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STATE OF NEW MEXICO
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:) CASE NO. 11077

APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

VOLUME II

BEFORE: Jim Morrow, Hearing Examiner

September 1, 1994

W 2

Santa Fe, New Mexico

This matter came on for hearing before the
Oil Conservation Division on September 1, 1994, at
Morgan Hall, State Land Office Building, 310 Old
Santa Fe Trail, Santa Fe, New Mexico, before Deborah
O'Bine, RPR, Certified Court Reporter No. 63, for the
State of New Mexico.

ORIGINAL

I N D E X

September 1, 1994
 Examiner Hearing
 CASE NO. 11077

	PAGE
APPEARANCES	24
SANTA FE ENERGY'S WITNESSES:	
<u>DARRELL ROBERTS</u>	
Examination by Mr. Bruce	25
Examination by Mr. Kellahin	32
Examination by Examiner Morrow	39
<u>MIKE DILLI</u>	
Examination by Mr. Bruce	44
Examination by Examiner Morrow	48
REPORTER'S CERTIFICATE	53

E X H I B I T S

	ID	ADMTD
Exhibit 1		50
Exhibit 2		50
Exhibit 3		50
Exhibit 4		50
Exhibit 5		50
Exhibit 6	28	32
Exhibit 7	44	47
Exhibit 8	44	47

A P P E A R A N C E S

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Oil Conservation Commission
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FOR THE APPLICANT: HINKLE, COX, EATON,
COFFIELD, & HENSLEY
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BY: JAMES G. BRUCE, ESQ.

FOR WALTER KRUG: KELLAHIN AND KELLAHIN
117 N. Guadalupe
Santa Fe, New Mexico
BY: W. THOMAS KELLAHIN, ESQ.

1 DARRELL ROBERTS,
2 the witness herein, after having been first duly
3 sworn upon his oath, was examined and testified as
4 follows:

5 EXAMINATION

6 BY MR. BRUCE:

7 Q. Would you please state your name.

8 A. It's Darrell Roberts.

9 Q. Who do you work for and in what capacity?

10 A. I work for Santa Fe Energy, and I'm a
11 drilling engineer in Midland, Texas.

12 Q. Have you previously testified before the
13 Division as a drilling engineer?

14 A. Yes, I have.

15 Q. Were your credentials as a drilling
16 engineer accepted as a matter of record?

17 A. Yes, they were.

18 Q. Are you the person responsible for
19 obtaining the APD and will you be responsible for
20 drilling this well?

21 A. Yes, sir.

22 MR. BRUCE: Mr. Examiner, I tender Mr.
23 Roberts as an expert drilling engineer.

24 EXAMINER MORROW: All right. We accept
25 Mr. Roberts.

1 Q. (BY MR. BRUCE) Mr. Roberts, Mr. Smith and
2 Mr. Kellahin already went into this in a little
3 detail, but what was the original footage location,
4 the original proposed footage location for the
5 Sinagua No. 2 well?

6 A. It was 660 feet from the south line and
7 1,980 from the east, which was within the 150 foot
8 radius of a dry hole, but the BLM denied that
9 application because that dry hole never did produce
10 from the Yates.

11 Q. Okay. So that dry hole was a Yates well?

12 A. Right.

13 Q. So even though you were drilling deeper,
14 they still denied it?

15 A. Right.

16 Q. When was this location proposed?

17 A. The latter part of 1994.

18 Q. What did Santa Fe Energy do then?

19 A. We then proposed the same well at a
20 different location, at 1,770 feet from the south line
21 and 1,637 feet from the east line, and then like
22 Curtis said, we were at the BLM, and they told us
23 they were going to deny that because we were outside
24 of the 150-foot radius because of topographic
25 reasons.

1 Q. So the drilling island they talked about
2 or you talked about with the BLM, you weren't in an
3 appropriate place for that?

4 A. We initially tried to stake the well
5 within the 150-foot radius of the Dewey Sparger well,
6 but because of pipelines and topographic reasons, we
7 moved it further away to the south -- southeast of
8 the Dewey Sparger well.

9 Q. To the southeast is the preferred
10 geological location anyway?

11 A. That's true.

12 Q. And, once again, these problems you're
13 encountering is because this well is in the oil-
14 potash area?

15 A. Right, it is.

16 Q. So you've had two locations denied. What
17 did you do next?

18 A. When we found out that we'd be granted
19 this drilling island, I contacted a surveyor and went
20 out with him and staked three different locations in
21 the northwest quarter of the southeast quarter of
22 Section 18 and submitted all these plats to the BLM
23 and came up with the only location that they would
24 give us, which was 2,041 feet from the south line and
25 2,171 feet from the east line. This was mainly

1 because of sand dunes and topographic reasons.

2 Q. So besides the potash, there are other
3 topographic reasons?

4 A. Right.

5 Q. And you were the person in conjunction
6 with Mr. Smith dealing with the BLM on all these
7 issues?

8 A. That's correct.

9 Q. What is Exhibit 6?

10 A. Exhibit 6 is a sundry notice that we sent
11 in to alter our APD mainly to change the surface
12 location and also to apply for authority to
13 directionally drill the well.

14 Q. Could you briefly discuss the directional
15 drilling aspects of this case and go through the
16 sundry notice for the examiner?

17 A. Okay. Like I say, the first page of this
18 exhibit is the sundry notice and explains exactly
19 what we were trying to do. And then we have a C-102,
20 which is a plat showing the surface location and our
21 proposed bottomhole location.

22 And then skip the third page, which is a
23 division of interest. And then I have a computer
24 printout of the well path data on an every 100-foot
25 interval that shows how we're going to drill the

1 directional well. But basically we're going to be
2 drilling vertically to around 5,500 feet and then
3 taking the well off at 2 degrees per hundred at an
4 azimuth of 130 degrees to a total TD of 13,700 feet,
5 which would give us a bottomhole displacement of
6 1,144 feet.

7 Q. Is the procedure you're using for the
8 directional drilling of this well a common procedure?

9 A. Yes, it is.

10 Q. And Santa Fe has drilled other directional
11 wells?

12 A. Yes, they have.

13 Q. What is the incremental cost of the
14 directional drilling over and above the vertical
15 hole?

16 A. Around \$150,000.

17 Q. Walter Krug has expressed concern about
18 potential harm to the Yates formation. Do you see
19 any basis for this concern?

20 A. No, sir, I don't.

21 Q. Santa Fe drilled the Sinagua 18 #1 well
22 fairly recently, did they not?

23 A. Yes, they did.

24 Q. And that well is located in the southwest
25 quarter of the northeast quarter?

1 A. Yes, sir.

2 Q. Does this offset any of Mr. Krug's well?

3 A. Yes, it does. It offsets his well No. 7
4 in the southwest quarter of the northeast quarter.

5 Q. How far is the Wallen Production Company
6 No. 7 well away from your Sinagua No. 1 well?

7 A. Six hundred and sixty-eight feet, by my
8 calculation.

9 Q. And, once again, in the Sinagua No. 1 you
10 drilled through the Yates?

11 A. Yes, we did.

12 Q. Into the Morrow?

13 A. Yes, we did.

14 Q. Were any problems encountered in drilling
15 that well?

16 A. Not that I've heard.

17 Q. Your proposed Sinagua No. 2 well, how far
18 away is that from Mr. Krug's nearest well?

19 A. By my calculations, it's 866 feet.

20 Q. So it's about 200 feet further away from
21 Mr. Krug's nearest well than your No. 1 well was?

22 A. Exactly.

23 Q. So you would anticipate no problems?

24 A. No.

25 Q. In your opinion, is there any need for any

1 special drilling or casing or cementing procedures
2 for Santa Fe's well?

3 A. No.

4 Q. Is it pretty common in this state to drill
5 through a shallow producing formation to reach a
6 deeper formation?

7 A. Yes, sir.

8 Q. Now, without -- if there were no potash
9 problems, and assuming the geology was correct, could
10 you have drilled even closer to Mr. Krug's wells and
11 at a standard location?

12 A. Yes. By the Commission rules, we could
13 have drilled, staked the well and permitted a well at
14 1,980 from the south line and 2,310 from the east
15 line, which would have been 760 feet from Mr. Krug's
16 nearest well without even notifying him.

17 Q. So, in other words, you don't believe
18 there's any basis for any special procedures required
19 for this well?

20 A. No, I don't.

21 Q. In your opinion, will the granting of this
22 application be in the interests of conservation, the
23 protection of waste, and the protection of
24 correlative rights?

25 A. Yes.

1 Q. Was Exhibit 6 prepared by you?

2 A. Yes, it was.

3 MR. BRUCE: Mr. Examiner, I move the
4 admission of Santa Fe's Exhibit 6.

5 EXAMINER MORROW: Exhibit 6 is admitted.

6 EXAMINATION

7 BY MR. KELLAHIN:

8 Q. Mr. Roberts, when you looked at the
9 proximity of your surface location for this well to
10 the Krug No. 7 well -- no, I don't have the Krug well
11 number. The Sinagua No. 2 is 866 feet away from
12 which Krug well?

13 A. 8Y.

14 EXAMINER MORROW: Which one, sir?

15 THE WITNESS: 8Y.

16 Q. (BY MR. KELLAHIN) 8Y. So that's --

17 A. According to your prehearing statement,
18 it's located at 2,310 from the south line and 2,285
19 from the west line in unit letter K of Section 18.

20 Q. So that's the west offset to your surface
21 location?

22 A. Yes, sir.

23 Q. When you looked north of your surface
24 location in unit letter G, there's the Wallen Federal
25 7, did you calculate to see how close you were to

1 that well?

2 A. No, I didn't.

3 Q. Then there's another Krug well in unit
4 letter F, which is the northwest offset to your
5 surface location. Are you with me? That would be --

6 A. No. 6 well.

7 Q. The No. 6 well.

8 A. Yes.

9 Q. Did you calculate how close you were to
10 that well?

11 A. No, I didn't.

12 Q. What's the drilling procedure? You will
13 set up and drill the surface hole and then set the
14 surface casing string?

15 A. Yeah. There will be three strings of
16 casing prior to us getting to our kick-off point; is
17 that what you mean?

18 Q. I want to know what happens from surface
19 to the kick-off point.

20 A. Let me tell you. I'll tell you the depths
21 and the size of casing we'll be setting.

22 Q. Does Santa Fe use a printed or a written
23 drilling procedure or program for these wells?

24 A. Yes, we do. I haven't drawn up one for
25 this well.

1 Q. What I'm concerned about is what happens
2 with relation to the Yates interval. All right?

3 A. Okay.

4 Q. If you'll describe for me what happens in
5 the drilling and then in setting up the wellbore as
6 you enter the Yates and move out of the Yates? What
7 do you do?

8 A. Our last string of casings to be set prior
9 to entering the Yates would be a string of 13-3/8,
10 68-pound casing set at 3,300 feet.

11 Q. Is that the surface casing string?

12 A. That would be the first intermediate.

13 Q. The first intermediate after the surface
14 casing string?

15 A. Our surface casing will be 20-inch set at
16 450 feet. We'll circulate that back to surface. Our
17 13-3/8 set at 3,300 feet will -- that's right at the
18 top of the Yates.

19 Q. Stop right there. That first
20 intermediate, the 13?

21 A. 13-3/8.

22 Q. Is going to be set before you move into
23 the Yates?

24 A. It's over the salt section.

25 Q. That's your salt protection string?

1 A. Right, or potash.

2 Q. What then do you do to move below the base
3 of that first intermediate string to get you into the
4 Yates?

5 A. We'll be drilling an 11-inch hole starting
6 at 3,300 feet, drilling with fresh water, and then
7 our casing point is at 5,200 feet. We are required
8 by the BLM in the potash area to circulate cement up
9 to the 13-3/8 casing, which is at 3,300 feet.

10 Q. If you set -- that's that second
11 intermediate string, if you will --

12 A. Yes.

13 Q. The 11 inch?

14 A. It would be 8-5/8 and 11-inch hole.

15 Q. The 8-5/8 then, is that the casing string
16 that's set through the Yates interval?

17 A. Yes.

18 Q. After 5,200 feet, we're well below the
19 Yates?

20 A. Yes.

21 Q. The process is to drill that with fresh
22 water?

23 A. Yes.

24 Q. Is there pressure on the drilling fluids?

25 A. There's a hydrostatic of the fluid.

1 Q. What is the pressure relationship between
2 the formation and the drilling fluids?

3 A. I'm sure it's overbalanced.

4 Q. But the fluids that are introduced into
5 the Yates are going to be fresh water? No?

6 A. I'm not sure that any fluid will go into
7 the Yates.

8 Q. If you're overbalanced, wouldn't that put
9 pressure on the reservoir?

10 A. It would put pressure on it, but I'm not
11 sure the fluid will go into the Yates. You have to
12 have porosity and permeability.

13 Q. If fluids are introduced into the Yates,
14 what kind of fluids would it be?

15 A. Fresh water.

16 Q. Does the Yates produce any fresh water?

17 A. Probably not.

18 Q. Does it produce any saltwater or waters
19 associated with Yates oil production?

20 A. I think there's some water, some formation
21 water.

22 Q. Is it feasible to design a drilling
23 program so that fresh water is not introduced into
24 the Yates as you drill through it?

25 A. Not economically, I don't think.

1 Q. Do you have a sense as a drilling engineer
2 what those pressures or protocols need to be to
3 accomplish that?

4 A. Could you --

5 Q. To not introduce the drilling fluids or
6 the drilling materials into the Yates as you drill
7 through it?

8 A. Well, I don't think -- we didn't lose any
9 on our No. 1 well, and we drilled with fresh water.

10 Q. You didn't lose any what?

11 A. Any fresh water.

12 Q. Your returns back to the surface of the
13 drilling fluids told you that you weren't losing
14 returns in the reservoir?

15 A. Right.

16 Q. After you drilled through the Yates, are
17 you still drilling with fresh water?

18 A. Yes.

19 Q. You get to the point where you're ready to
20 set the 8-5/8 in the 11-inch hole?

21 A. Uh-huh.

22 Q. What do you do then?

23 A. We run our casing and then displace the
24 drilling fluid and the fresh water with cement which
25 weighs 15 pounds per gallon as opposed to 8.3 pounds

1 per gallon for water.

2 Q. After you do that, then what happens?

3 A. We let the cement set up, and then we
4 drill out of the 8-5/8 casing a 7-7/8 hole with fresh
5 water again.

6 Q. Then you continue to drill vertically to a
7 kick-off point?

8 A. Yes.

9 Q. Where's your kick-off point?

10 A. 5,400 feet, I believe.

11 Q. At that point you start building angle,
12 and I think you said 2 degrees per 100 feet?

13 A. Yeah, to a maximum deviation of 8 degrees
14 from vertical, which is not very much deviation. And
15 then we'll hold that to other TVD of around 13,700
16 feet.

17 Q. Other than the first well, the Sinagua No.
18 1, have you had any other personal experience with
19 drilling deep gas wells in proximity to Yates oil
20 wells?

21 A. Not personal, but there's two wells to the
22 north of our No. 1 well, the TXO well, two TXO wells
23 in Section 7, I believe, that set casing at 5,200
24 feet, and they did not lose circulation or returns
25 into the Yates.

1 Q. But when we move through the Yates, the
2 drilling material is going to be fresh water, the
3 drilling fluid, if you will, is going to be fresh
4 water?

5 A. Yes.

6 Q. And you successfully accomplished that
7 when you drilled the Sinagua No. 1?

8 A. Yes, sir.

9 Q. That was the same protocol, the same
10 procedures?

11 A. Yes, sir.

12 MR. KELLAHIN: Thank you, Mr. Examiner.

13 EXAMINER MORROW: Go ahead.

14 MR. BRUCE: I have nothing further of this
15 witness.

16 EXAMINATION

17 BY EXAMINER MORROW:

18 Q. The three wells or your three locations
19 that you submitted to BLM, all those were within that
20 drilling island; is that correct?

21 A. Yes, sir. I have the actual locations if
22 you want them, but they were mainly around the Dewey
23 Sparger well. One of the three is the one --

24 Q. Is that the southernmost well?

25 A. Yes, sir. They were all surrounding that

1 one.

2 Q. And all the ones that proves is where the
3 X is on the Exhibit No. 8?

4 A. That's just a hand drawn. It's not exact.

5 Q. Well, I know. It's approximate?

6 A. Yes, sir.

7 Q. Where were the others about?

8 A. One was further to the west, closer to the
9 8Y well, but there's a big sand dune there, and they
10 disallowed it. The other one would be southwest of
11 the Dewey Sparger well within 150 feet. There's also
12 a big sand dune there. So we elected -- and they
13 approved this one that's exactly 200 feet from the
14 Dewey Sparger well.

15 Q. The 8Y well, Mr. Wallen's well, is that
16 one the southwesternmost in the drilling island; is
17 that correct?

18 A. Yes, sir.

19 Q. Where is that Sinagua No. 1 on some of
20 these plats? Maybe on Exhibit No. 1 you might tell
21 me.

22 A. That's not on any of the plats that I
23 have.

24 Q. This one right here.

25 A. Okay. On this Exhibit No. 8 of theirs,

1 it's that well there (indicated).

2 Q. Oh, yeah, it's marked. All right.

3 A. And Mr. Krug approved this actual location
4 of the No. 1.

5 Q. Was his nearest well still 8Y, or did he
6 have other wells nearer?

7 A. No, the No. 7.

8 Q. Which one is it?

9 A. It's on the northeast corner of that
10 drilling island.

11 Q. I thought you said you were 800 feet from
12 his nearest well?

13 A. Well, our No. 2 well is 860 feet from the
14 8Y, but our No. 1 well is 668 feet from the No. 7
15 well.

16 Now, I probably pointed to the wrong well
17 on the Sinagua No. 1. This is one we applied for
18 originally, and then it was denied, and this is the
19 one we actually drilled (indicated).

20 MR. KELLAHIN: I'm sorry, could you show
21 me, Mr. Roberts?

22 THE WITNESS: Yes. We applied for this
23 one, and then this is the one we actually drilled.

24 MR. KELLAHIN: The northern location was
25 applied for the drilled location south of the first

1 proposed location?

2 THE WITNESS: Right.

3 Q. (EXAMINER MORROW) It was right in the
4 corner of that rectangle?

5 A. Yes. That's the drilling island that the
6 BLM gave us also. This would be the No. 7 well
7 (indicated). This would be the No. 6 well. This
8 would be the No. --

9 Q. Where is 6 again?

10 A. Up here in the northwest quarter of the
11 drilling island. The 8Y would be the southeast
12 corner -- southwest corner.

13 Q. Three of those are island wells. One of
14 them is the Dewey Sparger well?

15 A. Yes, sir, we're closest to the Dewey
16 Sparger well, within -- we're 200 feet from his
17 wells.

18 Q. Does BLM require that you run a
19 temperature survey or a bond log to make sure you tie
20 it back into that 13-3/8?

21 A. They haven't been.

22 Q. You just do it by calculations?

23 A. Yes, sir.

24 Q. Do you normally do that or not?

25 A. As long as we have good returns on our

1 cement, we figure -- we pump, I guess, like 130
2 percent excess or 30 percent excess on our cement,
3 and we've been able to circulate cement up to that
4 13-3/8 casing.

5 Q. Are all the Wallen wells Yates wells?

6 A. Yes, sir.

7 Q. What depths are those completed at?

8 A. I think in the prehearing statement, it
9 says they're all around 3,300 to 3,500 feet.

10 EXAMINER MORROW: Anybody else have
11 anything?

12 Thank you, Mr. Roberts. Appreciate your
13 testimony.

14 MR. BRUCE: Mr. Examiner, I call Mike
15 Dilli to the stand again. Mr. Dilli was previously
16 sworn and previously qualified as an expert petroleum
17 geologist, if we could have the record reflect that
18 for this case?

19 EXAMINER MORROW: Okay. Good.

20 MIKE DILLI,
21 the witness herein, after having been first duly
22 sworn upon his oath, was examined and testified as
23 follows:

24 EXAMINATION

25 BY MR. BRUCE:

1 Q. What is the primary zone of interest for
2 the Sinagua No. 2 well, Mr. Dilli?

3 A. Pennsylvanian Morrow sandstone.

4 Q. Would you please refer to Exhibit 6 and
5 discuss the Middle Morrow geology, or I should say
6 Exhibit 7.

7 And before you do that, maybe for the
8 examiner's convenience, looking at Section 18, are
9 those -- right in the middle of Section 18, are those
10 four black dots, those four oil wells, is that the
11 drilling island that we were talking about?

12 A. Yes, it is, and you can see the well
13 numbers on this plat, that they were talked about in
14 the previous plats.

15 Q. So that little odd-shaped rectangle formed
16 by those four wells is the drilling island that Mr.
17 Roberts talked about?

18 A. Right.

19 Q. Okay, go ahead. Would you discuss the
20 Middle Morrow geology and discuss some of the
21 concerns about why you want that bottomhole location?

22 A. The Middle Morrow sandstones, this map is
23 an isopach map, using density porosity cutoff at 10
24 percent. The Middle Morrow section is a series of
25 fluvial sandstones being deposited from the north to

1 the south across the location.

2 We feel like the bottomhole location where
3 we've applied for, 1,300 and 1,300 from the south and
4 east line, will best be located for encountering the
5 thick porous and permeable Morrow sandstones within
6 the Middle Morrow interval.

7 Q. Besides the Middle Morrow, is there any
8 other prospective zone?

9 A. Yes. At this particular location, the
10 Lower Morrow sandstone is also prospective. That
11 sandstone is what is being produced in the Santa Fe
12 Sinagua No. 1-18 well.

13 Q. And the Lower Morrow isopach is marked
14 Exhibit 8?

15 A. Yes, it is.

16 Q. Go ahead.

17 A. This isopach, again, is an isopach at
18 density porosity greater than 10 percent cutoff.
19 This map represents a specific sandstone within that
20 interval, which we have called the Sinagua
21 sandstone. It is a continuous sand that runs, again,
22 from north to south across the area.

23 And we also feel that the bottomhole
24 location where we've proposed will be best situated
25 and best suited to encounter this sandstone in its

1 most thickest and permeable position.

2 Q. Up in the north half by the 12/22, that's
3 the Sinagua No. 1 well; is that correct?

4 A. Yes, it is.

5 Q. As Mr. Roberts discussed, there were
6 several proposed well locations to the south and east
7 of Santa Fe's final surface location. Why did you
8 want the final bottomhole location, besides getting
9 in the center of the fairway, why did you want that
10 final bottomhole location to be to the south and east
11 of the surface location?

12 A. For a couple of reasons, one, of course
13 being getting into the center part of the fairway of
14 both these sandstones we have mapped. Additionally,
15 we wanted to get further away from the Sinagua 1-18
16 well for potential drainage.

17 Q. You don't want to crowd that well too
18 much?

19 A. No, we don't.

20 Q. And that's a fairly decent well?

21 A. Yes. It's producing at over 3 million a
22 day and 100 barrels of condensate a day.

23 Q. If the interest owners who Santa Fe seeks
24 to force pool go nonconsent, what penalty do you
25 recommend against those interest owners?

1 A. Cost plus 200 percent or 300 percent
2 penalty.

3 Q. What would you base that on?

4 A. A couple of reasons. The Morrow sands are
5 extremely risky to drill for, with the discontinued
6 nature of especially the Middle Morrow sands. This
7 well is a deep well, and it's also a directional
8 well, which may have more mechanical risks. And it
9 also is costing us about \$150,000 more than a
10 straight well. It's a pretty good prospect, but we
11 still think there's some risk involved in it.

12 Q. In your opinion, is the granting of this
13 application in the interest of conservation and the
14 prevention of waste?

15 A. Yes, it is.

16 Q. Were Exhibits 7 and 8 prepared by you or
17 under your direction?

18 A. Yes, they were.

19 MR. BRUCE: Mr. Examiner, I move the
20 admission of Santa Fe's Exhibits 7 and 8.

21 EXAMINER MORROW: 7 and 8 are admitted.

22 MR. KELLAHIN: I have no questions. Thank
23 you.

24 EXAMINATION

25 BY EXAMINER MORROW:

1 Q. Are the numbers beside those wells that
2 describe the drilling island, are those TD's, over to
3 the left?

4 A. Like the 3-8, the 25?

5 Q. Yes.

6 A. Yes, that's the TD's of those wells.

7 Q. For all four Yates' wells?

8 A. Um-hm.

9 Q. The control is all to the north and maybe
10 a little to the west in one case; is that correct?

11 A. Yes, it is.

12 Q. Is there some more control to the north
13 that we don't see here?

14 A. Yes. To the north there is, oh, a string
15 of good Morrow producers.

16 Q. Is there potential for the Sinagua No. 1
17 in the Middle Morrow?

18 A. Yes, sir, we believe that there's some
19 behind pipe zones and that, but the well is producing
20 at such a good rate right now, we haven't perforated
21 it.

22 EXAMINER MORROW: Thank you, sir.

23 MR. BRUCE: I have nothing further in this
24 case, Mr. Examiner.

25 EXAMINER MORROW: Thank you.

1 MR. KELLAHIN: Mr. Examiner, I'd like to
2 present for the record copies of the completion
3 reports for Mr. Krug's seven Yates wells in this
4 immediate vicinity. They were taken from the OCD
5 case files upstairs. I've marked each one as a
6 separate exhibit number. The exhibit number
7 corresponds to the well in the order in which I've
8 listed them on the prehearing statement. So No. 1
9 represents Exhibit 1.

10 EXAMINER MORROW: How many wells are
11 there?

12 MR. KELLAHIN: Seven.

13 EXAMINER MORROW: You've given me two,
14 Tom?

15 MR. KELLAHIN: Pardon?

16 EXAMINER MORROW: There's two in this
17 pile?

18 MR. KELLAHIN: Perhaps I didn't -- here's
19 an extra one. We would move the introduction of
20 Exhibits 1 through 7. In addition, Exhibit 8, which
21 Mr. Smith and I talked about, we'd move the
22 introduction of that exhibit.

23 EXAMINER MORROW: 1 through 8 are
24 admitted.

25 MR. KELLAHIN: I'd like to make a short

1 statement about my position when you're ready, Mr.
2 Examiner.

3 EXAMINER MORROW: Okay.

4 MR. KELLAHIN: Mr. Krug's obviously
5 concerned about any potential risk or harm to his
6 Yates oil production. He believes he set up his
7 production so that eventually it may be part of a
8 waterflood project. He's concerned about the
9 proximity of the gas well.

10 I would suggest that it would relieve his
11 anxiety if you would require the applicant, as Mr.
12 Roberts has testified about having a detailed
13 drilling program -- it would help Mr. Krug's anxiety
14 level, I think, if you would require Santa Fe to
15 submit to you their detailed drilling program in
16 writing and let you approve that, using your own
17 expertise and judgment with regards to what happens
18 in the Yates.

19 I'm certainly not in any position to judge
20 that what they're doing poses no risk to the Yates,
21 and I think it would satisfy Mr. Krug if you would
22 require the applicant to submit those details to you
23 and let you pass judgment on it.

24 That's his concern, and that's his
25 request.

1 EXAMINER MORROW: Okay, sir.

2 MR. BRUCE: Mr. Examiner, Santa Fe
3 certainly has no problem with submitting a detailed
4 drilling program to you. We don't believe there's
5 any problem here. Santa Fe is simply drilling
6 through a shallow producing formation to a deeper
7 producing formation. This happens weekly in New
8 Mexico without problem. We think the fact that the
9 Sinagua No. 1 well was drilled in the north half even
10 closer to Mr. Krug's wells without problem shows that
11 there is no problem.

12 We believe that any Santa Fe drilling
13 program will be approved by you, and we don't think
14 there's any need for any special drilling or casing
15 procedures. Thank you.

16 EXAMINER MORROW: Anything further?

17 MR. BRUCE: No, sir.

18 EXAMINER MORROW: Case 11077 will be taken
19 under advisement.

20 I believe this case is going to be long
21 enough that we should take a lunch break. We can
22 vote on 30 minutes or an hour. Whichever you all
23 prefer will suit me okay.

24 MR. BRUCE: Mr. Carr is not only
25 long-winded, he's got a big appetite; so he probably

1 needs an hour.

2 EXAMINER MORROW: What do you all want to
3 do?

4 MR. CARR: Whatever pleases you, Mr.
5 Morrow. We could go forward now, I can break for
6 half an hour or an hour.

7 MR. BRUCE: My clients need to go check
8 out of their hotel and do everything; so if we could
9 have an hour, we'd appreciate it.

10 EXAMINER MORROW: All right. We will
11 break for one hour.
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1 CERTIFICATE OF REPORTER

2
3 STATE OF NEW MEXICO)
4) ss.
5 COUNTY OF SANTA FE)
6

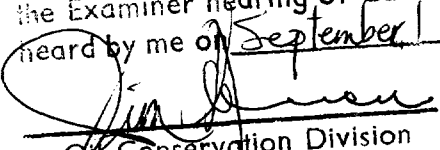
7 I, Deborah O'Bine, Certified Shorthand
8 Reporter and Notary Public, HEREBY CERTIFY that I
9 caused my notes to be transcribed under my personal
10 supervision, and that the foregoing transcript is a
11 true and accurate record of the proceedings of said
12 hearing.

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

17 WITNESS MY HAND AND SEAL, October 31,
18 1994 .
19

20 

21 DEBORAH O'BINE
22 CCR No. 63

23 I do hereby certify that the foregoing is
24 a complete record of the proceedings in
25 the Examiner hearing of Case No. 11077,
heard by me on September 1, 1994.
 Examiner
Off Conservation Division

CUMBRE COURT REPORTING

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