

NEW MEXICO OIL CONSERVATION DIVISION
STATE LAND OFFICE BUILDING
STATE OF NEW MEXICO
CASE NO. 10517

IN THE MATTER OF:

The Application of Shackelford Oil
Properties, on behalf of Plains Radio
Petroleum Company, for a unit
agreement, Chaves County, New Mexico.

BEFORE:

MICHAEL E. STOGNER

Hearing Examiner

State Land Office Building

August 6, 1992

REPORTED BY:

DEBBIE VESTAL
Certified Shorthand Reporter
for the State of New Mexico

ORIGINAL

A P P E A R A N C E S

FOR THE APPLICANT:

KELLAHIN, KELLAHIN & AUBREY

Post Office Box 2265

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BY: W. THOMAS KELLAHIN, ESQ.

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1 EXAMINER STOGNER: I'll call Case
2 10517, which is the application of Shackelford
3 Oil Properties, on behalf of Plains Radio
4 Petroleum Company, for a unit agreement, Chaves
5 County, New Mexico.

6 At this time I'll call for appearances.

7 MR. KELLAHIN: Mr. Examiner, I'm Tom
8 Kellahin of Santa Fe, New Mexico, appearing on
9 behalf of the applicant. And I have two
10 witnesses to be sworn.

11 EXAMINER STOGNER: Are there any other
12 appearances in this matter?

13 Will the witnesses, please, stand to be
14 sworn at this time.

15 [The witnesses were duly sworn.]

16 EXAMINER STOGNER: Mr. Kellahin.

17 MR. KELLAHIN: Mr. Examiner, my first
18 witness is Mr. Phil Moore. Mr. Moore is a
19 geologist appearing on behalf of Plains Radio
20 Petroleum Company.

21 PHIL MOORE

22 Having been duly sworn upon his oath, was
23 examined and testified as follows:

24 EXAMINATION

25 BY MR. KELLAHIN:

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

3 A. Yes. My name is Phil Moore. I'm a
4 petroleum geologist, vice president of
5 exploration for Plains Radio Petroleum in
6 Amarillo, Texas.

7 Q. On prior occasions have you testified
8 before the Division?

9 A. No.

10 Q. Would you summarize for us your
11 educational background?

12 A. Sure. Received a BS in geology from
13 West Texas State University in 1973. I've worked
14 continuously in the oil and gas exploration
15 business since then.

16 Q. This particular project is an
17 application for approval of a voluntary
18 exploratory unit?

19 A. Correct.

20 Q. And the reservoir that's the primary
21 target is a San Andres reservoir?

22 A. That's right.

23 Q. Do you have prior experience in
24 geologic interpretations in mappings of San
25 Andres reservoirs?

1 A. Yes, sir, I sure do. I have generated
2 several other exploratory type prospects, but I
3 have also worked in development and just field
4 studies in the Racetrack-San Andres Field, in
5 Chaves County, and also the East Chisolm-San
6 Andres Field, which is also in Chaves County, New
7 Mexico.

8 Q. And does the geologic interpretation
9 and presentation we're about to make represent
10 your work product?

11 A. Yes, sir, it does.

12 MR. KELLAHIN: We tender Mr. Moore as
13 an expert petroleum geologist.

14 EXAMINER STOGNER: Mr. Moore is so
15 qualified.

16 Q. (BY MR. KELLAHIN) Mr. Moore, to orient
17 the Examiner about your proposed unit, let me
18 direct your attention, sir, to what we've marked
19 as Applicant Exhibit No. 1. Take a minute and
20 orient us as to the acreage that is proposed for
21 inclusion in the unit.

22 A. Okay. Exhibit No. 1, as titled, is a
23 Leasehold Ownership Map. The unit boundary that
24 we would like to have proposed as the unit in
25 question is outlined in the hachureds. The

1 acreage is shown that we'd like to include in
2 that unit shaded in yellow along with the
3 ownership thereof.

4 Q. The kinds of acreage to be dedicated to
5 the unit are what, sir?

6 A. The kinds of acreage, one, there's only
7 one section that is State of New Mexico; the rest
8 is federal.

9 Q. What's the significance of the yellow
10 shading within the boundary of the proposed unit
11 area?

12 A. That yellow shading illustrates the
13 acreage that we, as Plains Radio Petroleum
14 Company, have had as an agreement -- or those
15 people who own that acreage have agreed to in
16 some way join in the unit.

17 Q. All right. And you will pursue then
18 efforts to get the parties that have the interest
19 within the unit that is not yet shaded to
20 participate on a voluntary basis?

21 A. Yes, sir, that's correct.

22 Q. All right. Let's turn now to Exhibit
23 No. 2. Identify and describe that display.

24 A. Okay. Mr. Examiner, Exhibit No. 2 is
25 just a unit index map that illustrates the

1 location of our proposed unit. It also
2 illustrates a band of San Andres production that
3 is shaded there in brown signifying the San
4 Andres fields.

5 As you can see there, there is an
6 east-west trending band of these San Andres
7 fields that extends across the northwest shelf of
8 southeast New Mexico.

9 Q. All right. Let's turn now to Exhibit 3
10 and begin to discuss in more detail some of the
11 information that you have accumulated upon which
12 then you base your ultimate geologic
13 conclusions.

14 First of all, let me have you turn to
15 what we've identified as Exhibit 3, and it's a
16 production map.

17 A. Okay. Exhibit No. 3, Mr. Examiner, is
18 a production and also a shows map. And I have
19 gone through here and identified the various
20 zones that produce in and around the proposed
21 unit with primary emphasis on the San Andres
22 Formation.

23 I have color-coded these zones. The
24 San Andres is shown in brown. And then besides
25 some of the dry holes that are in the area, I

1 have indicated any type of show that might have
2 been in the San Andres. And these shows would
3 have been on drill stem test information or
4 production through pipe.

5 I have also designated the cumulative
6 and the average daily rates of production next to
7 the wells shown. And then also underneath,
8 underneath the horizontal line, I indicated the
9 cumulative water production.

10 In doing the geology for the
11 exploration idea of this project, we used the
12 field that is in Section 16 and 17 of Township 8
13 South, 31, as an analogy. And that is the
14 analogy that we were trying to use in doing our
15 exploration project here.

16 Q. The pool or the field to the north of
17 you in 16 and 17 is called what?

18 A. It's called the Siete Field.

19 Q. Within the interior of this boundary
20 for the proposed unit, you've also identified a
21 proposed location?

22 A. That's correct.

23 Q. Based upon your geologic
24 interpretation, does that represent the optimum
25 place to put the initial test well that would

1 qualify as the unit well?

2 A. Based on the technical data that we
3 have, that would appear to be the optimum
4 location, yes, sir.

5 Q. In doing your research, do you find
6 evidence that any of the formations contained
7 within the unit boundary have producing wells on
8 them?

9 A. No, sir, they do not. There is one
10 well in the southeast quarter of Section 23 that
11 was originally completed and produced about 100
12 barrels of oil cumulative out of the Upper Penn
13 carbonate, but that well has been plugged.

14 Q. When you went through your analysis of
15 the data, what is the first level of
16 investigation that you make as a geologist in
17 order to reach a conclusion about the area to be
18 included so that the operator will have effective
19 and efficient control over this San Andres
20 reservoir if this unit is approved?

21 A. Normally what I do is I like to make a
22 production map, as we see here by Exhibit 3, but
23 then I also make a structural map. In this case
24 I did make a structure map on top of the pie
25 marker in the San Andres, although the hypothesis

1 that I used for this particular project is not
2 totally dependent on present day structure.

3 Q. Let's look at the structure maps so the
4 Examiner will see your interpretation. That's
5 Exhibit No. 4?

6 A. That's correct.

7 Q. Identify and describe that for us.

8 A. Exhibit No. 4, Mr. Examiner, is a
9 structure map drawn on the pie marker, which is a
10 consistent marker regionally within the Lower San
11 Andres Formation. And the map that is before you
12 is a structure map, and it is present-day
13 structure, in other words, the structure that is
14 consistent during today's time.

15 One thing that I would like to point
16 out on this particular map is that the Siete
17 Field in Sections 16 and 17 does not appear to be
18 on a closed structure, nor does the unit that we
19 have proposed to the south of it.

20 Q. Can you rely exclusively on the
21 structural interpretation to help you draw the
22 proposed boundaries of the exploratory unit?

23 A. No, sir, not at all.

24 Q. Let's turn to an isopach of the San
25 Andres. It's marked as Exhibit No. 5.

1 A. Okay.

2 Q. And continuing with your methodology
3 for analyzing the reservoir, having completed the
4 work on the structure, do you prepare an isopach?

5 A. Yes, sir.

6 Q. Describe the kind of isopach that
7 you're working with here.

8 A. Exhibit No. 5, Mr. Examiner, is an
9 interval isopach. And let me just clarify this a
10 little bit about the hypothesis that is used --
11 that I used in exploring in this area. It's
12 based on a theory that San Andres production in
13 the northwest shelf area of southeast New Mexico
14 is not totally relevant to present day
15 structure.

16 But that these reservoirs trapped oil
17 and gas or hydrocarbons shortly after deposition
18 of the San Andres dolomite and that they -- that
19 the traps were in preexisting or Paleo structures
20 and that during tertiary time or, as a result of
21 the Laramide orogeny, these reservoir were tilted
22 to the east.

23 And the oil and gas is not consistent.
24 The traps are not consistent with the present day
25 structure. They have tilted oil-water contacts.

1 And that's the hypothesis here.

2 And this map is an interval that was
3 drawn from the top of the San Andres to the pie
4 marker. And it is the best tool, I believe, for
5 trying to identify the Paleo structure in the
6 area.

7 And, as you can see there, there looks
8 to be a fairly broad thin in the area of the
9 proposed unit. Hopefully this is indicative of
10 the preexisting Paleo-type trap that we would be
11 looking for in our exploratory project.

12 Q. I see on Exhibit 5 you have in purple a
13 line of cross-section through the unit area.
14 Let's turn to the cross-section that describes
15 that.

16 A. Okay.

17 Q. Exhibit No. 6.

18 A. Well, Exhibit No. 6, sir, is the model
19 cross-section.

20 Q. I'm sorry. All right.

21 A. That's shown there in blue, X-Y-Z.

22 Q. This is the one to the northwest --

23 A. Right.

24 Q. -- as model cross-section?

25 A. Right.

1 Q. What's the purpose of preparing the
2 cross-section that is not over the unit area?

3 A. This is over a little field that is to
4 the north of us. It is not the Siete Field.
5 It's only a two-well field. But I think this
6 best illustrates the theory of the Paleo or the
7 diagenetic trap type theory in the San Andres.

8 As we look at the wells, and this was
9 made with porosity logs, I think primarily sonic
10 logs, from X to Y to Z illustrated on Exhibit No.
11 5. Well number -- or well letter "Y" would
12 represent the top or very near the top of the
13 Paleo structure.

14 If you look at the interval there that
15 I isopached, which is shown there bracketed in
16 blue, one can tell that there is a thin in that
17 interval. And also underneath that interval the
18 porosity buildup shown down there toward the base
19 of the P-1 porosity zone is thicker. So this is
20 just a model to indicate that the theory that I
21 used here is potentially correct.

22 Q. Show us the application of that theory
23 then to the unit area as you build a
24 cross-section, A-to-A prime, through the unit.

25 A. Okay. That would be Exhibit No. 7, Mr.

1 Examiner, and it's on a larger scale. And these
2 wells that are on this were hung with whatever
3 porosity log that was available on those
4 particular wells. And again that is
5 cross-section A-to-A prime that identifies the
6 proposed location. That is a stratigraphic
7 cross-section hung at the pie marker.

8 The key well would be the well in the
9 middle, the second well going from either side.
10 That is the Pennzoil United Pubco well in Section
11 33. We have identified the top of the pie
12 marker. We have also identified the top of the
13 P-1 porosity zone.

14 And what we're looking for here is a
15 zone that occurs right at the base of the Lower
16 P-1 interval, which I call the "K" zone,
17 indicating permeability. This is what I think is
18 the key to good San Andres production in the
19 area, is the development of this Lower P-1 "K"
20 zone. It is usually fairly thin, no more than 15
21 to 16 feet thick. But the log character of this
22 zone is very, very good. It shows a very good
23 porosity and good indications of permeability.

24 The cross-section that we're looking at
25 there identifies that zone. And, as we go to the

1 north or northwest, we can see that, as
2 illustrated by the well in the far left of the
3 cross-section, that that porosity, that Lower P-1
4 "K" zone, is not developed to the northwest of
5 our unit.

6 So somewhere between Section 33, which
7 drill stem tested this with a slight show and to
8 the northwest over our proposed location, we lose
9 this zone. The well to the left was able to
10 complete in the upper portion of the P-1 porosity
11 zone, but it made a very poor well. It did
12 potential for 62 barrels of oil a day and 235
13 barrels of water. But evidently, after they put
14 the well in production, it did not make enough to
15 even have any reported production history, so
16 that well has been plugged.

17 So there is considerable risk in this
18 exploratory unit in trying to find this
19 permeability zone that exists right at the base
20 of the P-1 interval.

21 Q. Have you taken this information about
22 the P-1 zone and isopached that interval?

23 A. Yes, sir, I sure have, and that would
24 be shown on Exhibit No. 8. And, Mr. Examiner,
25 this is a distribution and a thickness map or

1 isoporosity map of that Lower P-1 "K" zone. It
2 shows the relationship of the production at Siete
3 Field and some of these smaller one- and two-well
4 fields and the thickness that those wells have in
5 them.

6 At Siete Field the best wells in Siete
7 Field have at least eight feet of this Lower P-1
8 "K" zone. The rest of the wells that have, say,
9 less than five wells, five feet of this zone, are
10 fairly poor as far as the production goes. This
11 map indicates the development of the Lower P-1
12 "K" zone across the proposed unit.

13 Q. Have you been able to reach a geologic
14 conclusion about the surface boundary of the unit
15 and how it relates to the San Andres reservoir?

16 A. From the data that we have in the area,
17 which is strictly subsurface, wireline logs, we
18 have no core information, it looks as though the
19 development in the thickest portion of that Lower
20 P-1 interval that we have mapped here should
21 develop very nicely for the center of our unit.
22 And then, as you go in all directions away from
23 the unit, it appears to thin out.

24 A lot of the San Andres fields in the
25 area seem to have very poor development of this

1 to the north and northwest of where you find this
2 P-1 "K" zone development.

3 Q. Based upon the current status of data
4 available to you, are you able to conclude as a
5 geologist that the proposed unit boundaries are
6 such that they will give the operator and the
7 interest owners within the unit effective and
8 efficient control of this San Andres reservoir?

9 A. Yes, sir, I surely believe that's
10 right.

11 Q. Do you have an opinion as to whether or
12 not the approval of the unit concept for
13 exploration and development is a more efficient
14 way to develop the hydrocarbons in this potential
15 reservoir than competitive leasehold exploration
16 and development?

17 A. Yes, sir. It is my opinion that given
18 the luxury of having this unitized that that
19 would give us the time that I think is critical
20 to accurately and prudently develop the resources
21 that potentially underlie this proposed unit.
22 Should we make a discovery well, we would like
23 the opportunity to evaluate every piece of
24 technical information we have. I think that's
25 critical in the San Andres.

1 A case in point does occur in the Siete
2 Field to the north. In Section 17,, the operator
3 in that particular section drilled a well that
4 would be located approximately in Unit H. That
5 well potentialed for 348 barrels of oil a day
6 flowing.

7 And I'm not sure when they spud the
8 well to the west, but they offset the well to the
9 west, completed it less than a month after
10 completing that particular well, and the well
11 only potentialed for 23 barrels of oil a day and
12 has only made 2- or 3,000 barrels of oil
13 cumulative. So that's kind of the nature of that
14 particular reservoir.

15 And I believe, given the luxury of
16 having this unitized, we can best design our
17 development with the information that we receive
18 from the drilling of each well.

19 Q. Were the wells drilled in 16 and 17 in
20 the Siete Pool drilled pursuant to a unit
21 concept?

22 A. No, sir, they were not.

23 Q. With approval of the unit, then, you
24 will have the opportunity to space your wells
25 regardless of the differences within the leases

1 contained within the unit boundary?

2 A. Yes, sir.

3 Q. This area looks to be different from
4 the conventional exploratory wildcat unit that
5 the Commission often sees?

6 A. Right.

7 Q. Describe for us what you conclude as
8 the risk involved and why that risk is managed
9 and minimized under a unit concept versus
10 leasehold development.

11 A. As far as the risk, I'll address that
12 issue first, and then I may need some
13 clarification on your second question. But the
14 San Andres, particularly in this area, is a very
15 risky, exploratory objective. As indicated by
16 the exhibits that I prepared and the different
17 theories in trying to explore for the San Andres,
18 that in itself is somewhat indicative of the
19 risk.

20 But just as the analogies to the north,
21 good wells are very hard to find, and they're
22 very hard to offset. And we do not -- you really
23 cannot use seismic. And you're looking for
24 either structural noses that we seem to see on
25 our present day structure interpretation or the

1 interval isopach, which is somewhat indicative of
2 Paleo structure. And these are very, very hard
3 to predict from the subsurface information that
4 you have.

5 And so subsurface is the only tool that
6 you have. And with the nature of the risk of the
7 San Andres, it's as risky as some of the things
8 that are -- you know, even though it is not a
9 rank wildcat, it still does have a large degree
10 of risk.

11 Q. Does it allow the interest owners
12 within the unit area to reduce that risk if they
13 develop and explore this San Andres reservoir on
14 a unit concept versus on competitive leasehold
15 development?

16 A. Yes, sir, I believe that's right. And
17 the way I would see that is that it gives the
18 participants in a unit of this nature, even
19 though it dilutes their interest, it would give
20 them a smaller interest, say, in a field versus
21 100 percent interest of what quite possibly could
22 be very poor fringe type production.

23 Did that answer that question?

24 Q. Well, I understand your point of view
25 is that the risk is shared among all interest

1 owners --

2 A. Right.

3 Q. -- within the voluntary unit. And if
4 they get a prolific well, they share and it
5 affords the opportunity to explore the fringes --

6 A. Right.

7 Q. -- without having a selected group of
8 owners bear that entire responsibility?

9 A. Right. Right.

10 Q. Have you presented this same geologic
11 interpretation and presentation to the
12 Commissioner of Public Lands, State of New
13 Mexico?

14 A. Yes, sir, we have.

15 Q. And have you obtained preliminary
16 approval from that agency?

17 A. Yes, we have.

18 Q. And have you made the same geologic
19 presentation to the Bureau of Land Management?

20 A. Yes, sir.

21 Q. And have you obtained the preliminary
22 approval of that agency?

23 A. Yes, sir, we have.

24 Q. Were the exhibits that we have
25 described, Exhibits 1 through 8, prepared by you

1 directly?

2 A. Yes, sir.

3 MR. KELLAHIN: That concludes my
4 examination of Mr. Moore, Mr. Stogner. We would
5 move the introduction of his Exhibits 1 through
6 8.

7 EXAMINER STOGNER: Exhibits 1 through 8
8 will be admitted into evidence at this time.

9 EXAMINATION

10 BY EXAMINER STOGNER:

11 Q. Mr. Moore, in your proposed location do
12 you propose to complete that in any other or test
13 any other formations of the deeper horizons?

14 A. Mr. Examiner, not to any deeper
15 horizons at this time. We will or would like to
16 thoroughly evaluate the thin sandstone members of
17 the Queen Formation, including the Queen itself
18 and the Penrose Premier possibilities that may
19 exist at this location.

20 At a future time certainly it would be
21 considered to drill deeper in looking for the
22 opportunity to produce gas from the Atoka and
23 Morrow or possibly even oil from the Devonian.
24 In Section 33 there was -- the Pennzoil well that
25 you see there did have what I would say is a

1 fairly significant show and drill stem test in
2 the Devonian Formation, recovered 190 feet of
3 oil, free oil on the drill stem test. But that
4 would be later on.

5 Q. That well is plugged and abandoned at
6 this time?

7 A. Yes, sir, it is.

8 Q. Did it test the San Andres, the
9 Pennzoil well?

10 A. It did test through a drill stem test.
11 I believe, if you will look on your cross-section
12 A-to-A prime, it is the middle well. I have
13 highlighted the test information in the drill
14 stem test beneath the well there on that scout
15 ticket. And I believe they did drill stem test
16 it.

17 It showed a lot of fluid recovery with
18 some oil- and gas-cut mud, I believe. There's a
19 little scout ticket that is below that scout
20 ticket which represents the dry hole drilled by
21 Pubco, which is about 2- or 300 feet to the
22 north. And they did have a show of free oil on
23 the drill stem test from the San Andres in that
24 well.

25 Q. Of course these two wells are to be

1 included in the area of your exploratory unit at
2 this time?

3 A. That's correct.

4 Q. But yet take note that preliminary
5 approvals also have been included, this acreage.

6 A. Yes, sir.

7 Q. You've used some geological tops that I
8 want to make sure I'm clear with.

9 A. Okay.

10 Q. When I look at the A-A prime
11 cross-section, you have the orange mark --

12 A. Uh-huh.

13 Q. -- which is the straight line on the
14 top, showing the top of the San Andres P-1
15 marker.

16 A. Right.

17 Q. Is that to be interpreted the top of
18 the San Andres Formation?

19 A. No, sir. That is a local or actually
20 it's a regional marker that is relative to the
21 structure and deposition of the porosity zones
22 that occur within the Lower San Andres.

23 I might ask you to look back at Exhibit
24 6, which is the model cross-section, and in that
25 on X-Y-Z, the top of the San Andres is designated

1 there with the red. And then one can look down
2 toward the bottom of the cross-section, and where
3 I have the orange marked again, that would be the
4 relationship to where the pie marker is and the
5 top of the San Andres.

6 Is that clear, Mr. Examiner?

7 Q. Now, that you have brought that out,
8 yes.

9 A. Okay. Thank you.

10 Q. I was confused with the colors you
11 used.

12 A. Sorry.

13 Q. You used pink as the top of the P-1 on
14 the A-A prime, but purple on the top of the P-1
15 on the other one.

16 A. Yeah.

17 Q. I just overlooked that.

18 A. Well, on A-A prime those logs don't go
19 high enough to include the top of the San
20 Andres. And I see your confusion, and I
21 apologize for that.

22 Q. Oh, no problem. I just wanted to
23 clarify that.

24 A. Okay.

25 EXAMINER STOGNER: I have no other

1 questions of this witness, Mr. Kellahin.

2 MR. KELLAHIN: Thank you. Mr.
3 Examiner, I'd like to call Mr. Sam Shackelford.
4 Mr. Shackelford is a landman.

5 **SAM SHACKELFORD**

6 Having been duly sworn upon his oath, was
7 examined and testified as follows:

8 EXAMINATION

9 BY MR. KELLAHIN:

10 Q. Could you, please, state your name and
11 occupation?

12 A. Sam Shackelford. I'm a consultant
13 petroleum landman from Roswell, New Mexico.

14 Q. On prior occasions, Mr. Shackelford,
15 have you testified before the Division as a
16 landman?

17 A. No, I have not.

18 Q. Summarize for us your experience as a
19 petroleum landman.

20 A. I have been working as an independent
21 consulting landman for approximately 15 years.

22 Q. Where do you reside, sir?

23 A. Roswell, New Mexico.

24 Q. As part of your duties as a consulting
25 landman, have you been employed by Plains Radio

1 Petroleum to make an investigation of the
2 ownership of the acreage that is proposed to be
3 included within this unit?

4 A. Yes, sir.

5 Q. Have you completed that work?

6 A. Yes, sir.

7 Q. In addition, are you familiar with the
8 necessary unit agreement and the operating
9 agreements that are required for operations under
10 a unit concept?

11 A. Yes, sir.

12 Q. Have you prepared those documents?

13 A. Yes, sir.

14 MR. KELLAHIN: We tender Mr.
15 Shackelford as an expert petroleum landman.

16 EXAMINER STOGNER: Mr. Shackelford is
17 so qualified.

18 Q. (BY MR. KELLAHIN) Mr. Shackelford, let
19 me ask you, sir, to turn to what is marked
20 Exhibit No. 9. Do you have a copy of that?

21 A. Yes, sir.

22 Q. Would you identify that for us? What
23 is that?

24 A. This is the form of the unit agreement
25 that was provided to me from the BLM as their

1 model form. And it includes three exhibits,
2 Exhibit A, B, and C, showing the ownership and so
3 forth.

4 Q. Have you taken the model form from the
5 Bureau of Land Management that is utilized for
6 state, federal, and fee exploratory units and
7 modified that in any way?

8 A. No, sir.

9 Q. Have you completed all the necessary
10 blanks in the form including all the exhibits?

11 A. Yes, sir.

12 Q. To the best of your knowledge, is that
13 information accurate and correct?

14 A. Yes, sir.

15 Q. In looking at Exhibit A to the unit
16 agreement, what have you displayed on that
17 exhibit?

18 A. This is a map showing the boundaries of
19 the unit and also the ownership lease numbers and
20 so forth. And it's numbered in numerical order
21 the leases by serial number and by federal
22 acreage first and state acreage.

23 Q. Have you taken the information
24 available to you and tabulated the ownership by
25 tracts as shown on the plat and attached that

1 tabulation as Exhibit B?

2 A. Yes, sir.

3 Q. Does the information show the kinds of
4 leases that are being dedicated to the unit in
5 terms of whether they're state, federal, or fee?

6 A. Yes, they do.

7 Q. What kinds of leases do you have?

8 A. We have federal and state.

9 Q. You don't have any fee tracts?

10 A. No, sir.

11 Q. Okay. The tabulation of interest
12 owners, is that accurate to the best of your
13 knowledge?

14 A. Yes, sir.

15 Q. And have you made initial contacts with
16 everyone who proposes to have an interest in the
17 unit?

18 A. I've made contact with all the working
19 interest owners.

20 Q. At this point, just as a reference to
21 the Examiner, what is the status of your efforts
22 to get voluntary participation in the unit?

23 A. Currently approximately 89 percent of
24 the people involved have committed, verbally
25 committed to the unit.

1 Q. Will that include all tracts except for
2 Tract No. 1 as it's shown on Exhibit A?

3 A. Correct.

4 Q. Do you propose to continue to discuss
5 with the owners in Tract 1 their voluntary
6 participation in the unit?

7 A. Yes, sir.

8 Q. Let me turn to what is marked as
9 Exhibit No. 10. Would you identify and describe
10 that for us?

11 A. This is the Model Form 610 Operating
12 Agreement which we're going to use in conjunction
13 with the unit agreement. I've modified it to be
14 subject to the unit agreement. And it states the
15 operator and also the working interest owner.

16 Q. Have you submitted the unit agreement
17 and the operating agreement to the Bureau of Land
18 Management along with all the necessary
19 supporting documents including the geology to
20 obtain preliminary approval from the Bureau of
21 Land Management?

22 A. I've submitted everything that you
23 mentioned except for the operating agreement.

24 Q. Okay. Have you also submitted the unit
25 agreement and the supporting documents to the

1 Commissioner of Public Lands for preliminary
2 approval?

3 A. Yes, sir.

4 Q. And have you obtained preliminary
5 approval from both those agencies?

6 A. Yes, sir.

7 Q. Turn to Exhibit 11. Identify that for
8 me.

9 A. Exhibit 11 is the letter that I
10 received from Mr. Armando Lopez giving us
11 preliminary approval of the unit. Also mentions
12 the zones and so forth that we are attempting to
13 target.

14 Q. The qualifying well for the unit as
15 written and requested is a San Andres well or a
16 well to at least 4,000 feet?

17 A. Correct.

18 Q. Identify and describe for us Exhibit
19 No. 12.

20 A. Exhibit No. 12 is the letter I received
21 from Floyd Prando from the State of New Mexico.
22 I provided them with the same information that I
23 did the BLM. Once I received the BLM approval, I
24 sent the same information to the State of New
25 Mexico. And this is the letter granting this

1 approval, preliminary approval.

2 Q. Okay. And if the Division enters its
3 order approving the unit, then you'll go forward
4 and comply with the rest of the conditions and
5 requirements of these letters?

6 A. Yes, sir.

7 MR. KELLAHIN: That concludes my
8 examination of Mr. Shackelford, Mr. Examiner. We
9 would move the introduction of his Exhibits 9
10 through 12.

11 EXAMINER STOGNER: Exhibits 9 through
12 12 will be admitted into evidence.

13 EXAMINATION

14 BY EXAMINER STOGNER:

15 Q. Mr. Shackelford, in looking at page 4
16 of Exhibit No. 10, that being the model form
17 operating agreement, who will be the operator of
18 this unit, and has that been determined yet?

19 A. Plains Radio Petroleum Company.

20 Q. Okay. Now, in today's ad there was
21 also mentioned Fred Pool or Plains Broadcasting
22 to be named the initial operator, and it has been
23 determined that Plains Radio Broadcasting will be
24 the operator?

25 A. Yes, sir.

1 Q. How is Mr. Fred Pool, is he still
2 involved in this?

3 A. Yes, sir.

4 Q. As a --

5 A. Working interest owner. He's listed in
6 the operating agreement as a working interest
7 owner on Exhibit A.

8 Q. Now, I see reference to Plains Radio
9 Broadcasting in the preliminary approval by the
10 State Land Office. But, looking it over in the
11 BLM preliminary approval, I see no mention of the
12 operator. Oh, I'm sorry. I do see that. That's
13 on the very top line. Okay.

14 No questions of this witness.

15 MR. KELLAHIN: That concludes our
16 presentation, Mr. Examiner.

17 EXAMINER STOGNER: Thank you, Mr.
18 Shackelford, you may be excused.

19 Does anybody else have anything further
20 in Case No. 10517? If not, this case will be
21 taken under advisement.

22 [And the proceedings were concluded.]

23 I do hereby certify that the foregoing is
24 a complete record of the proceedings in
the Examiner hearing of Case No. 10517,
25 heard by me on 6 May 1992.


Examiner
Oil Conservation Division

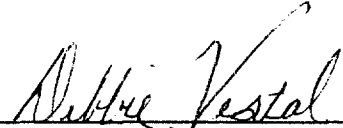
CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Debbie Vestal, Certified Shorthand Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I caused my notes to be transcribed under my personal supervision; and that the foregoing is a true and accurate record of the proceedings.

I FURTHER CERTIFY that I am not a relative or employee of any of the parties or attorneys involved in this matter and that I have no personal interest in the final disposition of this matter.

WITNESS MY HAND AND SEAL AUGUST 15,
1992.


DEBBIE VESTAL, RPR
NEW MEXICO CSR NO. 3