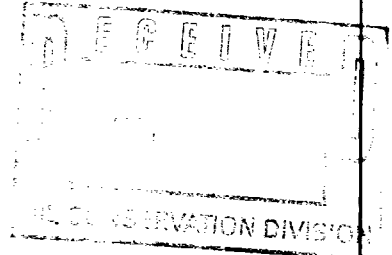


STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION



IN THE MATTER OF THE HEARING )  
CALLED BY THE OIL CONSERVATION )  
DIVISION FOR THE PURPOSE OF )  
CONSIDERING: )  
APPLICATION OF CONOCO, INC. )

CASE NO. 11,241

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

April 6th, 1995

Santa Fe, New Mexico

This matter came on for hearing before the Oil Conservation Division on Thursday, April 6th, 1995, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, before Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

\* \* \*

## I N D E X

April 6th, 1995  
 Examiner Hearing  
 CASE NO. 11,241

	PAGE
APPEARANCES	3
APPLICANT'S WITNESSES:	
<u>BILL HARDIE</u>	
Direct Examination by Mr. Kellahin	5
Examination by Examiner Catanach	18
REPORTER'S CERTIFICATE	23

\* \* \*

## E X H I B I T S

	Identified	Admitted
Exhibit 1	6	18
Exhibit 2	10	18
Exhibit 3	11	18
Exhibit 4	12	18
Exhibit 5	14	18
Exhibit 6	16	18
Exhibit 7	18	-

\* \* \*

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

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\* \* \*

1           WHEREUPON, the following proceedings were had at  
2 11:30 a.m.:

3           EXAMINER CATANACH: All right, at this time we'll  
4 call Case 11,241.

5           MR. CARROLL: Application of Conoco, Inc., for an  
6 unorthodox gas well location, Eddy County, New Mexico.

7           EXAMINER CATANACH: Are there appearances in this  
8 case?

9           MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of  
10 the Santa Fe law firm of Kellahin and Kellahin, appearing  
11 on behalf of the Applicant.

12           I have one witness to be sworn.

13           EXAMINER CATANACH: Are there additional  
14 appearances?

15           MR. COOTER: Paul Cooter with the Kemp Smith firm  
16 in Albuquerque, appearing on behalf of Southwest Royalties.

17           EXAMINER CATANACH: Any additional?

18           Will the witnesses please stand to be --

19           MR. KELLAHIN: Mr. Examiner, the case file should  
20 reflect an entry of appearance by Ernest Carroll on behalf  
21 of Yates Petroleum Corporation.

22           EXAMINER CATANACH: Thank you, Mr. Kellahin.

23           Can I get the witness to stand and be sworn in?

24           (Thereupon, the witness was sworn.)

25           MR. KELLAHIN: Mr. Examiner, this case was

1 referenced in the prior case. The topic of this particular  
2 Application is only one of the issues involved with the  
3 Julie Com 3 well. This Application deals with our request  
4 for an unorthodox gas well location.

5 Mr. Hardie is an expert witness in the field of  
6 petroleum geology, and his concern is to optimize his  
7 opportunity to have this well drilled to test the Morrow.

8 This well would be a standard location for the  
9 Cisco production. And the topic of the case, then, today,  
10 is seeking approval from the Division that in the event  
11 this well is successful as a Morrow well, that we might  
12 produce it at an unorthodox location.

13 BILL HARDIE,

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

16 DIRECT EXAMINATION

17 BY MR. KELLAHIN:

18 Q. For the record, sir, would you please state your  
19 name and occupation?

20 A. My name is Bill Hardie. I'm a geologist with  
21 Conoco, Incorporated, and I work the southeast New Mexico  
22 area.

23 Q. You're going to have to yell at us, Mr. Hardie.  
24 You're soft-spoken, and the hum of the heater is drowning  
25 you out.

1           You reside where, sir?

2           A.    In Midland, Texas.

3           Q.    On prior occasions, have you testified before the  
4 agency as a qualified petroleum geologist?

5           A.    Yes, I have.

6           Q.    Does the topic of this particular Application  
7 within your field deal with matters that you have personal  
8 knowledge about?

9           A.    Yes.

10          Q.    And based upon your personal knowledge, have you  
11 made a study of the technical issues regarding this  
12 Application?

13          A.    Yes, I have.

14          Q.    And based upon that study, do you now have  
15 certain opinions and conclusions as a geologist?

16          A.    I do.

17               MR. KELLAHIN: We tender Mr. Hardie as an expert.

18               EXAMINER CATANACH: Mr. Hardie is so qualified.

19          Q.    (By Mr. Kellahin) Mr. Hardie, if you'll turn to  
20 what we've marked as Conoco Exhibit 1, have you identify  
21 for us the basic items on the display and then I'll ask you  
22 some questions.

23          A.    Exhibit 1 is simply a base map of the North  
24 Dagger Draw area. On it I've shown Conoco-operated acreage  
25 in solid yellow shading.

1           Acreage that Conoco has a working interest in but  
2 does not operate, I've shown with cross-hatched yellow  
3 shading.

4           I've also highlighted the proposed Cisco/Morrow  
5 well, the Julie Com Number 3, in the northeastern quarter  
6 of Section 17. It's located 660 feet from the north line,  
7 660 feet from the east line of Section 17.

8           Q.    When we look at the well symbols on this display,  
9 what kinds of wells are we looking at?

10          A.    For the most part we're looking at oil wells that  
11 are completed in the North Dagger Draw-Upper Penn Pool.  
12 The black -- Solid black circles indicate that they're oil-  
13 productive.

14                Solid red circles indicate recently drilled and  
15 completed oil wells, so you can get a good idea about where  
16 the most recent activity is.

17                Open circles indicate proposed wells.

18          Q.    How would we direct the Examiner's attention to  
19 any Morrow wells that have been drilled within the area  
20 shown on the display?

21          A.    Most of the Morrow wells that have been drilled  
22 are gas wells. Well, all of them are. So typically on  
23 this display, if it's a gas well symbol, then it has been  
24 completed in the Morrow formation.

25                There's also a possibility that it may produce

1 out of the Atoka formation. Both of those are gas-  
2 productive.

3 Q. Will we have a later display to show the Examiner  
4 specifically the Morrow attempts and completions within the  
5 area of concern?

6 A. Yes.

7 Q. What are the meaning and purpose of those blocks  
8 within the north half of 17 that are shaded in blue?

9 A. Those blocks indicate the orthodox windows for a  
10 320-acre spacing unit, which is what the Morrow would be.  
11 So within those windows any wells would be orthodox.

12 Q. Based upon your geologic study, why are you not  
13 drilling this well at a standard Morrow gas well location?

14 A. Because of the excessive risk involved with  
15 Morrow completions, we are limited to drilling Morrow wells  
16 as tails on Cisco development wells. And in this  
17 particular case, the only remaining Cisco location in the  
18 northeast quarter of Section 17 is the Julie Com Number 3,  
19 which is standard at the Cisco.

20 Coincidentally, this location also appears to be  
21 prospective at the Morrow horizon.

22 So we are somewhat constrained by the Cisco in  
23 our attempts to develop Morrow.

24 Q. For the Morrow gas production that has been  
25 obtained in this area, has the Division identified that



1 production with any pool name?

2 A. Morrow production in this area has been called  
3 the Boyd-Morrow Pool, and the nearest producing well from  
4 the Boyd-Morrow Pool is found in the southwest corner of  
5 Section 9, which would be just northeast of our proposed  
6 well. It's labeled as the Fasken (Morrow) well. It's a  
7 gas well.

8 Q. We have submitted to the Division Examiner a  
9 certificate of mailing of notice to the offset operators  
10 towards whom this unorthodox location encroaches. For the  
11 record, would you identify for us those operators who are  
12 entitled to notice?

13 A. Those operators are shown in the red text  
14 surrounding the north half of Section 17. The most  
15 directly affected operators would be those in Section 16,  
16 which lies due east of the proposed location. That would  
17 be Yates Petroleum.

18 The next most affected would be those operators  
19 in the south half of Section 9, and in that section Fasken  
20 operates the Morrow, and Yates Petroleum operates the  
21 Cisco/Canyon.

22 Q. In addition, have you caused notification to be  
23 sent to the working interest owners for those spacing units  
24 towards which you are moving, which do not have a producing  
25 gas well?

1           A.    Yes.

2           Q.    Have you received any objection from any of those  
3 parties towards whom this well encroaches?

4           A.    We have not.

5           Q.    Let's turn to Exhibit Number 2.  Identify for us  
6 the source of the information used for Exhibit 2.

7           A.    Exhibit 2 is a surface topographic map copied  
8 from the USGS 7-1/2-minute quadrangle series, and it shows  
9 the north half of Section 17 and the surface features which  
10 may or may not limit the drilling of locations within the  
11 Morrow orthodox windows, which on this map are shown again  
12 with the green shading.

13          Q.    Do you have experience with utilizing those USGS  
14 quadrangle maps?

15          A.    Yes, I do.

16          Q.    And have they proved to be accurate and reliable  
17 with regards to this particular area?

18          A.    Yes, they have.

19          Q.    Have you been on the surface of this area and  
20 compared the surface topography to the mapping shown by the  
21 quadrangle maps?

22          A.    Yes, I have.

23          Q.    And how do they compare?

24          A.    They compare -- They are the same.  The map is an  
25 accurate reflection of what's going on at the surface.

1 Q. Do you have any surface limitations with regards  
2 to the siting on the surface of the proposed Julie Com  
3 Number 3?

4 A. There are no surface limitations for that  
5 location.

6 Q. Let's turn now to Exhibit Number 3. What kind of  
7 map are we looking at?

8 A. Exhibit Number 3 is an isopach map of the  
9 dolomite reservoir thickness for the Cisco/Canyon  
10 formation.

11 Q. Who prepared the map?

12 A. I did.

13 Q. What's your experience in doing this kind of work  
14 in this particular reservoir?

15 A. We have found that isopach maps on the dolomite  
16 are a good indication of the productivity in the  
17 Cisco/Canyon. And what I'm showing with this exhibit is  
18 that at our proposed location at the Julie Com Number 3, we  
19 would expect to encounter a gross dolomite thickness of  
20 about 220 feet. This is a -- would be a standard infill  
21 location, development location, at the Cisco/Canyon  
22 horizon.

23 Q. How long have you been working as a geologist for  
24 your company, looking at the specific geologic details of  
25 the North Dagger Draw Pool?

1           A.    For approximately five years.

2           Q.    Do you have remaining available to you in this  
3 spacing unit any other location that would be a standard  
4 location for a Cisco attempt?

5           A.    The proration unit for Cisco development is 160  
6 acres, and it would comprise the northeast corner of  
7 Section 17. Within that northeast corner, there is only  
8 one remaining location for Cisco development, and that is  
9 the Julie Com Number 3.

10          Q.    All right, let's turn to Exhibit Number 4.  
11 Identify for us what Exhibit 4 is.

12          A.    Exhibit 4 is a structure map on the top of the  
13 Cisco/Canyon dolomite.

14          Q.    Who prepared this map?

15          A.    I prepared this map.

16          Q.    Why did you propose to draw this map on top of  
17 the Cisco/Canyon dolomite?

18          A.    This map is the best indication of the relative  
19 elevation of the reservoir and provides us with an  
20 indication of how much of that reservoir will be within the  
21 oil column.

22          Q.    Is structure a component of significance to you  
23 as a geologist when you're looking for Cisco locations in  
24 the North Dagger Draw?

25          A.    It's a very important component.

1 Q. What conclusion do you reach, having made your  
2 geologic investigation using this type of procedure?

3 A. We, based on this map, would anticipate that the  
4 top of the reservoir would occur at approximately minus  
5 4220 feet subsea elevation. We believe that in this area  
6 the oil-water contact is at approximately minus 4300 feet  
7 of elevation. That would give us approximately 80 feet of  
8 gross dolomite within the oil column.

9 As you can see by adjacent completions, that  
10 amount of pay has been economically productive.

11 Yates recently drilled their Warren Number 2 to  
12 the northeast of our location, and I'm not positive about  
13 the current rate, but I believe it IP'd somewhere between  
14 300 and 400 barrels of oil per day.

15 So we have reason to believe that this elevation  
16 is sufficient to produce economic reserves.

17 Q. Does the North Dagger Draw produce water?

18 A. Yes, it does.

19 Q. Is the production of that water of significant  
20 concern to you as a geologist?

21 A. It is.

22 Q. And how do you handle that problem in terms of  
23 finding a location?

24 A. Typically, we select a location which is  
25 sufficiently above where we believe the oil-water contact

1 to exist. And then once we drill that well, we try to  
2 avoid perforating near the oil-water contact.

3 Q. Even if you're successful with that strategy, do  
4 these oil wells continue to produce substantial quantities  
5 of water?

6 A. They do in many cases.

7 Q. Let's turn now to the Morrow. Identify for us  
8 what is shown as Exhibit 5.

9 A. Exhibit 5 is actually a combination of two maps.  
10 With the purple contours I'm showing a structural map on  
11 the top of the Morrow clastics. It's a marker that's very  
12 near the reservoir that's productive in the Boyd-Morrow  
13 field.

14 Q. Is this your work product?

15 A. Yes, it is.

16 Q. Having displayed the structure, what also have  
17 you displayed?

18 A. The second part of this is a color-filled contour  
19 map. It's an isopach of the sand thickness in the Morrow  
20 formation, and it's graded such that thinner sands are  
21 represented by yellow colors, and then as they become  
22 thicker and thicker, they get more red, so that the  
23 thickest part of the sand isopach on this map is something  
24 over 60 feet.

25 Q. Is the Boyd-Morrow Gas Pool one where the

1 operators have elected to drill straight-up single-  
2 completion gas wells in the Morrow formation?

3 A. At the time those wells were drilled, the North  
4 Dagger Draw Pool was not even recognized as a viable  
5 target. They were drilled in the early Seventies, and it  
6 was believed at that time that Dagger Draw was primarily  
7 water productive with marginal amounts of oil. We now know  
8 that to be much different. So that they were drilled as  
9 primary Morrow targets.

10 Q. Do operators still do that for Morrow in this  
11 area?

12 A. Almost never.

13 Q. What is their exploitation strategy for accessing  
14 the Morrow?

15 A. Primarily due to the excessive risk in Morrow  
16 completions, the strategy is to find a Cisco development  
17 well under which there lies a Morrow prospect, and pretty  
18 much let the Cisco determine the location of that well.

19 In this particular case, it's coincidental that  
20 our only remaining Cisco location is also, according to  
21 this map, the best Morrow location in the north half of  
22 Section 17. That's primarily due to the sand thickness.  
23 This is the location at which we would expect to find  
24 approximately 50 feet of sand thickness in the Morrow.

25 Q. Would you recommend to your management that you

1 drill this proposed unorthodox Morrow location as a Morrow  
2 stand-alone?

3 A. No, I would not.

4 Q. The only way you would recommend it is how, sir?

5 A. Is as a tail on an existing Cisco well. It takes  
6 approximately 1500 feet of additional drilling to reach the  
7 Morrow at, I think, a cost of approximately -- a dryhole  
8 cost of approximately \$80,000.

9 The odds of completing a Morrow, based on  
10 statistics from this area, are approximately one in ten, of  
11 actually finding something that's commercial.

12 Q. Is it common for the operators in this area to  
13 afford their competitors the opportunity to add a Morrow  
14 tail onto their Cisco wells at an unorthodox location  
15 without opposition?

16 A. That has been the practice thus far.

17 Q. Let's turn now to your cross-section.

18 A. The cross-section is shown on Exhibit 5 -- get an  
19 idea of where the wells lie -- and this is drawn from the  
20 Boyd-Morrow field in Section 9, which is at the right-hand  
21 side of the cross-section, and then it's drawn through the  
22 proposed Julie Com 3 location and into the south half of  
23 Section 17 where Conoco drilled a dryhole to the Morrow,  
24 the Barbara Com Number 17 well.

25 This cross-section is designed to show the



1 correlation that I have made of the Morrow sand.

2 This is a little bit unusual in that it's not a  
3 channel sand, which is the more typical target in the  
4 Morrow. This is a strand-line deposit. Strand lines tend  
5 to be a little bit more mappable than channel sands.  
6 They're a little easier to correlate. The long axis of the  
7 sand body, when it's a strand line, tends to trend parallel  
8 to strike.

9 And Conoco's objective in drilling its Julie Com  
10 Number 3 is to more or less split the difference between  
11 our dryhole and the Barbara Com 17, which was dry due to it  
12 being tight, and the productive well, namely the Fasken  
13 Number 1 Johnston Federal, which is currently productive in  
14 the Morrow. It was drilled in 1972 and has cum'd, I  
15 believe, 3.1 billion cubic feet of gas.

16 Q. In your opinion, should the Examiner approve this  
17 Application, will it afford Conoco the opportunity to  
18 recover potential hydrocarbons out of the Morrow Pool that  
19 it might not otherwise recover?

20 A. Yes.

21 Q. Was this cross-section also prepared by you?

22 A. It was.

23 MR. KELLAHIN: That concludes my examination of  
24 Mr. Hardie.

25 We move the introduction of Conoco Exhibits 1

1 through 6 and the introduction of the certificate of  
2 mailing, which is unmarked but I will stamp it as Exhibit  
3 7.

4 EXAMINER CATANACH: Exhibit 1 through 6 will be  
5 admitted as evidence.

6 EXAMINATION

7 BY EXAMINER CATANACH:

8 Q. Mr. Hardie, is there more than one producing sand  
9 interval in the Morrow?

10 A. The only one that's been perforated is the one --  
11 the upper sand that you can see on the cross-section.  
12 Perforations are shown by the black-shaded area at the  
13 middle of each well column.

14 Although there are sands beneath that, I suspect  
15 those are too thin and too tight to be productive.

16 Q. Your Exhibit Number 5, is that gross sand that  
17 you map?

18 A. That is a gross-sand map. I have applied no  
19 cutoff, other than whether or not the sand was present.  
20 There's no porosity cutoff applied to that.

21 Q. Have you mapped it with a porosity cutoff?

22 A. I have not, because I don't feel as a geologist  
23 that that is a useful map. The preservation of porosity in  
24 the Morrow is not well understood, and without an  
25 understanding of how that porosity is preserved I find it

1 difficult to map it and interpret a map based on that.

2 Q. Based on your gross-sand map, you're going to  
3 gain maybe ten feet of gross sand in the Morrow, drilling  
4 at the proposed location?

5 A. The -- Versus a standard location?

6 Q. Versus a standard, I'm sorry, yes.

7 A. That is correct. The Barbara 17, which is in the  
8 south half of Section 17, encountered 26 feet of sand. It  
9 was a good, clean sand, but it was tight.

10 We feel that when we optimize the sand thickness,  
11 we encounter a better opportunity to find adequate porosity  
12 and permeability as well, which is why we would like to  
13 maximize our opportunity to encounter the maximum  
14 thickness.

15 Q. What other Morrow penetrations did you use to  
16 construct this map?

17 A. All of the penetrations shown, or all of the  
18 Morrow wells that are shown on this map were used in its  
19 construction.

20 Q. And those are shown as gas wells?

21 A. Well, some of them are shown as oil wells because  
22 they were dry in the Morrow. But the maps shown were  
23 penetrations to the Morrow, and most of them on this map,  
24 of course, had no sand in them. The only ones that are  
25 within the confines of the color-filled contours actually

1 had some sand in them.

2 Q. There have been no Morrow penetrations in the  
3 north half of 17?

4 A. There have not.

5 Q. Did you utilize any other information besides  
6 well control?

7 A. No, I did not, other than interpretation,  
8 knowledge about the geometry of strand-line sandbodies and  
9 such.

10 Q. I believe it was your testimony that the proposed  
11 location also represents the best Cisco location in that  
12 northeast quarter?

13 A. It's the only remaining Cisco location. I don't  
14 think it would be the best one. There are others that  
15 would be better, but they've already been drilled.

16 Q. Do you know if the Julie Com 1 ever produced from  
17 that pool?

18 A. It produced from the Upper Penn Pool. It was  
19 drilled by Roger Hanks, I believe, in the early Seventies.  
20 It had a very high initial rate of approximately 700  
21 barrels of oil per day, declined very rapidly, and watered  
22 out very quickly and was plugged.

23 Q. Okay, structurally is that about the same  
24 position as the proposed Number 3?

25 A. Yes, it is. We believe that the Julie Com Number

1 1 watered out due to improper completion techniques and  
2 that it was plugged as a result of that. Roger Hanks  
3 either didn't get an appropriate cement job across the  
4 reservoir to isolate the water zone, or he perforated the  
5 water zone.

6 This was drilled in an early stage of development  
7 of the field, and there was very little understanding about  
8 where the water was.

9 Q. What are Conoco's plans with regards to if the  
10 well -- If you do make a Morrow completion, is that -- will  
11 the well be produced as a single Morrow?

12 A. That is something we typically look at after  
13 we've drilled the well.

14 If it's a high-rate Morrow well, there's a  
15 possibility of twinning it, to drill a Cisco location. If  
16 the rate is low enough, there's a possibility of dualing it  
17 to the Cisco. And that's something we usually decide upon  
18 after it's been drilled.

19 Of course, the most likely outcome is that the  
20 Morrow will be dry, based on statistics. So that decision  
21 is usually pretty easy, although we hope for better.

22 Q. As far as you know, you've had no opposition from  
23 Fasken to this location?

24 A. We have communicated with Fasken about this  
25 location, and they have expressed no interest in opposing

1 the case.

2 EXAMINER CATANACH: That's all I have, Mr.

3 Kellahin.

4 MR. KELLAHIN: That concludes our presentation.

5 EXAMINER CATANACH: All right. There being  
6 nothing further in this case, 11,241 will be taken under  
7 advisement.

8 (Thereupon, these proceedings were concluded at  
9 11:58 a.m.)

10 \* \* \*

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I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Exam or hearing of Case No. 11241,  
heard by me on April 6 1998.

David R. Catanch, Examiner  
Oil Conservation Division

CERTIFICATE OF REPORTER

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

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 April 16th, 1995.

*(Handwritten signature)*

STEVEN T. BRENNER  
 CCR No. 7

My commission expires: October 14, 1998