

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 ENRON OIL AND GAS)
 COMPANY TO AMEND DIVISION ORDER)
 NO. R-10,109, PROMULGATING SPECIAL)
 RULES AND REGULATIONS FOR THE RED)
 HILLS-BONE SPRING POOL, AND FOR)
 THE ASSIGNMENT OF A SPECIAL DEPTH)
 BRACKET ALLOWABLE, LEA COUNTY,)
 NEW MEXICO)

CASE NO. 11,375

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

RECEIVED

BEFORE: MICHAEL E. STOGNER, Hearing Examiner OCT 19 1995

Oil Conservation Division

October 5th, 1995

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, MICHAEL E. STOGNER, Hearing Examiner, on Thursday, October 5th, 1995, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

* * *

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October 5th, 1995
 Examiner Hearing
 CASE NO. 11,375

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* * *

A P P E A R A N C E S

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 By: WILLIAM F. CARR

* * *

1 WHEREUPON, the following proceedings were had at
2 10:04 a.m.:

3 EXAMINER STOGNER: Call Case Number 11,375.

4 MR. CARROLL: Application of Enron Oil and Gas
5 Company to amend Division Order Number R-10,109,
6 promulgating special rules and regulations for the Red
7 Hills-Bone Spring Pool, and for the assignment of a special
8 depth bracket oil allowable, Lea County, New Mexico.

9 EXAMINER STOGNER: At this time I'll call for
10 appearances.

11 MR. CARR: May it please the Examiner, my name is
12 William F. Carr with the Santa Fe law firm Campbell, Carr
13 and Berge. We represent Enron Oil and Gas Company in this
14 matter, and I have three witnesses.

15 EXAMINER STOGNER: Any other appearances?

16 Will all three witnesses please stand to be sworn
17 at this time?

18 (Thereupon, the witnesses were sworn.)

19 EXAMINER STOGNER: Mr. Carr?

20 PATRICK J. TOWER,

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

23 DIRECT EXAMINATION

24 BY MR. CARR:

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

1 A. Patrick Tower.

2 Q. Mr. Tower, where do you reside?

3 A. Midland, Texas.

4 Q. By whom are you employed?

5 A. Enron Oil and Gas Company.

6 Q. And what is your current position with Enron?

7 A. I'm a petroleum landman.

8 Q. Have you previously testified before this
9 Division?

10 A. Yes, I have.

11 Q. At the time of that testimony, were your
12 credentials as a petroleum landman accepted and made a
13 matter of record?

14 A. Yes, they were.

15 Q. Are you familiar with the Application filed in
16 this case on behalf of Enron Oil and Gas Company?

17 A. Yes, I am.

18 Q. And are you familiar with the status of the lands
19 in the area which is the subject of this Application?

20 A. Yes, I am.

21 MR. CARR: Are the witness's qualifications
22 acceptable?

23 EXAMINER STOGNER: They are.

24 Q. (By Mr. Carr) Mr. Tower, would you briefly
25 summarize what Enron seeks with this Application?

1 A. Yes, Enron Oil and Gas Company seeks to amend
2 Division Order Number R-10,109, which promulgated special
3 rules and regulations for the Red Hills-Bone Spring Pool.
4 These amendments we seek so as to permit a change of the
5 150-foot setback rule to that of 330 feet. In addition, we
6 are applying for an increase in the depth bracket oil
7 allowable to 660 barrels of oil per 80-acre unit, and to
8 allow for an additional well to be drilled within the
9 current 80-acre spacing unit.

10 Q. What are the current spacing and well-location
11 requirements for this pool?

12 A. Currently they are 80-acre spacing, with the well
13 locations to be required 150-foot setbacks from the center
14 of each quarter-quarter section in the 80-acre tract.

15 Q. You indicated that these rules were adopted by
16 Order 10,109?

17 A. Yes.

18 Q. Was that order entered pursuant to an application
19 filed in this matter by Enron?

20 A. Yes, it was.

21 Q. And do you know approximately when the special
22 pool rules were adopted?

23 A. Yes, they were adopted in -- thank you, effective
24 April 26th, 1994.

25 Q. Mr. Tower, have you prepared exhibits for

1 presentation in this hearing?

2 A. Yes, I have.

3 Q. Let's go to what has been marked for
4 identification as Enron Exhibit Number 1. Would you
5 identify that and review it for the Examiner, please?

6 A. Yes, Exhibit Number 1 is a land plat depicting
7 several things off the scale of 1 to 2000, off the Midland
8 Map Company.

9 If you'll notice, there are two outlines on the
10 plat. The interior outline is a purple outline, and this
11 is currently the existing outline of the Red Hills-Bone
12 Spring Pool. The outside red outline is in essence the
13 field boundaries of what we see as the Red Hills Pool
14 currently. I believe our geological witness will further
15 substantiate this, based on the geology, with the red
16 outline being in essence the area that we are applying for
17 in this -- in these -- to have these amendments apply to
18 these particular pool rules.

19 Also within this land plat, the blue coloring of
20 acreage represents all the federal leasehold within this
21 area.

22 The green represents one state lease that falls
23 within this pool boundary.

24 One thing is clarification. I will point out on
25 this land map, in Section 7 of Township 25 South, 34 East,

1 you'll see in the northwest quarter and also the southwest
2 quarter a couple gas symbols. Those are erroneous. Those
3 are actually oil -- should be oil symbols. Midland Map has
4 those wrongly depicted. Those are Bone Spring oil wells.

5 Within this field, Enron is the operator of the
6 entire field outline in red.

7 And I believe that's it.

8 Q. Are there other operators in the Bone Spring
9 formation outside the pool boundaries defined by the
10 Division but within a mile of that boundary?

11 A. Yes, there are other operators. However, I do
12 not believe that any of these operators currently have any
13 Bone Spring wells in this one-mile boundary.

14 Q. And who are those operators?

15 A. Those operators to the east or southeast of this
16 pool, you have Yates Petroleum. Also to the east Aztec or
17 now it's operated by Meridian Oil.

18 To the west you have Hallwood Petroleum. And to
19 the north or northwest you have Meridian.

20 However, I will point out that also surrounding
21 the entire pool, the majority operator of most of the wells
22 in that area is Enron as well.

23 Q. Now, Mr. Tower, Enron is proceeding to change the
24 setback requirements for wells in the pool. Could you
25 explain why?

1 A. Yes, we have -- Within this are we've encountered
2 approximately six -- had to go to I believe it's been six
3 hearings and possibly nine location moves due to primarily
4 archeological and/or drainage reasons through this whole
5 field area.

6 Q. These have been cases seeking approval of
7 unorthodox well locations?

8 A. Yes, they have, but the main reason was the BLM
9 requirements. And we believe that all but one of these, if
10 we would have had the 330-foot setback rule, that it would
11 not have necessitated the hearing.

12 Also, I believe, as further testimony will come
13 from the engineer as to the drainage, by allowing the
14 flexibility of 330 will allow us to move away in some
15 situations to prevent additional drainage.

16 So it does add some flexibility to properly
17 develop the field.

18 Q. It not only would allow wells to be drilled
19 closer together, but it would enable you to move them
20 farther apart if necessary --

21 A. Yes.

22 Q. -- is that right?

23 How many wells does Enron anticipate still
24 drilling within the area shown in blue?

25 A. The possibility exists, anywhere from 15 to 20

1 wells, whether it be new wells or infill wells combined.

2 Q. So by moving or changing the well-location
3 requirements, you not only would have additional
4 flexibility, but it would result in potentially fewer
5 administrative proceedings --

6 A. Yes.

7 Q. -- as you go forward?

8 A. This is correct.

9 Q. Will correlative rights problems result from this
10 change in the well setback requirements?

11 A. We don't believe they will. And as we pointed
12 out, Enron is the operator of the entire field.

13 However, we will point out, in the northern
14 portion of the field we have a joint operating agreement,
15 covers several sections. Enron owns 96 percent with two
16 other partners. However, the interest is uniform working
17 interest no matter where we drill.

18 To the western side of the field, we have an
19 additional working interest joint operating agreement
20 again, where the partners involved -- we are pretty well
21 uniform, with again, Enron owning the majority at 72
22 percent.

23 To the southern end of the field, though, Enron
24 owns 100 percent of the leasehold towards that end.
25 However, it's generally one operator, and in most areas we

1 share common agreements.

2 Q. Mr. Tower, have you reviewed this proposal with
3 representatives of the Bureau of Land Management and also
4 the State Land Office?

5 A. Yes, we notified both parties. I have directly
6 spoken to the State Land Office, to Pete Martinez, and also
7 specifically the engineer, G.F. Albers, and reviewed this
8 Application. They did not have any problem with it.

9 You'll note on the state lease we already have
10 two existing wells that are com'd with 80-acre standups.
11 But we do physically already have two wells on the state
12 tract. However, discussing what we are applying for, they
13 had no problems.

14 I also directly talked to Adam Salameh, who's an
15 engineer in the Carlsbad Resource Office, and both their
16 Albuquerque and their Roswell office were also notified.
17 However, in my conversation with them they had no problem.

18 Q. Mr. Tower, is Exhibit Number 2 an affidavit with
19 attached letters and return receipts confirming that notice
20 of this Application has been provided to all operators in
21 the pool and all operators in the Bone Spring formation
22 within a mile thereof?

23 A. Yes.

24 Q. Will Enron be calling geological and engineering
25 witnesses to review those aspects of this case?

1 A. Yes, we will.

2 Q. Were Exhibits 1 and 2 either prepared by you or
3 compiled under your direction?

4 A. Yes, they were.

5 MR. CARR: Mr. Stogner, at this time we would
6 move the admission into evidence of Enron Oil and Gas
7 Company Exhibits 1 and 2.

8 EXAMINER STOGNER: Exhibits 1 and 2 will be
9 admitted into evidence.

10 MR. CARR: And that concludes my direct
11 examination of Mr. Tower.

12 EXAMINATION

13 BY EXAMINER STOGNER:

14 Q. Mr. Tower, referring to Exhibit Number 1, you
15 said that the purple is the nomenclature or the pool
16 outlines --

17 A. Yes.

18 Q. -- pursuant to our nomenclature; is that correct?

19 A. Yes, sir.

20 Q. And the red is depicting the field?

21 A. Depicting the field boundaries. And in some
22 cases, you'll note, we have already drilled into those
23 boundaries outside the purple; I believe just the
24 nomenclature has not caught up with it yet.

25 Q. Okay. Why don't you give me a little definition

1 of what you mean by "field"?

2 A. If it's all right, I may defer that to Barry
3 Zinz. It's based on the geological testimony and the
4 drilling and the existence of 30-some wells, the
5 boundaries, and he can get into that, probably more
6 properly, with the geology.

7 Q. Okay, fair enough. So it more depicts the
8 geological boundaries?

9 A. Yes.

10 Q. As opposed to lease lines?

11 A. That is correct.

12 Q. Now, you said that the setback requirements
13 primarily are being requested due to archeological and
14 drainage?

15 A. Surface drainage, yeah --

16 Q. Surface.

17 A. -- in this area we have had problems with various
18 terrain, and in most cases we have been able to work around
19 this with -- not large moves, but we have consistently had
20 to move quite a number of these locations. Not all have
21 required hearings, as we've tried to work with the BLM to
22 find one to prevent a hearing.

23 Q. I just wanted to make sure that you had meant
24 surface drainage in here.

25 A. That is correct, surface.

1 Q. Okay. Of the outline shaded blue, which depicts
2 the federal leases, which predominantly takes in your so-
3 called field boundary, how many of those leases are
4 operated by Enron or owned by Enron?

5 A. We operate 100 percent of those, and we own the
6 majority interest in all of those, 72 up to 100 percent of
7 the interest.

8 Q. How many separate leases would you say are out
9 here?

10 A. I would say -- I would say approximately 12 to
11 15.

12 Q. And again, who all was notified?

13 A. All of the -- all of our -- Well, to begin with
14 on the list, on Exhibit Number 2, the second page, the
15 Bureau of Land Management and the Commissioner of Public
16 Lands, which I spoke to, Southland Royalty Company and/or
17 Meridian, who's an offset operator, the Petroleum Synergy
18 Group, which is a nonoperated partner of ours in one of the
19 JOAs.

20 Exxon Corporation owns a 40-acre tract
21 approximately a mile away from the edge of the pool, what
22 I'm calling the geological pool boundary.

23 EM Nominee Partnership Company and Hallwood
24 Petroleum, which are part of the Hallwood group, are our
25 partners in one of the operating agreements, also offset

1 operator.

2 Sol West III and Michael Shearn are partners of
3 ours in the JOA. Roden Associates, Limited, is a partner.
4 Kaiser-Francis is a partner in the JOA. Yates Petroleum
5 Corporation is an offset operator.

6 Q. For the most part, the operators are listed in
7 Exhibit A of Exhibit 2. Are they -- Do they depict the
8 working interest in this blue-shaded area?

9 A. Do they -- If I understand, do they also own an
10 interest in there?

11 Q. Yes.

12 A. They also -- Some of these do. The ones I
13 mentioned, specifically Petroleum Synergy Group; EM Nominee
14 Partnership Company; Hallwood Petroleum, Inc.; Sol West and
15 Michael Shearn; Roden Associates, Limited -- and I believe
16 that's it -- are interest owners in the outlined area.
17 Some of these are also operators outside that area.

18 Q. Have you had the opportunity in preparing this
19 map to find or know of any close pools in the Bone Spring
20 formation surrounding this area?

21 A. I don't believe -- And again, Mr. Cate or our
22 next witnesses may be better prepared to answer. But to
23 the best of my knowledge, I don't believe there's another
24 pool, several townships or for some large area near this,
25 in the Bone Spring.

1 EXAMINER STOGNER: Okay. With that, I have no
2 other questions of Mr. Tower. He may be excused.

3 MR. CARR: At this time we call Mr. Zinz.

4 BARRY L. ZINZ,

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

7 DIRECT EXAMINATION

8 BY MR. CARR:

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

10 A. Barry L. Zinz.

11 Q. And where do you reside?

12 A. Midland, Texas.

13 Q. By whom are you employed?

14 A. Enron Oil and Gas Company.

15 Q. And what is your current position with Enron?

16 A. Geologist.

17 Q. Have you previously testified before this

18 Division?

19 A. I have.

20 Q. At the time of that testimony, were your
21 credentials as a petroleum geologist accepted and made a
22 matter of record?

23 A. Yes, they were.

24 Q. Are you familiar with the Application filed in
25 this case on behalf of Enron Oil and Gas Company?

1 A. Yes, I am.

2 Q. Have you made a geological study of the area
3 which is the subject of this Application?

4 A. I have.

5 MR. CARR: Are the witness's qualifications
6 acceptable?

7 EXAMINER STOGNER: They are.

8 Q. (By Mr. Carr) Mr. Zinz, have you prepared
9 exhibits for presentation here today?

10 A. I have three exhibits.

11 Q. Let's go to what has been marked Enron Exhibit
12 Number 3. I'd ask you to identify that and then review it
13 for Mr. Stogner.

14 A. Exhibit Number 3 is a structure map on the --
15 what I refer to as the Wolfcamp marker. It's below the pay
16 sands that we produce in the Red Hills field. The contour
17 interval is 50 feet.

18 If you look down at the legend on the map, you'll
19 see that several things are distinguished there. Stars are
20 -- These purple stars are found associated with several of
21 the wells within the field. These are wells with drainage
22 area calculations. And our engineer, Mr. Cate, will refer
23 to these particular wells.

24 Also have a type log that I want to show you.
25 It's identified on the map as well.

1 And the field boundary in red matches the
2 boundary that Mr. Tower referred to in his testimony.

3 The map -- Structurally speaking, the production
4 from the third Bone Spring sand within this field is not
5 really influenced that much by structure. What I mean by
6 that is that we do not really see any significant water
7 production, there's no oil-water contact in these sands.

8 But the variability within the sands do exist.
9 We have thin and thick areas, and sometimes the thin wells
10 produce very well, even if they -- they're not of the
11 thicker nature. And it's possible that these little
12 structural features that you see on the map influence and
13 enhance the -- possibly the fracturing of the sands. This
14 is the reason why I wanted to bring that out.

15 Q. Let's go now to Exhibit 4, the type log.

16 A. Okay. The type log, Exhibit 4, is the Half "7"
17 Fed Number 1. It's located in the southwest quarter of
18 Section 7. And there again, it is the well that has the
19 orange square located around it.

20 What I'd like to point out here is, you see the
21 whole third Bone Spring sand interval from the top of the
22 sand unit down to the top of the Wolfcamp. You see the pay
23 sand outlined there, denoted by the third Bone Spring pay
24 sand. The perforations are opposite the porous sand there.

25 Also the Wolfcamp marker is distinguished on the

1 log, which this map that we just referred to was based on.
2 And we have some completion information at the bottom of
3 the log.

4 Q. Mr. Zinz, let's now go to Exhibit Number 5,
5 across the isopach. I'd ask you to identify it, review the
6 information on it, and then compare it to the area outlined
7 in red on our Exhibit Number 1.

8 A. This map is a porosity isopach map of the third
9 Bone Spring pay sand within the field. It's based on a
10 density porosity greater than or equal to 9 percent, which
11 is the cutoff that I used here.

12 Again, this map is a -- has a contour interval of
13 20 feet, and again, the legend, the same legend, applies to
14 this map as we discussed on the previous map.

15 The field boundary -- This is the main map, which
16 the field boundary, the red outline, is really based on.

17 This field right now has like 33 producers in it.
18 We just got through drilling one within the last couple of
19 days. I think it will be a producer here shortly.

20 The field is within the later stages of primary
21 development, and this is the way I have interpreted the
22 field outline, based on the porosity encountered in the
23 producing wells and lack of porosity in the well control
24 adjacent to the field.

25 Q. Generally describe the nature of the Bone Spring

1 formation in this area.

2 A. The Bone Spring is a sand. It's a very fine-
3 grained sand, very, very tight. We have several cores
4 within the sand, in the field. The permeability varies
5 quite a bit, and the production varies quite a bit. You
6 have tight areas versus better permeable areas, and it
7 requires a frac on all these wells, and Mr. Cate will get
8 into that more.

9 Q. Mr. Zinz, in fact this Exhibit Number 5 is the
10 basis for the boundaries of the field as shown on Enron
11 Exhibit Number 1; is that correct?

12 A. That's correct.

13 Q. And this is the geological interpretation of the
14 reservoir that was utilized by Mr. Cate in preparing his
15 engineering drainage calculations?

16 A. That's correct.

17 Q. Were Exhibits 3 through 5 prepared by you?

18 A. Yes, they were.

19 MR. CARR: At this time, Mr. Stogner, we would
20 move the admission into evidence of Enron Oil and Gas
21 Company Exhibits 3 through 5.

22 EXAMINER STOGNER: Exhibits 3 through 5 will be
23 admitted into evidence at this time.

24 MR. CARR: And that concludes my direct
25 examination of Mr. Zinz.

EXAMINATION

1
2 BY EXAMINER STOGNER:

3 Q. Your control seems to be somewhat substantial
4 back up to the north and the east. However, over to the
5 west is there anything to lead you to believe that this is
6 the pool or the structural or the productive boundary?

7 A. As far -- Like I said, really, structure does not
8 seem to be the key issue here; it's the porous sand. And
9 the wells that you see within the mapped area is all the
10 well control we have.

11 There are some other wells off the mapped area to
12 the west. There's one well over there that we actually
13 re-entered and tried to complete within the sands, and we
14 were unsuccessful. It's off the mapped area, actually over
15 in Section 15.

16 So I think that this is a legitimate picture of
17 the porosity, the end of the porosity and the permeability
18 from the well control we have.

19 Q. Going back to your type log, are all your other
20 wells that are producing in this area, or producing from
21 this pool, are they perforated in the top of that third
22 Bone Spring pay sand?

23 A. Yes, sir. That interval you see is basically the
24 sand interval, although it does thicken and thin, and our
25 perforations are confined to that sand interval.

1 Q. Nothing else in the upper portion of that Bone
2 Spring formation?

3 A. No, sir.

4 Q. Now, again, looking at Exhibit Number 5, there
5 seems to be -- What? There's one plugged and abandoned
6 well over there in the south half of 13, two of them
7 actually. And then over there in Section 18 there's a well
8 in the south half. Is that just a location or --

9 A. The well in 18?

10 Q. Yes.

11 A. That's the one we have just finished drilling,
12 and we will be attempting completion on it probably within
13 the next week or ten days.

14 Q. Okay.

15 A. And I'm here to tell you that it didn't come in
16 at no 70 feet like I had it mapped; it come in a lot
17 thinner. So we're definitely reaching the limits of the
18 field down there.

19 Q. How about the two wells in the southeast quarter
20 of Section 13?

21 A. Those are shallow wells denoted by the TDs there
22 of 5400 feet and 5375.

23 Q. So that Well Number 5 is essentially your
24 southernmost point at this time?

25 A. Yes, sir. It's not incorporated within -- on

1 these exhibits, because like I say, we just got it logged
2 yesterday.

3 EXAMINER STOGNER: Okay. I have nothing else
4 further at this time.

5 MR. CARR: Nothing further of Mr. Zinz.

6 EXAMINER STOGNER: He may be excused.

7 MR. CARR: At this time, Mr. Stogner, we call
8 Randy Cate.

9 RANDALL S. CATE,

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

12 DIRECT EXAMINATION

13 BY MR. CARR:

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

15 A. My name is Randall Cate, C-a-t-e.

16 Q. And where do you reside?

17 A. I reside in Midland, Texas.

18 Q. By whom are you employed?

19 A. I'm employed by Enron Oil and Gas.

20 Q. And what is your current position with Enron?

21 A. I'm a petroleum reservoir engineer.

22 Q. Mr. Cate, have you previously testified before
23 this Division?

24 A. Yes, I have.

25 Q. At the time of that testimony, were your

1 credentials as a reservoir engineer accepted and made a
2 matter of record?

3 A. Yes, they were.

4 Q. Are you familiar with the Application filed in
5 this case on behalf of Enron Oil and Gas Company?

6 A. Yes.

7 Q. And have you made a drainage area study of the
8 wells in this particular Bone Spring pool?

9 A. Yes, I have.

10 MR. CARR: Are the witness's qualifications
11 acceptable?

12 EXAMINER STOGNER: They are.

13 Q. (By Mr. Carr) Could you initially just describe
14 for Mr. Stogner the nature of the study or type of study
15 that you have made in this reservoir?

16 A. All right. The type of study that I did, I
17 incorporated reservoir data that we've collected from logs
18 and buildups, other engineering diagnostic tools; we got
19 some core data out there. Incorporated that into the
20 drainage -- Well, excuse me, actually the estimated
21 declines that we have projected, which Exhibit 6 has
22 approximately 13 of the 33 producers.

23 I've studied those as a representative cross-
24 section of the field, some thin wells, thick wells,
25 primarily ones that we've got some producing history on.

1 And using the reservoir data and the expected ultimate
2 recoveries off decline-curve analysis, I've arrived at a
3 calculated drainage acreage for the 13 wells.

4 Q. In selecting these wells, have you been able to
5 utilize wells that are located throughout the area which is
6 the subject of this hearing?

7 A. Yes. On Exhibit Number 5 the purple stars
8 designate the wells with the drainage area calculation.
9 That's the isopach map; it shows the sand thickness.

10 And as you can see, I tried to bring at least one
11 in from each of the -- It appears there's six to seven
12 sections of producers out here, and I tried to bring at
13 least one in. Some sections have three wells. But we've
14 included wells throughout the field in the sampling here.

15 Q. And these wells are representative, in your
16 opinion, of all the wells located in this field?

17 A. Yes.

18 Q. Let's go to Exhibit Number 6. Would you first
19 identify and then let's just work through this.

20 A. Okay, Exhibit Number 6 is -- It's got two pages
21 of calculations based on reservoir data, and then the
22 results that I have seen and conclusions. And then there
23 are 13 decline curves that give an estimated ultimate
24 recovery for each of the wells that have been described,
25 and the drainage calculations have been performed on the

1 first page.

2 Q. Okay, let's go to the first page, and I would ask
3 you to review the reservoir data that you used in making
4 your calculations.

5 A. Okay. At the top of the page the average
6 porosity in the pool is approximately 12 percent, again off
7 core data and logs primarily.

8 Average oil saturation is approximately 60
9 percent. The formation volume factor for the oil is 1.8.
10 Recovery factor is predicted to be 18 percent. We've run
11 some simulations, reservoir simulation models, that would
12 predict a recovery factor in that range.

13 The decline type is hyperbolic. The recoverable
14 oil per foot, using this data -- porosity, oil saturation,
15 formation volume factor -- would be 55.86.

16 I used that in the calculations below, simply by
17 taking the decline, the EUR, and dividing it by the pay
18 that Mr. Zinz has calculated for each well, and then
19 dividing it by the barrels, oil acre-feet recoverable. to
20 arrive at the drainage acres.

21 Again, the field does have 33 producers currently
22 on 80-acre spacing units. We have done some static
23 bottomhole pressure measurements as we complete these
24 wells, and we have seen little or no effects from offset
25 wells on the initial completions from a pressure drainage

1 basis. So that there does also support perhaps the 40
2 acres or in that range, would be needed out here on these
3 spacing units.

4 The second half of the page shows the calculation
5 of the drainage area for the 13 selected wells. The
6 variability can be seen in the estimated ultimate
7 recoveries that Mr. Zinz also spoke about. It's tabularly
8 shown here, the variability in the thickness of pay.

9 And subsequently you have highly variable
10 drainage acres calculated. Along with that, I show a
11 summary for the wells that we have the data,
12 permeabilities, effective to oil, based on buildups and
13 special core analyses.

14 On the second page, then, I give a result of the
15 first page, basically the drainage calculations on 13
16 wells, for a range of from 14.8 acres up to 181.2. I would
17 note that the 181.2 is a very thin well, pay qualitywise.
18 It's the Hallwood 12 Number 7, and it's a very good well.
19 And because it is a thin pay, it does calculate very high.
20 I personally believe that there's probably thicker pay
21 closer by.

22 Again, the drainage calculations for the 13 wells
23 show an average of 60.4 acres per -- well, per 80-acre
24 unit.

25 Also, the measured effective permeabilities range

1 from .017 millidarcies to .13 millidarcies, and there's a
2 good relationship of permeability to the calculated
3 drainage areas.

4 And a summary of the 13 wells, only two calculate
5 to drain more than 80 acres, seven will drain between 40
6 and 80, and four will drain less than 40 acres.

7 Q. All right, what conclusions have you reached?

8 A. Our conclusions are that many of the 80-acre
9 spacing units will need two wells to fully and efficiently
10 drain that acreage. And it would -- If we were not granted
11 that, we would be leaving recoverable reserves in the
12 ground.

13 Q. Now, attached to these two summary pages are your
14 decline curves?

15 A. Yes.

16 Q. Is this the supporting information for the
17 conclusions and the data contained in the first two pages
18 of the exhibit?

19 A. Yes, it is.

20 Q. If your Application is granted and you are
21 authorized to put additional wells in the pool and increase
22 the rate at which you produce them, are you going to be
23 actually increasing ultimate recovery from the reservoir,
24 or would we be just looking at rate acceleration?

25 A. We will be increasing the ultimate recovery of

1 this reservoir.

2 Q. Enron is also seeking a change in the rules to
3 provide additional flexibility in where wells are located
4 on the spacing units?

5 A. Yes.

6 Q. What are the real benefits that you see in making
7 that change?

8 A. It will allow flexibility in where we position
9 the wells, even greater distance between wells where it
10 needs to be, and it would also allow us to not have to come
11 in for as many unorthodox-location hearings, as Mr. Tower
12 has previously talked of. And it would just give us the
13 flexibility to better position the wells for optimum
14 recovery of the reservoir.

15 Q. Enron is also requesting an increase in the depth
16 bracket allowable for wells in the pool?

17 A. That's correct.

18 Q. What is the current allowable?

19 A. The current allowable on 80-acre spacing is 490
20 barrels per day.

21 Q. What is it on 40s?

22 A. 410 barrels per day.

23 Q. And Enron is requesting 660?

24 A. That's correct.

25 Q. Why are you asking for this increase in the depth

1 bracket allowable?

2 A. The reason we're asking for that is that the
3 wells initially are massively fracture stimulated, and
4 approximately 2000 barrels of fracture fluid is put into
5 the formation. And from our core studies and all we
6 believe that the quickest cleanup that you can get those
7 liquids back out of the formation, it's best not to allow
8 the fluids to imbibe and possibly damage the reservoir.

9 And so we do bring the wells back fairly quickly.
10 And they will -- At least for the first month or two, some
11 of them will average up in the 400- to 500-barrel-per-day
12 range. And then they fall off very quickly, as can be seen
13 by the 13 decline curves that are shown here. They're very
14 dramatic declines because of the tight rock.

15 And so if we have a well for one or two months on
16 a -- the second well on an 80-acre spacing unit could be in
17 the 400- to 500-barrel-a-day range offsetting one of the
18 current producers, say, at -- some of those are between 150
19 and 200 barrels per day, then that would be in that range
20 of 660, and that was our reasoning.

21 Q. You're anticipating in fact that the 660 depth
22 bracket allowable will probably only be utilized during a
23 short period of time during the first few months of the
24 life of an infill or a new well on the --

25 A. That's correct.

1 Q. If this allowable is approved, do you see any
2 potential for damaging the reservoir?

3 A. No, I do not.

4 Q. Are there adequate facilities to transport and
5 market any of the oil that would be produced as a result of
6 the higher depth bracket allowable?

7 A. Yes.

8 Q. Would the same be true of the casinghead gas that
9 would be produced?

10 A. Yes.

11 Q. How much water are you producing out here at this
12 time, Mr. Cate?

13 A. Approximately 300 to 400 barrels of water per
14 day.

15 Q. With the increase in the depth bracket allowable,
16 would you anticipate any problem with producing water or
17 disposal of that water?

18 A. No, there would be no problems. We have a
19 disposal well in the area that is operated by Enron and
20 does take this water.

21 Q. In your opinion, will approval of this
22 Application be in the best interest of conservation, the
23 prevention of waste and the protection of correlative
24 rights?

25 A. Yes, it would.

1 Q. Was Exhibit 6 prepared by you?

2 A. Yes, it was.

3 MR. CARR: At this time, Mr. Stogner, we would
4 move the admission into evidence of Enron Exhibit 6.

5 EXAMINER STOGNER: Enron Exhibit 6 will be
6 admitted into evidence at this time.

7 MR. CARR: And that concludes my direct
8 examination of Mr. Cate.

9 EXAMINATION

10 BY EXAMINER STOGNER:

11 Q. Mr. Cate, was 80 acres the appropriate spacing
12 for this unit in the beginning?

13 A. I believe so. When we initially came in, the
14 high rates that we were seeing led us to believe that the
15 possibility existed that 40 acres, at least in all cases,
16 may be too tight of a spacing.

17 And I think from the evidence here we're seeing
18 that some of those spacing units will not need an
19 additional well. They will, in fact, drain 80 acres. So
20 it did prevent the possibility of overdrilling in those
21 cases.

22 However, now, with a little more time and
23 production data, we're seeing that just certain areas in
24 the field will benefit from a change in the pool rules.

25 Q. What is Enron's long-range -- short-range, for

1 that matter -- plans for the pool?

2 Because if I remember right, there are no present
3 80-acre proration units that have more than one well; is
4 that correct?

5 A. That's correct.

6 Q. What kind of an infill program does Enron plan
7 with this?

8 A. Well, we would start off very slowly. We will
9 probably pick -- and I would assume it will be into next
10 year before we do anything like this -- we would pick one
11 or two of the areas we believe have the least amount of oil
12 probably pulled from the 80-acre unit and, in addition to
13 that, do some diagnostics.

14 So we would start very slowly and possibly drill
15 a well, do bottomhole pressure buildup analyses to see if
16 we're correct, and then proceed from there.

17 But it would not be -- It would not be several
18 rigs at a time. It would probably be one rig and one well
19 at a time, and collecting data as we go.

20 Q. Where did the 660 barrels come from?

21 A. 660 was -- Again, it's calculated based on some
22 of the units that we could anticipate drilling have one
23 well now, say if it's producing 170 barrels of oil per day
24 in its current decline, and the second well on the 40
25 acres, some of them have been shown to be -- the initial

1 wells have been shown to be capable of producing the 490
2 barrels per day for one or two months while we clean them
3 up.

4 And so if you add the 170 barrels of the current
5 producer with the anticipated 490 that the second well
6 would temporarily need, that equals the 660.

7 Q. You said that each well has had a massive
8 fracture job?

9 A. A massive fracture, what I would consider a
10 massive. It's a large sand hydraulically fractured job,
11 yes.

12 Q. And each one of the wells completed out there has
13 had this?

14 A. Yes, every one of them requires it.

15 Q. Same as your infill wells, I assume?

16 A. Yes, I would anticipate each one will be
17 fracture-treated.

18 EXAMINER STOGNER: I have no other questions of
19 this witness. You may be excused.

20 MR. CARR: Mr. Stogner, that concludes our
21 presentation in this case.

22 EXAMINER STOGNER: Does anybody else have
23 anything else further in Case Number 11,375?

24 Before I take this case under advisement, Mr.
25 Carr, would you please provide me a rough draft order --

1 MR. CARR: Yes, sir, I will.

2 EXAMINER STOGNER: -- of the proposed rule
3 changes -- or amendments, I should say?

4 This case will be taken under advisement.

5 (Thereupon, these proceedings were concluded at
6 10:50 a.m.)

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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.

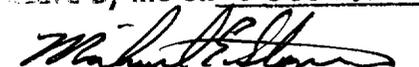
WITNESS MY HAND AND SEAL October 13th, 1995.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 1998

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 11375, heard by me on 5 October 1995.


Examiner
Oil Conservation Division