

STATE OF NEW MEXICO  
 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
 OIL CONSERVATION DIVISION

|                                    |                  |
|------------------------------------|------------------|
| IN THE MATTER OF THE HEARING )     |                  |
| CALLLED BY THE OIL CONSERVATION )  |                  |
| DIVISION FOR THE PURPOSE OF )      |                  |
| CONSIDERING: )                     | CASE NOS. 11,094 |
| )                                  | 11,095           |
| APPLICATIONS OF AMOCO PRODUCTION ) | (Consolidated)   |
| COMPANY )                          |                  |
| _____ )                            |                  |

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

September 29th, 1994

Santa Fe, New Mexico

REC  
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This matter came on for hearing before the Oil Conservation Division on Thursday, September 29th, 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 29th, 1994  
 Examiner Hearing  
 CASE NOS. 11,094, 11,095 (Consolidated)

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\* \* \*

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\* \* \*

## A P P E A R A N C E S

## FOR THE DIVISION:

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Legal Counsel to the Division  
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## FOR THE APPLICANT:

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By: WILLIAM F. CARR

\* \* \*

1 MR. CARR: Mr. Catanach, the next four cases on  
2 the docket, as you're aware, relate to downhole commingling  
3 Applications filed by Amoco. The last case we have  
4 continued.

5 The three cases remaining, we attempted to review  
6 in hopes of being able to consolidate and we simply were  
7 unable to do so. The first case is different from the  
8 other two, and therefore we need to make two downhole  
9 commingling presentations.

10 With your permission, we would like to first  
11 present Cases 11,094 and 11,095, and then come back and  
12 come back after that and present Case 11,093.

13 EXAMINER CATANACH: I think we can handle that,  
14 Mr. Carr.

15 So at this time we'll call Case 11,094 and  
16 11,095.

17 MR. CARROLL: Application of Amoco Production  
18 Company for downhole commingling, San Juan County, New  
19 Mexico.

20 MR. CARR: May it please the Examiner, my name is  
21 William F. Carr with the Santa Fe law firm Campbell, Carr,  
22 Berge and Sheridan.

23 We represent Amoco Production Company in these  
24 cases, and I have two witnesses.

25 EXAMINER CATANACH: Will the witnesses please

1 stand to be sworn in?

2 (Thereupon, the witnesses were sworn.)

3 GARY WEITZ,

4 the witness herein, after having been first duly sworn upon  
5 his oath, was examined and testified as follows:

6 DIRECT EXAMINATION

7 BY MR. CARR:

8 Q. Will you state your name for the record, please?

9 A. Gary Weitz, last name is spelled W-e-i-t-z.

10 Q. Where do you reside?

11 A. Denver.

12 Q. By whom are you employed and in what capacity?

13 A. Amoco Production Company as a petroleum landman.

14 Q. Have you previously testified before this  
15 Division?

16 A. Yes, I have.

17 Q. At the time of that testimony, were your  
18 credentials as a petroleum landman accepted and made a  
19 matter of record?

20 A. Yes, they were.

21 Q. Are you familiar with the Applications filed on  
22 behalf of Amoco in each of these cases?

23 A. Yes, I am.

24 Q. And are you familiar with the status of the lands  
25 and the ownership thereof in each of the cases?

1           A.    Yes, I am.

2                   MR. CARR:  Are Mr. Weitz's qualifications  
3 acceptable?

4                   EXAMINER CATANACH:  They are.

5           Q.    (By Mr. Carr)  Could you briefly state what Amoco  
6 seeks in each of these cases?

7           A.    What Amoco seeks in each of these cases, in the  
8 Bolack and the Gooch 2E, we're seeking approval to downhole  
9 commingle the Mesaverde and the Dakota formations.

10          Q.    Now, we have an exhibit, Exhibit 1 in each of  
11 these cases?

12          A.    Yes.

13          Q.    Would you go to the exhibit for Case 11,094 and  
14 turn to the first page in that exhibit and identify it for  
15 the Examiner?

16          A.    The first page was the Application that we  
17 submitted, and this Application was in turn also sent out  
18 to each of the offset operators, the working interest  
19 owners, the royalty owners, and the overriding royalty  
20 owners.  This was sent out by certified mail with receipt  
21 requested.

22          Q.    Would you go now to the second page in this  
23 exhibit.  What does this show?

24          A.    This is a plat showing the Gooch 2E, which is  
25 located in Township 28, Range 8 West, in the northeast --

1 excuse me, northwest quarter.

2 It also shows the Dakota -- all the Dakota and  
3 Mesaverde's offsets to it.

4 Q. Now, the Gooch well is the one with the black  
5 arrow pointed to it?

6 A. Yes, it is.

7 Q. And that is the subject of case 11,094?

8 A. Yes, it is.

9 Q. Is the Bolack well, the well which is the subject  
10 of Case 11,095, also shown on this plat?

11 A. No, it's not, but it's located in the southeast  
12 quarter. It's approximately where the -- it looks like an  
13 L and a zero.

14 Q. And that is shown on this plat diagonally  
15 offsetting to the north and west from the Gooch well?

16 A. Yes, it is.

17 Q. What is the purpose of the next document in  
18 Exhibit 1?

19 A. The next document is just to show the Gooch 2E,  
20 and it's showing the acreage dedication plat and showing  
21 the location of the Gooch 2E being in the north half of  
22 Section 29, Township 28 North, Range 8 west.

23 Q. The spacing unit for the Gooch 2E in the Basin  
24 Dakota, then, will be a laydown north-half unit?

25 A. That's correct.

1 Q. Okay. Now, let's go to the next page. What does  
2 this show?

3 A. This is also a well location and acreage  
4 dedication for the Mesaverde -- well, it says Mesaverde --  
5 and it is for the Florance C LS 4, which is a standup  
6 location in Section 29, in the west half.

7 Q. So what we have is, we have a laydown unit in the  
8 Dakota formation and a standup unit in the Mesaverde?

9 A. That's right.

10 Q. And these are because of prior development in the  
11 acreage dedication -- has been determined by other  
12 development in the area?

13 A. Yes, that's correct.

14 Q. Okay. Let's go to the next page in Exhibit  
15 Number 1.

16 Could you identify and review that, please?

17 A. This is an offset operator plat indicating  
18 location of the Gooch 2E being the north half of Section  
19 29, Township 28 North, Range 8 West, with the offset  
20 operators being Meridian Oil and Koch Exploration.

21 Q. And as you previously indicated, the offset  
22 operators as well as all interest owners in this property  
23 received notice by certified mail?

24 A. Yes, they have.

25 Q. Now, this is the Dakota dedication.

1           Let's go for the next page and review the  
2 Mesaverde dedication.

3           A.    This is a Mesaverde offset operator plat, and --  
4 indicating that the only other offset operator in this area  
5 associated with this well is Meridian, which we also  
6 notified, and this plat also indicates the location of the  
7 Florance C LS Number 4, which is a west-half stand-up  
8 spacing unit.

9           Q.    Now, because the dedicated acreage is different  
10 in each of these formations, there is a differing ownership  
11 in each of the zones; is that right?

12          A.    Yes.  The working interests in both the Mesaverde  
13 and the Dakota formations is identical, being Amoco and  
14 Conoco, 50 percent.

15                The royalty is identical, being 12-1/2 percent  
16 BLM.

17                The only difference is in the overriding royalty  
18 interest owners.  Not all overriding royalty interest  
19 owners have an interest in both the Mesaverde and Dakota.

20          Q.    And there are approximately ten pages following  
21 the two plats in Exhibit 1 which indicates which owner owns  
22 an interest in which formation?

23          A.    That's correct.

24          Q.    Now, do you have anything else to present in  
25 terms of land testimony in Case 11,094 as it relates to the

1 Gooch 2E?

2 A. No.

3 Q. All right. Let's go to Exhibit 1 in Case 11,095.

4 A. Yes.

5 Q. The first page of that exhibit, again, is the  
6 Application, which you sent to all interest owners?

7 A. That's correct.

8 Q. As well the offset?

9 A. Yes.

10 Q. The next page is, again, a plat which shows the  
11 location of the Bolack well, and it offsets the Gooch well  
12 to the north and the west?

13 A. That's correct.

14 Q. What is the next page in Exhibit 1?

15 A. The next one is again an acreage dedication for  
16 the Dakota, showing the east half of Section 19, Township  
17 28 North, Range 8 West, where the Bolack 2E is located.

18 Q. Okay, so we have an east half in the Dakota.

19 The next page shows the Blanco-Mesaverde. What's  
20 dedicated in that formation?

21 A. The Mesaverde is a laydown.

22 It's the Florance C LS Number 3, and it's located  
23 in Township 28 North, Range 8 West, the south half of the  
24 19 location being J.

25 Q. Okay, Mr. Weitz, let's go to the next page in

1 this exhibit.

2 What is the purpose of including this document?

3 A. This is also a proration plat, and it's  
4 indicating that it is for the south half of Section 19 in  
5 Township 28 North, Range 8 West, for the location of the  
6 Florance CL S Number 3.

7 Q. In the Mesaverde formation?

8 A. In the Mesaverde.

9 Q. Okay, let's go to the next page.

10 A. Next page is an offset operator plat, and it  
11 indicates that Amoco is the only offset operator for the  
12 Dakota formation.

13 It also indicates the Bolack 2E well located in  
14 the east half of Section 19, Township 28 North, Range 8  
15 west.

16 Q. The next page?

17 A. The next page is an offset operator plat for the  
18 Florence C LS Number 3, located in the south half of  
19 Section 19, Township 28 North, Range 8 West, and also  
20 indicating that the offset operators are Amoco Production  
21 and Meridian Oil.

22 Q. Again, we have a different orientation on the  
23 spacing unit in the Dakota and in the Mesaverde formation?

24 A. Yes, we do.

25 Q. Following these plats, have you again broken out

1 the interest owners in each of these spacing units?

2 A. Yes, we have. The interests in both the  
3 Mesaverde and Dakota, as far as working interest, is Amoco  
4 50 percent, Conoco 50 percent.

5 The royalty interest is common, being the BLM.

6 The overriding royalty owners have interest in  
7 each zone within the Mesaverde and Dakota, but the only  
8 difference is that there is a slight decimal interest  
9 difference in some of the interests there.

10 Q. Were the portions of Exhibits 1 in both Cases  
11 11,094 and 11,095, the portions that we've just reviewed,  
12 were they prepared by you or under your direction?

13 A. Yes.

14 Q. And you can testify as to their accuracy?

15 A. Yes.

16 Q. Will Amoco also be calling an engineering witness  
17 to review the technical portions of these cases?

18 A. Yes, we will.

19 MR. CARR: That concludes my examination of this  
20 witness.

21 EXAMINATION

22 BY EXAMINER CATANACH:

23 Q. Mr. Weitz, were the overriding royalty interest  
24 owners notified of this case?

25 A. Yes, they were.

1 Q. Have you had any objection from any of those  
2 parties?

3 A. No, we have not.

4 EXAMINER CATANACH: Nothing further of the  
5 witness.

6 FURTHER EXAMINATION

7 BY MR. CARR:

8 Q. Mr. Weitz, have you in fact received any response  
9 to the notice that was provided in this case?

10 A. Not on these two cases.

11 Q. And do you have copies of the return receipts  
12 from the mailing?

13 A. Yes, we do.

14 MR. CARR: Mr. Catanach, we can provide the  
15 return receipts if you desire.

16 We have sent each of the letters by certified  
17 mail, and we do have virtually all the return receipts  
18 back.

19 EXAMINER CATANACH: No, we don't need the return  
20 receipts, except that -- Your testimony is that each of  
21 those interest owners has received notice?

22 THE WITNESS: Yes.

23 EXAMINER CATANACH: Okay, that's fine.

24 MR. CARR: All right. At this time we call Mr.  
25 Hawkins.

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JAMES W. HAWKINS,

the witness herein, after having been first duly sworn upon his oath, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. CARR:

Q. Would you state your name for the record, please.

A. James William Hawkins.

Q. And where do you reside?

A. In Denver, Colorado.

Q. By whom are you employed and in what capacity?

A. Amoco Production Company as a petroleum engineer.

Q. Have you previously testified before this Division?

A. Yes, I have.

Q. At the time of that testimony were your credentials as a petroleum engineer accepted and made a matter of record?

A. Yes.

Q. Are you familiar with the Applications filed in each of these cases?

A. Yes.

Q. And are you familiar with the proposal before the Division to downhole commingle production in each of these wells?

A. Yes, I am.

1 MR. CARR: Are the witness's qualifications  
2 acceptable?

3 EXAMINER CATANACH: They are.

4 Q. (By Mr. Carr) Mr. Hawkins, would you go to the  
5 production graph in Exhibit 1 in Case 11,094, which is the  
6 third page from the back of that exhibit?

7 A. Yes.

8 Q. Would you review the information? First identify  
9 this exhibit and then review the information for Mr.  
10 Catanach.

11 A. Yes. This is a historical production plot for  
12 the Gooch 2E well. It has two curves shown on the graph.

13 The dashed line at the top is the gas production  
14 and the MCF per day. The solid line at the bottom of the  
15 page is the oil production in barrels per day.

16 We show that the wells produced from early 1982  
17 up through 1993; it actually has produced some 1994. It's  
18 declined from its initial rates of about 380 MCFD down to a  
19 rate of approximately 60 MCFD, say, average, in 1993.

20 Q. In your opinion is this a marginal well?

21 A. Well, it's certainly economic but it's not any  
22 barn-burner. I'd call it a marginally economic well at  
23 this point.

24 Q. What do you hope to achieve by commingling Dakota  
25 production with the Mesaverde in this particular well?

1           A.   Well, in this wellbore we hope to be able to  
2 improve the economic status of this well and recover the  
3 Mesaverde resource reserves by utilizing this same  
4 wellbore.

5           Q.   By doing that, will you in fact ultimately  
6 recover more from this property than if you are not allowed  
7 to downhole commingle production?

8           A.   Probably be able to reduce the economic limit of  
9 producing this wellbore by combining the reserves.

10          Q.   Will commingling, in your opinion, be the only  
11 economically justifiable way to recover these additional  
12 reserves at this time?

13          A.   Yes.

14          Q.   And you will present an exhibit later that will  
15 review that for the Examiner?

16          A.   Yes.

17          Q.   All right. Let's go to the next page in Exhibit  
18 Number 1. Could you identify and review this?

19          A.   Yes, the next page is a wellbore sketch of the  
20 Gooch 2E as it exists today.

21                It shows that we have a 4-1/2-inch casing set  
22 down through the Dakota. The current perforations in the  
23 Dakota are from about 6570 down through 6708.

24                We plan to perforate the Mesaverde interval  
25 through a number of sets of perforations in the interval of

1 4170 through 4720 and then downhole commingle both zones  
2 through a single string of tubing, 2-3/8-inch tubing.

3 Q. Do you anticipate any compatibility problems with  
4 the proposed downhole commingling?

5 A. No, we do not. Both zones produce very little  
6 water, similar types of gravity condensates. We wouldn't  
7 anticipate any problem.

8 Q. Is it possible that you could achieve production  
9 from both zones by dually completing the well?

10 A. Well, in this case we would have some problems  
11 due to the 4-1/2-inch casing. We'd either have to run  
12 small string tubings, which could restrict the flow, or try  
13 to flow the Mesaverde up the back side with a packer  
14 between, and that could cause some problems in trying to  
15 produce the condensate from the Mesaverde.

16 So downhole commingling does appear to be the  
17 most feasible and economically attractive method.

18 Q. What sort of pressure information do you have on  
19 the zones in the area?

20 A. We have some pressure information from the Dakota  
21 zone that we're in, plus some offset Mesaverde wells.

22 The last Dakota pressure that we have for the  
23 Gooch 2E is roughly 2300 pounds. That's based on a shut-in  
24 tubing pressure, and it's an estimated downhole gravity due  
25 to the density of the gas.

1 Q. 2300 pounds is in the Dakota formation?

2 A. In the Dakota zone. That was taken back in the  
3 summer of 1992.

4 The Mesaverde pressures that we have are going to  
5 be in offset wells. In the Riddle F LS Number 4 which is  
6 also in Section 29 in the northeast, that Mesaverde well  
7 has a bottomhole pressure of roughly 1340 p.s.i.

8 Also in Section 30, which is to the west, up in  
9 the northeast quarter of Section 30 is the Florance C LS  
10 Number 5 well. It's a Mesaverde well. It has a shut-in  
11 bottomhole pressure of approximately 1345 p.s.i.

12 So pressures are lower than the Dakota but do not  
13 exceed the 50-percent limitation.

14 Q. In this situation, would you anticipate any  
15 cross-flow between the zones if commingling is approved?

16 A. No, I would not.

17 Q. All right, let's go to the last page in this  
18 exhibit.

19 Would you identify this for the Examiner and then  
20 review the information for him?

21 A. What we show on the last page is an economic  
22 threshold for development under two cases.

23 The first case we show is a drill case for the  
24 Mesaverde.

25 If we were to attempt to try to recover the

1 Mesaverde reserves through a new well, that well would cost  
2 us roughly \$500,000. And in order for us to have an  
3 economic rate of return of 15 percent, we would need to  
4 recover about 1.4 BCF of gas, and an initial stabilized  
5 rate during the first year of about 400 MCFD.

6 Based on our analysis of the surrounding  
7 Mesaverde wells, we don't believe we would be able to  
8 achieve that type of rate of reserve from a new well.

9 The downhole commingle case would cost us  
10 approximately \$200,000 to use this existing wellbore, and  
11 in order to get an economic rate of return at 15 percent we  
12 would need to recover about .5 BCF with an initial  
13 stabilized rate during the first year of 200 MCFD.

14 In looking at the offset Mesaverde wells, we  
15 think we can achieve the 200 MCFD rate and probably get an  
16 economic -- or estimated recovery of about .7 BCF.

17 Q. So it's economically feasible if you commingle to  
18 go after the additional reserves in the Mesaverde?

19 A. Yes, it is.

20 Q. If you do not at this time, it is not feasible to  
21 do so?

22 A. That's correct.

23 Q. All right, let's go to the Bolack well, Case  
24 11,095. And again, let's go to the production plat, which  
25 is --

1           A.    Third from the last.

2           Q.    -- the third from the last page in the exhibit.  
3    What does this show?

4           A.    Well, it shows very similar information, both gas  
5    production and liquid production.  Gas is shown in the  
6    dashed curve at the top.

7                    Again, this well was drilled and began production  
8    in 1982 and has production up through 1983.

9                    It's declined from a high rate, it looks like, of  
10   about 650 MCFD initially, very rapidly declined, and it's  
11   currently down at about 25 MCFD, is the average rate, say,  
12   for 1993.

13                   Again, I think this would be classified as a  
14   marginal gas well.

15                   And as you can see, there's very little liquids  
16   that are recovered, very little condensate recovered with  
17   this Dakota well.

18           Q.    And you're again proposing to commingle this  
19   production with the Mesaverde?

20           A.    That's correct.

21           Q.    And in so doing hope to be economically able to  
22   reach those Mesaverde reserves?

23           A.    Yes.

24           Q.    All right.  Let's go to the next page in the  
25   exhibit.  Would you identify and review that?

1           A.    Yes.  This next page is, again, a wellbore  
2 diagram as it exists today for the Bolack 2E.

3                    It shows 4-1/2 inch casing set through the Dakota  
4 zone.  Dakota perforations from 6581 down through 6748.  We  
5 have 2-3/8-inch tubing we're producing the Dakota through.

6                    We plan to perforate the Mesaverde through a  
7 number of intervals within this gross section of about 4248  
8 to 4762 and produce both of the formations through that  
9 single string of 2-3/8-inch tubing.

10                   I think there would be the same type of  
11 restrictions here.  If we were to try to dually complete,  
12 we would have to run either small-string tubing with packer  
13 or -- and, you know, could potentially have some problems  
14 in trying to recover the liquids from the Mesaverde if we  
15 try to flow up the back side.

16                   So downhole commingling does appear to be the  
17 most technically feasible recover the reserves using this  
18 wellbore.

19           Q.    And again, with this well you wouldn't anticipate  
20 compatibility problems?

21           A.    That's correct.

22           Q.    What sort of pressure information do you have on  
23 this particular well?

24           A.    The Dakota zone in the Bolack 2E has a bottomhole  
25 pressure of approximately 1950 p.s.i.  Again, that's based

1 on a pressure taken in the summer of 1992.

2 It has its shut-in tubing pressure and then an  
3 estimated additional pressure or column of gas from the  
4 tubing down to the perforations.

5 The Mesaverde offsets would be the same Mesaverde  
6 offsets that we showed for the Gooch with pressures on the  
7 order of 1350.

8 Q. So again, you wouldn't anticipate any cross-flow  
9 between the commingled zones?

10 A. That's correct.

11 Q. Let's go to the last page on Exhibit 1.

12 A. The last page is identical to the presentation  
13 for the Gooch. It simply shows the drill case versus the  
14 downhole commingle case.

15 We're anticipating the same type of recovery for  
16 the Bolack as we do for the Gooch of about .7 BCF and 200-  
17 MCFD-type initial rate, which would not meet the economic  
18 threshold for development under drilling but would be  
19 economic under a downhole commingle case.

20 Q. If in fact you're permitted to downhole commingle  
21 with Dakota and Mesaverde production in this well, in your  
22 opinion, will additional reserves ultimately be recovered?

23 A. Yes.

24 Q. And accordingly, the value of those reserves  
25 would be increased?

1           A.    Yes.

2           Q.    How do you propose the production should be  
3 allocated between the zones in each of the two wells in  
4 this hearing?

5           A.    When we make a completion in the Mesaverde, we'll  
6 be able to do some initial testing on that zone  
7 individually, produce it to get a stabilized flow rate.

8                   And then when we commingle the two zones, we'll  
9 be able to get a stabilized rate for both zones together,  
10 and that should provide us with a fixed percentage that we  
11 can use to allocate production throughout the life of the  
12 well.

13          Q.    Have you proposed that you work out the actual  
14 allocation percentages with the Oil Conservation Division's  
15 Aztec District Office?

16          A.    Yes, that's correct.

17          Q.    In your opinion, will approval of these  
18 Applications and downhole commingling of Basin Dakota and  
19 Blanco Mesaverde production in each of these wellbores be  
20 in the best interest of the conservation, the prevention of  
21 waste and the protection of correlative rights?

22          A.    Yes.

23          Q.    Were the portions of Exhibits 1 in Cases 11,094  
24 and 11,095, the portions which you've just discussed,  
25 prepared by you?



1 MR. CARR: I have nothing further in each of  
2 these cases, Mr. Catanach.

3 EXAMINER CATANACH: There being nothing 25  
4 further, Cases 11,094 and 11,095 will be taken under  
5 advisement.

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CERTIFICATE OF REPORTER

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

I, Deborah O'Bine, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that my notes were transcribed under my supervision; 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.

*Deborah O'Bine*

DEBORAH O'BINE  
CCR No. 63

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. *11094/11095* heard by me on *September 25* 19 *98*.

*David R. Catanzano*, Examiner  
Oil Conservation Division