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BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO
November 1, 1972

EXAMINER HEARING

IN THE MATTER OF:

Application of Texaco Inc. for a unit
agreement, Lea County, New Mexico and
application of Texaco Inc. for a pressure
maintenance project and special rules
therefor, Lea County, New Mexico

Case No. 4851
and
Case No. 4852

BEFORE: ELVIS A. UTZ, EXAMINER

TRANSCRIPT OF HEARING

1 MR. UTZ: The Hearing will come to order, please.

2 Case No. 4851 - application of Texaco, Inc. for a
3 unit agreement, Lea County, New Mexico.

4 MR. KELLY: William Booker Kelly of White, Gilbert,
5 Koch & Kelly, Santa Fe, on behalf of the applicant.

6 Mr. Examiner, cases 4851 and 4852 are really
7 connected. We would ask that they be consolidated for
8 testimony purposes, but with separate orders.

9 MR. UTZ: Case 4852 is a related matter for
10 pressure maintenance project on the unit agreement, which
11 is covered and 4851, and they will be consolidated for
12 purposes of testimony, with separate orders.

13 KENNETH HARBIN SWORN TO TESTIFY ON HIS OATH AS
14 FOLLOWS:

15 DIRECT EXAMINATION BY MR. KELLY

16 Q Would you state your name, please?

17 A My name is Kenneth Harbin, I am employed by
18 Texaco Incorporated, Midland, Texas.

19 Q And what is your position with Texaco?

20 A Proration engineer.

21 Q Have you previously qualified as an expert
22 witness in that field before this Commission?

23 A I have not.

24 Q Would you give the examiner a brief summary of
25 your professional experience?

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1 A Yes, I received a Bachelor of Science Degree
2 in Petroleum Engineering at Texas Tech University
3 in 1962. I was employed by Texaco at that time.
4 I have held various engineering positions at West
5 Texas and New Mexico over the past ten years
6 involving reservoir engineering and in the field
7 of operations, and I am presently assigned as
8 proration engineer.

9 Q Then your experience covers the particular Vacuum
10 pool that we are discussing today?

11 A Yes sir, it does.

12 MR. KELLY: Are the witness's qualifications
13 acceptable?

14 MR. UTZ: Yes, they are.

15 MR. KELLY: All right, sir. Now, the two
16 applications for oil, 4851 and 4852, have been
17 condolidated.

18 Q Would you state what Texaco seeks by these
19 applications?

20 A Texaco is today making application to, first of all,
21 form a 1400-acre unit comprised of all of portions
22 of sections 1,2,11, and 12, Township 18 South,
23 Range 34 East, Lea County, New Mexico, for the
24 purpose of conducting secondary recovery operations
25 in the Vacuum of the Grayburg-San Andres pools.

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1 Secondly, we request permission to drill eight
2 injection wells, seven producing wells, at
3 unorthodox locations, in order to develop the unit
4 area, and, we further request that a full allowable
5 be granted for each well drilled effective upon
6 completion of that well.

7
8 We request approval to initiate a pressure
9 maintenance project in the Vacuum Grayburg-San
10 Andres reservoirs, and we request that Texaco be
11 granted a bonus allowable of 75% above the
12 projected allowable. We request permission to
13 continue the present commingling of separate lease
14 production into a common tank battery for leases
15 both inside and outside of the proposed unit.

16 And lastly, we request that we be authorized to
17 drill and/or convert additional wells in the
18 proposed unit area without notice of hearing,
19 subject to administrative approval by the
20 Commission.

21 Q Now, in that connection, are you requesting
22 by this application that the right to drill
23 additional wells be given prior to showing response?

24 A Yes.

25 Q Referring to your plat, would you explain the

1 various codes shown there to the Examiner, Exhibit
2 No. 1?

3 A Exhibit No. 1 shows a portion of the Vacuum
4 Grayburg-San Andres pool, and the other reservoirs
5 overlying, underlying it. The red border outlines
6 the proposed unit area. The symbol indicated by
7 the individual wells, the letter symbols, are
8 explained in the legend on down here and denotes
9 the completion reservoirs of various wells.

10 The one of interest is the designation shown as
11 "S" which we've used to denote a Vacuum Grayburg-
12 San Andres completion. Inside the unit area, you
13 will note wells denoted with red circles, these
14 are current Vacuum Grayburg-San Andres producing
15 wells.

16 The green circles are locations of proposed
17 producers to be drilled, and the yellow triangles
18 denote proposed injection wells to be drilled.

19 Q The plat also shows other secondary recovery
20 projects in the area, is that correct?

21 A Yes, it does. Adjoining the proposed unit to the
22 West is Texaco's West Vacuum Grayburg-San Andres
23 unit, and to the North, beginning approximately
24 one mile North of the proposed unit, is Mobile's,
25

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1 Bridges State water flood project.

2 Q Now, as far as ownership surrounding that
3 unit, does Texaco own the acreage surrounding it
4 except to the North?

5 A See, there are Phillips that borders the proposed
6 unit to the North, Shell on the Northeast corner,
7 Marathon on the Eastern edge, Humble and Sohio on
8 the Southeast portion and Amoco to the Southwest
9 corner.

10 Q And then Texaco would have the rest?

11 A That's correct.

12 Q Referring to what is marked Exhibit No. 2, would
13 you identify that?

14 A Exhibit 2 is the proposed unit agreement.

15 Q And can you state for the record the actual
16 description, the legal description of the acreage
17 contained in the unit?

18 A The unit will be comprised of all of Sections 1 and
19 2, the Northeast quarter of the Northeast quarter
20 of Section 11, the North half of the Northwest
21 quarter of Section 12, Township 18 South, Range 34
22 East, Lea County, New Mexico.

23 Q And what is the unitized formation?

24 A The unitized formation is the Grayburg-San Andres
25 interval. It's specified in the unit agreement on

1 Article 1.4, page 2.

2 Q And the purpose of this unit is for a secondary
3 recovery project?

4 A That's correct.

5 Q Now, is Texaco the only working interest owner and
6 operator of this unit?

7 A That is correct.

8 Q What is the land involved?

9 A All of the leases here are State owned leases,
10 various beneficiaries.

11 Q Now, referring to Exhibit 3, do you have tentative
12 approval from the State Land Office, subject only
13 to the Commission's action?

14 A That's true. Exhibit 3 is a letter from the
15 office of the Commissioner of Public Lands, indicat-
16 ing that they have approved the unit agreement as
17 to form and content, subject to approval by the
18 Commission.

19 Q Now, I assume this unit is basically similar
20 to other units that have been approved by the
21 Commission?

22 A That is correct.

23 MR. KELLY: Now, after the application in 4852,
24 Mr. Examiner, I would like to point out that the notice
25

1 contains two small errors which I don't feel are
2 jurisdictional in any sense, but we would like to correct
3 that.

4 It says by the injection of water through eight
5 wells at orthodox and unorthodox locations. Actually, all
6 the locations sought are unorthodox.

7 Further, it says that we seek to drill eight
8 producing wells. The applicant seeks seven producing wells.

9
10 MR. UTZ: I would consider the applications
11 basically correct, since we don't have a lawyer to argue with.

12 MR. KELLY: Well, it's alright.

13 Q Now, referring to Exhibit 4, which is a structure
14 map of the unit, would you give the Examiner the
15 history of this pool?

16 A Yes, Exhibit 4 is, incidentally, only outlines
17 a portion of the Vacuum Grayburg-San Andres pool,
18 but the Vacuum pool was discovered in May 1929,
19 with production being derived from both the lower
20 Grayburg limestone and the San Andres formation.
21 The field is located on a east-southwest
22 trending anti-cline at the end, which is located
23 on the southern edge of the Northwestern platform.
24 The southern flank of the structures dips steeply
25

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1 to the hole water contact.

2
3 In regard to the proposed secondary recovery area,
4 the heterogeneous carbon characteristics will be
5 illustrated by an exhibit to be presented in later
6 testimony. The Vacuum Grayburg-San Andres reservoir
7 within the proposed project area had an initial
8 reservoir pressure of minue 600 feet, 1638 p.s.i.,
9 with a saturation pressure of 1107 p.s.i. The
10 current reservoir pressure is 720 p.s.i. The field
11 is developed on standard 40 acres spacing. As of
12 August 1, 1972, 558 wells were producing from the
13 Vacuum Grayburg-San Andres pool. Depletion
14 varies throughout the field, from partial to
15 advanced stages.

16 During July of 1972 the field produced 454,069
17 barrels of oil and 185,721 barrels of water. The
18 average GOR was 1600 cubic feet per barrel of oil.
19 Cumulative time production to August 1, 1972, was
20 138,914,336 barrels of oil.

21 Q That's for the whole pool?

22 A That's correct.

23 Q Do you have anything for the unit, cumulative
24 production?

25 A Yes, cumulative production from the proposed unit

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- 1 area to 8/1/72 is 16,433,000 barrels.
- 2 Q How about water production, is there much water
- 3 production there?
- 4 A No, I do not have a cumulative water production
- 5 available, but water production in this proposed
- 6 unit area has been small.
- 7 Q Now, Exhibit No. 5 is pro-well production figures
- 8 in a unit, is that correct?
- 9 A That's correct. Exhibit 5 lists the wells
- 10 on the proposed unit area, with their current
- 11 allowable, and the current oil and water testing
- 12 with the corresponding GOR, gas-oil ratio.
- 13 Q And most of these wells are still making their
- 14 allowable?
- 15 A That's correct.
- 16 Q Now, as to your plan of operation here, would you,
- 17 referring back to Exhibit No. 1, show the Examiner
- 18 what Texaco feels to be the project area?
- 19 A Yes, back on Exhibit 1, which is the base map of
- 20 the area, you will note that inside the unit
- 21 boundary, we have penciled in a dashed line which
- 22 connects what we consider to be the outer most
- 23 wells in the project area.
- 24 Q And would you, referring to Exhibit No. 6, explain
- 25 that to the Examiner?

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1 A Exhibit No. 6 is a listing of the thirteen wells
2 that we propose to drill. The first seven wells
3 listed are the wells that we proposed to drill
4 as producing wells; and we have listed the lease
5 and well number, the actual footage locations, and
6 the Section, Township, and Range, and following
7 that we have listed similar information for the
8 proposed injection wells.

9 Q Now, this is only for the wells that you plan to
10 drill?

11 A That is correct.

12 Q Now, about your designation for the existing wells?

13 A We plan to continue to present well numbering
14 system and designation that we have at this time.

15 Q Are your present producing facilities for the
16 various leases in the unit consolidated at a central
17 point?

18 A Yes, they are. We have a consolidated battery
19 located on our State "S" lease which is in the north-
20 west corner of the unit area. We consolidate
21 production from each of the leases in the unit area
22 as well as other leases outside the unit area. The
23 production is metered, of course, prior to leaving
24 the individual leases, and we plan to, with the
25 Commission's approval, continue this practice of

1 commingling this production.

2 Q All right, now, go ahead and explain the plan of
3 the project.

4 A I think it could best be seen on the Exhibit 1, the
5 base map.

6 By drilling these proposed injection wells and
7 producing wells, we will develop an inverted 9-spot
8 injection pattern within what we have designated
9 as a project area, and this will, in effect, be
10 developing this acreage on 20 acre spacing as
11 opposed to the current 40 acre spacing.

12 Q All right. Now, as to your injection procedures,
13 referring to Exhibit 7, is that sketch typical of
14 the installation that you will use for all your
15 injection wells?

16 A Yes sir. That is correct. Of course, since we
17 plan to drill all of our injection wells, this is
18 the proposed installation. This particular one is
19 what we proposed to install in our New Mexico R
20 State N.C.T. 3, Well No. 20; but it is typical
21 of the similar installations that will be used on
22 the other seven wells.

23 We plan to drill and complete this well, these
24 eight wells, I should say, using 8 and 5/8
25 surface casing at approximately 350 feet, cemented

1 with 210 sacks cement, which should be sufficient.
2 We will then install 4 and 1/2 inch production
3 casing at approximately 4710 feet, cemented, with
4 650 sacks. We estimate the top of the cement to be
5 at 2,000 feet. We will then use 2 and 3/8 inch
6 plastic coated tubing with a packer, the packer
7 being set above the pay interval at approximately
8 4360 feet. We will load the casing tubing
9 annulus with inhibited water. Injection interval
10 will be approximately from 4460 to 4710 feet.
11 This exact interval, of course, could vary
12 between the various wells.

13 Q The figures that you gave would be the range of
14 all the wells, or just this particular well?

15 A That will be the range. I might add, too, that
16 we will install a pressure gauge on the tubing
17 and on the casing annulus.

18 Q Can you give the Examiner what you contemplate as
19 far as injection rates and pressure?

20 A Well, we anticipate an injection rate of about
21 1500 barrels of water per day, per well, at a
22 pressure of 2,000 p.s.i.

23 Q Do you think you will have any problem in
24 injecting that volume with that pressure in this
25 pool?

- 1 A No, we do not.
- 2 Q Do you anticipate any corrosion problems?
- 3 A No, we will be using fresh water and we are taking
4 care in using inhibited water in the annulus,
5 and plastic coating tubing to prevent corrosion.
- 6 Q Does Texaco have what they consider an adequate
7 water supply for the project area and for any
8 expansion within the limits of the unit?
- 9 A Yes, the water rights which we have will be
10 sufficient for the current project area and any
11 expansion up to the unit area.
- 12 Q In your opinion, will the installation you have
13 shown on Exhibit 7 prevent migration of fluids
14 to any other zone?
- 15 A Yes, it will.
- 16 Q Now, let's go to the unorthodox aspect of this
17 period. What is unorthodox about the locations
18 of these wells?
- 19 A In order to develop the space in which we have
20 outlined, the proposed wells to be drilled
21 will fall at less than 330 feet from the border
22 section rights.
- 23 Q What is the reason that Texaco plans to drill all
24 these additional wells rather than using your
25 existing pattern for a project?

1 A It's Texaco's opinion that these additional wells
2 are needed to recover additional secondary oil
3 that is not recoverable under present spacing.
4 We've conducted a study of the proposed unit area,
5 which indicates that the pay in the reservoir is
6 laterally discontinuous.

7 Q That's Exhibit No. 8?

8 A That's correct.

9 Q Go ahead and show that to the Examiner.

10 A Exhibit No. 8 is a schematic representation
11 of the pay discontinuity which we have determined
12 from our study, and the results of our study
13 indicates that only about 60% of the actual pay
14 interval is continuous between more than two wells.

15 Utilizing the present spacing would result in a
16 portion of this porous interval not being opened
17 to injection, and we anticipate by in-field
18 drilling on the 20 acre spacing, we will reduce
19 the unflooded pay by approximately half. Of
20 course, another benefit which can be derived from
21 the drilling of these injections wells lies
22 in the fact that most of the present wells are
23 open hole completions, and by drilling in the
24 casing through the proposed injection interval
25

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1 and our injection wells, we will be able to
2 complete them in such a way as to control the
3 actual intervals of injection.

4 Q Now, has Texaco's experience with that adjoining
5 waterflood, does that support your conclusion
6 that a more dense pattern would be more effective?

7 A Yes, it does. That West Vacuum unit, which adjoins
8 us here on the west, was initially developed as
9 a double inverted 9-spot pay lot. We initiated
10 this project about 1965, and we did obtain
11 response with that pattern, but the response was
12 slow.

13 We have recently, earlier this year, developed and
14 expanded the injection pattern in the west Vacuum
15 unit to a 5-spot pattern in order to accelerate
16 response, and we feel that by developing this on
17 even denser spacing, we will recover additional
18 reserves, that we could not recover otherwise.

19 Q You mentioned that Texaco's studies support the
20 conclusion that you've shown on Exhibit 8.

21 Referring to Exhibit 9, would you give the
22 Examiner some of the information that supports
23 this conclusion?
24

25 Q Exhibit 9 is an actual log cross section, from which

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1 the schematic diagram on Exhibit 8 was derived.

2 Q Before we get into the discussion of what it

3 shows, let's locate, using your structure map,

4 Exhibit 4 of the wells, that are on your cross

5 section.

6 A I think probably the structure map would be the

7 best, that's Exhibit 4, I believe.

8

9 The cross section begins actually on just

10 outside of the northern boundary of the project

11 area on Texaco's "O" tract one, well number 8. It

12 extends southward down to the second location

13 which is the "M" number 4. It then goes east

14 to the "M" number 1, goes further east to the

15 "L" number 1, on east to "L" number 3, and then

16 north again to "L" number 2.

17 Q Now, the cross section doesn't cover the whole

18 unit. Did Texaco use all of the available logs?

19 A That is correct. In order to develop a cross

20 section, I had the continuous pay, as we've

21 tried to do, we denote porosity logs, we have

22 other logs across the area which are old electric

23 logs, and they are not really satisfactory for our

24 purposes.

25 Q In your opinion, though, is the conclusion shown

1 on Exhibit 8 indication for the whole unit, rather
2 than just the area covered by the cross section?

3 A And it might explain just a little further here,
4 that Exhibit No. 9 here does indicate that the
5 porous intervals are not continuous across the
6 field, they are continuous, maybe, for one, two,
7 or three wells, but as far as being consistently
8 continuous laterally, across the field, the are
9 not.

10 Q Now, do you have any other evidence that you can
11 give the Examiner as far as other studies
12 of this nature in this pool?

13 A Yes, I might refer to a previous case, it was
14 Case No. 4368 in September 17, 1970, which was
15 a De Novo hearing involving Mobile Oil
16 Corporation, and their Bridges State waterflood
17 project for the north.

18 They presented in their testimony Exhibit No. 11,
19 which was a cross section that began just to the
20 North of our proposed unit area, and continued
21 in a northerly line for approximately 4 miles,
22 and their cross section essentially indicates the
23 same type of pay discontinuity that we have
24 represented here on our cross section.
25

1 Q All right. What do you predict the performance
2 of this pressure maintenance project will be?

3 A The project area, I again will refer to Exhibit
4 No. 1, which outlines the project area, will
5 recover a total of \$14,660,000 barrels full of
6 secondary oil. Of this amount, 2,349,000 barrels
7 are directly attributable to the in-field drilling
8 program.

9
10 Current production from the proposed project
11 area is 1650 barrels per day from 24 wells.
12 Upon completion of the frill program, production
13 will be increased by an anticipated 1120 barrels
14 per day. The project will achieve a peak
15 producing rate of 5460 barrels per day for 39
16 wells; that's 24 existing wells, plus the
17 16 proposed wells. Ultimate primary recovery
18 from the wells within the initial project area
19 will be 16,654,000 barrels of oil; cumulative
20 recovery is 10,875,000 barrels, which indicates
21 that it is approximately 65% depleted at this time.

22 Q Now, these figures assume that the Commission
23 grants you the authority to in-field drill and also
24 grants you the authority for the bonus allowable,
25 is that correct.

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1 A That's correct.

2 Q Well, let's go into this bonus allowable. What
3 is the reason that Texaco feels it is crucial
4 to have this extra allowable?

5 A In our opinion, the bonus allowable is necessary to
6 prevent waste of oil reserves and to insure
7 the most efficient recovery of oil from the
8 reservoir, and I would refer you, again, to
9 Exhibits 8 and 9 which indicate that the pay
10 continuity in this portion of the reservoir
11 is in the ratio of 60% continuous, the total
12 pay period.

13 You can visualize, I think, from Exhibit No. 9,
14 that because of the heterogeneity of the
15 reservoirs, as the flood front in any of the
16 pattern of this reservoir fronts, from an injection
17 well to a producing well, that any response oil
18 that is not produced as it reaches the wellbore
19 will continue on past the producing well, and a
20 portion of it will enter into discontinuous
21 pay, which has been completed under primary
22 production but is not continuous to another
23 producing well. As the flood front then continues,
24 a portion of this trapped oil will be permanently
25

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1 trapped, due to the arrival of the flood front at
2 the producing well.

3 We estimate this loss to be in order of 1 million
4 barrels. This is a conservative estimate and
5 could be considerably more than that. We considered
6 one alternative of handling this problem, that
7 would be to limit injection rates in order to
8 limit the amount of response. However, by limiting
9 injection rates, this will have a detrimental
10 effect upon the injection profile due to the
11 same heterogeneity of the pay interval.

12 Under curtailed injection rates, the injection
13 profile would be altered and water would not enter
14 all of the zones that we desire to flood, resulting
15 in poor sweep efficiency. Maximum recovery, then,
16 is dependent upon maintaining optimum injection
17 rates. The only way to optimize injection rates
18 and vertical sweep efficiency, and at the same
19 time, to limit the loss of the reserves to discon-
20 tinuous pay, is to have the ability to produce all
21 of the response oil as it comes to the producing
22 wellbore. To do this requires a bonus allowable
23 of 75% above the project allowable.

24 Q Now, do you feel that there is an advantage as far
25 as ultimate recovery, to institute a pressure

1 maintenance project now, rather than wait for
2 these wells to be depleted and then go into a
3 waterflood?

4 A Definitely, there is. By flooding the reservoir at
5 this higher pressure, at this present time,
6 secondary recovery will be increased 2,400,000
7 barrels, and this additional recovery is due to
8 the fact that at a higher performance, volume
9 factor, there will be fewer stock tank barrels
10 of oil left behind as residual oil.

11 Q So, what you are saying here, is that the granting
12 of this application in it's complete form will
13 save an estimated 2,400,000 barrels of oil that
14 would not be recovered; or are you just saying
15 that it would be delayed?

16 A That it would not be recovered.

17 Q So, I assume that 75% bonus allowable represents
18 your engineering estimate, or decision, of what
19 is necessary to produce this unit most efficiently
20 and that basically you are seeking the right to
21 produce all the oil that responds to your
22 pressure maintenance project, is that correct?

23 A That's correct.

24 MR. KELLY: Mr. Examiner, we would point out that
25 Texaco feels that under the 701D2, the Commission

1 certainly has the authority to set what ever
2 allowables on a case by case basis. The
3 fresh maintenance project should have, and we
4 would, we feel there is no legal problem as far as
5 Commission granting this type of application and
6 that the evidence supports that it would certainly
7 support the conclusion that it would prevent
8 waste.

9 BY-MR. KELLY:

10 Q If the application were granted, and you were able
11 to produce this additional oil, you would probably
12 have additional casing head gas. Can you guarantee
13 to the Commission that you would have a purchaser
14 for both?

15 A Yes, we have contacted Texas-New Mexico Pipe Line,
16 and Phillips Gas Pipe Lines, and we have a written
17 indication from each of them that they will be
18 able to handle the increased oil and casing head
19 gas production.

20 Q Now, in your opinion, would this granting of these
21 two applications prevent waste by allowing you to
22 recover substantial amounts that would otherwise
23 be lost, and also protect the correlative rights
24 of off set operators in the area?

25 A Definitely, it would.

1 Q Were Exhibits 1 and Exhibits 4 through 9 prepared
2 by you or under your supervision?

3 A They were.

4 Q And Exhibit 2 is a conformed copy of the unit
5 agreement?

6 A It is.

7 Q And Exhibit 3 is a copy of the land office's appro-
8 val?

9 A Right.

10 MR. KELLY: I would move at this time the
11 introduction of Exhibit's 1 through 9.

12 MR. UTZ: Without objection, Exhibit's 1 through 9
13 will be entered into this case.

14 MR. KELLY: We have no further direct testimony.

15 CROSS EXAMINATION BY MR. UTZ:

16 Q In referring to the project area, don't we consider
17 the off-sets and diagonal off-sets as a part of
18 the project area, that is to injection wells?

19 A As I recall, the waterflood projects are spelled
20 out that way. I think pressure maintenance are
21 not specifically spelled out, but historically,
22 that's the way they've been interpreted.

23 Q What are you asking for, now, you are asking for
24 the project area to be the area outlined in pencil
25 on Exhibit 1, or the unit?

- 1 A The project area that, really, this was in
2 anticipation of what would be granted, it's the
3 penciled, outlined area.
- 4 Q I'm sure Texaco would have no objections if the
5 Commission were to grant the project area as the
6 unit area.
- 7 A It would certainly be to our benefit, of course, to
8 have the entire unit area designated as a project
9 area. But since there were no specific guidelines
10 here for the pressure maintenance project, like I
11 say, this is what we anticipated.
- 12 Q Well, in your opinion, were the wells outside
13 or beyond and to the outside of the project wells,
14 injection wells, receive any benefit from your
15 injection?
- 16 A Possibly, but that's something we could not
17 demonstrate..
- 18 Q And, what you are telling me here is that the new
19 depth factor allowables for the area outlined by
20 pencil on your Exhibit 1 will not be such to
21 handle the oil produced?
- 22 A That's correct.
- 23 Q And that increased by 75%?
- 24 A Right.
- 25 Q Now, if the Commission should decide to allow

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1 you the unit area as your project area, how would
2 that effect your production?

3 A I would have to do a little calculating there to
4 see if that would be sufficient.

5 Q You would have quite a few additional wells,
6 wouldn't you?

7 A That would entail 35 existing wells, and 15
8 proposed wells, so that's 50 at 80 barrels a day
9 that's 4,000, and we anticipate a peak producing
10 rate here of 5460 barrels per day. So that
11 allowable still would not be adequate to handle
12 all the response oil that we anticipate.

13 Q How many producing wells will you have in the
14 unit there?

15 A There are 35 existing wells, and we are going to
16 drill seven more.

17 Q Being 45 wells?

18 A Yes.

19 Q And what is the depth factor allowable?

20 A Eighty--3,600 barrels.

21 Q So even then you would need an increase in ratio--
22 increase by a ratio of 3600 to 5460?

23 A That's correct.

24 Q Okay, would you clarify for me as to how you are
25 commingling now?

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1 A Yes, we have one central battery located on our
2 SE tract 1 lease, that is in the Northwest portion
3 of the unit. Production from each of these
4 individual leases in the unit area and other
5 leases outside the unit area even, for example, our
6 S lease which is to the North there is one,
7 production is metered continuously on these
8 individual leases and then transported down to the
9 central battery and commingled at that point.
10 Q Now, how would the oil produced from the unit area
11 be handled? Would that be considered one lease?
12 A We plan to continue metering production from the
13 separate tracts.
14 Q From each separate lease?
15 A Yes.
16 Q Now, referring to Exhibit 6, all your producing
17 wells, as I understand, are on location?
18 A Yes.
19 Q And how about the ones with edges, are they on
20 standard location?
21 A Yes.
22 Q So everything is on standard?
23 A Yes sir.
24 Q And to the best of your knowledge, these are the
25 locations which you intend to drill, is that right?

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- 1 A That's right.
- 2 Q So, in addition to that, you are asking, are you
- 3 not, for administrative approval of any other
- 4 standard and non-standard locations?
- 5 A That's correct.
- 6 Q For producing and injection wells?
- 7 A Yes sir. I might add here, too, that we do
- 8 anticipate expanding this project area, maybe
- 9 at a later date, of course, depending upon the
- 10 performance of the initial project area by
- 11 drilling additional injection and producing wells,
- 12 extending it out to the unit battery. At that
- 13 time, of course, we would either have a cooperative
- 14 agreement with the other off-set operators, or,
- 15 if it's possible, we might attempt to expand the
- 16 unit boundary intself at that time. But one
- 17 way of the other, we would include the off-set
- 18 operators, cooperate with them.
- 19 Q Now, it would be under the present conditions,
- 20 it's your intention of producing more than a depth
- 21 factor allowable from the outside wells, or wells
- 22 adjoining the boundries of the unit?
- 23 A Only insofar as they are also in the project area.
- 24 Q Well, Well number 4 and number 4 on the westside
- 25 of the unit would qualify for that, would they not?

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- 1 A Yes.
- 2 Q As well as number 7-5 and 2-2?
- 3 A Yes.
- 4 Q Now, what difficulty would you encounter in
- 5 limiting those wells to one depth factor allowable?
- 6 A It's possible that one problem that would be
- 7 involved in this would be that since we are
- 8 injecting back to the interior of the project area,
- 9 that if we were not able to produce these wells
- 10 at a sufficient rate to recover all the response
- 11 oil, we could push oil from the unitized area to
- 12 the leases outside of the unit area.
- 13 Q Well, we have a proposal by Phillips and we may
- 14 as well consider that because at this point, and
- 15 on the record, that you be limited to these wells
- 16 or to the allowable for these wells to one depth
- 17 factor allowable. Now, as I peruse your map here,
- 18 is Phillips involved in only Section 35 to the
- 19 north of the unit?
- 20 A That's right.
- 21 Q And under the project rules you proposed here,
- 22 they would not be effected?
- 23 A That's right.
- 24 MR. UTZ: Are there any other questions of the
- 25 witness?

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REDIRECT EXAMINATION BY MR. KELLY:

Q Referring back to Exhibit No. 5, in answer to the Examiner's question, the wells in the project area, what are their current allowables now, on the outside boundary?

A By and large they are top allowable wells at the present time.

Q So, if they were limited, you wouldn't be able to produce any response oil?

A That's correct.

Q And you did inform all off-set operators of this application, is that correct.

A Yes, they received a copy of our application.

MR. KELLY: I have nothing further.

MR. UTZ: The witness may be excused.

Are there statements in the case?

(No response)

MR. UTZ: The Commission has a letter from Phillips Petroleum which I will read their proposal into the record. Did you receive a copy of this?

MR. KELLY: Yes, we did.

MR. UTZ: Well, in fact, it requests that a rule

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be incorporated in the order to limit any directly or diagonally off-set wells to the outside boundary of the unit to one depth factor allowable.

We have discussed this in the record, which ought to be sufficient.

The cases will be taken under advisement and the hearing is adjourned.

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STATE OF NEW MEXICO)
) SS
COUNTY OF BERNALILLO)

I, JOHN DE LA ROSA, A Certified Shorthand Reporter,
do hereby certify that the foregoing and attached Transcript
of Hearing before the New Mexico Oil Conservation Commission
was reported by me; and that the same is a true and correct
record of the said proceedings, to the best of my knowledge,
skill and ability.

John De La Rosa

[Faint, illegible text and signatures at the bottom of the page]