ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF POGO PRODUCING COMPANY TO INSTITUTE A COOPERATIVE TERTIARY RECOVERY PROJECT AND TO QUALIFY THE PROJECT FOR RECOVERED OIL TAX RATE, LEA COUNTY, NEW MEXICO CASE NO. 13,581

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: WILLIAM V. JONES, JR., Hearing Examiner

October 20th, 2005

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, WILLIAM V. JONES, JR., Hearing Examiner, on Thursday, October 20th, 2005, at the New Mexico Energy, Minerals and Natural Resources Department, 1220 South Saint Francis Drive, Room 102, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

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EXHIBITS

Applicant's		Identified	Admitted
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Exhibit	3	8	14
Exhibit	4	9	14
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Exhibit	6	11	14
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STEVEN T. BRENNER, CCR (505) 989-9317

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GAIL MacQUESTEN Deputy General Counsel Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

FOR THE APPLICANT:

JAMES G. BRUCE Attorney at Law P.O. Box 1056 Santa Fe, New Mexico 87504

* * *

WHEREUPON, the following proceedings were had at 1 9:10 a.m.: 2 EXAMINER JONES: At this time let's call Case 3 13,581, Application of Pogo Producing Company to institute 4 a cooperative tertiary recovery project and to qualify the 5 project for recovered oil tax rate, Lea County, New Mexico. 6 7 Call for appearances. MR. BRUCE: Mr. Examiner, Jim Bruce of Santa Fe, 8 9 representing the Applicant. I have three witnesses. 10 EXAMINER JONES: Any other appearances in this 11 case? 12 Will the witnesses please stand to be sworn? (Thereupon, the witnesses were sworn.) 13 14 LESLYN M. WALLACE, 15 the witness herein, after having been first duly sworn upon her oath, was examined and testified as follows: 16 17 DIRECT EXAMINATION BY MR. BRUCE: 18 Would you please state your name and city of 19 Q. residence for the record? 20 Leslyn Wallace, Midland, Texas. 21 Α. Who do you work for and in what capacity? 22 Q. 23 I'm a district landman for Pogo Producing Α. 24 Company. Have you previously testified before the 25 Q.

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6 Division? 1 Yes, sir, I have. 2 Α. And were your credentials as an expert petroleum 3 Q. landman accepted as a matter of record? 4 5 Α. Yes, sir, they were. And are you familiar with the land matters 6 Q. 7 involved in this Application? 8 Α. Yes, I am. Mr. Examiner, I'd tender Ms. Wallace 9 MR. BRUCE: 10 as an expert petroleum landman. 11 EXAMINER JONES: Ms. Wallace is gualified as an 12 expert petroleum land manager. (By Mr. Bruce) Would you first please identify 13 0. Exhibit 1 and describe the land involved in this 14 15 Application. Exhibit 1 is an illustration or a plat of the 16 Α. acreage which we are seeking approval for the tertiary 17 recovery project. The acreage is outlined with a hached 18 line, and it is the 13th enlargement of the Delaware sand 19 20 participating area within the Cotton Draw Unit. The south half of Section 16, which has the hach 21 22 marks on it, is also acreage that we seek the Application 23 to be approved, but it is not a part of the participating area, nor is it a committed tract to the Cotton Draw Unit. 24 25 Q. And besides seeking the tertiary recovery

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1	project, Pogo also seeks to qualify the project for the
2	recovered oil tax rate, does it not?
3	A. Yes, it does, sir. And the acreage is owned 100
4	percent by Pogo Producing Company.
5	Q. And so this would be a rather than a statutory
6	unitization, this would be a cooperative carbon dioxide
7	flood, would it not?
8	A. Yes, sir, it would.
9	Q. On this exhibit, within the participating area,
10	there are some circled numbers. What are those numbers?
11	A. Those represent the tracts within the
12	participating area, and those tracts the participation
13	factors for those tracts are determined based on surface
14	acres.
15	Q. Okay. We also have Exhibit 1A as a land plat.
16	Is this simply showing some leasehold ownership in the
17	area?
18	A. Yes, it is, it's a copy of a Midland Map Company
19	map, and it shows the leasehold ownership within a half
20	mile and two miles outside the boundary of the
21	participating area in the Monsanto State Lease in the south
22	half of Section 16.
23	Q. Okay. Let's move on to the unit, just very
24	briefly. What is Exhibit 2?
25	A. Exhibit 2 is a copy of the unit agreement for the

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1	Cotton Draw unit that was dated April 21st, 1958, and
2	originally when the unit was approved, it covered some
3	35,000 acres.
4	Q. It has since been contracted to what, something
5	like 10,000 or 12,000 acres?
. 6	A. That is correct, I think it's about 12,000 acres.
7	Q. But this unit agreement is still in effect?
8	A. Yes, sir, it is.
9	Q. And under this unit agreement This was an
10	exploratory unit?
11	A. It was a federal exploratory unit, yes, sir.
12	Q. Okay. And in exploratory units participating
13	areas are formed and production is shared on an acreage
14	basis; is that correct?
15	A. That is correct, and that's shown under Section
16	11, page 13, in the unit agreement itself.
17	Q. Okay, and that's Section 11 is the
18	participation after discovery, and that pertains
19	Sections 11 and 12 pertain to the formation of
20	participating areas, do they not?
21	A. That's correct.
22	Q. What is Exhibit 3?
23	A. Exhibit 3 is a copy of the unit operating
24	agreement for the Cotton Draw unit that is still in place,
25	but when it was originally executed there were about a

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1	dozen parties that participated and joined in the unit
2	operating agreement at the time.
3	Q. And as you said, now not only within the Delaware
4	participating area but in the south half of Section $\begin{pmatrix} 1 \end{pmatrix}$ Pogo
[.] 5	is the sole working interest owner in the injection
6	interval; is that correct?
7	A. That is correct.
8	Q. What is Exhibit 4?
9	A. Exhibit 4 is a copy of the application for the
10	13th and the final enlargement of the Delaware sand
11	participating area within the Cotton Draw Unit. And if
12	you'll note on the back page of this application, there is
13	160 acres
14	Q. Excuse me, the Mr. Examiner, the final page of
15	that exhibit.
16	A. Yeah, the final page of Exhibit 4.
17	Q. Which is a land plat.
18	A. The land plat, yes.
19	It shows approximately 160 acres. It's the south
20	half of Section 16, to be within the participating area.
21	But Exhibit B of the application lists that lease
22	as well, but it does state that that lease was never
23	committed to the Cotton Draw Unit. Therefore, the
24	production that's coming from that lease is shared on a
25	lease basis only, and it is not apportioned or shared by

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1 the participating area. Okay. So even though the PA, the participating 2 Q. area, allegedly covered part of the south-half, Section 16 3 lease, none of the production from the south half of 4 Section 16 is allocated to the rest of this acreage? 5 That is correct. 6 Α. 7 And by the same token, none of the production Q. from the participating area is allocated to the south half 8 of Section 16? 9 That is correct. 10 Α. And this last expansion was done in 1962? 11 ο. Yes, effective April 1st, 1962. 12 Α. And the engineer is going to discuss this later 13 Q. in more detail, but at this point production is marginal on 14 these leases, isn't it? 15 Yes, sir, it is. 16 Α. Certainly a stripper status? 17 Q. 18 Α. Stripper status, yes, sir. What is Exhibit 5? 19 Q. 20 Α. Exhibit 5 is the order approving the Cotton Draw 21 Unit. It was Order R-1186, and it was approved June 4th, 22 1958. And again, the Cotton Draw Unit originally covered a 23 little over 35,000 acres. Subsequent to the formation of the unit and 24 Q. 25 subsequent to the last enlargement of the participating

area, were waterflood projects approved for the Delaware in 1 2 this pool? Yes, sir, they were. 3 Α. And is that reflected in Exhibit 6? 4 0. Yes, Exhibit Number 6, there are actually two 5 Α. Order R-3313 is the approval for waterflood of the 6 orders. Delaware sand under that Monsanto State Lease, which is the 7 south half of Section 16. And then Order R-3314 is the 8 approval of a waterflood for the Delaware sand under the 9 Cotton Drawn unit participating area, the 13th enlargement, 10 as is shown on Exhibit 1. 11 And the waterflooding continues in these project 12 ο. 13 areas to this date, does it not? 14 Α. Yes, sir, it does. Okay. What does Exhibit 7 reflect? 15 Q. Exhibit 7 is our illustration showing who the 16 Α. different offset owners are within a half mile of the 17 boundaries of the participating area and the Monsanto State 18 Lease. 19 And the colors obviously show on the legend who 20 the offset owners are that were required to receive notice 21 of this Application. 22 23 And there is an error on this map. If you look at Section 17, the northeast quarter should have been 24 25 colored, but it is owned by Chevron, and Chevron did

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1	receive notice of the Application.
2	Q. And written notice was given of this hearing to
3	all of the offset operators, was it not?
4	A. Yes, sir, it was.
5	Q. And is that reflected in Exhibit 8?
6	A. Yes, Exhibit 8 is the copy of the notice that was
7	provided to all the offset owners.
8	Q. And all of the offset owners have valid addresses
9	had valid addresses, and notice was received?
10	A. Yes, sir, that's correct.
11	MR. BRUCE: Finally, Mr. Examiner, Exhibit 9 is a
12	notice that was allegedly published in the Hobbs newspaper;
13	I never received the affidavit of notice. I published this
14	just in case. For a couple of days we didn't have an
15	address for Eugene H. Perry, although we did find an
16	address later on.
17	And I would request permission, whenever I
18	receive the affidavit of publication, to make that part of
19	the record.
20	EXAMINER JONES: Okay.
21	Q. (By Mr. Bruce) Now just a couple of final
22	questions, Ms. Wallace.
23	Because there's already a unit agreement in place
24	and an operating agreement in place, you do not propose
25	altering the participation which has been in place now for,
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1	what, 40-some years under the PA?
2	A. That is correct, sir.
3	Q. And with respect and Another question. The
4	PA is Who are the lessors under the participating area?
5	A. Sorry, I should have covered that. The lessors
6	are the federal government and the State of New Mexico
7	and
8	Q. There are no fee leases?
9	A. There are no fee leases, no.
10	Q. Okay. And with respect to this Application, the
11	federal government and the state government were noticed
12	also?
13	A. Yes, they were.
14	Q. And representatives of Pogo have spoken with both
15	the state and federal government representatives, and they
16	have not objected to this Application?
17	A. That is correct.
18	Q. Finally, with respect to that Monsanto State
19	Lease, did Pogo approach the State Land Office about how to
20	handle that, whether to expand the unit or to leave it as
21	is, and did they not
22	A. Yes, we did, and they advised us it would be best
23	to leave it as it was.
24	MR. BRUCE: And that way, Mr. Examiner,
25	production would just be allocated on a lease

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THE WITNESS: -- on a lease basis. 1 MR. BRUCE: -- on a lease basis. 2 EXAMINER JONES: Okay. For that lease? 3 THE WITNESS: For that lease. 4 MR. BRUCE: For that lease. 5 Q. (By Mr.-Bruce) Were Exhibits 1 through 9 6 7 prepared by you or under your supervision? Yes, they were. 8 Α. And in your opinion, is the granting of this 9 Q. Application in the interests of conservation and the 10 11 prevention of waste? Yes, sir, it is. 12 Α. MR. BRUCE: Mr. Examiner, I'd move the admission 13 of Pogo's Exhibits 1 through 9. 14 EXAMINER JONES: Pogo Exhibits 1 through 9 will 15 be admitted to evidence. 16 17 EXAMINATION BY EXAMINER JONES: 18 So you're going to leave that lease out, but is 19 Q. there going to be injection wells on that lease? 20 Yes, sir, there will be injection wells. But the 21 Α. production from that lease will just be contained -- or the 22 23 revenues from production on that will just be shared by the owners of that -- the royalty and the override under that 24 25 lease.

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15 Okay. What about the royalty burden? Is it 1 Q. consistent throughout this area, one-eighth royalty? 2 The royalty is one-eighth on all the leases, yes, 3 Α. sir. 4 State and federal leases? 5 Q. State and fed. 6 Α. 7 Are some of the leases better than others -- I Q. mean, some of the tracts better than others? I quess 8 9 that's immaterial at this point, because you're not 10 proposing --MR. BRUCE: I think you could ask the geologist 11 12 there --13 EXAMINER JONES: Geologist. MR. BRUCE: -- and they could tell you --14 15 EXAMINER JONES: Okay. (By Examiner Jones) This was a long time ago, 16 Q. 17 the latest PA change on this. 18 Α. Right. EXAMINER JONES: I know I worked for Texaco, but 19 20 I don't recognize this. 1962, I think. Long time ago. (Laughter) 21 22 THE WITNESS: Way before your time. 23 (Laughter) 24 MR. BRUCE: Texaco did own interest in here until 25 just a few years ago.

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THE WITNESS: Right. 1 MR. BRUCE: They sold out just -- I don't 2 remember the exact date, but they just sold out their 3 interest. 4 EXAMINER JONES: Oh. 5 MR. BRUCE: Five years ago --6 THE WITNESS: Five -- eight -- eight to ten years 7 8 ago, yes. (By Examiner Jones) Real good gas wells, there's Q. 9 a few good gas wells in here. Are they included --10 Α. No, sir. 11 -- below this unit? 12 Q. Not -- not in this participating area. 13 Α. It's just Delaware only? 14 Q. That's correct. 15 Α. And you noticed everybody within a half mile? 16 Q. A half mile, yes, sir. 17 Α. MR. BRUCE: And that was, of course, primarily 18 for the injection -- ' 19 EXAMINER JONES: Injection applications, okay. 20 21 Gail, do you have any questions? MS. MacQUESTEN: I don't have any questions, 22 23 thank you. 24 EXAMINER JONES: Okay, thanks, Ms. Wallace. 25 THE WITNESS: Thank you.

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1	<u>GLENN H. CURRY</u> ,
2	the witness herein, after having been first duly sworn upon
3	his oath, was examined and testified as follows:
4	DIRECT EXAMINATION
5	BY MR. BRUCE:
6	Q. Will you please state your name for the record?
7	A. Glenn Curry.
8	Q. And where do you reside?
9	A. Midland, Texas.
10	Q. Who do you work for and in what capacity?
11	A. I work for Pogo Producing Company as senior
12	geologist.
13	Q. Have you previously testified before the
14	Division?
15	A. Yes, sir.
16	Q. And were your credentials as an expert petroleum
17	geologist accepted as a matter of record?
18	A. Yes, sir, they were.
19	Q. And are you familiar with the geology involved in
20	this Application?
21	A. Yes, I am.
22	Q. Mr. Examiner, I tender Mr. Curry as an expert
23	petroleum geologist.
24	EXAMINER JONES: Mr. Curry, you spell your name
25	C-u-r-r-y?
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THE WITNESS: Yes, sir, that's correct. 1 EXAMINER JONES: Mr. Curry is qualified as an 2 expert petroleum geologist. 3 (By Mr. Bruce) Mr. Curry, could you identify 4 Q. Exhibit 10 and discuss the -- maybe a little bit of the 5 history of the development of this reservoir? 6 Okay. Exhibit 10 is a structure map on top of 7 Α. the Ramsey sand, which is the primary reservoir in this 8

10 miles north of the Texas border and two miles east of the 11 Eddy County line. It's in Township 25 South, Range 32 12 East.

Paduca field. The field is located in Lea County, eight

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13 It was discovered in 1960, and subsequently it 14 was drilled -- 56 wells were drilled on 40-acre spacing. 15 As I said, the primary producing reservoir is the Ramsey 16 sand. It's a member of the Bell Canyon formation.

17 Minor production was recovered from the Olds18 sand, which is slightly deeper than the Ramsey.

19 It produced under primary recovery from 1960 20 until 1968, and at that time it was -- the waterflood 21 began. And since that time it's continued to produce under 22 waterflood. The production to date is over 14 million 23 barrels of oil and 15 BCF of gas.

The field is a -- typical of many Delaware sand traps in the Basin. It's a northeast-southwest-trending

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turbidite sand channel and it's overlying a structural 1 nose. On Exhibit 10 you can see that generally the 2 regional dip is to the east, and there's a structural nose 3 evident -- it crosses in the north part of Section 21 and 4 plunges to the east-southeast. 5 6 And the -- Exhibit 11 --7 Q. Before you go on to that, you mentioned what has been recovered to date. What percentages of oil have been 8 recovered in primary and secondary production? 9 Well, the original estimate -- well, the oil-in-10 Α. place estimate is 61 million barrels of oil. Primary was 6 11 million, secondary 8 million, so primary is about 10 12 percent and secondary about 13 percent of the original oil 13 in place. So that leaves a lot of reserves behind. 14 Let's move on to your exhibits, maybe together 11 15 Q. 16 and 12 and you can describe the --17 Α. Sure. -- primary producing zone. 18 Q. Okay, Exhibit 11 is a net sand isopach of the 19 Α. 20 Ramsey sand, and it demonstrates that the sand reservoir trends from the northeast to the southwest. It continues 21 both in the north and south directions. And on the updip 22 western edge you have a pinchout of pay. To the east and 23 southeast you have a pinchout or an oil-water contact that 24 25 bounds it on the east side.

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Both north and south, the sand does continue past 1 the field limits, but it's bound by the oil-water contact 2 in both directions. So it's a pretty typical stratigraphic 3 sand trap. 4 And these plats are based solely on well control 5 ο. in the area, correct? 6 7 That's correct. Exhibit 12 is a type log. It's Α. taken from a recently drilled well, the Pogo Monsanto State 8 10, and that location is in the southeast of 16. And that 9 well -- Well, I have a density neutron log here, and I have 10 shaded in porosity greater than 20 percent, and I have --11 the Ramsey sand in this well is 83 feet gross and about 50 12 feet of pay greater than 20 percent. The Olds is 58 feet 13 14 gross and 32 feet greater than 20. I have a blue bar indicated on the left side of 15 the type log, which is the proposed stratigraphic interval 16 that we are wanting to inject CO₂ in. 17 Q. Approximately how many productive acres are in 18 this reservoir? 19 The productive area is approximately 2300 acres. 20 Α. What type of porosity and permeability are you 21 Q. looking at in this reservoir? 22 Okay, the oil in place is calculated for the 23 Α. Ramsey sand only. We consider the Olds a minor 24 25 contributor. The permeability is much less in the Olds

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1	sand, so the numbers I'm about to tell you relate to the
2	Ramsey sand.
3	The porosity in the pay ranges from 15 to 28
4	percent, with an average of 24 percent.
. 5	The permeability, based from several core
6	studies, varies from 1 to 100 millidarcies, with about a
7	20-millidarcy average. And the pay thickness of net sand
8	greater than 20 percent porosity varies from zero to 72
9	feet, with an average pay thickness of about 30, 30 feet.
10	The original water saturation ranged from about
11	35 to 70 percent, with the average water saturation of
12	about 45 percent. Many of the initial wells that were
13	completed in the field did have 100-percent oil or very low
14	water cuts, so
15	And of course the reservoir engineer will cover
16	this more thoroughly, but our estimated tertiary target is
17	another 12 million barrels of oil, which would represent
18	about 20 percent of our estimated original oil in place.
19	Q. And is the reservoir continuous across the
20	participating area and the separate Monsanto State Lease?
21	A. Yes, sir, it is.
22	Q. And with respect and this goes to the
23	injection application is there any faulting in this area
24	which could connect freshwater sources with the injection
25	interval?

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1 No, sir. Α. Let's move on to your Exhibit 13, and discuss a 2 ο. little bit the proposed development plan with respect to... 3 Okay. Well, Exhibit 13 is a base map with our Α. 4 acreage and the producing wells shown. I've indicated with 5 a triangle the proposed locations for future injection 6 wells. As I said earlier, the field is developed on 40 7 acres, and we intend to bring that down to 20-acre spacing 8 with the drilling of injection wells. 9 We have it represented in a table, which is 10 Exhibit 13A, which is simply a list of the locations and 11 their footages, represents 57 well locations, of which all 12 13 but two are new drills. Actually, there's two conversions planned. One 14 conversion is the new well, the Monsanto State 10, which is 15 the type log, so it's essentially a new well. Really just 16 only one conversion. All the injection wells will have new 17 casing and new cement, et cetera. 18 Now, Exhibit 13 lists the footages for the 19 Q. injection wells. Might some of these change in the future? 20 Yes, sir, I'd like to say that it's a preliminary 21 Α. 22 pattern, preliminary plan. We're still doing some studies. 23 Particularly, we're trying to understand the fracture

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direction. We've employed Pinnacle Technologies to do a fracture study in this new well. We're going to have an

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1	array of geophone tiltmeters around the well. We're going
2	to induce a frac hydraulically and try to determine the
3	azimuth of frac propagation.
4	And based on that study and other subsurface
5	study, we may want to change the orientation of some of
6	these wells and move them. I would say this is the maximum
7	number of injectors that we would drill. If we choose to
8	eliminate some or even propose horizontal injectors rather
9	than verticals, the number of wells may be reduced. But
10	until we finish our study we won't know exactly how to
11	place these and how to set up the play.
12	Q. Were Exhibits 10 through 13A prepared by you or
13	under your supervision?
14	A. Yes, sir.
15	Q. And in your opinion is the granting of this
16	Application in the interests of conservation and the
17	prevention of waste?
18	A. Yes, sir, it is.
19	MR. BRUCE: Mr. Examiner, I'd move the admission
20	of Pogo's Exhibits 10 through 13A.
21	EXAMINER JONES: Pogo Exhibits 10 through 13A
22	will be admitted to evidence.
23	EXAMINATION
24	BY EXAMINER JONES:
25	Q. Mr. Curry, what direction do you think the

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STEVEN T. BRENNER, CCR (505) 989-9317 23 ·

fractures are going? 1 Well, sir, I may refer that question to our 2 Α. reservoir engineer, because he's done a little more work on 3 In the past history of the waterflood, there was some 4 it. 5 breakthrough in an east-west direction --6 Q. Okay. 7 -- so we're conscious of that. But we'd like Α. to -- we know that the pressure regimes have changed in the 8 field through the years, and we just want to know how is it 9 today. 10 How is it regionally, though? I mean, as a 11 Q. geologist, how -- in other fields, in other -- even down in 12 the Geraldine Ford stuff down in Texas, does that have any 13 kind of linearity to it? 14 15 Α. It's generally an east-west or northeastsouthwest, I believe. Of course Dan may correct me on 16 that. He's studied it a lot more and talked to a lot 17 more --18 19 EXAMINER JONES: He says he's not going to. 20 (Laugher) (By Examiner Jones) He's wanting you to commit. 21 Q. Yeah. Well, we certainly want to avoid --22 Α. 23 Q. -- breakthrough. 24 Α. We want to try to be -- have our injection 25 parallel to that trend so we don't have breakthrough --

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1	Q. Okay.
2	A prematurely. And we're just trying to do our
3	homework, nail it down before we spend all this money.
4	Q. Yeah, it looks like you're going to spend a lot
5	of money here.
6	A. Lot of money.
7	Q. Lot of money. As far as isolating these
8	injection wells from the salt zone, what have you got? 200
9	feet? 250 feet from the salt? So you're not worried about
10	it getting up in the salt. You're going to have all new
11	injection wells
12	A. All new
13	Q good cementing
14	A good cement, right.
15	Q. As far as that Olds sand, you don't expect it to
16	take much CO ₂ ?
17	A. Well, as an example, the permeability in this
18	well, the type log you know, the average perm in the
19	Ramsey is 20 millidarcies, average perm in that Olds sand
20	is like 3 millidarcies. So we think preferentially it's
21	going to be hard to treat
22	Q. Yeah.
23	A hard to process with CO_2 . And apparently it's
24	contributed some in the waterflood, but a minor amount
25	compared to the Ramsey.

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1	Q. Okay. And we hope we get some added reserves
2	from the Olds. We definitely are going to drill through it
3	and evaluate it. We know that the oil-water contact for
4	the Olds is it doesn't extend all the way across the
5	field. The best production is on the west half of the
6	field, so we know it won't be a target all the way across.
7	Q. Okay.
8	A. But we're not going to neglect it, we're going to
9	try to exploit it if possible. And we haven't but of
10	course our all of our economics and all of our
11	justification for the project is based on the Ramsey, which
12	is the primary objective.
13	Q. Okay, it looks like you're going to a smaller
14	spacing on your actual overall well count?
15	A. Yes, sir.
16	Q. As a geologist, do you agree with the is that
17	needed as far as not from a reservoir-engineering
18	standpoint, but from a discontinuity/heterogeneity
19	standpoint in the reservoir?
20	A. Well, the depositional environment is the deep-
21	water marine turbidite sands, which is really a series of
22	multiple sand flows, gravity flows, of very fine sand.
23	Generally, it's a sand-rich environment where each flow is
24	in contact with the other, and there may or may not be
25	continuity through there. We've seen examples of both

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where you have continuity for some distance, and maybe in a 1 direction normal to that it might not be that continuous. 2 So we feel it's necessary to drill 20-acre spacing to get 3 better efficiency in processing the rock. 4 Okay. Does this turbidite marine fine-grain 5 0. sands -- does that have any sort of coarsening-upward 6 characteristics on it, or --7 Well, sir, it is a very, very fine sand. I've 8 Α. examined cores, and you seldom get above a 175-micron grain 9 This is -- You know, we're probably 20 to 25 feet 10 size. from the -- 20 to 25 miles from the source rock. We're in 11 12 deep marine. It doesn't have enough velocity to carry large grain sizes. So your range of grain sizes from clay 13 size to upper silt, lower very fine grain. 14 Q. Okay. 15 16 Α. So you do have some coarsening-downward sequences, but generally it's pretty homogeneous. 17 You'll have silty, shaly sands, separated with suspension deposits 18 of clay-size material, which may or may not be a barrier. 19 Sometimes they're not barriers, they're just baffles that 20 slow the --21 Oh. 22 Q. 23 Α. -- it impedes the permeability and 24 transmissibility. So it's a big pile of sand --Where's the source of the oil? 25 Q. Okay.

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1	A. It's the platform 25 miles northeast. It's well
2	documented that this particular channel is mapped over
3	about a 25-mile area, and it's periodic pulses of sand that
4	go down this defined channel, and they just fill in and
5	slide and plow into each other and just fill this channel
6	valley full of this silt sand.
7	Q. Where would be the best example of the best
8	Ramsey sand in the is it would it be down in the
9	Geraldine Ford field, or would it be is this one of the
10	best ones that a person could find?
11	A. Well, it's a pretty nice sand. You know, we're
12	up in the about 20- to 28-percent porosity. That's
13	pretty good. The permeability looks pretty good. So it's
14	a pretty nice project.
15	Q. Okay.
16	A. It compares with the other fields that have been
17	waterflooded and CO ₂ -flooded. There's problems with this
18	kind of sand.
19	Q. Now, do you Do logs tell you anything, or do
20	you have to core this stuff?
21	A. We're fortunate in this field that the earlier
22	operators I think there's about 32 cores cut in this
23	field. We have reports on about 20 of them, so we have
24	that porosity and perm data.
25	The logging suite used out here in the past was

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1	sonic logs. The resistivity logs are not as common. So
2	But since we do have enough core data, we have a pretty
3	feel for the porosity. By the time we drill it out and run
4	modern logs, we'll have a lot better data. We intend to
5	core three or four more wells and do some lab work on
6	Q. Whole cores?
7	A. Yes, sir, we have one whole core on this new
8	well, and we're currently doing studies on it. We've
9	identified the mineralogy and the clays, and we're doing
10	some special core-analysis studies in the lab currently
11	Q. Okay.
12	A and
13	Q. Okay.
14	A I'm stealing Dan's thunder
15	Q. Yeah.
16	A here. He can really help you with that. But
17	we think it's a good project.
18	Q. Okay. You must be willing to spend some money
19	now.
20	I guess the biggest question I've got is, you
21	said it was to the east you have increasing water
22	saturation.
23	A. Well, I was discussing the boundaries of the
24	field, what defines the field limits. And as you can see
25	on the we do have field pinchout limits in most areas.
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1	However, up in the northeast, you have kind of a splay of
2	sand that goes past, over into Section 14, so
3	Q. In the Ramsey?
4	A. Yes, sir, this is a Ramsey map.
5	Q. Okay.
6	A. So what I was saying is, the boundary to the east
7	is either a pinchout of sand, or you encounter the oil-
8	water contact as you proceed downdip.
9	Q. Okay. So if you CO ₂ I think I remember you
10	can CO ₂ -flood areas higher in water saturation than you can
11	successfully waterflood.
12	So are you considering expanding this to the west
13	a little bit?
14	A. To the west?
15	Q. To the east, I'm sorry.
16	A. To the east? No, sir.
17	Q. So that would be
18	A. We're just going to go with
19	Q going to go with what you've got?
20	A go with what we've got.
21	Q. Yeah.
22	A. And flood that.
23	EXAMINER JONES: Okay, that's all I have. Gail,
24	do you
25	MS. MacQUESTEN: No questions.

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1	EXAMINER JONES: Thanks a lot, Mr. Curry.
2	DAN STOELZEL,
3	the witness herein, after having been first duly sworn upon
4	his oath, was examined and testified as follows:
5	DIRECT EXAMINATION
6	BY MR. BRUCE:
7	Q. Could you please state your name for the record?
8	A. Yes, sir, my name is Dan Stoelzel.
9	Q. Could you spell your last name for the Examiner?
10	A. That's spelled S-t-o-e-l-z like zebra -e-l.
11	Q. Where do you reside?
12	A. I reside in Midland, Texas.
13	Q. Who do you work for and in what capacity?
14	A. I'm a district reservoir engineer for Pogo
15	Producing Company.
16	Q. Have you previously testified before the
17	Division?
18	A. No, I have not.
19	Q. Could you please summarize your educational and
20	employment background?
21	A. Yes, sir, I got my bachelor's degree at Texas
22	Tech University in 1985, master's degree in petroleum
23	engineering from Colorado School of Mines. I've been
24	working in the industry since 1987, mostly as a reservoir
25	engineer. The last ten years or so of my career has been

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1 pretty much strictly in the Permian Basin west Texas-New Mexico area. 2 How long have you been employed by Pogo? 3 ο. A little over a year. 4 Α. And does your area of responsibility at Pogo 5 0. include this part of southeast New Mexico? 6 7 Α. Yes, sir. And are you the engineer in charge of the CO_2 8 0. 9 flood for this project? 10 Α. Yes, I am. MR. BRUCE: Mr. Examiner, I'd tender Mr. Stoelzel 11 as an expert engineer. 12 EXAMINER JONES: Mr. Stoelzel is qualified as an 13 expert petroleum engineer. 14 MR. BRUCE: You first -- Let's go through the 15 C-108, the injection Application, first, which is marked 16 Exhibit 14. 17 Mr. Examiner, if you'll look at the -- it's 18 paper-clipped together. There's a few different sections, 19 20 and if you took off the biggest paper clip, it might be easiest to go through it that way. 21 22 The first exhibit is a -- or the first section of this is a land plat, Mr. Stoelzel. What does that reflect? 23 This just reflects the area of interest with 24 Α. boundaries showing offset acreage, and I think the red line 25

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1	represents the half-mile radius for the injection permit
2	reasons
3	Q. Okay
4	A you know, reasons.
5	Q and so you looked at all wells within that red
6	line?
7	A. Yes, I have.
8	Q. Okay. Let's move on to the second section, which
9	is item Roman numeral VI of the C-108, the wells in the
10	area of review. Could you just briefly go through that and
11	discuss whether there are any wells that need remedial work
12	before injection begins?
13	A. Most of these wells Currently there are about
14	12 active injectors and about 12 active producers. There
15	are several shut-in producers, but the majority of the
16	wells are either TA'd or P-and-A'd. And most of them were
17	P-and-A'd were done under the regulations when Texaco
18	operated the field, they P-and-A'd quite a few back in the
19	1980s and again back in the mid-1990s and, you know, set
20	cement plugs and whatnot, according with the rules.
21	We've reviewed all the wells, and we feel like
22	they've all been P-and-A'd appropriately, and currently
23	there are no problem wells.
24	Q. Okay. And behind this section is all of the
25	the thickest section of this contains information on all
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1 the plugged and abandoned wells, does it not? 2 Α. Correct. And again, your review shows that they're all 3 Q. properly plugged and abandoned? 4 That is correct. 5 Α. And from what you've seen, there's no chance of 6 Q. 7 any migration of fluids that would violate Division rules? No, sir. 8 Α. 9 0. Could you discuss the typical wellbore for your 10 proposed injectors? 11 Α. Yes, one of the last pictures in the thick packet would be a pretty straightforward completion. Surface 12 casing would be set around 750 feet, which will protect all 13 the surface fresh waters. And both casing strings, surface 14 as well as a production string, will be cemented to 15 16 surface. And this is the type of program that was used on 17 Q. the recently drilled Monsanto 10 State --18 That is --Α. 19 -- or Monsanto State Number 10 well; is that 20 ο. correct? 21 That is correct, yes. 22 Α. 23 Now, on this well plat it shows -- or well Q. 24 schematic, it shows the wells being drilled to approximately 5000 feet. Again, you are in the upper 25

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Delaware at that depth? 1 That is correct. 2 Α. 3 Q. And what is the approximate base of the Delaware? The base of the entire Delaware section is at 4 Α. 5 about 8500 feet, but the injection interval for the CO₂ 6 project is defined under various leases but generally goes 7 down to about 5000 feet, which gets you through the Ramsey 8 and Olds sections. 9 Okay. Above the Ramsey sand, are there any Q. productive intervals in this area? 10 11 Α. No, sir, there are not. The anhydrites are 12 pretty much right above. Could you go over the items 7, 8 and 9 of the 13 Q. 14 C-108 with respect to the operational data, and discuss the 15 injection rates, et cetera? Yeah, where is that? Yeah, we're proposing, 16 Α. 17 currently, rates of 1000 barrels of water a day and/or 1000 18 -- you know, 1 million standard cubic feet of CO₂ a day, or 2 million -- 1 to 2 million, I believe, for a vertical 19 20 well, vertical injector, injection pressures not to exceed 500 for the water and estimated to be about 900 pounds for 21 22 the CO₂ injectors. 23 Q. And is there a stimulation program proposed for these wells? 24 For the injectors, we're still evaluating that, 25 Α.

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1	and that's going to be based on the stiltmeter study we're
2	doing. If we do In the past these producers have been
3	frac'd, but the fracs are generally very small, on the
4	order of 15,000 to 20,000 pounds, and I think they
5	generally frac'd them to basically hook up the sands near
6	the wellbore. It wasn't necessarily frac'd for extension
7	to get rate. And if we do frac any of the injectors, it
8	would certainly be on that order, just to connect up sands.
9	But currently we're evaluating that, you know,
10	and that's an ongoing science project right now, as it
11	were.
12	Q. With respect to the injected water, where does
13	that come from?
14	A. Most of it is produced water from the flood. If
15	we do need makeup water, we have a freshwater well that we
16	can mix in with the produced water and treat accordingly,
17	but we don't anticipate the need for very much makeup
18	water.
19	Q. Where is the nearest freshwater well in this
20	area?
21	A. I believe it's about six miles away, and Pogo
22	also owns that well, and it's currently being used by the
23	local ranchers out there to water their cattle. And that's
24	also included in the exhibits. There's a
25	Q. And a

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1	A water analysis
2	Q freshwater analysis
3	A. Right.
4	Q is included?
5	A. Yes.
6	Q. You mentioned there's about a dozen producing
7	wells out there. What is the production?
8	A. The current production for the entire area, which
9	includes the Cotton Draw Unit and Monsanto State Lease, is
10	between 50 and 60 barrels a day right now. So you're
11	looking at less than five barrels a day on average, per
12	producer.
13	Q. Okay. They are definitely stripper wells under
14	the various regulations?
15	A. Definitely stripper, it's a worn-out old
16	waterflood. There's not much left in conventional recovery
17	methods, that's for sure.
18	Q. Okay. Let's discuss the cost of this project.
19	Could you identify Exhibit 15 for the Examiner?
20	A. Certainly, Exhibit 15 is a very brief rundown of
21	what we estimate to be capital costs and returns from the
22	CO ₂ flood. Capital costs amount to about \$35.5 million,
23	which includes a CO_2 trunk line, workovers, drill wells,
24	and about \$13 million in recycle facilities.
25	We anticipate, as Glenn mentioned earlier,
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recovering about 12 million barrels from the CO₂ total
 gross, and I've thrown a little bit of NGL recovery in
 there that we'd probably get from the recycle facilities.
 You know, when you factor in the lease operating expense
 and the capital, you know, your incremental value, a little
 over 400 million barrels, we anticipate.

Q. On the project cost you have pipeline, fairly
substantial item. There is no CO₂ pipeline in this area;
is that correct?

There's a supply line about 10 Α. That is correct. 11 seven miles south of this area that supplies the El Mar and used to supply the Ford Geraldine, and I think it supplies 12 a little bit of CO₂ gas to the East Ford Unit, and that's 13 operated by Kinder Morgan. As it stands now, though, we've 14 contacted them and they have no supply capacity remaining 15 to that area. 16

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So we are currently investigating other sources 17 of supply CO₂ further north. We're in discussions with 18 both Kinder and ExxonMobil, who are the two major 19 suppliers, and we're looking at various options to capture 20 that CO₂ from some of the larger supply lines to the north. 21 Q. So a substantially long pipeline will have to be 22 23 built? That is correct, and that cost is not in here, Α. 24

the \$4.5 million pipeline cost is just a trunkline to

39 probably tap into that system. 1 Okay. Let's go into your anticipated recoveries, 2 0. maybe just go to Exhibits 16 and 17 together --3 All right. 4 Α. -- and discuss historic production and what you 5 Q. 6 anticipate or hope to recover. 7 Α. Very well. The Exhibit 16 is a fairly busy plot showing historical production from oil, gas, water, as well 8 9 as water injection. As you can see, the production started 10 in late 1960, early 1961. In 1968 it was unitized for waterflood, and that's when they started injecting water, 11 you can see by the light blue line. 12 You see a bump in production toward the end of 13 1970, and that is partially due to waterflood response, but 14 as I went through the records the operator at the time, 15 which I believe is Texaco, put in a fairly comprehensive 16 stimulation program where they went in and frac'd most of 17 their producers, because they had previously just been 18 19 stimulated with acid. And so some of that jump from about 1000 barrels a day to about 2500, 2600 barrels a day is due 20 to workover stimulation. 21 22 And then as you go into 1973-74 time frame, you 23 another little bump, and I think that's probably more 24 representative of the true waterflood response, because if 25 you look at the GOR plot, you know, you don't -- you fully

1 collapse your gas sometime in late 1975-76. That's where the GOR tends to level off. So I feel like from that point 2 on it's probably more representative of waterflood 3 4 response. 5 And then if you go to Exhibit 17, the last plot, 6 it shows kind of the tail end of primary -- or secondary 7 production, rather, with what I anticipate to be the 8 tertiary CO₂ response. We plan on having CO₂ available in late 2006 or early 2007, and we anticipate about a three-9 or four-year response period, with the peak response 10 coming, you know, sometime in probably 2009 or 2010 at, oh, 11 12 close to 5000 barrels a day, and then declining from there. Will the tertiary project result in an increase 13 Q. in the amount of crude oil ultimately recovered from the 14 reservoir? 15 Yes, sir, it will. 16 Α. And in your opinion, is it prudent to apply 17 ο. enhanced recovery techniques to maximize ultimate recovery 18 of oil from the pool? 19 Yes, sir. 20 Α. And in your opinion, is the CO_2 project 21 Q. economically and technically feasible at this time? 22 23 Α. At this time all indications are, it should be a 24 very good CO₂ project. 25 Were Exhibits 14 through 17 prepared by you or Q.

> STEVEN T. BRENNER, CCR (505) 989-9317

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1	under your supervision?
2	A. Yes, sir.
3	Q. And in your opinion, is the granting of this
4	Application in the interests of conservation and the
5	prevention of waste?
6	A. Yes, it is.
7	MR. BRUCE: Mr. Examiner, I'd move the admission
8	of Exhibits 14 through 17.
9	EXAMINER JONES: Exhibits 14 through 17 will be
10	admitted to evidence.
11	EXAMINATION
12	BY EXAMINER JONES:
13	Q. What did you get your master's what was your
14	option in the master's program?
15	A. It's a master of science, I did do thesis work.
16	Q. Did you specialize in a certain reservoir
17	engineering?
18	A. Actually, my thesis project pertained to
19	waterflood experimentation, and some tertiary-type studies.
20	Q. I just wondered, it seems like you're really
21	doing your homework here. Is your team the one that had to
22	sell it to management, sell this project to management?
23	A. Pretty much the team is me for CO ₂ flood at Pogo
24	right now, so it better work.
25	MR. CURRY: We're right behind you.

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1	MS. WALLACE: We're right behind you.
2	(Laughter)
3	Q. (By Examiner Jones) Guess you've got a lot going
4	here. I won't belabor this a whole lot, but your
5	injection-withdrawal ratio right now, as far as Are you
6	worried about losing any CO ₂ out of zone?
7	A. That is a concern. I think there's more of a
8	concern of losing it out the channel to the north and
9	south. And I plan to set up, you know, water blanket
10	injection wells to kind of close off those escape paths, as
11	it were, use water injectors. Because we're drilling all
12	new injector wells, we you know, in a CO ₂ flood
13	obviously you don't want to lose any of it, it's pretty
14	expensive stuff. So we're going to try as best we can to
15	contain the injection within the flood intervals.
16	And that's another reason why we're pretty much
17	well, every one of our injection wells is going to be a
18	new drill, so we know we'll have cement and casing
19	integrity.
20	Q. Did you run a model to get this prediction, or do
21	you just base it on a certain percentage original in place
22	and
23	A. It's actually a model, but it's an analog model.
24	We're currently doing the science. I plan to run a
25	simulation, but that's probably going to be sometime next
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1 year before that's completed.

But to get the ball rolling and to get a first 2 look at CO₂ requirements, I actually developed an analog 3 model based on the CO2 response from the Two Freds field, 4 which is probably the most successful Ramsey sand CO₂ flood 5 currently. And I --6 Where's that one at? 7 ο. That's actually down in Texas, in Loving and Ward 8 Α. I think it's about 60 miles -- pretty much due 9 Counties. south of the Paduca field. And it was an old waterflood 10 that was CO_2 -flooded back in 1974, one of the first CO_2 -11 12 floods in the Permian Basin. And it was very successful. And I believe it could have been more successful, 13 but they were using CO₂ from tail gas coming from some of 14 the processing plants in the area, and in the 1980s, going 15 into the late 1980s, into the 1990s, those plants started 16 to drop off in, you know, production processing. So they 17 lost a lot of their CO_2 supply. 18 This processing of CO_2 , are you going to recycle 19 Q. your gas stream, or are you going to --20 Yes, we --Α. 21 -- strip it out? 22 Q. 23 -- we -- probably -- you know, I've got some CO₂ Α. experience. Before I worked with Pogo I worked with OXY 24 25 and was involved in some of their floods. And typically

1 what the industry is leaning towards now is, when you start to get enough contaminated gas coming from your production 2 system, you just turn it back around and re-inject it, you 3 4 know, blood, guts and feathers, until you reach a point where you can no longer -- you endanger maintaining 5 miscibility. And at that point you probably -- you have to 6 go and put in some sort of NGL-recovery-type facilities to 7 pull some of those hydrocarbons out of the produced gas 8 9 stream. And that's sort of what we're planning. We'll 10 probably initially just go with recycle, and at some point 11 we'll have to start stripping out the NGLs to, you know, 12 13 purify up the CO₂ stream, as it were. And that's all -hopefully, we'll be a little bit more -- the timing of all 14 that, hopefully, will come out of some of the more detailed 15 studies I plan to do. 16 17 Q. As far as those detailed studies, the special core analysis, are you going to get your capillary pressure 18 curves and your --19 20 Yes, sir, we're --Α. -- saturation --Q. 21

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A. -- we've got all that going with the new core we've cut, and we plan to do that with the -- Like Glenn said, I think we've got three or four more wells planned to cut some cores. We're just waiting on the permits to be

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approved.

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Q. When would have been the best time to start CO₂
in this flood to get the best recovery out of this
reservoir?

That's a good question. You know, there's 5 Α. various studies that have shown that some rocks will 6 7 recovery incrementally more under CO₂ flood before you get too far into a waterflood, and some studies showing that, 8 you know, recovery -- ultimate recoveries aren't that much 9 affected, you know, if you're at the later stages of a 10 waterflood. And from what I remember, those cases were 11 typically carbonate floods where companies have gone in and 12 CO₂-flooded old waterflood carbonate reservoirs, recoveries 13 don't seem to be affected. 14

But in sandstones, from what I remember in the literature, it's now believed, I think, that if you start your CO₂ floods a little bit earlier you might gain incrementally more reserves. So -- We're kind of past that point out here, so we're going to obviously live with what we get.

And that's another reason we're drilling new injectors, to help sweep efficiencies and to overcome some of that if we can.

Q. Okay, so -- And the pattern is going to be a 20acre well-spacing; is that right?

Α. Yes. 1 Forty-acre fivespots? 2 ο. 3 Yeah -- we're looking at various options; Α. fivespots are where we're going now. 4 5 But we feel that, based on what we see with the fracture work -- and when we say "fractures", we don't see 6 7 any evidence, per se, in the core of natural fracturing, but we do know that there's probably induced fracturing, 8 because -- You know, if you can see by the curve here, if 9 you look at the IWR plot, through the -- all through the 10 1970s and into the mid-1980s, you know, you've got IWRs, in 11 some cases more than two to one. And I feel that probably 12 there's quite a bit of induced fractures coming from those 13 14 old injectors, and we want to try and manage the flood such that we, you know, avoid those and go parallel to those as 15 best we can. 16 And so -- So I say 20-acre wells. You know, it 17 probably will be something like that, but the exact pattern 18 alignments, it might be more of a line drive versus a 19 20 fivespot and that sort of thing. Or even possibly horizontal injections? 21 Q. We're looking at that, yes. 22 Α. So you've still got a lot of studying to do, it 23 Q. looks like. 24 Right, right. 25 Α.

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1 And you'll have a full staff of equipment Q. 2 engineers and --3 Yup, yup, our operations group is trying to get Α. 4 that staff in place right now, actually. 5 Okay. Well, the graph that you're projecting for Q. 6 CO_2 , that would be the projected qualification for the EOR, 7 or the tax credit --8 Α. (Nods) 9 EXAMINER JONES: Okay, I think that's about the 10 only questions I should be asking at this point. 11 Okay, thank you very much, Mr. Stoelzel. 12 MR. BRUCE: I have nothing further in this 13 matter, Mr. Examiner. 14 EXAMINER JONES: Thank you, Mr. Bruce. 15 With that, we'll take Case 13,581 under 16 advisement, and good luck with your project. MR. STOELZEL: Thank you. 17 18 (Thereupon, these proceedings were concluded at 19 10:10 a.m.) I do heraby certify that the foregoing n a complete record of the proceedings is 20 * * the Examiner hearing of Case No. heard by me on 21 Can Conservation Division 22 23 - Examiner 24 25

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

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I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I transcribed my notes; and that the foregoing is a true and accurate record of the proceedings.

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

WITNESS MY HAND AND SEAL October 28th, 2005.

STEVEN T. BRENNER CCR No. 7

My commission expires: October 16th, 2006