.

24 Q So your whole interval is essentially
25 cased and being 4-1/2, that would make it impossible to dual

1 complete in any kind of a --

2 A That's correct.

3 MR. STOGNER: Are there any
4 other questions of this witness?

5 If there is none, Mr. Kellahin,
6 do you have anything further?

7 MR. KELLAHIN: No, sir.

8 MR. STOGNER: The witness may
9 be excused.

10 Mr. Kellahin, I'm going to
11 leave the record open on this case pending the supplemental
12 information that we talked about.

13 MR. KELLAHIN: Fine.

14 MR. STOGNER: And if there's
15 nothing further in this case, you may be excused.

16 MR. KELLAHIN: Thank you.

17

18 (Hearing concluded.)

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C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO
HEREBY CERTIFY 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. 9169,
heard by me on 2 December 1987.

Michael S. [Signature], Examiner
Oil Conservation Division