

1 STATE OF NEW MEXICO
2 ENERGY AND MINERALS DEPARTMENT
3 OIL CONSERVATION DIVISION
4 STATE LAND OFFICE BLDG.
5 SANTA FE, NEW MEXICO
6 12 OCTOBER 1983

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Phillips Petroleum CASE
10 Company for the amendment of Divi- 7974
11 sion Orders R-3181 and R-3181-A,
12 Lea County, New Mexico.

13 BEFORE: Richard L. Stamets, Examiner

14 TRANSCRIPT OF HEARING

15 A P P E A R A N C E S

16 For the Oil Conservation
17 Division:

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19 Legal Counsel to the Division
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I N D E X

MICHAEL BROWNLEE

Direct Examination by Mr. Kellahin 3

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2
3 MR. STAMETS: We'll move on to
4 Case 7974.

5 MR. PEARCE: That case is on
6 the application of Phillips Petroleum Company for the amend-
7 ment of Division Orders R-3181 and R-3181-A, Lea County, New
8 Mexico.

9 MR. KELLAHIN: If the Examiner
10 please, I'm Tom Kellahin of Santa Fe, New Mexico, appearing
11 on behalf of the applicant and I have one witness to be
12 sworn.

13 MR. PEARCE: Are there other
14 appearances in this matter?

15 (Witness sworn.)

16 MICHAEL BROWNLEE,
17 being called as a witness and being duly sworn upon his
18 oath, testified as follows, to-wit:

19 DIRECT EXAMINATION

20 BY MR. KELLAHIN:

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

23 A I'm Michael H. Brownlee. I'm a reservoir
24 engineer for Phillips Petroleum in Odessa, Texas.

25 Q Mr. Brownlee, have you previously testi-
fied before the Division as a reservoir engineer and had

1
2 your qualifications accepted and made a matter of record?

3 A Yes.

4 Q And as a reservoir engineer for Phillips
5 Petroleum Company have you made a study of the facts
6 surrounding this particular application?

7 A Yes, sir.

8 MR. KELLAHIN: Mr. Examiner, we
9 tender Mr. Brownlee as an expert reservoir engineer.

10 MR. STAMETS: He is considered
11 qualified.

12 Q Mr. Brownlee, let's skip the first exhibit,
13 which is not identified by exhibit number but is the
14 Commission Form C-108, and have you turn to what we've
15 labeled as Exhibit Number One, which is a plat showing the
16 Vacuum Abo Unit of Lea County, New Mexico.

17 Using that as our first exhibit, Mr.
18 Brownlee, would you please identify for us what is indicated
19 by the blue hatched line running from the northeast to the
20 southwest corner of the map?

21 A The blue hatched line is the outer boundary
22 of the Vacuum Abo Unit as it exists today.

23 Q All right, sir, and what is the significance
24 of the red lines that have divided the unit into three
25 parts?

A The area between the two red lines is the
pressure maintenance project area as it exists today, as
outlined by Order 3181-A.

1
2 Q All right, the original Commission Order
3 3181 is the one that approved the pressure maintenance pro-
4 ject and that's the area contained within the two red lines?

5 A Essentially, yes.

6 Q And then that order was subsequently
7 changed by Order Number R-3181-A.

8 A Correct.

9 Q All right. What's the significance of
10 the three wells that are identified in various ways on the
11 exhibit, some are circled in red and I think others are
identified in yellow? What are those three wells?

12 A All right, those three wells, all of
13 which have a cross through them, are the three gas injection
14 wells by which we are injecting gas into the unit at this
15 time, and it's the existence of those three wells that pro-
vides for the project area.

16 Q All right, sir. What do you propose to
17 do now with this application?

18 A With the approval of this application we
19 will amend order -- the two orders that we've discussed to
20 allow for the injection of water into this unit through the
21 10 wells that are shown with the arrows through them on Ex-
hibit One.

22 Q You'll continue to use the gas injection
23 wells as gas injection wells.

24 A That's correct.
25

1
2 Q And what we're doing is adding then the
3 ten -- converting ten producing wells to water injection
4 wells.

5 A Right.

6 Q All right, sir, what else to you want to
7 do?

8 A Well, by the injection of water, we also
9 wish to expand the project area, the pressure maintenance
10 project area, to include everything within the boundaries of
11 the unit.

12 Q All right, sir.

13 All right, let's go to a map that's on a
14 little larger scale, which is Exhibit Number Two, Mr. Brown-
15 lee.

16 All right, what have you depicted on Ex-
17 hibit Number Two?

18 A Well, as required by rules on the Form C-
19 108 we've identified all of the wells within the half mile
20 radius, or a two mile radius of each of the proposed injec-
21 tion wells.

22 We've also drawn in a circle -- ten
23 circles, actually, which just the intersections are shown
24 here, and identified on a table which we'll talk about
25 later, all of the wells that do penetrate the Abo formation.

The yellow line is the unit boundary and
the ten red arrows do point at the proposed injection wells.

Q Before we get into the other requirements

1
2 of the Form C-108, let's talk about what you propose to
3 accomplish with the water injection wells patterned in the
4 particular configuration you have recommended.

5 A Well, geologic data was submitted during
6 the first hearing whenever we did get the pressure
7 maintenance order, and that data does show that this is a
8 reef, is a massive reef structure with the high point on the
9 structure actually being -- running lengthwise along the
10 center of this unit.

11 By injection down structure into these --
12 into these wells on the back and fore fronts of the reef, we
13 do plan to recover approximately 14-million barrels of oil
14 by repressuring and by moving the oil up structure into
15 wells where it can be recovered.

16 Q What happens to this Abo Reef as you move
17 to the south and east?

18 A The area inside the unit is a massive
19 reef. Now as you can see there, as depicted by the
20 triangles, there are other wells completed in the Abo to the
21 -- to the southeast; however, those wells are not actually
22 on the massive reef itself. Those are detrital deposits;
23 however, they are designated as the Vacuum Abo as a field
24 name, but don't actually share in the same -- in the same
25 reservoir.

26 Q All right, sir, what happens when we move
27 to the north and west of the reef? What kind of wells do we
28 find out there?

1
2 A To the north and west we really don't
3 have any -- any Abo producers. The formation is just not
4 there to be produced.

5 To the, let me go on directly to the --

6 Q Yeah, let me, before you leave, on the
7 north and west, what kind of wells do we find out in that
8 area?

9 A Our deepest completions are in the Glo-
10 rieta, which are approximately 2500 to 3000 feet shallower
11 than the Abo formation.

12 Q All right, sir. Now, on the southwestern
13 corner here, adjacent to the Texaco and Getty acreage, what
14 happens to this Abo Reef formation at that point?

15 A The actual producible high of the struc-
16 ture exists on Section 7, Township 18, Range 35, on tracts
17 leased by Getty and Texaco and Exxon.

18 The structure tends to run from a low on
19 the very northeastern part of our unit to a high, as I just
20 quoted, on Section 7.

21 Q What will be the source of the water that
22 you'll use for injection water in the ten injection wells?

23 A At present we are going to use just pro-
24 duced water and this produced water will come from Rice En-
25 gineering Vacuum 35 Salt Water Disposal System, which they
operate in Section 35 of Township 17, Range 35.

Q All right, I see in the northeast corner

1
2 of Section 35 there are at least two salt water disposal
3 wells indicated on the exhibit.

4 A Right. Those are Rice's.

5 Q All right, Rice Disposal System takes
6 produced water from your unit and is disposing of that water
7 into those disposal wells?

8 A Correct.

9 Q And you propose then to take the water,
10 instead of disposing of it into the disposal wells, to
11 re-inject it in your injection wells.

12 A That's correct.

13 Q What other sources of water will you
14 have?

15 A It hasn't been contracted as yet but we
16 -- but Mobil operates a Ogallala completed fresh water well
17 in Unit B of Section 5, Township 18, Range 35, and it's not
18 shown on this map, but it's just outside our unit boundary.

19 Q Okay, in Section 5, Unit B --

20 A Right.

21 Q -- there is a --

22 A There's a fresh water well.

23 Q There's a fresh water source there?

24 A Right. And we feel that that water can
25 also be used for injection in the future.

Q The current pressure maintenance order,
R-3181, as amended, shows what I'll call a rather complex
formula for determining allowables and all the rest for the

1
2 gas injection wells.

3 Now, insofar as that order is concerned,
4 is it necessary to amend any of those pressure maintenance
5 provisions?

6 A No.

7 Q All right, what we're talking about doing
8 is inserting the use of water for the injection into these
9 ten wells.

10 A That's true.

11 Q You have some specific proposals; we'll
12 talk about language shortly.

13 Before we leave the exhibit, then, Mr.
14 Brownlee, within the area of review, I assume you've made a
15 tabulation of all those wellbores that have penetrated the
16 Abo.

17 A Yes.

18 Q All right. That tabulation is exclusive
19 of four plugged and abandoned wells where -- for which you
20 have prepared or are preparing schematics.

21 A Correct.

22 Q All right, let's turn to those now.

23 I've got a couple exhibits before I get
24 to that one, Mr. Brownlee.

25 Let's talk about your production fore-
cast. First of all, Exhibit Number Three is your past his-
tory on the -- on the pressure maintenance project. Would
you identify that exhibit for us?

1
2 A Yes, sir. It's just a, for a matter of
3 record, the unitization was done February 1st of 1967, pro-
4 duced under primary recovery until gas injection was started
5 in March of 1970.

6 We've produced approximately 47-million
7 barrels of oil inside the unit since that time.

8 At present we produce approximately 2000
9 barrels of oil a day, 5000 barrels of water, 3.8-million
10 cubic feet of gas, and we inject approximately 1.2-million
11 cubic feet.

12 Q All right, sir, let's look at Exhibit
13 Four, which is the forecast of what you anticipate will hap-
14 pen with the water injection.

15 A At present we have, as is shown by this
16 blue highlighted line at the top, we have about 15,000 bar-
17 rels of water available for injection. For simplicity's
18 sake I started it at the first of the year.

19 We have enough gas to move our gas injec-
20 tion up to about 2-million cubic feet a day and continue
21 that through 1991, which is a point picked solely because
22 it's on a dip, it's on the decline side of the -- of the oil
23 production forecast.

24 The oil production forecast shows that we
25 have a 15-year project which will peak in about 1989 at 6000
barrels of oil a day.

Q What's the source of the gas used in the
gas injection wells?

1
2 A The gas is residue returned to us from
3 Phillips' Lea plant after processing.

4 Q Gas produced on the unit?

5 A Yes, gas produced on the unit.

6 Q Let's go to Exhibit Number Five, now, Mr.
7 Brownlee, which your tabulation of wellbores penetrating the
8 Abo.

9 Was this prepared by you or compiled un-
10 der your direction?

11 A Yes.

12 Q In your review of the various wellbores
13 that penetrate the Abo, Mr. Brownlee, are you aware of any
14 of these wellbores that constitute what I will call problem
15 wells?

16 A No, all of the wells, predominantly the
17 cement on the production casing ties back into the interme-
18 diate casing and even in the cases where it does not, the
19 top of that cement is identified well above the Abo, the top
20 of the Abo Reef.

21 Q Generally what is the location vertically
22 of fresh water sources in the area in relation to the Abo?

23 A The Ogallala is the -- is the fresh water
24 that's used in the area, and it's approximately 50 to 100
25 feet deep.

Q Are there --

A Well above this zone.

Q And what producing horizons exist between

1
2 the Glorieta and the Abo?

3 A None.

4 Q Well, do you have San Andres production?

5 A San Andres production exists above the
6 Glorieta. I should make note here that we are in the geo-
7 graphical location of the East Vacuum-Grayburg-San Andres
8 Unit, which is already -- is a pressure maintenance project
9 and has already taken great care and caution to seal off any
10 contomination from the San Andres up.

11 Q All right. Leaving the tabulation, Mr.
12 Brownhlee, let's go to Exhibits Six, Seven, and Eight, which
13 are three of the four wellbore schematics for plugged and
14 abandoned wells in the area.

15 A Exhibit Six is the Standard of Texas, now
16 Chevron USA, (inaudible) No. 1, located in Unit O of Section
17 4, Township 18, Range 35.

18 This well was the original well drilled,
19 actually, drilled to the Devonian, with casing set at 9072
20 feet, below the Wolfcamp correlation point.

21 Q In your opinion as a reservoir engineer,
22 Mr. Brownlee, has this well be properly plugged and aban-
23 doned to isolate the Abo formation?

24 A Yes.

25 Q All right, sir, let's go to Number Seven,
then, and have you give us your opinion about the way this
well has been plugged and abandoned.

A Again, the Cities Service State K No. 5

1 that has met state regulations in the manner in which it was
2 plugged and sealed off the Abo formation such that we don't
3 expect any problems.

4 Q All right, sir, let's go to Exhibit Num-
5 ber Eight.

6 A Again, the same, Phillips Santa Fe No. 3,
7 with cement plugs covering the Abo formation.

8 Q All right. The fourth plugged and aban-
9 doned well for which we need to submit a schematic is in
10 Section 35, is it not, Mr. Brownlee?

11 A Yes, it is.

12 Q And where in Section 35 is it?

13 A It's in Unit A of Section 35. It's Well
14 No. 2 and it's marked with a plugged and abandoned designa-
15 tion. It's on what is designated there as TBC&O lease.
16 That well is actually, as I've come to learn, was actually
17 drilled and completed by Mac Jones, and also abandoned by
18 that company.

19 I did not realize that at the time when I
20 was doing the search for the plugged and abandonment. I
21 have since had an associate go to the Division Office in
22 Hobbs yesterday, and we should have a schematic ready for --
23 to put in the mail to the Commission tomorrow.

24 Q All right, sir. Based upon the informa-
25 tion you've learned about that well, do you have an opinion
as to whether that well has been properly plugged
and abandoned?

1
2 A I don't know yet.

3 Q All right, sir.

4 Let's turn now to Exhibit Number Nine and
5 Ten. Let's look at those together.

6 Nine is your written summary of how
7 you're going to convert the producing wells to injection and
8 then Ten is the tabulation of all the wellbore schematics
9 for the injection wells.

10 A Five of the wells, five of the ten wells
11 that we plan to convert to injection have been plugged in
12 the Abo formation, not such that the entire Abo formation is
13 plugged but such that when the water encroachment came into
14 the well we plugged them back so that we could get more eco-
15 nomical completions.

16 Those five are designated there at the
17 top of Exhibit Nine.

18 What we basically plan to do is to move
19 in a completion unit and drill out the plugs that are there,
20 reperforate those lower intervals, acidize so as to stimu-
21 late them, and then put the wells on injection in accordance
22 with regulations.

23 The other five wells do not have these
24 plugs and we will go with completions just as they are.

25 Q What is your proposed injection volumes
for each of the injection wells?

A Should average about 2000 barrels a day
with a maximum of up to 4000.

1
2 Q Do you know whether or not these injec-
3 tion wells will take the water under gravity or will you re-
4 quire some surface pressure?

5 A With current bottom hole pressure surveys
6 that we've run, we don't feel that we will incur any surface
7 injection pressure at all for some time.

8 Q So if the order by the Division approves
9 a surface limitation of not to exceed .2 of a pound per foot
10 of depth, you can live within that pressure.

11 A Sure.

12 Q All right, let's go to Number Eleven and
13 have you tell us what is indicated by this exhibit.

14 A As I said earlier, the water sources
15 we'll have will be from Rice Engineering and from the Mobil
16 fresh water source well, and that is, as on the front page
17 of this, Water Source Well No. 8, and that is -- it's desig-
18 nated here as Rice, but that's actually Mobil's well.
19 That's our fresh water well.

20 What we've done is actually taken and
21 gotten analysis of those two waters and since the Rice
22 system does contain so much Vacuum Abo water, we feel that
23 -- that the Vacuum Abo analysis would be real similar and
24 we've actually run some mixtures from the -- between the
25 salt water disposal system and the Water Source Well No. SO-
8, looking for any problems in particulates falling out,
precipitants forming, and this is actually the data that we
built and analysis of that doesn't show that we will have

1
2 any serious problems with plugging or contamination of the
3 Abo Reef by injection of this water.

4 Q How do you propose to handle the water
5 that comes from the Rice Disposal System back into the
6 injection wells in order to insure that hydrocarbon contami-
7 nants that may exist in that water are not re-injected in
8 the injection wells?

9 A We have allocated money for a skim and
10 separation tank that might pick up any of the contaminants.

11 Q All right.

12 MR. KELLAHIN: If the Examiner
13 please, the geologic data that's necessary to complete the
14 application is found in abundant quantities in the case file
15 in 3181.

16 We'd like to incorporate that
17 by reference if you'll permit us to do so.

18 MR. STAMETS: Yes, we will be
19 happy to do that.

20 Q Mr. Brownlee, let me direct your atten-
21 tion now to the specific previous orders that have been en-
22 tered on the pressure maintenance project, and have you
23 identify for us the exact language that you would propose to
24 have included in the new order in order to accomplish what
25 you seek.

In that regard, let's refer to Exhibits
Twelve, Thirteen, Fourteen, and Fifteen.

I have marked Fourteen and Fifteen your

1
2 proposed rule changes.

3 Twelve is Exhibit 3181; Thirteen is 3181-
4 A.

5 Let's start with Order R-3181 and let's
6 turn, I think, to page three and at the end of not rule one
7 but at the end of paragraph one and just before we start
8 paragraph two, right in the middle of the page? All right.

9 A We propose to insert the two paragraphs
10 shown on Exhibit Fourteen, which would expand -- outline the
11 pressure maintenance project area to include all area inside
12 the unit boundary.

13 I'm sorry, pardon me.

14 Paragraph one is for the actual conver-
15 sion of the ten wells.

16 Q It identifies the ten wells to be
17 converted to water injection.

18 A Right.

19 Q Paragraph one of this order talks about
20 approval of the wells for gas injection, right?

21 A Right.

22 Q And we're inserting just below that para-
23 graph a new paragraph, which would be numbered, in order to
24 do it correctly, would be number two and three.

25 A Right.

Q Number these two and three and then the
existing number two becomes number four.

All right, sir, apart from that change,

1 where does the next change occur?

2 A The next change would occur, would be
3 special rule number one.

4 Q On the same page.

5 A Right.

6 Q All right, sir.

7 A This rule was amended in 3181-A, and it
8 pertains to the project area that I've just discussed awhile
9 ago.

10 Q The amendment at this point would include
11 the expansion of the project area to include the entire area
12 of the unit.

13 A Right.

14 Q All right. All right, there is one more
15 change, I believe, Mr. Brownlee, and I think that occurs on
16 page four of this order.

17 A Right, in rule seven, approximately
18 halfway through that paragraph, there is a phrase that says
19 this: "As a well receives a substantial response to gas
20 injection"...now I've highlighted on that page the word
21 "gas".

22 We would like, since we are going to have
23 both gas injection and water injection in this projection at
24 this time, we would like to delete that word from the order.

25 In most, in several other points in this
order the word "injection" will -- is used by itself without
the adjective "gas" there, so we would just like to really

1
2 stick with the same type of language as used throughout the
3 rest of the order.

4 Q By the deletion of the word "gas" form
5 order -- rule number seven, then the only thing you have
6 done is added the availability of using water injection
7 wells.

8 A Correct.

9 Q And it won't change any of the other for-
10 mulas or calculations as to how the different credits are
11 applied for the gas injection.

12 A That's right.

13 MR. STAMETS: Okay, on page
14 five of that first order there's a formula for determining,
15 oh, the wells daily adjusted allowable, and that takes into
16 account only gas injection. Now is that going to continue
17 to be the case?

18 A Yes, sir.

19 MR. STAMETS: And is there
20 going to be a bonus for the water injection at all?

21 A No, sir.

22 MR. KELLAHIN: Gets an allow-
23 able but it doesn't get that gas injection bonus.

24 MR. STAMETS: Okay.

25 A The allowables for the injection wells
are outlined on rule five, page four.

MR. STAMETS: Okay, very good.

MR. KELLAHIN: If the Examiner

1
2 please, we do not have available for you the required
3 notices to the offsets and the surface owners. We are
4 getting those and would like to submit those subsequent to
5 the hearing, if that's acceptable.

6 That concludes my examination
7 of Mr. Brownlee.

8 We would move the introduction
9 of Exhibits One through, I believe, Sixteen is the last one.

10 MR. STAMETS: The exhibits will
11 be admitted.

12 Were those notices indeed made?

13 MR. KELLAHIN: Yes, but we
14 didn't make them within the fifteen days prior to the
15 hearing date and so we need to notify, explain to all those
16 people that we've had the hearing but they still have the
17 option of object.

18 MR. STAMETS: All right.

19 Are there any questions of the
20 witness?

21 MR. KELLAHIN: We'd be happy to
22 draft an order for your review, if you would like.

23 MR. STAMETS: I would really
24 appreciate that under the current circumstances that have
25 absolutely nothing at all to do with this case.

If there are no questions the
witness may be excused and if there is nothing further the
case will be taken under advisement.

C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY
CERTIFY that the foregoing Transcript of Hearing before the
Oil Conservation Division was reported by me; that the said
transcript is a full, true, and correct record of the
hearing, prepared by me to the best of my ability.

Sally W. Boyd CSR

I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 7924
heard by me on 10-13 1983.

Richard T. Starn Examiner
Oil Conservation Division