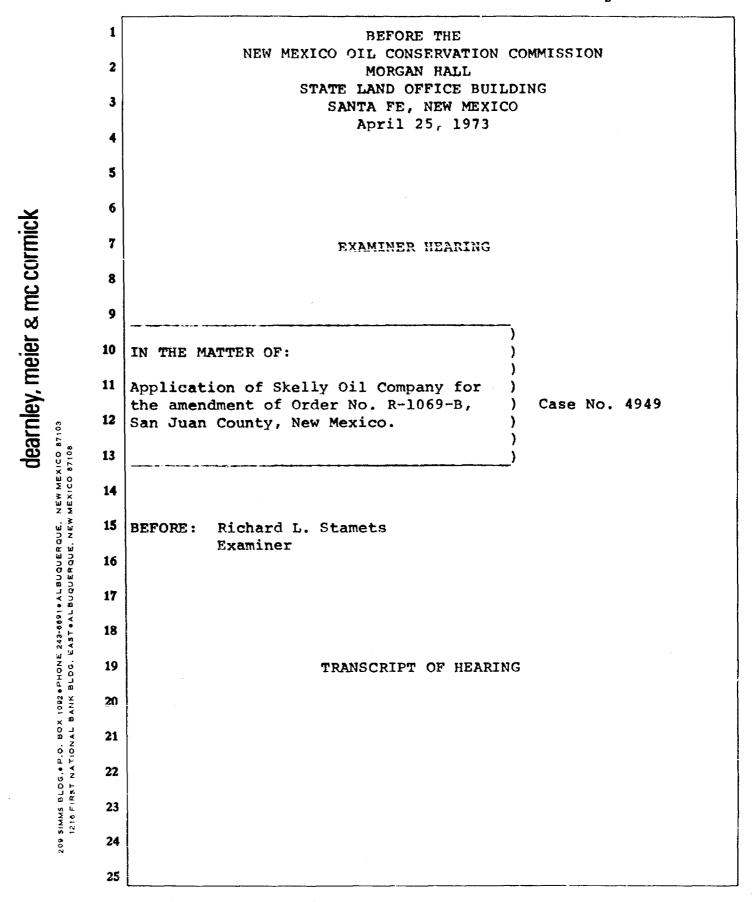
CASE 4949: Application of SKELLY OIL COMPANY FOR AMENDMENT OF ORDER NO. R-1069-B, San Juan Co.

CHSE 170. 4949

Application,

Transcripts,

Small Ekhibts



9

10

11

12

13

14

15

16

18

24

MR. STAMETS: Call next Case 4949.

MR. CARR: Case 4949, Application of Skelly Oil Company for the amendment of Order No. R-1069-B, San Juan County, New Mexico.

MR. BLODGET: Mr. Examiner, I'm Chester Blodget appearing also on behalf of Skelly Oil Company in this case. I have a copy of Mr. White's Entry as local counsel the original of which, I believe, was heretofoxe sent to the Commission. I have one witness. I'd like to have him sworn, please.

GERALD BROWN

was called as a witness and after being duly sworn, according to law, testified as follows:

DIRECT EXAMINATION

BY MR. BLODGET:

- Q State your name, please.
- 17 A Gerald Brown.
 - Q What is your profession and by whom are you employed?
- A I'm a Senior Engineer with Skelly Oil Company located in
 Denver, Colorado.
- 21 Q Have you testified before this Commission prior to this 22 time?
- 23 A No.
 - Q Would you give us a summary of your higher education and

experience, please, and who you have worked for?

209 SIMMS BLDG. # P.O. BOX 1092 #PHONE 243-669] # ALBUQUERQUE. NEW MEXICO 87103	1216 FIRST NATIONAL BANK BLDG. EAST • ALBUQUERQUE, NEW MEXICO 87108	

23

24

25

I was graduated from the University of Oklahoma in 1958; A 2 and in the past 15 years, I have worked for Skelly Oil Company in six different locations, the Gulf Coast, Mid-Continent, and Rocky Mountain areas. How long have you worked in the Rocky Mountain area? 6 I worked in the Rocky Mountain area a total of nine years; 7 and in the past three years, it has included the New 8 Mexico area. 9 Are you generally familiar with the rules and regulations 10 of the New Mexico Oil Commission? 11 Yes. 12 MR. STAMETS: What was your degree from Oklahoma 13 University? THE WITNESS: Bachelor of Science in Petroleum 14 Engineering. MR. STAMETS: The witness' qualifications are acceptable. 18 MR. BLODGET: Thank you. 19 (By Mr. Blodget) Mr. Brown, I call your attention to 20 Skelly Oil Company's Exhibit No. 1 and ask you to identify 21 that, please. This is a base plat of the old East Bisti Unit with 22

other information superimposed upon it. It covers the

eastern portion of the Bisti-Gallup Field about a 13-mile

stretch through here (indicating). This application is

SIMMS BLDG. • P.O. BOX 1092 • PHONE 243-6691 • ALBUQUERQUE, NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST • ALBUQUERQUE, NEW MEXICO 87108 concerned with changing the rules so that gas wells can be designated in this oil pool.

However, we feel that our one well is probably a single situation that will come up. We have no knowledge of any other operator having this same situation, and our particular well is outlined in blue, and that is the acreage which we want designated.

This map also shows the East Bisti Unit Engineering
Committee's interpretation of the gas cap areas, and
there were two of them because there are two separate
zones. These are indicated by the red lines. The curved
green line in the center part of the plat shows an area
of extreme casing failure in which our well is located.

All the wells that are colored in orange have had casing failures. All of these failures except two happened before methodic protection was instituted in the field.

Methodic protection is now disbanded because the unit was terminated.

Two of the wells have had casing failure since this other failure was removed. One, we believe, was lost. The other one was repaired and successfully opened back to production is what our information is. The green dots represent the last remaining wells in this part of the Bisti-Gallup Pool.

There are seven of them. There have been 111 wells

8 A

asking for.

plugged about two years ago. And only seven remain productive and two of those seven are located in the gas cap area, our well and another well which is not capable of producing its allowable. That covers Exhibit 1.

Q I call your attention to Skelly Oil Company's Exhibit No.

2. Would you identify that, please, and explain it?

Yes. This is a bottom hole pressure over "Z" compressed belted factor Z versus cumulative production for Skelly J. C. Daum Well Number 1 which is the only well that we are aware of that will fit under this new ruling we are

It shows that to date, 1.2 billion MMCF of gas has been produced and that the ultimate recovery to 100 pounds BHP over Z abandonment will be 2.4 billion per cubic foot from the single well in the gas cap area.

This shows that there are considerable reserves remaining, 1.2 billion. It also shows that we are definitely located in a gas cap area.

Q I call your attention to Exhibit No. 3. Would you identify that and explain it, please?

Yes. This is a tabulation of economics that points out what might happen if we have a casing failure after we have produced the well five years from today. If we have a casing failure before then, these figures would be

1.3

; BLDG. • P.O. BOX 1092 • PHONE 243-6691 • ALBUQUERQUE, NEW MEXICO 87103 ; Irst national bank bldg. East • Albuquerque, new mexico 87108 even more drastic; or if we have it after five years, they would be less drastic.

The reason I chose the five-year period was that if we had a maximum allowable on the well where we could produce it at a maximum rate, we could get our reserves in approximately five years. So what I have shown here is that with the present allowable, we would have a life of approximately 11 to 17 years, probably closer to 17.

With the production of 275 MMCF, the life would be reduced to four to five years. Now, if we had the present allowable and then lost our well in five years, the next set of calculations show that we would lose 618 MMCF of gas, where if we had a complete failure of the well, and this represents \$115,000 at gas prices which I use \$12 per MCF. I think that's about doubled, but I'm not sure. So this could represent 230 now.

- Now, you were talking about days allowable. How is this well classified at this time?
- 19 A It's classified as an oil well with 80 acres designated to 20 it.
 - Q And what reason? Is it the gas-oil ratio that is cutting your allowable now?
 - A Yes. It's the gas-oil ratio, and we had an unfortunate situation that again applied only to this well. The Commission issued an order a few months back, Order No.

9 Q

20 A

3

AMS BLDG. • P.O. BOX 1092 • PHONE 243-6691 • ALBUQUERQUE, NEW MEXICO 87103 16 first national bank bldg. East • Albuquerque, New Mexico 87108 R-4348 which had the purpose of gearing our production, and I quote, "gear our production to the present period of under supply rather than the over supply and lower our allowable of yesteryear".

And in our particular case, this order had the effect of cutting our allowable from 400 MCF per calendar day to 320. So we were further handicapped in producing this well.

On the average, how long does it take, how many days per month does it take us to produce our allowable on that well?

We have actually been taking anywhere from 12 to 18, but the engineering technician who watches the well very closely and our foreman both tell me we could get our allowable from 8 to 12 days, possibly even less if they opened it up right. We have just never done this.

And Skelly's application in this case requests that these

And Skelly's application in this case requests that these allowables be changed by adopting or amending the rules in the Bisti Lower Gallup Pool; is that correct?

Yes. We ask that they be amended similar to the amendments

made in the Gallegos-Gallup Pool. In fact, we would 'e satisfied with the exact type of amendment, and I think there are several other fields that have this similar rule which provided for non-standard gas proration units along with the provision of re-classified oil wells as gas wells

209 SIMMS BLDG. & P.O. DOX 1092 & PHONE 243-6691 • ALBUQUERQUE, NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST • ALMOQUERQUE, NEW MEXICO 87108 if the gas-oil ratio was in excess of 30,000. Our gas-oil ratio is in excess of 50,000.

Now, are the reservoir characteristics in this particular pool -- I believe you testified that they indicate that there is a gas area there?

A Yes.

- Q Gas cap?
- A Yes, it is a gas area, definitely.
- O In your opinion, do you believe that that area could be efficiently and economically drained and developed on a 320-acre spacing?
- A Yes, I definitely do, and this is evidenced by the production capabilities of our particular well. I was informed by our foreman and technician that this well will produce upwards to two million a day. Looking at our analysis, we have a total of 67 feet of pay and we have a 10-foot slide interval where the permeability averages 65 millidarcies.

So, I'm convinced that we could adequately drain 320 acres.

And based on your information that this subject pool presently would justify a definition of a gas well as a well producing with a gas-oil ratio of 30,000 or more cubic feet of oil per barrel of liquid hydrocarbons --

) SIMMS BLDG. # P.O. BOX 1092 # PHONE 243-6691 # ALBUQUERQUE. NEW MEXICO 87103 1210 First national bank bldg. East # Albuquerque. New Mexico 87108 A Yes.

o -- in your opinion, would the change of rules and change of classification of this particular well present economic loss and the drilling of unnecessary wells?

Yes. It would definitely for our particular case and for any other operator that may run into this in other portions of the Bisti-Gallup Pool. I'm not familiar with the West Bisti Field. We do have some interest in it, but it's operated by another operator. They may have situations similar to this, but if they do, it's several miles distance from our well.

MR. BLODGE: Mr. Examiner, you will note that in this application a letter to the Commission was considered an application in this particular matter. In that application we set out that the 320 acres we wished to assign is in the southeast quarter of Section 26 and the northeast quarter of Section 35, Township 25 North, Range 11 West, San Juan County.

So we also are asking for a variance, I believe, in the statewide rules in order to put the 160, 320 acres together there.

We ask that really because this is an isolated situation. We have the acreage that does adjoin that right to the south of the well and all the other acreages owned by other people.

MR. STAMETS: Mr. Blodget, I was just pondering that

6

7

10

11

12

13

14

15

17

18

19

20

21

22

23

24

25

9 SIMMS BLDC. • P.O. BOX 1092 • PHONE 243•6691 • ALBUQUERQUE, NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST • ALBUQUERQUE, NEW MEXICO 87108 particular situation. I'm not certain how the advertisement was worded. The docket does not mention this particular thing, and this may or may not give us a problem. If it does, it may be necessary to re-advertise this portion of the case and not issue any order until it should be called again.

In a case like that, if we have no objection here at this time, I would assume no one would need to appear. After the case was called again, we could go ahead and issue such an order; but this may have already been taken care of in the advertisement and our special pool rules possibly could be broad enough to cover this. We'd just have to see.

MR. BLODGET: We have no further evidence, then, Mr. Examiner; and we move the introduction of Skelly Oil Company's Exhibits 1, 2, and 3 in this matter.

MR. STAMETS: Without objection, these exhibits will be admitted into evidence. Are there questions of the witness?

(No response)

CROSS EXAMINATION

BY MR. STAMETS:

- Q Mr. Brown, you have described this as a unique situation.
 - Do you not anticipate any more gas wells in this area?
- A Not by us. I don't know. And I said I can't speak for the West Bisti or the Central Bisti, but I think that if anyone anticipated future gas wells, then they would

welcome this ruling. We would be doing them a service to have this ruling made.

All the area which you have on here that has the yellow outline, that is a unitized area still?

No. Α

2

3

It is not? Q

No. This unit was disbanded or terminated on December 1, 1971; and subsequent to that date, we have plugged all wells except those colored in green. This amounted to 117 wells that were plugged. These are only the straggler wells that were considered marginally profitable by the original operators.

And they were taken back by the original operators for continued production, these seven. There was another one, an eighth well, that had the casing collapsed a few months ago; and they lost the well.

- So what is identified on here as Tract 27 is a single lease in two different sections, and this lease is currently operated by Skelly?
- Right. And we also have another 80 acres to the west of our outlined area. The lease is 400 acres.
- Right.
- 23 And we are asking for 320 to be assigned to that well.
- 24 And this would be treated just as a gas well and an oil 25

pool and the gas allowable would be calculated by a multiple

2

3

5

6

7

8

9

10

11

12

13

17

18

19

20

21

22

23

24

25

9 SIMMS BLDG. # P.O. BOX 1092 # PYONE 243-6691 # ALBUQUERQUE, NEW MEXICO 87103 1216 FIRST NATIONAL BANK BILDG. EAST # ALBUQUERQUE, NEW MEXICO 87108 of the acreage times the standard acreage and the GOR times the limiting GOR?

- A Right. That's our understanding.
- Q Now, this is a depleted pool. Can the extra gas withdrawals from this well harm this reservoir in any way at this time?
- I don't think so. It's about a shot reservoir, I guess you could call it; and their nearest well, there is one exactly a mile to the west. There is another one a mile and a half to the north, and all of the other wells are at least two and a half miles away. I really don't see that we would hurt the reservoir.

MR. BLODGET: Didn't you state that a mile to the west is an economic well site?

THE WITNESS: Well, it's not uneconomic. It will just barely, if at all, make its present allowable under the present oil designation.

- Q It is a gas well but the productivity is low?
- A It's a gas well, yes. It's located in the gas cap and has a gas-oil ratio of 44,000 to one. The productivity is very low, about 1/20 of our well.
- Now, you brought the situation of casing failures, and I got the impression at least that if you were restricted to the current allowable and you had a casing failure in five years, you couldn't afford to fix this well.

6

7

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

9 SIMMS BLDG. # P.O. BOX 1092 # PHONE 243-6601 # ALBUQUERQUE. NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST # ALBUQUERQUE, NEW MEXICO 87108 It depends. If we had a complete casing collapse, probably no. Just the fact, and this is probably more important than just the mechanical problems involved, but our experience as operator of the East Bisti Unit was that when we had casing failures the formation and way over half the cases was severely damaged by mud and water and so forth going on the formation.

This was not the case, however, in this well, as I understand it, that had the casing collapse in 1972 just last year. I haven't talked to the operators specifically, but our foreman informed me that that well was returned to production.

They didn't lose the well. They repaired the casing collapse and returned the well to production; but our experience as operator of the unit doing the waterflood units doing the far majority of the cases, the well was severely damaged, the formation.

- Q So you run the risk if you should have casing failure of leaving gas in the ground?
- A Definitely, definitely.
- O The special rules that you have proposed here, would you require that any well classified as a gas well have 320 acres dedicated to it?
- A No, definitely not. Under the Gallegos-Gallup Ruling, Rule

2

3

5

6

?

8

9

10

11

12

13

14

18

19

20

21

22

23

25

Q

209 SIMMS BLDG. # P.O. BOX 1092 #PHONE 243-6601 #ALBUQUERQUE, NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST #ALBUQUERQUE, NEW N'EXICO 87108 acres up to 320?

A Yes, very definitely, because in some of these areas which Skelly isn't interested in, these actual oil wells were drilled on 80-acre spacing. Since they fall in the gas cap in another area in the Bisti-Gallup Pool, then I'm

sure the other operators would want this provision.

So you would propose that it could be any size from 80

2-B provides that non-standard gas proration units could

be applied for and received from the Commission.

It doesn't affect us, but I'm sure that they would, and it should be included in the order just as it was in the Gallegos-Gallup Order.

- Q Gallegos-Gallup has a rather extensive bunch of rules there.
 I don't think you all want quite that many, do you?
- 15 A Actually, all we need is we would like the Commission to
 16 find three, four, five and six and issue Rule 2 and 2-B
 17 and possibly five.
 - Q All right. I believe that will clarify that point.

MR. BLODGET: I believe that was set out in our letter.

MR. STAMETS: Are there any other questions of this

witness?

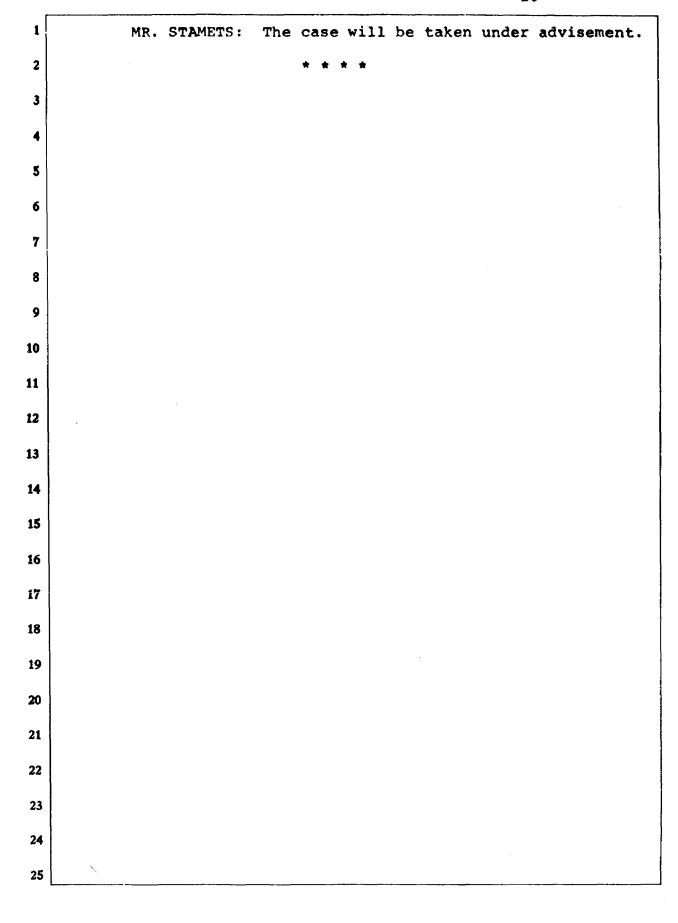
(No response)

MR. STAMETS: He may be excused. Is there anything

further in the case?

(No response)

dearnley, meier & mc cormick
1216 FIRST NATIONAL BANK BLDG. EAST-ALBUQUERQUE, NEW MEXICO 87103
1216 FIRST NATIONAL BANK BLDG. EAST-ALBUQUERQUE, NEW MEXICO 87108



23

24

25

STATE OF NEW MEXICO SS. COUNTY OF BERNALILLO)

I, JANET RUSSELL, 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.

A &s hereby certify that the foregoing is a semplate respect of the proceedings in

Examiner New Mexico Oil Conservation Commission

		1	INDEX		
		2	WITNESS		PAGE
dearnley, maler & mc cormick		3	GERALD BROWN		
		4	Direct Examination by Mr. Blodget		3
		5	Cross Examination by Mr. Stamets		11
		6	EXHIBITS	Offered	Admitted
		7	Exhibit No. 1 - Base plat of old East Bisti Unit	á	11
		8	Exhibit No. 2 - bottom hole pressure		
		9	data of Skelly J. C. Daum Well Number l	6	11
		10	Exhibit No. 3 - Tabulation of Economics	6	11
	m	12			
	108	13	_		
0	W MEXIC	14			
	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	15			
GEALT OF MEXICO 87103 BUQUERQUE, NEW MEXICO 87103	QUERQ RQUE, I	16			
	•- i	17			
	243-669 AST • AL	18			
	HONE LDG. R	19			
	1092 • 1 BANK B	20			
0. BOX	.0. BO	21			
	G + 4 Z F 8	22			
209 SIMMS BLDG. # P.O. BOX 1092 # PHONE 243-6691	IMMS BI	23			
	209 5	24			
		25			



Other__

OIL CONSERVATION COMMISSION

STATE OF NEW MEXICO P. O. BOX 2088 - SANTA FE 87501

ALEX J. ARMIJO MEMBER STATE GEOLOGIST A. L. PORTER, JR. SECRETARY - DIRECTOR

GOVERNOR BRUCE KING

CHAIRMAN

LAND COMMISSIONER

June 25, 1973

	Re:	Case No	4949
Mr. Chester E. Blodget		order No.	R-1069-F
Skelly Oil Company Post Office Box 1650		Applicant:	
Tulsa, Oklahoma 74102		Skelly	Oil Company
Dear Sir:			
Enclosed herewith are two Commission order recently	_		
	Very tr	ly yours,	
		ORTER, Jr.	
	Secreta	ry-Director	بند
ALP/ir			
Copy of order also sent	to:		
Hobbs OCC x			
Artesia OCC			
Aztec OCC x			

Mr. Charles White

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

CASE NO. 4949 Order No. R-1069 F

APPLICATION OF SKELLY OIL COMPANY FOR THE AMENDMENT OF ORDER NO. R-1069-B, SAN JUAN COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on April 25, 1973, at Santa Fe, New Mexico, before Examiner Richard L. Stamets.

NOW, on this 25th day of June, 1973, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Skelly Oil Company, is the owner-operator of the J. C. Daum Well No. 1 located in Unit I of Section 26, Township 25 North, Range 11 West, NMPM, Bisti-Lower Gallup Oil Pool, San Juan County, New Mexico.
- (3) That the Bisti-Lower Gallup Oil Pool in the area of said well has been depleted by primary and secondary recovery techniques and is now capable of only marginal production.
- (4) That applicant's J. C. Daum Well No. 1 has a gas-oil ratio in excess of 50,000 to 1, and that said well's allowable is restricted due to this high gas-oil ratio.
- (5) That said well is located in an area of the Bisti-Lower Gallup Oil Pool where casing failures have occurred and that should such a failure occur in said well before said well is depleted, hydrocarbons could be wasted through non-production.
- (6) That the applicant seeks the amendment to the special pool rules of the Bisti-Lower Gallup Oil Pool to include provisions for the classification of gas wells in said pool and the dedication of 320 acres thereto.

-2-Case No. 4949 Order No. R-1069-F

- (7) That the applicant further seeks approval of a 320-acre proration unit consisting of the SE/4 of Section 26 and the NE/4 of Section 35, Township 25 North, Range 11 West, NMPM, to be dedicated to said J. C. Daum Well No. 1.
- (8) That the evidence indicates that said well can efficiently and economically drain said 320 acre tract.
- (9) That the resultant higher allowables should permit the applicant to deplete said well at an earlier date minimizing the risk of waste due to casing failure.
- (10) That wells producing in the Bisti-Lower Gallup Oil Pool with gas-oil ratios in excess of 50,000 to 1 should be permitted to have dedicated thereto up to 320 acres and be assigned oil and casinghead gas allowables in proportion as the dedicated acreage relates to 80 acres; that approval of amendments to the special pool rules for the Bisti-Lower Gallup Oil Pool to provide for the same is in the interest of conservation, will prevent waste, and protect correlative rights.

IT IS THEREFORE ORDERED:

- (1) That the special pool rules for the Bisti-Lower Gallup Oil Pool are amended to include:
- RULE 6. Any well in the Bisti-Lower Gallup Oil Pool with a gas-oil ratio of 50,000 cubic feet or more of gas per barrel of oil may have dedicated to it up to 320 acres.
- RULE 7. That the acreage dedicated under Rule 6 above shall be all or part of a single governmental half section.
- RULE 8. That acceptance of Commission Form C-102 by the Supervisor of the Aztec District office of the Commission shall constitute approval of the proration unit.
- RULE 9. That wells in the Bisti-Lower Gallup Oil Pool shall be permitted to produce a casinghead gas allowable obtained by multiplying the top unit oil allowable for the pool by 2,000 and by a fraction, the numerator of which is the number of acres dedicated to the particular well and the denominator of which is 80.

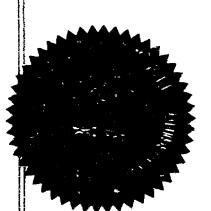
IT IS FURTHER ORDERED:

(1) That the SE/4 of Section 26 and the NE/4 of Section 35, Township 25 North, Range 11 West, NMPM, is hereby approved as a 320-acre proration unit to be dedicated to applicant's J. C. Daum Well No. 1, located in Unit I of said Section 26 in said pool.

-3-Case No. 4949 Order No. R-1069-F

- (2) That the dedication shall be effective after the effective date of this order and upon the receipt of a proper Form C-102 by the Aztec District Office of the Commission.
- (3) That the effective date of this order shall be June 1, 1973.
- (4) That jurisdiction of this cause is hereby retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year herein-above designated.



STATE OF NEW MEXICO OIL CONSERVATION COMMISSION

I. R. TRUJILLO, Chairman

ALEX J. ARMIJO Member

A. L. PORTER, Jr., Member & Secretary

SEAL

ME COMPRESSION APPEL 5, 1973

Mr. A. L. Porter, Jr. New Mexico Oil Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87501

RE: Skelly Oil Company Application to Amend Pool Rules, Bisti-Gallup Pool Rule, San Juan Basin, New Mexico

 $S_{\rm MM}(p) = \mathbb{R}_{p}.$

Dear Mr. Porter:

We herewith enter our formal appearance as local counsel for Skelly Oil Company in regard to amending the Bisti-Gallup Pool Rules, as requested in their letter of March 12th, 1973, and which matter will come on for hearing April 25th, 1973.

Very truly yours,

WHITE, KOCH, KELLY & McCARTHY

L. C. WHITE
P. O. Box 787
Santa Fe, New Mexico

LCW: DT

cc: Mr. Chester E. Blodget Skelly Oil Company P. O. Box 1650 Tulsa, Oklahoma 74102

DOCKET MAILED

Date 4-/2-73

L.C. White Sumner S. Koch William Booker Kelly John F. McCarthy, Jr. Kenneth Bateman Benjamin Phillips Ronald M. Friedman

Attorneys and Counselors at Law

220 Otero St., P.O. Box 787, (505)982-4374, Santa Fe, N.M. 87501 - P.O. Drawer E, (505)758-4338, Taos, N.M. 87571

Approve 4949

Find - Pool production marginal,

Show define gas wells

Definition of gas well, 60R
Dedication of gas well, 60R
Dedication of 320 acres to
gas wells.

Less ecrege for gas wells a diministratively
by Sec Director if tile application,
hotify off sets, no objection 30 days.

4949granding officialis will grand drilling Maylion de ser vivor la 330 acres
unie two sections.

will need to recall and mules 3-4-5-6 - and 2 and 2(b) 60 Suhmited



Chr. 4949

SKELLY OIL COMPANY

P. O. BOX 1650

TULSA, OKLAHOMA 74102

LAW DEPARTMENT GEORGE W. SELINGER SENIOR ATTORNEY

March 12, 1973

Re: Bisti-Gallup Field San Juan Basin, New Mexico

VIA AIR MAIL

Mr. A. L. Porter, Jr. New Mexico Oil Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Porter:

The Bisti-Lower Gallup Pool was classified by the Commission and field rules issued in 1958 and 1959 as an oil pool with uniform 80-acre well spacing and related special rules and regulations. Under these rules, together with the definition of a gas well in the Statewide Rules that any well with a gas-oil ratio in excess of 100,000 cubic feet of gas per barrel of oil producing from an oil pool is considered a gas well, consequently, our J. C. Daum with a producing gas-oil ratio of 50,385 to 1 is considered an oil well from a regulation standpoint. This creates an extreme hardship on our part to operate this well which the Commission has recognized in the Gallegos-Gallup Pool, that while this pool is presently classified as an oil pool it is in fact an associated reservoir and that the reservoir characteristics indicate that the gas area of the Bisti-Gallup Field can efficiently and economically drain 320 acres, and we therefore feel that insofar as the Bisti-Lower Gallup oil pool is concerned and the reservoir characteristics thereunder justifies the definition of a gas well in this particular pool as a well producing with a gas liquid ratio of 30,000 or more cubic feet of gas per barrel of liquid hydrocarbons

We, therefore, would like to have you consider amending the Bisti-Lower Gallup Oil Pool Rules by the inclusion of Findings 3, 4, 5 and perhaps 6, and Rule 2 and Rule 5 of the Gallegos-Gallup Pool Rules, and since other rules of the Gallegos-Gallup that may be applicable thereto.

DOCKET MAILER

Date 4-12-73

Mr. A. L. Porter March 12, 1973 Page 2

The hardship that I referred to is augmented by the fact that we believe our J. C. Daum is the only well in the Bisti-Gallup Field that the productivity is such that the limiting gas-oil ratio results in severe curtailment of production.

The 320 acres we wish to assign is in the SE/4 of Section 26, and the NE/4 of Section 35, Township 25 North, Range 11 West, San Juan County, and from the attached plat you will note that this lies southwest of the main portion of the field and is unique in this instance.

We would appreciate hearing from you in this regard.

GWS:br Attach. George W. Selinger

DOCKET: EXAMINER HEARING - WEDNESDAY - APRIL 25, 1973

9 A.M. - OIL CONSERVATION COMMISSION CONFERENCE ROOM, STATE LAND OFFICE BUILDING - SANTA FE, NEW MEXICO

The following cases will be heard before Richard L. Stamets, Examiner, or Daniel S. Nutter or Elvis A. Utz, Alternate Examiners:

CASE 4946: Application of Union Texas Petroleum for special pool rules, Lea County, New Mexico. Applicant, in the above-styled cause, seeks the promulgation of special pool rules for the Crosby-Fusselman Pool, Lea County, New Mexico, including a provision for classification of oil wells and gas wells, 80-acre spacing for oil wells, 320-acre spacing for gas wells, and a limiting gas-oil ratio of 5000 to one.

CASE 4947: Application of Tom Brown, Inc., for compulsory pooling, and a non-standard unit, Eddy County, New Mexico. Applicant, in the above-styled cause, seeks an order pooling all mineral interests underlying the N/2 of Section 13, Township 22 South, Range 26 East, South Carlsbad Field Extension, Eddy County, New Mexico, to form a non-standard 336.6-acre unit to be dedicated to a well to be drilled 1680 feet from the North line and 1980 feet from the East line of said Section 13.

Also to be considered will be the costs of drilling said well, a charge for the risk involved, a provision for the allocation of actual operating costs, and the establishment of charges for supervision of said well.

CASE 4948: Application of Skelly Oil Company for an unorthodox oil well location, Lea County, New Mexico. Applicant, in the above-styled cause, seeks authority to re-complete its R. R. Sims Well No. 7 located 2200 feet from the South and West lines of Section 3, Township 23 South, Range 37 East, Lea County, New Mexico, as a producing oil well in its Penrose "A" waterflood project, Langlie-Mattix Pool, said well being an unorthodox location closer than 330 feet to another well producing from the same pool. Applicant further seeks an administrative procedure for approval of further in-fill development at unorthodox locations in its Penrose "A" Unit Area.

CASE 4949:

Application of Skelly Oil Company for the amendment of Order No. R-1069-B, San Juan County, New Mexico. Applicant, in the above-styled cause, seeks the amendment of Order No. R-1069-B, which order promulgated special pool rules for the Bisti Lower-Gallup Oil Pool, San Juan County, New Mexico. Applicant seeks the adoption of rules for the classification of gas wells in said pool and the dedication of 320 acres thereto.

(SOUTH BLANCO-TOCITO POOL-Cont'd.)

Pool, except that credit for daily average net water injected into the Tocito formation through any injection well or wells located within the project area may be applied to any well or wells producing with a gas-oil ratio in excess of two thousand cubic feet of gas per barrel of oil. Total credit for net water injected in the project area shall be the gas equivalent volume of the daily average net water injected during a one-month period. The daily average gas equivalent of net water injected shall be computed in accordance with the following formula: cordance with the following formula:

$$E_g = (V_{w \text{ inj}} - V_{w \text{ prod}}) \times 5.61 \text{ ft}^3 \times P_a \times 520^{\circ} \times 1 \frac{1}{\text{bbl } 15.025 \cdot 635^{\circ}} \times 2$$

where: E_g = Average daily gas equivalent of net water injected

= Average daily volume of water injected, barrels

V_{w prod} = Average daily volume of water produced, barrels

= Average reservoir pressure at datum of -100 feet, psig + 11.5, as determined from most recent semi-annual survey.

15.C25 = Pressure base, psi

520° = Temperature base of 60°F

expressed as absolute temperature

635° = Reservoir temperature of 175°F expressed as absolute temperature

Supercompressibility factor for 0.7 grav-Z ity gas at average reservoir pressure, Pa, interpolated from supercompressibility

tabulation below:

Pressure	Z	\Pressure	Z
2000	0.845	1200	0.889
1900	0.849	`1100	0.897
1800	0.853	1000	0.905
1700	0.857	900	0.914
1600	0.861	800	0.923
1500	0.865	700	0.932
1400	0.873	600	0.941
1300	0.881	500	0.950

Distribution of the total calculated average daily gas equivalent volume may be made to any well or wells with gas-oil ratios in excess of two thousand to one. The daily adjusted oil allowable for any such well receiving water injection credit shall be determined as follows: Well's

Adjusted = (Top unit allowable X 2000) + gas Allowable equivalent volume assigned to well Allowable

Well's gas-oil ratio provided however, that in no event shall the gas equivalent volume assigned to a well be such as to cause the well's adjusted allowable to exceed the

top unit allowable for the pool.

(h) Each month the project operator shall, within three days after the normal unit allowable for Northwest New Mexico has been established, submit to the Commission a South Blanco-Tocito Water In-jection Project Operator's Report, on a form pre-scribed by the Commission, outlining thereon the data required, and requesting allowables for each of the several wells in the Project.

(i) The Commission shall, upon review of the report and after any adjustments deemed necessary, assign allowables to each well in the Project for the next succeeding month in accordance with these rules.

(j) The Special Rules and Regulations for the operation of wells in the project area shall prevail as against the Special Rules and Regulations for the South Blanco-Tocito Oil Pool, if in conflict therewith.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

BISTI-LOWER GALLUP OIL POOL San Juan County, New Mexico

Order No. R-1069-B, Adopting Rules for the Bisti-Lower Gallup Oil Pool, San Juan County, New Mexico, January 17, 1958. As made permanent by Order No. R-1069-E, February 2, 1959.

Application of Sunray Mid-Continent Oil Co-pany for an order extending the horizontal limits of the Bisti-Lower Gallup Oil Pool, in San Juan County, New Mexico, and tempo-rarily establishing uniform 80-acre well spac-ing and promulgating special rules and reg-ulations for said pool.

CASE NO. 1308 Order No. R-1069-B

ORDER OF THE COMMISSION

BY THE COMMISSION: This cause came on for hearing at 9 o'clock a.m., on September 18, 1957, at Santa Fe, New Mexico, before the Oil Conservation Commission of New Mexico, hereinafter referred to as the "Commission," and that this cause came on for rehearing before the Commission, upon the petition of Sunray Mid-Continent Oil Company et al, at 9 o'clock a.m. on December 18, 1957 at Santa Fe, New Mexico.

NOW, on this 17th day of January, 1958, the Commission, a quorum being present, having considered the application, the petitions for rehearing, and the evidence adduced at both the original hearing and the rehearing and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That Order No. R-1069 should be superseded by this
- (3) That the Commission found in Order No. R-1069 that "... the Commission should continue to follow its established policy of extending the horizontal limits of oil and gas pools in the State of New Mexico to include only such acreage as has been proven productive by actual drilling operations."

(BISTI-LOWER GALLUP OIL POOL-Cont'd.)

- (4) That the petitioners on rehearing failed to show cause why the Commission should deviate from the aforementioned policy in the Bisti-Lower Gallup Oil Pool.
- (5) That sufficient evidence was adduced by the petitioners on rehearing, in addition to the evidence adduced at the original hearing, to justify the establishment of 80-acre proration units in the Bisti-Lower Gallup Oil Pool on a temporary basis.
- (6) That 80-acre proration units should be temporarily established in the Bisti-Lower Gallup Oil Pool and that all wells drilled to or completed in said pool should be located on a unit containing 80 acres, more or less, which consists of either the North half or the South half of a single governmental quarter section; and further that all wells drilled in the Bisti-Lower Gallup Oil Pool should be located within 100 feet of the center of either quarter-quarter section; provided however, that the rules should not prohibit the drilling of a well on each of the quarter-quarter sections in an 80-acre proration unit.
- (7) That the Secretary-Director of the Commission should have authority to grant exceptions to the foregoing spacing and well location requirements without the necessity of a formal
- (8) That an 80-acre proration unit in the Bisti-Lower Gallup (3) That an 80-acre proration unit in the Bisti-Lower Sainty Oil Pool should be assigned an 80-acre proportional factor of two (2) for allowable purposes, and that in the event there is more than one well on an 80-acre proration unit, the operator should be permitted to produce the unit's allowable from said wells in any proportion.
- (9) That any well which was projected to or completed in the Bisti-Lower Gallup Oil Pool prior to the effective date of this order should be granted an exception to the 80-acre spacing and well location requirements set forth above, and that any such excepted well should be assigned an allowable which is in the proportion to the standard 80-acre allowable that the well's addicted acres to 80-acres; provided however, that the dedicated acreage bears to 80-acres; provided however, that the allowable for any such excepted well should be increased to that of a standard unit upon receipt by the Commission of proper notice that such well has 80 acres dedicated thereto.

 IT IS THEREFORE ORDERED: (Temporary Order No. R-1069-B made permanent by Order No. 1069-E, February 2, 1959)
- (1) That Order No. R-1069 dated October 9, 1957, be and the same is hereby superseded by this order.
- (2) That the application of Sunray Mid-Continent Oil Company to extend the horizontal limits of the Bisti-Lower Gallup Oil Pool to include acreage which has not been proven productive by actual drilling operations be and the same is hereby
- (3) That any well which was drilling to or completed in the Bisti-Lower Gallup Oil Pool prior to January 25, 1958, be and the same is hereby granted an exception to the well location requirements of Rule 3 of the Special Rules and Regulations for the Bisti-Lower Gallup Oil Pool hereinafter set forth, and that any such well which is located on a tract comprising either the North half or the South half of a governmental quarter section on which 80-acre unit there is located more than one well, be and the same is hereby granted an exception to the requirements of Rule 2 of the Special Rules and Regulations hereinafter set forth; further, that all such excepted wells shall be assigned an allowable effective at 7 o'clock c.m. Mountain Standard Time, March 1, 1958, which allowable shall bear the same proportion to the standard 80-acre allowable for the Bisti-Lower Gallup Oil Pool that the acreage dedicated to such well (3) That any well which was drilling to or completed in the Lower Gallup Oil Pool that the acreage dedicated to such well

bears to 80 acres; provided however, that the allowable for any such excepted well may be increased to that of a standard 80-acre unit by the dedication to the well of additional acreage sufficient to constitute a standard 80-acre proration unit, said allowable to become effective on the date of receipt by the Commission of an amended Form C-128, Well Location and Acreage Dedication Plat, showing the increased acreage dedication. Provided however, that no well shall be assigned an 80-acre allowable in the Bisti-Lower Gallup Oil Pool prior to March 1, 1958. March 1, 1958.

- (4) That the effective date of this order shall be March 1,
- (5) (Rescinded by Order No. 1069-E, February 2, 1959) That this order shall be of no further force nor effect after February
- (6) That a case be called for the regular Commission hearing in January, 1959, to permit all interested parties to appear and show cause why the Special Rules and Regulations hereinafter set forth should be continued beyond February 28, 1959.
- (7) That special pool rules for the Bisti-Lower Gallup Oil Pool be and the same are hereby promulgated as follows:

SPECIAL RULES AND REGULATIONS FOR THE BISTI-LOWER GALLUP OIL POOL

RULE 1. Any well projected to or completed in the Lower Gallup formation within one mile of the boundaries of the Bisti-Lower Gallup Oil Pool shall be spaced, drilled, operated, and prorated in accordance with the Special Rules and Regulations hereinafter set forth.

RULE 2. All wells projected to or completed in the Bisti-Lower Gallup Oil Pool shall be located on a unit containing 80 acres, more or less, which consists of either the North half or the South half of a single governmental quarter section.

RULE 3. All wells projected to or completed in the Bisti-Lower Gallup Oil Pool shall be located within 100 feet of the center of either quarter-quarter section in the unit; provided however, that nothing contained herein shall be construed as prohibiting the drilling of a well on each of the quarter-quarter sections in an 80-acre unit.

RULE 4. The Secretary-Director of the Commission may grant exceptions to the requirements of Rule 2 and, for topographical reasons only, to the requirements of Rule 3 above without notice and hearing where the application is filed in due form, provided the applicants furnish all operators within a 2640-foot radius of the subject well a copy of the application to the Commission, and provided further that the Secretary-Director of the Commission shall wait at least twenty days before approving any such application and that no such application shall be approved over the objection of an offset operator. In the event an offset operator objects to the application, the Commission shall consider the matter only after proper notice and hearing. The applicant shall include with his application a list of names and addresses of all the operators within the a list of names and addresses of all the operators within the radius set forth above together with a stipulation that proper notice of the application has been given said operators.

RULE 5. An 80-acre proration unit in the Bisti-Lower Galthe Oil Pool shall be assigned an 80-acre proportional factor of two (2) for allowable purposes, and in the event there is more than one well on an 80-acre proration unit, the operator may produce the allowable assigned to the unit from said wells in any proportion.

DONE at Santa Pc, New Mexico, on the day and year hereinabove designated.

(BUFFALO VALLEY-PENNSYLVANIAN GAS POOL - Cont'd.)

where an application has been filed in due form and where the unorthodox size or shape of the tract is due to a variation in the legal subdivision of the United States Public Land Surveys, or where the following facts exist and the following provisions are complied with:

- The non-standard unit consists of contiguous quarterquarter sections or lots.
- (2) The non-standard unit lies wholly within a single governmental section.
- (3) The entire non-standard unit may reasonably be presumed to be productive of gas from the Buffalo Valley-Pennsylvanian Gas Pool.
- (4) The applicant presents written consent in the form of waivers from all offset operators and from all operators owning interests in the section in which any part of the non-standard unit is situated and which acreage is not included in said non-standard unit.
- (5) In lieu of Paragraph 4 of this rule, the applicant may furnish proof of the fact that all of the aforesaid operators were notified by registered or certified mail of his intent to form such non-standard unit. The Secretary-Director may approve the application if, after a period of thirty days, no such operator has entered an objection to the formation of such non-standard unit.

C. ALLOCATION AND GRANTING OF ALLOWABLES

RULE 8(A). The allowable production in the Buffalo Valley-Pennsylvanian Gas Pool shall be allocated as follows:

The pool allowable remaining each month after deducting the total allowable assigned to marginal wells shall be allocated among the non-marginal wells entitled to an allowable in the proportion that each well's acreage factor bears to the total of the acreage factors for all non-marginal wells in the pool.

C. GENERAL

RULE 25. The vertical limits of the Buffalo Valley-Pennsylvanian Gas Pool shall be the Pennsylvanian formation.

RULE 26. The first proration period for the Buffalo Valley-Pennsylvanian Gas Pool shall commence May 1, 1969, and shall terminate December 31, 1969. Subsequent proration periods shall be the six-month periods as provided in the General Rules.

IT IS FURTHER ORDERED:

- (1) That the Special Rules and Regulations for the Buffalo Valley-Pennsylvanian Gas Pool promulgated by Orders Nos. R-2349 and R-2349-A are hereby superseded.
- (2) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

GALLEGOS GALLUP POOL San Juan County, New Mexico

Order No. R-3707, Adopting Operating Rules for the Gallegos-Gallup Pool, San Juan County, New Mexico, May 1, 1969, as Amended by Order No. R-4367, August 30, 1972. Application of El Paso Products Company for Special Pool Rules, San Juan County, New Mexico.

CASE NO. 4053 Order No. R-3707

ORDER OF THE COMMISSION

BY THE COMMISSION: This cause come on for hearing at 9 a.m. on February 26, 1969, at Santa Fe, New Mexico, before Examiner Elvis A. Utz.

NOW, on this 14th day of March, 1969, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, El Paso Products Company, seeks the promulgation of special rules and regulations for the Gallegos-Gallup Oil Pool, San Juan County, New Mexico, including provisions for the classification of oil and gas wells, 80-acre spacing for oil wells, and 320-acre spacing for gas wells.
- (3) That while said Gallegos-Gallup Oil Pool is presently classified as an oil pool, the evidence adduced indicates that it is in fact an "associated" reservoir.
- (4) That the reservoir characteristics of the subject pool indicate that the gas area can be efficiently and economically drained and developed on 320-acre spacing, and that the oil area can be efficiently and economically drained and developed on 80-acre spacing.
- (5) That the reservoir characteristics of the subject pool presently available justify the definition of a gas well as a well producing with a gas-liquid ratio of 30,000 or more cubic feet of gas per barrel of liquid hydrocarbons.
- acre' gas well spacing and 80-acre oil well spacing should be promulgated for the subject pool in order to prevent the economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells, prevent reduced recovery which might result from the drilling of too few wells, and otherwise prevent waste and protect correlative rights.

(GALLEGOS-GALLUP POOL - Cont'd.)

IT IS THEREFORE ORDERED:

(1) That Special Rules and Regulations for the Gallegos-Gallup Oil Pool, San Juan County, New Mexico, are hereby promulgated as follows, effective May 1, 1969:

SPECIAL RULES AND REGULATIONS FOR THE GALLEGOS-GALLUP OIL POOL

- RULE 1. Each well completed or recompleted in the Gallup formation within the boundary of the Gallegos-Gallup Oil Pool or within one mile thereof, and not nearer to nor within the boundaries of another designated Gallup pool, shall be drilled, spaced, and produced in accordance with the Special Rules and Regulations hereinafter set forth,
- RULE 2, (a) Each gas well shall be located on a tract consisting of approximately 320 acres which may reasonably by presumed to be productive of gas from said pool, and which shall comprise any two contiguous quarter sections of a governmental section, being a legal subdivision (half section) of the United States Public Land Surveys. For purposes of these rules, a unit consisting of between 316 and 324 contiguous surface acres shall be considered a standard gas unit.

RULE 2. (b)

- 1. The District Supervisor shall have the authority to approve a non-standard unit as an exception to Rule 2 (a) without notice and hearing when the unorthodox size or shape of the unit is necessitated by a variation in the legal subdivision of the United States Public Land Surveys and the non-standard unit is not less than 75% nor more than 125% of a standard unit.
- 2. The District Supervisor may approve the non-standard unit by:
- (a) Accepting a plat showing the proposed non-standard unit and the acreage to be dedicated to the non-standard unit, and
 - (b) Assigning an allowable to the non-standard unit.
- 3. The Secretary-Director of the Commission shall have authority to grant an exception to Rule 2 (a) without notice and hearing where an application has been filed in due form and when the unorthodox size or shape of the tract is due to a variation in the legal subdivision of the United States Public Land Surveys and the non-standard unitisless than 75% or more than 125% of a standard unit, or where the following facts exist and the following provisions are complied with:
- (a) The proposed non-standard proration unit consists of less acreage than a standard proration unit;
- (b) The non-standard gas proration unit consists of contiguous quarter-quarter sections and/or lots;
- (c) The non-standard gas proration unit lies wholly within a single governmental section;
- (d) The entire non-standard gas proration unit may reasonably be presumed to be productive of gas from the designated gas pool:
- (e) The applicant presents written consent in the form of waivers from:

- (1) All operators owning interests outside the non-standard gas proration unit but in the same section in which any part of the non-standard gas proration unit is situated, and
- (2) All operators owning interests in acreage offsetting the non-standard gas proration unit.
- (f) In lieu of subparagraph (e) of this rule, the applicant may furnish proof of the fact that said offset operators were notified by registered mail of his intent to form such non-standard gas proration unit. (This notification to offset operators should consist of the same information that is furnished to the Commission). The Secretary-Director of the Commission may approve the application if, after a period of 30 days following the mailing of said notice, no operator has made objection to formation of such non-standard gas proration unit.
- RULE 2. (c) The allowable assigned to any such non-standard gas proration unit shall bear the same ratio to a standard allowable in said pool as the acreage in the unit bears to 320 acres.
- RULE 3. (a) Each oil well shall be located on a unit containing approximately 80 acres, which may reasonably be presumed to be productive of oil from said pool, and which consists of the N/2, S/2, E/2, or W/2 or a governmental quarter section. For purposes of these rules, a unit consisting of between 79 and 81 contiguous surface acres shall be considered a standard unit. Nothing centained herein shall be construed as prohibiting the drilling of an oil well on each of the quarter-quarter sections in the 80-acre unit.
- RULE 3. (b) For good cause shown, the Secretary-Director may grant an exception to the requirements of Rule 3 (a) without notice and hearing when an application has been filed in due form, and where the unorthodox size or shape of the tract is due to a variation in the legal subdivision of the United States Public Land Surveys, or where the following facts exist and the following provisions are complied with:
- (1) The non-standard unit is to consist of a quarter-quarter section or lot.
 - (2) The non-standard unit consists of not more than 81 acres.
- (3) The entire non-standard unit may reasonably be presumed to be productive of oil from said pool.
- (4) The applicant presents written consent in the form of waivers from all offset operators.
- (5) In lieu of paragraph (4) of this rule, the applicant may furnish proof of the fact that all of the offset operators were notified by registered or certified mail of his intent to form such non-standard unit. The Secretary-Director may approve the application if, after a period of 30 days, no operator has entered an objection to the formation of such non-standard unit.
- RULE 3. (c) The District Supervisor shall have authority to approve non-standard oil proration units without notice and hearing and without administrative approval by the Secretary-Director if such unit consists of two contiguous quarter-quarter sections or lots comprising less than 79 acres lying within a governmental quarter section and the non-standard unit is necessitated by a variation in the United States Public Land Surveys.

(GALLEGOS-GALLUP POOL - Cont'd.)

RULE 3. (d) The allowable assigned to any such non-standard oil proration unit shall bear the same ratio to a standard allowable in said pool as the acreage in the unit bears to 80 acres.

RULE 4. (a) Each well, oil or gas, shall be located no nearer than 790 feet to any quarter section line and each such well shall be located no nearer than 330 feet to a governmental quarter-quarter section line or subdivision inner boundary line. Any well drilled to and producing from the Gallegos-Gallup Oil Pool prior to the effective date of this order at a location conforming to the well location requirements in effect at the time the well was drilled shall be considered to be located in conformance with this rule.

RULE 4. (b) The Secretary-Director shall have authority to grant an exception to Rule 4 (a) without notice and hearing when the application has been filed in due form and the Secretary-Director determines that good cause exists for granting such exception. However, such an unorthodox location, if approved, may necessitate an allowable adjustment.

Applicants shall furnish all offset operators and all operators within the section in which the subject well is located a copy of the application to the Commission, and the applicant shall include with his application a list of the names and addresses of all such operators together with a stipulation that proper notice has been given said operators at the addresses listed. The Secretary-Director of the Commission shall wait at least 20 days before approving any such unorthodox location, and only in the absence of objection from an offset operator may such application be approved.

RULE 5. A well shall be classified as a gas well if it has a gas-liquid ratio of 30,000 cubic feet of gas per barrel of liquid hydrocarbons, or more. A well shall be classified as an oil well if it has a gas-liquid ratio of less than 30,000 cubic feet of gas per barrel of liquid hydrocarbons. The simultaneous dedication of any acreage to both an oil well and a gas well is strictly prohibited.

RULE 6. The gas-liquid ratio limitation shall be 2000 cubic feet of gas per barrel of liquid hydrocarbons produced.

RULE 7. An oil well which has 80 acres dedicated to it shall be permitted to produce an amount of gas determined by multiplying the top unit oil allowable for said pool by the limiting gas-liquid ratio for the pool, (2000). In the event there is more than one oil well on an 80-acre oil proration unit, the operator may produce the allowable assigned to the 80-acre unit from said wells in any proportion.

A gas well shall be permitted to produce that amount of gas obtained by multiplying the top unit oil allowable for the pool by 2000 and by a fraction, the numerator of which is the number of acres dedicated to the particular gas well and the denominator of which is 80. In the event there is more than one gas well on a 320-acre gas proration unit, the operator may produce the amount of gas assigned to the unit from said wells in any proportion.

RULE 8. The operator of each newly completed well shall cause a gas-liquid ratio test to be taken on said well upon recovery of all load oil from the well, provided however, that

in no event shall the test be commenced later than 30 days from the date of first production unless the well is connected to a gas-gathering facility and is producing under a temporary gas allowable assigned in accordance with Rule 11. Provided further, that any well which is shut-in shall be exempted from the aforesaid gas-liquid ratio test requirement so long as it remains shut-in. The initial gas-liquid ratio test shall be taken in the manner prescribed by Rule 9. If the gas-liquid ratio is 30,000 cubic feet of gas per barrel of liquid hydrocarbons, or more, the operator shall not produce the well until beneficial use can be made of the gas.

No gas shall be flared or vented from any well classified as an oil well more than 60 days after the well begins to produce. Any operator that desires to obtain an exception to the forgoing provisions for a well classified as an oil well shall submit to the Secretary-Director of the Commission an application for such exception with a statement setting forth the facts and circumstances justifying it. The Secretary-Director is hereby authorized to grant such an exception if he determines that the granting of it is reasonably necessary. If the Secretary-Director declines to grant administrative approval of the requested exception, the matter shall be set for hearing if the operator so requests.

RULE 9. Gas-liquid ratio tests shall be taken on all wells in the pool, and on all wells producing from the Gallup formation within one mile of the boundaries of the pool which are not within another designated Gallup pool, during the month of April, 1969, and annually thereafter. An initial gas-liquid ratio test taken after April 1, 1969, shall suffice as the first annual test. Tests shall be 24-hour tests, being the final 24 hours of a 72-hour period during which the well shall be produced at a constant normal rate of production. Results of such tests shall be filed on Commission Form C-116 on or before the 10th day of the following month. At least 72 hours prior to commencement of any such gas-liquid ratio tests, each operator shall file with the Aztec office of the Commission a test schedule for its wells, specifying the time each of its wells is to be tested. Copies of the test schedule shall also be furnished to all offset operators.

Special tests shall also be taken at the request of the Secretary-Director and may also be taken at the option of the operator. Such special tests shall be taken in accordance with the procedures outlined hereinabove, including notification to the Commission and offset operators.

RULE 16. An initial shut-in pressure test shall be taken on each gas well and shall be reported to the Commission on Form C-125.

RULE 11. Any well completed after the effective date of this order shall receive an allowable only upon receipt by the Commission's Aztec office of Commission Forms C-104 and C-116, all properly executed. The District Supervisor of the Commission's Aztec office is hereby authorized to assign a temporary gas allowable to wells connected to a gas transportation facility during the recovery of load oil, which allowable shall not exceed the number of cubic feet of gas obtained by multiplying the daily top unit allowable for the pool by 2000.

RULE 12. (As Amended by Order No. R-4367, August 30, 1972.) The date 7:00 a.m. January 1 of each year shall be known as the balancing date, and the twelve months following this date shall be known as the gas proration period.

(GALLEGOS-GALLUP POOL - Cont'd.)

RULE 13. Any gas well which has an underproduced status as of the end of a gas proration period shall be allowed to carry such underproduction forward into the next gas proration period and may produce such underproduction in addition to the allowable assigned during such succeeding period. Any allowable carried forward into a gas proration period and remaining unproduced at the end of such gas proration period shall be cancelled.

RULE 14. Production during any one month of a gas proration period in excess of the allowable assigned to a well for such month shall be applied against the underproduction carried into such period in determining the amount of allowable, if any, to be cancelled.

RULE 15. Any well which has an overproduced status as of the end of a gas proration period shall carry such overproduction forward into the next gas proration period, provided that such overproduction shall be compensated for during such succeeding period. Any well which has not compensated for the overproduction carried into a gas proration period by the end of such proration period shall be shut-in until such overproduction is compensated for. If, at any time, a well is overproduced an amount equalling three times its current monthly allowable, it shall be shut-in during that month and each succeeding month until the well is overproduced less than three times its current monthly allowable.

RULE 16. The allowable assigned to a well during any one month of a gas proration period in excess of the production for the same month shall be applied against the overproduction carried into such period in determining the amount of overproduction, if any, which has not been compensated for.

RULE 17. The Commission may allow overproduction to be compensated for at a lesser rate than would be the case if the well were completely shut-in upon a showing after notice and hearing that complete shut-in of the well would result in material damage to the well and/or reservoir.

RULE 18. The monthly gas production from each gas well shall be metered separately and the gas production therefrom shall be reported to the Commission on Form C-115 so as to reach the Commission on or before the 24th day of the month next succeeding the month in which the gas was produced. The operator shall show on such report what disposition has been made of the produced gas.

RULE 19. Each purchaser or taker of gas shall submit a report to the Commission on or before the 15th day of the month next succeeding the month in which the gas was purchased or taken. Such report shall be filled on Form C-111 with the wells being listed in approximately the same order as they are listed on the oil proration schedule.

RULE 20. Failure to comply with any provision of this order or the rules contained herein shall result in the immediate cancellation of allowable assigned to the affected well. No further allowable shall be assigned until all rules and regulations have been complied with. The District Supervisor shall notify the operator of the well and the purchaser in writing of the date of allowable cancellation and the reason therefor.

All transporters or users of gas shall file gas well-connection notices with the Commission as soon as possible after the date of connection.

RULE 22. Allowables to wells whose classification has changed from oil to gas or from gas to oil as the result of a gas-liquid ratio test shall commence on the first day of the month following the month in which such test was reported, provided that a plat (Form C-102) showing the acreage dedicated to the well and the location of all wells on the dedicated acreage here here filed.

(4) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year herein-

LA PLATA-GALLUP POOL San Juan County, New Mexico

Order No. R-3720, Adopting Operating Rules for the La Plata-Gallup Pool, San Juan County, New Mexico, April 1, 1969.

Application of Benson-Montin-Greer Drilling Corporation for Special Pool Rules, San Juan County, New Mexico.

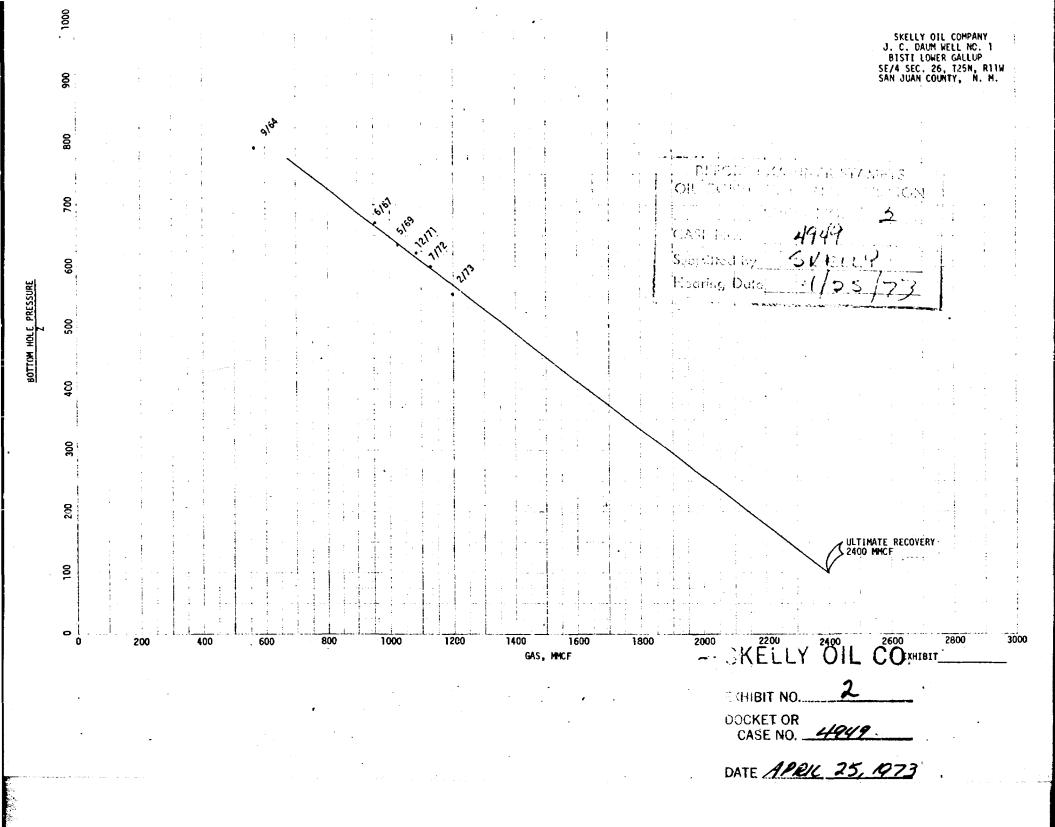
> CASE NO. 4067 Order No. R-3720

ORDER OF THE COMMISSION

BY THE COMMISSION: This cause came on for hearing at 9 a.m. on March 5, 1969, at Santa Fe, New Mexico, before Examiner Daniel S. Nutter.

NOW, on this 1st day of April, 1969, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

- (1) That due public notice having been given as required by w, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Benson-Montin-Greer Drilling Corporation, seeks the promulgation of special rules and regulations for the La Plata-Gallup Oil Pool, San Juan County, New Mexico, including a provision for 160-acre spacing and proration units.
- (3) That the applicant requests that said special rules provide that the unit allowable for a 160-acre unit in said pool be allocated on the basis of four times the normal unit allowable for Northwest New Mexico, and that no credit be given for depth factors.



BISTO GALLUP POOL SAN JUAN COUNTY, NEW MEXICO

SKELLY OIL COMPANY

J. C. DAUM WELL NO. 1

Ultimate Recovery to BHP/Z = 100 = 2,400 MMCF Present Recovery to BHP/Z = 554 = 1,198 MMCF Remaining Recovery T,202 MMCF

Present Allowable: 116.8 MMCF/Year

Life = 11 to 17 years at present allowable decides

Possible Average Production Over Life: 275 MMCF/Year Life = 4 to 5 Years

Production Loss If Hole Is Lost in 5 Years:

1202 MMCF - (5)(116.8 MMCF/Year) = 1202 MMCF - 584 MMCF = 618 MMCF

and the dollar loss:

(618 MMCF)(\$120/MMCF) + (618 MMCF)(20 B/MMCF)(\$3.34/bb1.) \$74,000 + \$41,000 = \$115,000

BEFORE DOLLARIES STATATIS

CR. COPSELL. C. J. COLAMISTON

EXCHANGE TO. 3

CACE NO. 1947

Sebalhad by SKELLY

Heading Dolo 4/55/77

w. Voods & Start

at allowalle from DATE
400 for 220 Mers
ver allow

SKELLY OIL CO.

DOCKET OR 4949

DATE APRIL 25 1973

EXHIBIT



RLS/dr

BEFORE THE CIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

CASE NO. 4949

Order No. R-1069-F

APPLICATION OF SKELLY OIL COMPANY FOR THE AMENDMENT OF ORDER NO. R-1069-B, SAN JUAN COUNTY, NEW MEXICO.

L = L

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on April 25 at Santa Fe, New Mexico, before Examiner Richard L. Stamets . 19⁷³

NOW, on this day of May, 19⁷³, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

- (1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.
- (2) That the applicant, Skelly Oil Company, is the owner-operator of the J. C. Daum Well No. 1 located in Unit I of Section 26, Township 25 North, Range 11 West, NMPM, Bisti-Lower Gallup Oil Pool, San Juan County, New Mexico.

Ph.

- (3) That the Bisti-Lower Gallup Oil Pool in the area of said well has been depleted by primary and secondary recovery techniques and is now capable of only marginal production.
- (4) That applicant's J. C. Daum Well No. 1 has a gas-oil ratio in excess of 50,000 to 1, and that said well's allowable is restricted due to this high gas-oil ratio.
- (5) That said well is located in an area of the BistiLower Gallup Oil Pool where casing failures have occurred and
 in
 that should such a failure occur/said well before said well is
 depleted, hydrocarbons could be wasted through non-production.
- (6) That the applicant seeks the amendment to the special pool rules of the Bisti-Lower Gallup Oil Pool to include provisions for the classification of gas wells in said pool and the dedication of 320 acres thereto.
- (7) That the applicant further seeks approval of a 320-acre proration unit consisting of the SE/4 of Section 26 and the NE/4 of Section 35, Township 25 North, Range 11 West, NMPM, to be dedicated to said J. C. Daum Well No. 1.
- (8) That the evidence indicates that said well can efficiently and economically drain said 320 acre tract.
- (9) That the resultant higher allowables should allow the applicant to deplete said well at an earlier date minimizing the risk of waste due to casing failure.
- with gas-oil ratios in excess of 50,000 to 1 should be permitted have to dedicated up to 320 acres and be assigned oil and casinghead gas allowables in proportion as the dedicated acreage relates to 80 acres and that approval of amendments to the special pool rules for the Bisti-Lower Gallup Oil Pool to provide for the same is in the interest of conservation, will prevent waste, and protect correlative rights.

IT IS THEREFORE ORDERED:

- (1) That the special pool rules for the Bisti-Lower Gallup Oil Pool are amended to include:
 - RULE 6. Any well in the Bisti-Lower Gallup Oil Pool
 with a gas-oil ratio of 50,000 cubic feet or more
 of gas per barrel of oil may have dedicated to it
 up to 320 acres.
 - RULE 7. That the acreage dedicated under Rule 6 above shall be all or part of a single governmental half section.
 - -RULE 8. That acceptance of Commission Form C-102 by the Supervisor of the Aztec District office of the Commission shall constitute approval of the proration unit.
 - RULE 9. That wells in the Bisti-Lower Gallup Oil Pool shall be permitted to produce a casinghead gas allowable obtained by multiplying the top unit oil allowable for the pool by 2,000 and by a fraction, the numerator of which is the number of acres dedicated to the particular well and the denominator of which is 80.

IT IS FURTHER ORDERED:

(1) That the SE/4 of Section 26 and the NE/4 of Section 35, Township 25 North, Range 11 West, NMPM, is hereby approved as a 320-acre proration unit to be dedicated to applicant's J. C. Daum Well No. 1, located in Unit I of said Section 26 in said pool.

-4-Case No. 4949 Order No. R-1069-F

- (2) That the dedication shall be effective after the effective date of this order and upon the receipt of a proper Form C-102 by the Aztec District Office of the Commission.
- (3) That the effective date of this order shall be June 1, 1973.
- (4) That jurisdiction of this cause is hereby retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.