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1	STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION										
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3	IN THE MA	IL CON	NSERVAI	I NOI	DIVISI			ORI	GIN	IAL	
4	THE PURPO										
5	AMENDED A						٠,	CASI	E NO.	15692	
6	INC. FOR A NONSTANDARD SPACING AND PRORATION UNIT, COMPULSORY POOLING, AND APPROVAL OF AN UNORTHODOX LOCATION,										
7	LEA COUNTY, NEW MEXICO.										
8											
9	REPORTER'S TRANSCRIPT OF PROCEEDINGS										
10	EXAMINER HEARING										
11	May 25, 2017										
12	Santa Fe, New Mexico										
13											
14	BEFORE:		DAWSON, CHIEF EXAMINER IP GOETZE, TECHNICAL EXAMINER								
15			D K. BF								
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17	New Mexic	co Oil								re the	
18	New Mexico Oil Conservation Division, Scott Dawson, Chief Examiner, Phillip Goetze, Technical Examiner, and David K. Brooks, Legal Examiner, on Thursday, May 25, 2017, at the New Mexico Energy, Minerals and Natural Resources Department, Wendell Chino Building, 1220 South										
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20	St. Francis Drive, Porter Hall, Room 102, Santa Fe, New Mexico.										
21	nexico.										
22	REPORTED	BY:	Mary C New Me		•	CCR,	RPR				
23			Paul E	Baca E	Profes	sional		-			
24	500 4th Street, Northwest, Suite 105 Albuquerque, New Mexico 87102 (505) 843-9241										
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2	FOR APPLICANT CHEVRON U.S.A., INC.:						
3	JORDAN L. KESSLER, ESQ. HOLLAND & HART, LLP						
4	110 North Guadalupe, Suite 1 Santa Fe, New Mexico 87501						
5	(505) 988-4421 jlkessler@hollandhart.com						
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- 1 AMBER TARR DELACH,
- 2 after having been previously sworn under oath, was
- 3 questioned and testified as follows:
- 4 DIRECT EXAMINATION
- 5 BY MS. KESSLER:
- Q. Will you please state your name for the record
- 7 and tell the Examiner by whom you're employed and in
- 8 what capacity?
- 9 A. Amber Delach, Chevron U.S.A., Inc., and a land
- 10 rep.
- 11 Q. Have you previously testified before the
- 12 Division?
- 13 A. No.
- Q. Can you please outline your educational
- 15 background?
- 16 A. Yes. A BBA in finance from Texas Tech
- 17 University in 2002, and an MBA from Texas Tech
- 18 University as well in 2003.
- 19 Q. What has been your work history?
- 20 A. I've been with Chevron for ten years, working
- 21 in land ownership for eight years and the land division
- 22 for three years, handling properties in the Permian
- 23 Basin.
- Q. For the past ten years, your responsibilities
- 25 have included the Permian Basin?

- 1 A. Yes.
- Q. Are you a member of any professional
- 3 associations?
- 4 A. AAPL, PBLA.
- 5 Q. And are you familiar with the application
- 6 that's been filed in this case?
- 7 A. Yes.
- Q. Are you familiar with the status of the lands
- 9 in the subject area?
- 10 A. Yes.
- MS. KESSLER: Mr. Examiners, I would tender
- 12 Ms. Tarr as an expert in petroleum land matters.
- 13 EXAMINER DAWSON: She is so admitted.
- MS. KESSLER: Thank you.
- 15 Q. (BY MS. KESSLER) Would you please turn to
- 16 Exhibit 1? Does Chevron request formation of a
- 17 nonstandard spacing unit?
- 18 A. Yes.
- 19 Q. Do you also seek to pool uncommitted interest
- 20 owners in the Bone Spring Formation?
- 21 A. Yes.
- 22 Q. And do you seek to dedicate the nonstandard
- 23 spacing units to two initial wells?
- 24 A. We do, yes.
- Q. And finally, do you seek approval of a

Does this C-102 reflect that the well location

25

Q.

- for the 6H well is unorthodox?
- 2 A. It does. We are 55 feet from the adjacent
- 3 proration unit.
- 4 Q. Is Chevron the 100 percent interest owner in
- 5 the spacing and proration units to the west?
- 6 A. We are.
- 7 Q. And if I turn to Exhibit 2, is this a map
- 8 showing the affected tracts by the nonstandard location?
- 9 A. Yes, it is. It shows our tract to the west and
- 10 then the quarter-quarter sections affected to the north
- 11 and south.
- 12 Q. Why is Chevron seeking a nonstandard location
- 13 for this well?
- 14 A. So we are developing six wells in a section,
- 15 and because of the oil spacing unit, it requires one
- 16 well -- well, actually two wells in a section to be
- 17 nonstandard.
- 18 Q. And that has been the spacing pattern that
- 19 Chevron has identified to most effectively develop the
- 20 section?
- 21 A. Correct.
- 22 Q. And preventing waste, correct?
- 23 A. Yes.
- Q. You mentioned that Chevron is the 100 percent
- 25 interest owner in the tracts to the west. Was notice

- 1 provided in any spacing units to the northwest and the
- 2 southwest?
- 3 A. Yes, it was.
- 4 Q. And did any of those interest owners object to
- 5 Chevron's application for an unorthodox location?
- 6 A. No, they did not.
- 7 Q. Is Exhibit 3 the C-102 for the 7H well?
- 8 A. Yes, it is.
- 9 Q. Is there an API number for this well?
- 10 A. There is, 30-025-43675.
- 11 Q. And this has been designated in the same Bone
- 12 Spring undesignated pool; is that correct?
- 13 A. It has, 97955.
- 14 Q. Thank you.
- And is this well at an orthodox location?
- 16 A. It is at an orthodox location.
- 17 Q. Why does Chevron seek to dedicate the spacing
- 18 unit to the two initial wells?
- 19 A. For operating efficiencies and economic
- 20 efficiencies, we will drill and complete them back to
- 21 back.
- Q. Does Chevron also expect better production with
- 23 simultaneous drilling and completing?
- 24 A. We do.
- Q. Were all interest owners notified of Chevron's

- 1 plan to drill and complete the two initial wells at the
- 2 same time?
- 3 A. Yes.
- 4 Q. Did any of those interest owners object?
- 5 A. No.
- 6 Q. Is Exhibit 4 an ownership outline showing
- 7 ownership in the spacing unit by tract?
- 8 A. Yes, it is.
- 9 Q. If I look at the second page of this exhibit,
- 10 are the interest owners that you seek to pool
- 11 highlighted in yellow?
- 12 A. Yes, they are.
- Q. Are these working interest owners?
- 14 A. They are working interest owners. Yes.
- 15 Q. And I see that they comprise a fairly small
- 16 percentage; is that correct?
- 17 A. Yes.
- 18 Q. Approximately, 1 percent?
- 19 A. Yes, approximately, 1 percent.
- Q. Does Exhibit 5 a copy of the well-proposal
- 21 letter for the 6H and the 7H wells that were sent to the
- 22 parties that you seek to pool?
- 23 A. Yes.
- Q. On what date was this letter sent?
- 25 A. March 2nd, 2017.

- 1 Q. Did each of the well-proposal letters include
- 2 an AFE?
- 3 A. Sorry. The -- so the one to Royalty
- 4 Clearinghouse is March 2nd, 2017, and the one to Atlas
- 5 was April 25th, 2017.
- 6 Q. Let me take a step back. This is a copy of
- 7 each of the letters that were provided to the working
- 8 interest owners. So a similar letter was sent to Atlas
- 9 on the 6H well, correct?
- 10 A. Correct.
- 11 Q. And a similar letter was sent to Royalty
- 12 Clearinghouse?
- 13 A. Correct. Uh-huh.
- 14 Q. And the well-proposal letters each included an
- 15 AFE when they were sent?
- 16 A. Yes.
- 17 Q. Are the costs reflected on the AFEs consistent
- 18 with what Chevron has incurred for drilling similar
- 19 horizontal wells in the area?
- 20 A. Yes, they are.
- Q. What is the status of Chevron's negotiations
- 22 with Atlas?
- A. Atlas, we have reached out to on three separate
- 24 occasions and have not received a response back, so we
- 25 just -- they have been unresponsive.

- 1 Q. So you sent them well-proposal letters and had
- 2 several attempted follow-up communications?
- 3 A. Correct.
- 4 Q. What is the status of Chevron's negotiations
- 5 with Royalty Clearinghouse?
- 6 A. Royalty Clearinghouse, we actually are in
- 7 negotiations to work on a joint operating agreement, but
- 8 have yet to come to a complete agreement as of this
- 9 date, so we've left them on the order.
- 10 Q. In the event you do reach an agreement with
- 11 them, will that agreement supersede the terms of the
- 12 pooling order?
- 13 A. It will.
- 14 Q. And you will notify the Division of that
- 15 agreement?
- 16 A. Yes.
- 17 Q. In your opinion, have you made a good-faith
- 18 effort to reach each of the parties you seek to pool?
- 19 A. Yes.
- 20 Q. Have you estimated overhead and administrative
- 21 costs for drilling and completing each of the wells?
- 22 A. Yes, 7,000 during drilling and 700 after.
- Q. And was that also included in your
- 24 well-proposal letters?
- 25 A. Correct.

- 1 Q. Are those costs in line with what Chevron and
- 2 other operators in the area charge for similar wells?
- 3 A. It is.
- 4 Q. Do you ask that those costs be incorporated
- 5 into any order resulting from this hearing?
- 6 A. We do.
- 7 Q. Do you ask that the cost be adjusted in
- 8 accordance with COPAS accounting procedures?
- 9 A. Yes.
- 10 Q. And for the uncommitted interest owners, do you
- 11 request the Division impose a 200 percent risk penalty?
- 12 A. Yes, we do.
- 13 Q. Finally, did Chevron identify and provide
- 14 notice of the hearing to the offset operators or lessees
- of record in the 40-acre tract surrounding the proposed
- 16 nonstandard unit?
- 17 A. Yes.
- 18 Q. Is Exhibit 6 an affidavit prepared by my office
- 19 with attached letters providing notice to the parties
- 20 that you seek to pool, the offset operators or lessees
- 21 of record and also the affected parties for the
- 22 nonstandard location?
- 23 A. Yes, it is.
- Q. And is Exhibit 7 an Affidavit of Publication in
- 25 the newspaper in the county providing notice of this

- 1 hearing?
- 2 A. Yes, it is.
- 3 Q. Were Exhibits 1 through 5 prepared by you or
- 4 compiled under your direction and supervision?
- 5 A. Yes, they were.
- 6 MS. KESSLER: Mr. Examiners, I move
- 7 admission of Exhibits 1 through 7, which include my two
- 8 notice affidavits.
- 9 EXAMINER DAWSON: Okay. What about Exhibit
- 10 8?
- MS. KESSLER: Exhibits 8 and 9 will be
- 12 addressed by a subsequent witness.
- 13 EXAMINER DAWSON: Okay. So Exhibits 1
- 14 through 7 will be admitted into the record.
- MS. KESSLER: Thank you.
- 16 (Chevron U.S.A., Inc. Exhibit Numbers 1
- 17 through 7 are offered and admitted into
- 18 evidence.)
- MS. KESSLER: Thank you.
- 20 EXAMINER DAWSON: Do you have any
- 21 questions, Mr. Goetze?
- 22 EXAMINER GOETZE: Yes.
- 23 CROSS-EXAMINATION
- 24 BY EXAMINER GOETZE:
- Q. Good morning.

- 1 A. Good morning.
- Q. Looking at the wildcat pool, I'm assuming that
- 3 the standard spacing unit is a 40-acre?
- 4 A. Uh-huh.
- 5 Q. Okay. So you notified the 40-acre to the
- 6 northwest and then the southwest?
- 7 A. Correct.
- Q. I notice in your letters, we have one to
- 9 Royalty, and it refers to the 6H, and then your other
- 10 one refers to the 7H.
- 11 A. Uh-huh.
- 12 Q. Evidently, the AFEs for both of these have
- 13 turned up similar estimates; is that correct?
- 14 A. Yes. Yes. Uh-huh. The APs were the exact
- 15 same.
- 16 Q. And then with regards to -- the tendency in
- 17 these orders is to have one well given the priority.
- 18 Has Chevron had any discussion as to which well will be
- 19 drilled first?
- 20 A. The --
- 21 Q. I mean, simultaneously -- but, I mean --
- 22 A. Yeah. It's pad drilling, so --
- Q. There's not going to be that much difference --
- 24 A. No, sir.
- 25 Q. -- as far as initiation --

- 1 A. (Indicating.)
- 2 Q. Just be forewarned, sometimes the numbers do
- 3 get lost, and so we do dedicate and put a time space
- 4 based on which well appears first. So if you have a
- 5 preference, please speak up now.
- 6 MS. KESSLER: Mr. Examiner, I think this is
- 7 something that the geologist can address, but I believe
- 8 that the order is -- let's see. The pad wells are 5, 6
- 9 and 7, drilled in that order, 5, 6 and 7.
- 10 EXAMINER GOETZE: Just to help us by so we
- 11 don't have to call you later.
- MS. KESSLER: Okay.
- 13 EXAMINER GOETZE: I have no further
- 14 questions. Thank you.
- 15 EXAMINER DAWSON: Mr. Brooks?
- 16 CROSS-EXAMINATION
- 17 BY EXAMINER BROOKS:
- 18 Q. Following up on what he said, we've done
- 19 several of these, and I'm not sure if we've done them
- 20 consistently. So do you -- is what you want to be able
- 21 to propose them all at the same time and give a -- what
- 22 you want is to get a simultaneous election from any
- 23 pooled parties? Is that what you're --
- A. I'm not sure I understand the question.
- Q. Well, our typical form of pooling order

- 1 requires -- you know, you're required to do a
- 2 proposal -- under our orders, you're required to do a
- 3 proposal before the hearing.
- 4 A. Uh-huh.
- 5 Q. But then under our hearing orders, you're
- 6 required to do another proposal after the hearing, if
- 7 there are any pooled parties.
- 8 A. Correct.
- 9 Q. Now, do you contemplate that those proposals
- 10 will be -- for these wells will all be sent out to the
- 11 pooled parties at the same time?
- 12 A. Yes. Individual well proposals, but they'll be
- 13 sent at the same time.
- 14 Q. Yeah.
- 15 A. Uh-huh.
- 16 Q. And so our order needs to provide for all three
- 17 wells and provide for a separate election, but -- I
- 18 mean, they can elect to participate in one and not in
- 19 another, if that's what they choose to do.
- 20 A. Correct. And for the -- there's, actually,
- 21 only the two wells that will affect the pooled parties.
- 22 The 5H well is, actually, in the adjacent proration
- 23 unit, which Chevron owns 100 percent.
- Q. Okay. So it's going to be entirely within the
- 25 Chevron -- it's not part of the pooling?

- 1 A. Correct. Only the 6H and 7H.
- Q. Yeah. So -- and let me go back to the --
- 3 Chevron owns the west half of the west half?
- A. It's the west half of the east half.
- 5 O. West half of the east half.
- 6 A. Uh-huh.
- 7 Q. And then the pooled acreage is the east half of
- 8 the west half?
- 9 A. The east half of the east half.
- 10 Q. East half of the east half.
- 11 A. Yes.
- 12 Q. It's the other west.
- Okay. Well, I think that tells us how we
- 14 want to write the order. So thank you for that
- 15 explanation.
- 16 A. Uh-huh.
- 17 Q. You need nothing about the 5H in the order?
- 18 A. Correct.
- 19 Q. It's not on the unit?
- 20 A. Correct.
- Q. The notice affidavit is Exhibit Number 6, and
- 22 you've only identified two pooled parties there -- two
- 23 parties to be pooled here --
- 24 A. Correct.
- 25 Q. -- Atlas OBO Energy and Royalty Clearinghouse,

- 1 correct?
- 2 A. Correct.
- 3 Q. And are those all of the persons that you have
- 4 identified that are named in instruments of record or
- 5 which you have knowledge that have an interest in
- 6 this -- have an interest in this unit that has not been
- 7 committed to your proposed drilling program?
- 8 A. Yes, sir.
- 9 Q. Okay. So they were all -- now, did they
- 10 receive actual notice?
- 11 A. Yes.
- 12 Q. Okay. And those return receipts are attached
- 13 to Exhibit Number 6, right?
- 14 A. Correct.
- 15 Q. So there actually isn't anybody that needed to
- 16 be served by publication, as it turned out, then?
- MS. KESSLER: Mr. Examiner, we actually did
- 18 not get a green card returned for Royalty Clearinghouse
- 19 2003.
- 20 EXAMINER BROOKS: Okay. You did not get a
- 21 green card from Royalty Clearinghouse?
- MS. KESSLER: Correct.
- 23 EXAMINER BROOKS: Okay. Have you
- 24 ascertained that they did receive actual notice, because
- 25 you answered "yes" to the questions: Did all those

- 1 parties receive actual notice?
- THE WITNESS: So --
- MS. KESSLER: That's the green card that
- 4 was sent out that we did not get the returned green
- 5 card.
- 6 THE WITNESS: Oh, okay. Okay.
- 7 MS. KESSLER: But it's my understanding
- 8 that there have been multiple communications with
- 9 Royalty.
- 10 THE WITNESS: Correct. Yes.
- 11 Q. (BY EXAMINER BROOKS) So they actually did
- 12 receive actual notice even though you do not have the
- 13 return receipt?
- 14 A. Correct, and we have email correspondence.
- 15 Q. Very good. Thank you.
- 16 CROSS-EXAMINATION
- 17 BY EXAMINER DAWSON:
- 18 Q. Is there some kind of a surface, like, a draw
- or something, like, why you're moving those wells over
- 20 to those surface locations? Do you know?
- 21 A. When you say "moving them over" --
- Q. Well, I mean, they're, like, 200 feet from the
- 23 line. So that's why I was asking the surface location.
- 24 A. Oh, for the surface-hole location --
- 25 Q. Yes.

- 1 A. -- on those?
- 2 Q. Yes.
- 3 There is some topographical problem
- 4 putting --
- 5 A. Not that I'm aware of. That's just the
- 6 surface-hole location that allows us to have our first
- 7 take point with the 330.
- 8 Q. In order to be able to recover for the well --
- 9 A. Correct.
- 10 Q. -- to get to the first take point?
- 11 A. Yes, sir.
- 12 Q. That's all the questions I have. Thank you.
- MS. KESSLER: Thank you.
- I'll call my next witness, please.
- 15 EXAMINER DAWSON: Okay. Thank you.
- Go ahead, Ms. Kessler, when you're ready.
- MS. KESSLER: Thank you.
- 18 FRED VERNER,
- 19 after having been previously sworn under oath, was
- 20 questioned and testified as follows:
- 21 DIRECT EXAMINATION
- 22 BY MS. KESSLER:
- Q. Please state your name for the record and tell
- 24 the Examiners by whom you're employed and in what
- 25 capacity.

- 1 A. My name is Fred Verner. I work for Chevron
- 2 U.S.A. in Houston, Texas. I am currently -- and this is
- 3 very recent -- been employed in our Permian Basin as the
- 4 regulatory manager. But before that, I spent roughly 12
- 5 years doing various earth science services, both
- 6 geologic and geophysical, across the Permian Basin in a
- 7 variety of places.
- 8 Q. Have you previously testified before the
- 9 Division?
- 10 A. Yes, I have.
- 11 Q. Were your credentials as a petroleum geologist
- 12 accepted and made a matter of record?
- 13 A. Yes.
- 14 Q. Are you familiar with the application that's
- 15 been filed in this case?
- 16 A. Yes.
- 17 Q. And have you conducted a geologic study of the
- 18 lands that are the subject of this location?
- 19 A. I did the original work on the unconventional
- 20 plays here a few years ago, and more recently, I've been
- 21 advising earth science activities on these specific
- 22 projects.
- MS. KESSLER: Mr. Examiners, I would tender
- 24 Mr. Verner as an expert in petroleum geology.
- 25 EXAMINER DAWSON: Mr. Verner is admitted as

- 1 an expert in petroleum geology.
- Q. (BY MS. KESSLER) Mr. Verner, please turn to
- 3 Exhibit 8 and identify this exhibit and walk us through
- 4 it.
- 5 A. Just to be sure I'm on the right page of these,
- 6 it should be the structure map of the top of the Bone
- 7 Spring and top of the Wolfcamp. The reason we're
- 8 presenting these is simply -- oh, and the red rectangle
- 9 represents the proration unit project area in question.
- 10 What we're showing here is the top of the
- 11 Bone Spring and the top of Wolfcamp, which, basically,
- 12 bound the top and the bottom of the Bone Spring. And
- 13 what we're seeing is a very consistent 1 degree dip to
- 14 the east with no interruptions in the way of faults or
- 15 significant folds.
- 16 Q. Did you mention what you observed with respect
- 17 to dip?
- 18 A. Yes. It's a very consistent regional dip down
- 19 to the east.
- Q. Thank you.
- 21 What is Exhibit 9?
- 22 A. Exhibit 9 is a cross section across the area.
- 23 If you look at the reference map in the lower,
- 24 right-hand corner, the three wells are identified that
- 25 are shown over on the left. They cross the proration

- 1 unit in question and extend a little further into the
- 2 Basin. What those wells are indicating -- it's a bit
- 3 hard to see. What you have on the left of each log is
- 4 the gamma ray. On the right-hand side of each log is a
- 5 neutron density. The red arrows on the left indicate
- 6 areas with a more prospective log. However, the wells
- 7 being applied for at this time, the 5, 6 and 7H, all
- 8 target the Upper Avalon, which is the top arrow.
- 9 What the wells are really indicating is
- 10 that it's very consistent lithologies across the area,
- 11 thin-bedded silts and shales, for the most part, down --
- 12 area of interior carbonates coming into play. We plan
- 13 to avoid those. They're typical of what we find
- 14 throughout the Bone Spring and, in fact, most of the
- 15 Wolfcamp.
- 16 Q. Have you identified any geologic impediments
- in the area of the two-mile horizontal wells?
- 18 A. Not at all.
- 19 Q. Do you believe the area can be efficiently and
- 20 economically developed by horizontal wells?
- 21 A. Yes.
- Q. Do you believe that each tract in the proposed
- 23 nonstandard unit will contribute, more or less, equally
- 24 to production from each of the wells?
- 25 A. Yes.

- 1 Q. In your opinion, will the granting of Chevron's
- 2 application be in the best interest of conservation, the
- 3 prevention of waste and the protection of correlative
- 4 rights?
- 5 A. Yes.
- Q. Mr. Verner, were Exhibits 8 and 9 prepared by
- 7 you or compiled under your direction?
- 8 A. Under my direction, yes.
- 9 MS. KESSLER: Mr. Examiners, I move
- 10 admission of Exhibits 8 and 9.
- 11 EXAMINER DAWSON: Exhibits 8 and 9 will so
- 12 be admitted.
- 13 (Chevron U.S.A., Inc. Exhibit Numbers 8 and
- 9 are offered and admitted into evidence.)
- MS. KESSLER: Thank you. That completes my
- 16 direct.
- 17 EXAMINER DAWSON: Mr. Goetze, do you have
- 18 any questions?
- 19 CROSS-EXAMINATION
- 20 BY EXAMINER GOETZE:
- 21 Q. Good morning. Just a couple of questions.
- First of all, in this area, has there been
- 23 development of the Avalon, and so are we following a
- 24 north-south trend? There seems to be a preferable
- 25 orientation for that in this area.

- 1 A. Definitely north-south is the trend in this
- 2 area. And yes, we -- we and others have been developing
- 3 this area for a few years. In fact, Sections 13 and 24
- 4 are already developed on the west half.
- Q. And also in the Avalon, or are you expanding?
- A. Also, the Upper Avalon has been developed.
- 7 We're starting to explore the Wolfcamp as well.
- 8 Q. Would these wells -- are we just drilling in
- 9 the Avalon, or are we going to have a pilot deeper in
- 10 one of them, or is that still up for debate?
- 11 A. On these three wells, I'm not certain, but I do
- 12 not recall hearing about a pilot on these wells. We do
- 13 have -- as you can see, the one on the left of the cross
- 14 section is a saltwater disposal well we had drilled
- 15 there recently, and that is serving as our deep pilot in
- 16 this area.
- 17 Q. With a few benefits?
- 18 A. Yes.
- 19 Q. Thank you. I have no further questions.
- 20 EXAMINER DAWSON: Mr. Brooks?
- 21 EXAMINER BROOKS: I have no questions.
- 22 CROSS-EXAMINATION
- 23 BY EXAMINER DAWSON:
- Q. I have one question, Mr. Verner. So you're
- 25 targeting the Avalon A?

24

25