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I N D E X

JOE L. JOHNSON, JR.

Direct Examination by Mr. Hunker	4
Cross Examination by Mr. Nutter	12
Redirect Examination by Mr. Hunker	13
Recross Examination by Mr. Nutter	14
Cross Examination by Mr. Padilla	17

E X H I B I T S

Applicant Exhibit One, Plat	5
Applicant Exhibit Two, Unit Agreement	6
Applicant Exhibit Three, Plat	8
Applicant Exhibit Four, Diagrammatic Sketches	8
Applicant Exhibit Five, Summary	9
Applicant Exhibit Six, Diagrammatic Sketches	11

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2 MR. NUTTER: Call next Case Number 7201.

3 MR. PADILLA: Application of Layton  
4 Enterprises, Inc., for a unit agreement, Roosevelt County,  
5 New Mexico.

6 MR. HUNKER: Mr. Examiner, I'm George  
7 H. Hunker, Junior, Roswell, New Mexico. I represent Layton  
8 Enterprises, Inc., in connection with Case Number 7201, which  
9 is an application for approval of a unit agreement.

10 I also represent Layton Enterprises in  
11 connection with the waterflood project, which is a necessary  
12 adjunct to the unit agreement, and I ask that you permit us  
13 to put on our testimony in this matter in a consolidated  
14 fashion.

15 MR. NUTTER: We will now call Case Number  
16 7202.

17 MR. PADILLA: Application of Layton  
18 Enterprises, Inc., for a waterflood project, Roosevelt County,  
19 New Mexico.

20 MR. NUTTER: Do you have any other wit-  
21 nesses, Mr. Hunker?

22 MR. HUNKER: No.

23  
24 (Witness sworn.)  
25

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2  
3 JOE L. JOHNSON, JR.

4 being called as a witness and being duly sworn upon his oath,  
5 testified as follows, to-wit:  
6

7 DIRECT EXAMINATION

8 BY MR. HUNKER:

9 Q For the record will you give the Examiner  
10 your name, address, and occupation?

11 A My name is Joe L. Johnson, Junior. I'm  
12 a petroleum engineer with Stevens Engineering, Wichita Falls.

13 Q Have you prepared engineering studies  
14 of the Todd Lower San Andres Field?

15 A Yes, sir, I have.

16 Q Did you do this on behalf of Layton  
17 Enterprises, Inc.?

18 A Yes, I have.

19 Q How long have you been working on this  
20 project, Mr. Johnson?

21 A Total time about eight years.

22 Q Are you familiar with the applications  
23 that have been filed in these cases by Layton for approval of  
24 unitization and for approval of the waterflood project?

25 A Yes, I am.

1  
2 Q Have you previously testified before  
3 the Commission and had your qualifications made a matter of  
4 record and found to be acceptable?

5 A Yes, they are.

6 MR. HUNKER: Are the witness' qualifica-  
7 tions acceptable?

8 MR. NUTTER: Yes, they are.

9 Q You've prepared certain exhibits. I'd  
10 like for you to turn first to Exhibit Number One and tell the  
11 Examiner what that exhibit is.

12 A Exhibit Number One is a map indicating  
13 the area covered and contained within the proposed Todd Lower  
14 San Andres Unit.

15 Q How many acres are involved in this unit?

16 A 3,255.

17 Q And what part of the acreage is Federal?

18 A Approximately 34 percent.

19 Q What part is State?

20 A 65, 66 percent.

21 Q Does the area that you have depicted on  
22 this exhibit include all of the wells that are producible from  
23 the Todd Lower San Andres formation?

24 A Yes, they do.

25 Q Looking further to the exhibit that's

1  
2 been marked Number Two, will you tell the Examiner what that  
3 exhibit is?

4 A. Exhibit Two is a unit agreement of the  
5 proposed Todd Lower San Andres Unit.

6 Q. Turn to page two of that agreement and  
7 explain the formation that is to be unitized.

8 A. The unitized formation is described under  
9 (h) of Section 2, and it is -- reads as follows: Commonly  
10 known as the Lower San Andres formation and which is the same  
11 formation that was encountered between the logged depths of  
12 4235 feet subsea elevation minus 84 foot and 4286 foot subsea  
13 elevation minus 135 in the Franklin Astin FAir, Incorporated,  
14 Bough State Well No. 1.

15 Q. Turn to page seven of the unit agreement  
16 and describe the tract participation formula.

17 A. Tract participation formula consists  
18 of four parts. A 70 percent weight is given to ultimate  
19 primary as a percentage of the primary in the entire field;  
20 10 percent weight is given to the cumulative primary produced  
21 by each tract as of January 1, 1979, as to the summation of  
22 the cumulative primary of the -- all tracts; 10 percent weight  
23 is given to the ratio of barrels of remaining oil for each  
24 tract as of January 1, 1979, to the summation; and 10 percent  
25 is given to the ratio of current production rate from each

1  
2 tract during the calendar year 1978 to the summation of the  
3 production rate from all tracts during the calendar year of  
4 '78.

5 Q Why was a single stage formula used in  
6 connection with this unit?

7 A It was felt that it was -- would be --  
8 since the primary was virtually gone from this property, there's  
9 very little remaining primary, that it would be a fair method  
10 in which to handle the investment, et cetera.

11 Q What is the status of the producing wells  
12 in the field at the present time?

13 A At the present time the field is pro-  
14 ducing approximately 100 barrels to 120 barrels a day, or  
15 about two to three barrels of oil per well.

16 Q They're stripper wells, in other words?

17 A Yes, sir.

18 Q And it's in the final stages of depletion  
19 as far as the primary is concerned, is that correct?

20 A That is correct.

21 Q In your opinion, Mr. Johnson, will the  
22 formula protect the correlative rights of royalty owners as  
23 well as the working interest owners?

24 A Yes, it will.

25 Q If the agreement is approved, is it your

1  
2 opinion that such approval will be in the interest of conser-  
3 vation and the protection of -- and the prevention of waste?

4 A. Yes, sir, it will.

5 Q. In connection with Case Number 7202,  
6 the waterflood case, explain what Layton expects to accomplish  
7 by the waterflood project.

8 A. We anticipate initially starting with  
9 a pilot project utilizing four injection wells and then based  
10 on the performance of these four wells expanding the project  
11 in approximately one to two years.

12 Anticipated recovery in the way of  
13 secondary recovery would be in the vicinity of 1-1/2 to 2  
14 million barrels of oil.

15 Q. Referring to Exhibit Number Three, will  
16 you explain what that exhibit shows?

17 A. Exhibit Three indicates the wells that  
18 we anticipate using as injection wells to start with.

19 Q. And how are they identified?

20 A. They're identified with a triangle around  
21 each of the wells.

22 Q. And the circled wells, does that mean  
23 anything?

24 A. No, sir.

25 Q. Turning to Exhibit Four, which is in four



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parts, Four A, B, C, and D, will you tell the Examiner what those refer to or demonstrate?

A. These are diagrammatic sketches of wells that have been plugged and abandoned in the general vicinity of a half mile of each injection well.

Q. Where did you obtain the information for these exhibits?

A. We obtained it from the State files.

Q. Now, referring to --

MR. NUTTER: Well, before you get off those, Mr. Johnson, on these exhibits I don't see any identification of the location of them. Would you point out the location so I could get them in the record?

MR. HUNKER: It will be shown, if the Examiner please, on the tabular summary which, I think, is the next exhibit.

MR. NUTTER: Okay.

Q. Is that correct, Mr. --

A. Yes.

MR. NUTTER: Okay, go ahead.

Q. Referring to Exhibit Number Five, Mr. Johnson, will you tell the Examiner what that exhibit shows?

A. Exhibit Five is a tabular summary of all wells within 1/2 mile of the injection wells.

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Q Are the four plugged and abandoned wells shown in that exhibit also?

A Yes, sir.

Q Are they marked with an asterisk?

A Yes, sir.

Q And is the location of those wells shown on the exhibit?

A Yes, sir, that's the first column.

Q Now what does this tabular summary show, Mr. Johnson?

A The tabular summary indicates the location of the wells, the surface casing used, the amount, as well as the amount of cement used, the top of the cement. It also indicates production casing that was run, the size of that casing, the depth at which it was set, cement used on that cementing job, the top of the cement, total depth of the well, the producing interval, and any data concerning plugged and abandoned wells, such as plugs, sacks of cement, depth.

Q All right. Where did you obtain that information?

A Also from the State files.

Q That's your Exhibit Number Five, is that correct?

A That is correct.

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2 Q Referring to Exhibit Number Six, which  
3 is in four parts, A, B, C, and D, will you explain to the  
4 Examiner what that exhibit shows?

5 A These are diagrammatic sketches of the  
6 planned injection wells for the project and the planned method  
7 in which these wells will be completed, for injection purposes.

8 Q Are these typical of waterflood projects,  
9 Mr. Johnson?

10 A Yes, they are.

11 Q Are they self-explanatory?

12 A Yes, sir.

13 Q And they also indicate the precise loca-  
14 tion of the four wells that are going to be used for injection  
15 purposes in the pilot flood, is that correct?

16 A Yes, sir, they do identify that.

17 Q In your opinion will the approval of  
18 the waterflood project be in the interest of conservation and  
19 the prevention of waste?

20 A Yes, sir, it will.

21 Q Will correlative rights be protected?

22 A Yes, sir.

23 Q Have you anything further that you'd  
24 like to add to your testimony?

25 A No, sir.

1  
2 MR. HUNKER: I'd like to offer at this  
3 time Exhibits One through Six on behalf of the applicant.

4 MR. NUTTER: Exhibits One through Six  
5 will be entered into the record of Cases 7201 and 7202.

6  
7 CROSS EXAMINATION

8 BY MR. NUTTER:

9 Q Now, Mr. Johnson, on your Exhibit Number  
10 Five you show the surface pipe that has been run in each of  
11 these wells in the area and it looks like it probably averages  
12 anywhere to 272 feet to 363 feet, somewhere in that neighbor-  
13 hood.

14 What is the depth of the fresh water in  
15 the area, do you know?

16 A No, sir, I'm not positive of that.  
17 There is very little fresh water in this general vicinity but  
18 I would assume it would be more in the vicinity of 200 or less.

19 Q Yeah, well, I would imagine so, just  
20 looking at the surface pipe.

21 A Uh-huh.

22 Q It's probably set below the surface  
23 water, but you don't know exactly?

24 A No, sir, I don't. There are a few  
25 few windmills out there but I don't know how deep they are.

1  
2 Q Now, cement has been circulated to the  
3 surface on each one of these surface strings, is that correct?

4 A That is correct.

5 Q And then for the four wells within a  
6 half mile of the injection wells, which has been plugged, you  
7 show the location of those plugs on your Exhibit Four A through  
8 Four D, and you've also indicated on Exhibit Five the location  
9 of those plugs, is that correct?

10 A That is correct.

11 MR. HUNKER: I have one or two other  
12 questions.

13 MR. NUTTER: Okay, Mr. Hunker.

14  
15 REDIRECT EXAMINATION

16 BY MR. HUNKER:

17 Q Have you made recommendations to the  
18 operator regarding pressures and the volume of fluid to be  
19 injected?

20 A Yes, sir, we have.

21 Q What do you recommend at this particular  
22 time?

23 A We're anticipating approximately 200  
24 barrels a day per injection well as an initial point of  
25 starting; a maximum pressure in the vicinity of 800 to 900

1  
2 pounds.

3 Q Will care be taken by the operator to  
4 insure that the water enters only the proposed injection in-  
5 terval and not permit it to escape?

6 A Yes, sir.

7 Q Are you requesting on behalf of operator  
8 that administrative procedures be adopted whereby the operator  
9 can obtain approval administratively for additional producing  
10 and injection wells at both orthodox and unorthodox locations?

11 A Yes, sir.

12 MR. HUNKER: I have nothing further, Mr.  
13 Nutter.

14  
15 RE-CROSS EXAMINATION

16 BY MR. NUTTER:

17 Q Mr. Johnson, your proposed injection  
18 pressure would be between 800 and 900 pounds. Now the Divi-  
19 sion's rule of thumb for limiting of injection pressures in  
20 the absence of information to the contrary would be 0.2 of  
21 a pound per foot of depth to the uppermost perforation.

22 On Exhibit Six C, is -- I can't tell  
23 exactly what that upper perforation is. Is that 4080 or 4282  
24 or just what is that?

25 A That's 4282.

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Q Okay, the most shallow of the injection zones, then, would be on Exhibit Six A, which is 4240.

A. Yes, sir.

Q And that rule of thumb that I mentioned would be 0.2 of a pound, or 848 pounds --

A. That's correct.

Q --per square inch. Is that a suitable maximum for your present plans?

A. We think it would be, yes, sir.

Q Okay. Now, I see these injection wells are equipped with tubing and packer and the annulus, I presume, would be loaded with an inhibitive fluid?

A. Yes, sir.

Q And equipped with pressure gauge or other device at the surface to indicate whether there's a leak in tubing, packer, or casing?

A. That is correct.

Q Now, looking at the unit boundary as depicted on Exhibit One, and looking at the map showing the location of the wells on Exhibit Number Three, I don't see the unit boundary on here, but the unit boundary is spread out in such a manner that all of these producing wells shown on Exhibit Three are included in the unit area?

A. Yes, sir, you need to take note now to

1  
2 the northwest there are several gas wells, you'll notice,  
3 which are producing from a different interval of the San Andres.  
4 They are not included in the unit. Only the oil producing  
5 wells are the ones that are brought into the unit area.

6 Q Okay. Now how about the -- there are  
7 some oil wells, or there is an oil well in the southwest of  
8 the northwest of Section 26. Is that producing from another  
9 pool?

10 A 26, yes, sir. I believe that well is  
11 plugged now.

12 Q Is it?

13 A I believe so.

14 Q Just bear with me a minute, I'm going  
15 to draw the unit outline on this plat.

16 MR. HUNKER: I'll be glad to furnish  
17 you one. I just didn't have time.

18 MR. NUTTER: Oh, this will be all right.  
19 You've got one non-contiguous 40 going up there in Section  
20 20 to take in that old well, I see.

21 A Yes, sir.

22 Q I notice you do have some gas wells in  
23 the north half of Section 31 included in the unit area, and  
24 also -- Section 35, I beg your pardon, and also a gas well  
25 that's in the northeast of the southeast of Section 35. Is



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that -- is that a unit well?

A. Yes, sir, those are shown as gas wells but they are now oil wells.

Q. I see.

MR. NUTTER: Are there any further questions of Mr. Johnson? He may be -- oh, Mr. Padilla.

CROSS EXAMINATION

BY MR. PADILLA:

Q. Mr. Johnson, I believe you -- I'm not sure whether you testified to this or not, but did you get preliminary approval from the Land Commissioner and the USGS for your unit agreement?

MR. HUNKER: I'll answer that. We have not from the Commissioner of Public Lands but we have from the USGS.

MR. PADILLA: I have nothing further.

MR. NUTTER: How about the working interest commitment to the unit, Mr. Hunker?

MR. HUNKER: We've had -- well, I think that Mr. Johnson can testify to that.

MR. NUTTER: I notice from Exhibit Number One that most of the leases in here are labeled as being Layton Enterprises leases. You have a few other com-

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panies.

A. I don't have a recent percentage but in a series of meetings that we've had there at this point appears to be no objection from any of the operators at this time, but as to the amount that have signed and sent their unit agreement in, I just don't know.

MR. NUTTER: Obviously the Layton leases are committed to the unit.

A. Yes, they are.

MR. NUTTER: And we do have correspondence here from a couple of companies.

A. I see.

MR. NUTTER: How about Texaco? Do you know the status of negotiations with Texaco?

A. Texaco has been for it all the way.

MR. LAMAR: Mr. Examiner.

MR. NUTTER: Yes, sir, state your name for the record, please.

MR. LAMAR: I am J. R. Lamar and I am employed by the Amoco Production Company in Houston, Texas.

On behalf of Amoco, and as Amoco is a working interest owner in this field, Amoco has been involved in negotiations here and we approve the plan and we recommend that you approve the unit.

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MR. NUTTER: Thanka, Mr. Lamar. So we've heard from Amoco. Will you read our correspondence, Mr. Padilla?

MR. PADILLA: Mr. Examiner, Sun Oil Company and Getty Oil Company both have filed a concurrence of this -- for this unit agreement.

MR. NUTTER: Mr. Johnson or Mr. Hunker, do you know the status of the Gulf negotiations?

A. Again, in the meetings we have had no indication of any objection from Gulf.

MR. NUTTER: And Monument Energy?

A. The same.

MR. NUTTER: So you think you will have 100 percent?

A. Looks like we'll have 100 percent. We've fought for eight years to get it, but we'll get it.

MR. NUTTER: Okay, are there any further questions of Mr. Johnson? He may be excused.

Do you have anything further, Mr. Hunker?

MR. HUNKER: Nothing further.

MR. NUTTER: Does anyone have anything they wish to offer in Case 7201 or 7202?

We'll take the cases 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 HEREPY 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.

SALLY W. BOYD, C.S.R.

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I do hereby certify that the foregoing is a complete and correct transcript of the hearing held on 3/25 at 7201 & 7202 81.  
[Signature], Examiner  
Oil Conservation Division