

NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARING

SANTA FE, NEW MEXICO

Hearing Date

JANUARY 23, 1997

Time: 8:15 A.M.

| NAME | REPRESENTING | LOCATION |
|---------------------------------------|---|---|
| Gloria Timmer W D Jaap Pat Noah | Byram Phillips PHILLIPS PETROLEUM | Farmington FARMINGTON Oklahoma City |
| Dick Morrow W Jellalain | Devon Energy Yellon & Yellon | Oklahoma City Santa Fe |
| Travis Crow JAMES STRECHLER | Valero Energy BURLINGTON REP. | San Antonio TX FARMINGTON |
| TRAVIS SICK JOAN SORBY | BURLINGTON RESOURCES Burlington | FARMINGTON Foyton |
| JAMES HORNBECK Doug Thomas | " " " " | " " |
| James Bunn | Heitke Law Firm | SF |
| William F. [unclear] | Campbell, [unclear] and [unclear] | Santa Fe |
| Bill Smith Rich DeFurough | Intervent Oil Intervent Oil & Gas | Midland Tulsa |

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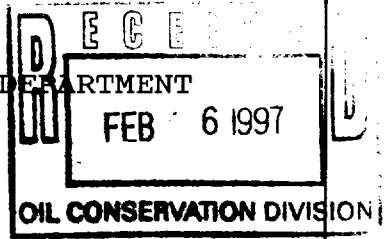
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|----------------|-----------------------|----------|
| Duke Roush | Nearburg | Midland |
| Jerry Elger | Nearburg | Midland |
| RANDALL CATE | Enron O&G | MIDLAND |
| PATRICK TOWER | ' | ' |
| Mike Brown | Manzano Oil | Roswell |
| Larry Hunsieck | SunValley Energy Corp | Roswell |

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 BURLINGTON RESOURCES OIL)
AND GAS COMPANY FOR THE ESTABLISHMENT OF)
A DOWNHOLE COMMINGLING REFERENCE CASE)
FOR ITS CANYON LARGO UNIT PURSUANT TO)
DIVISION RULE 303.E AND THE ADOPTION OF)
SPECIAL ADMINISTRATIVE RULES THEREFOR,)
RIO ARriba COUNTY, NEW MEXICO)
)

CASE NO. 11,685

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

January 23rd, 1997

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, January 23rd, 1997, 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.

* * *

I N D E X

January 23rd, 1997
 Examiner Hearing
 CASE NO. 11,685

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* * *

A P P E A R A N C E S

FOR THE DIVISION:

RAND L. CARROLL
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 Santa Fe, New Mexico 87505

FOR THE APPLICANT:

KELLAHIN & KELLAHIN
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 P.O. Box 2265
 Santa Fe, New Mexico 87504-2265
 By: W. THOMAS KELLAHIN

* * *

1 WHEREUPON, the following proceedings were had at
2 8:18 a.m.:

3 EXAMINER CATANACH: At this time we'll call first
4 Case 11,685.

5 MR. CARROLL: Application of Burlington Resources
6 Oil and Gas Company for the establishment of a downhole
7 commingling reference case for its Canyon Largo Unit
8 pursuant to Division Rule 303.E and the adoption of special
9 administrative rules therefor, Rio Arriba County, New
10 Mexico.

11 EXAMINER CATANACH: Call for appearances.

12 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of
13 the Santa Fe law firm of Kellahin and Kellahin, appearing
14 on behalf of the Applicant, and I have three witnesses to
15 be sworn.

16 EXAMINER CATANACH: Additional appearances in
17 this case? There being none, can I get the witnesses to
18 please stand and be sworn at this time?

19 (Thereupon, the witnesses were sworn.)

20 JAMES R.J. STRICKLER,
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. KELLAHIN:

25 Q. Mr. Strickler, for the record, sir, would you

1 please state your name and occupation?

2 A. My name is James Strickler, and I'm a petroleum
3 landman for Burlington Resources.

4 Q. On prior occasions, Mr. Strickler, have you
5 testified before the Division as a petroleum landman and
6 had your qualifications accepted and made a matter of
7 record?

8 A. Yes.

9 Q. What is your responsibility with regards to the
10 Canyon Largo Unit, Mr. Strickler?

11 A. I take care of the land functions covering the
12 Canyon Largo Unit in Rio Arriba County, New Mexico.

13 Q. As part of that responsibility, do you have data
14 available to you to identify for the Division all of the
15 appropriate interest owners entitled to share in production
16 from any formation within the Canyon Largo Unit?

17 A. Yes, I do.

18 Q. In addition, have you made yourself aware of and
19 familiar with the offset operators to the particular unit
20 in question?

21 A. Yes, sir.

22 MR. KELLAHIN: We tender Mr. Strickler as an
23 expert witness.

24 EXAMINER CATANACH: He is so qualified.

25 Q. (By Mr. Kellahin) Mr. Strickler, let me have you

1 take a second, and let's look at the exhibits that you're
2 sponsoring this morning.

3 If you'll turn to Exhibit Tab 1, and behind the
4 tab if you'll turn to the first page, it's a notice letter,
5 isn't it, sir?

6 A. Yes, sir.

7 Q. Describe for us how you went about determining
8 the list of all the parties to whom notice was sent of this
9 particular hearing.

10 A. We searched our Division order records and
11 identified 122 owners, working interest, royalty and
12 overriding royalty owners in the Canyon Largo Unit, which
13 covers approximately 49,876 acres.

14 Q. As part of that process, can you approximate for
15 us the total number of interest owners that were notified
16 of this case?

17 A. We sent out notices to all 122 owners by
18 certified mail on December 5th, which is 20 days before the
19 -- our meeting today.

20 Q. Mr. Strickler, are you aware of the current
21 Division Rule 303, which requires in the absence of
22 approval by the Division that each administrative
23 application for commingling of each well require that you
24 send that application to each of the affected interest
25 owners, if the production to be commingled is under

1 separate ownership?

2 A. Yes, sir.

3 Q. In this case, for each commingled well, in the
4 absence of permission by the Division, you would have to
5 send in some instances as many as 120 notices per
6 application?

7 A. That's correct.

8 Q. Is that an administrative process that you're
9 seeking an exception for in today's hearing?

10 A. Yes, sir.

11 Q. Let's turn to Exhibit 2 and have you help us find
12 the Canyon Largo Unit in relation to other known operations
13 and communities in the San Juan Basin.

14 A. What you see there is the location map. The
15 Canyon Largo unit is identified in yellow. Again, it's in
16 Rio Arriba County. We're approximately 49 miles southeast
17 of Farmington, New Mexico.

18 Q. Let's turn behind Tab 3 and fold out the first
19 plat. When we look at this plat, Mr. Strickler, what are
20 we seeing?

21 A. This is a Canyon Largo Unit -- unit map. It's
22 outlined in the green dashed lines. It comprises -- Well,
23 it's in primarily four townships, 25 North, Range 7 West
24 and Range 6 West, and 24 North, Range 6 and 7 West.

25 Q. What is the approximate vintage of this unit?

1 When was it first established?

2 A. This unit was approved by the regulatory
3 authorities in September of 1953.

4 Q. In terms of a percentage, can you give us an
5 approximate percentage of the kinds of oil and gas leases
6 that were consolidated for unit operations?

7 A. Yes, sir, the fee acreage is approximately 45,726
8 acres, or 91.68 percent of the unit.

9 Q. Is that federal or fee?

10 A. Federal, I'm sorry, excuse me, federal. The
11 state acreage is 3029 acres, or roughly 6.07 percent of the
12 unit. And the balance is fee acreage, 1120.65 acres --
13 1120.65 acres, or 2.25 percent of the unit.

14 Q. If we turn back to Exhibit 1 and look at the
15 first page of the Application, in paragraph 1 of the
16 Application you have summarized the well count within the
17 unit, have you not?

18 A. Yes.

19 Q. There is a correction necessary for the Gallup
20 well count, is there?

21 A. Yes, sir. We've posted there 6 Gallup wells, and
22 there are 59.

23 Q. Six Gallup wells would have been the Burlington-
24 operated wells?

25 A. Correct.

1 Q. And 53 are operated, I believe, by Merrion Oil
2 and Gas Corporation?

3 A. Yes, sir, they're the suboperator of the Gallup
4 PA.

5 Q. All right, the rest of the well counts shown on
6 that page are correct?

7 A. Yes, sir.

8 Q. What accounts, when we look back, then, at
9 Exhibit Number 3 in the foldout plat, what accounts for its
10 odd boundary?

11 A. The reason for the -- there was some contraction
12 due to marginal wells that weren't included in the unit.

13 Q. Did you have the ability to identify the owners
14 entitled to production for all areas of the unit, for all
15 formations?

16 A. Yes.

17 Q. How were you able to do that?

18 A. We have a summary sheet, again generated by our
19 Division order system, that identifies all the working
20 interest owners. We were also able to capture the royalty
21 and overriding royalty owners in the various PAs.

22 We looked at leases that were outside the Canyon
23 Largo Unit, and we researched that, and there were common
24 owners. There are large leases in the Canyon Largo Unit,
25 primarily made up of federal lands, and so we were able to

1 obtain this information.

2 Also, Merrion Oil and Gas furnished us their
3 Division order records, since they operate as suboperator
4 of the Gallup PA. So between the two sources we were able
5 to capture all the ownership.

6 Q. So for those tracts which are not currently
7 dedicated to any participating area in any formation, you
8 still had a way to identify --

9 A. Yes, sir.

10 Q. -- and send notice to those interest owners?

11 A. Yes, sir.

12 Q. All right. Let's turn behind the foldout tab,
13 plat, and have you identify the next series of exhibits for
14 us that are contained behind Exhibit Tab 3.

15 A. The first map you see here shows a composite of
16 all the PAs. And as we flip the chart -- This is the
17 composite map. As we flip the chart, we see the Chacra
18 participating area, which is in the northeast section of
19 the Canyon Largo unit.

20 Then we also -- Then the next map covers the
21 Mesaverde participating area, which includes one 320-acre
22 area.

23 The following map is the Dakota PA, which again
24 is on the eastern side of the Canyon largo unit.

25 And then finally we have the Gallup participating

1 area that is in the center of the Canyon Largo Unit.

2 Q. Let's turn now to Exhibit Tab 4 and have you
3 identify and describe the information contained behind that
4 exhibit tab.

5 A. What we have here is a list of all the interest
6 owners in the Canyon Largo Unit. Again, it totals 122
7 entities.

8 And behind that we have copies of the certified
9 receipts. We sent out the notices by certified mail and we
10 have copies of the receipts, return receipts, of those
11 owners for your records.

12 Q. If the Division grants this Application, Mr.
13 Strickler, you're seeking to accomplish the following, that
14 when Burlington files an administrative application, fills
15 out the form -- I think it's the 107 form, for an
16 individual well, that if the ownership is not common for
17 production in that spacing unit, you will not be required
18 to send notice to those interest owners, having satisfied
19 that requirement with this Application?

20 A. That's correct.

21 Q. If there are offsetting interest owners to that
22 spacing unit, which are working interest owners or
23 operators and which would otherwise not been notified, then
24 you'll continue to send notice to those offset operators?

25 A. Yes, we will.

1 Q. That would probably occur only around the fringes
2 of the unit?

3 A. Correct.

4 Q. And it would occur only if Burlington was not, in
5 fact, the offset operator to that unit -- spacing unit?

6 A. Yes, sir.

7 MR. KELLAHIN: All right. Mr. Examiner, that
8 concludes my examination of Mr. Strickler.

9 We move the introduction of his Exhibits 1
10 through 4.

11 EXAMINER CATANACH: Exhibits 1 through 4 will be
12 admitted as evidence.

13 EXAMINATION

14 BY EXAMINER CATANACH:

15 Q. Mr. Strickler, what exactly did you guys send to
16 the interest owners? Was it -- It was a letter, it
17 appears, behind Exhibit Number 1, and the Application?

18 A. We sent a form letter to the working interest
19 owners. I didn't include a copy of that in this exhibit.
20 I can certainly furnish that to you, if you would like.

21 Q. Okay, so it's -- You simply sent a single letter?

22 MR. KELLAHIN: No, Mr. Examiner, the entire
23 Application and attachment --

24 EXAMINER CATANACH: Okay.

25 MR. KELLAHIN: -- plus my cover letter went to

1 all the parties.

2 EXAMINER CATANACH: Okay, the Application
3 that's --

4 MR. KELLAHIN: Yes, sir.

5 EXAMINER CATANACH: -- behind the tab?

6 MR. KELLAHIN: Yeah, they got the whole thing.

7 EXAMINER CATANACH: Okay, got you.

8 Q. (By Examiner Catanach) And are you satisfied,
9 Mr. Strickler, that you've identified all the interest
10 owners within this unit?

11 A. Yes, sir.

12 Q. Have you had any contact with any of the interest
13 owners regarding this Application?

14 A. We had one inquiry by Merrion Oil and Gas. They
15 sent us a letter -- and I believe you received a copy of
16 that -- concerning the allocation of the various formations
17 that we will discuss later in the exhibits.

18 That was the only inquiry.

19 Q. Okay. I do not see a PC participating area.

20 A. You're right, and we -- we inadvertently omitted
21 that, and I have a copy of that with me.

22 Q. Now, the -- If you could submit that, that would
23 be good.

24 MR. KELLAHIN: We'll have to give it to you
25 after --

1 THE WITNESS: Yes.

2 EXAMINER CATANACH: Okay.

3 Q. (By Examiner Catanach) The composite of
4 participating areas includes just those five formations
5 you've got listed?

6 A. Correct. The Fruitland Coal, there's no
7 production in the Fruitland Coal.

8 Q. The participating area for the PC must be the
9 most extensive one in the unit?

10 A. It is, it is, and I apologize for omitting that
11 map.

12 Q. You stated there were actually 59 Gallup wells,
13 and 53 are operated by Merrion?

14 A. Correct.

15 Q. If those 53 wells -- if any of the 53 wells that
16 are operated by Merrion are commingled with other
17 formations, will Merrion still be the operator of those
18 wells?

19 A. Yes, sir, I believe so. We have a settlement
20 agreement with Merrion, and if they have the largest
21 ownership in those zones, then they will still operate, if
22 their ownership decreases.

23 Q. Did you say there was no PA within the Fruitland
24 Coal at this point?

25 A. No, sir.

1 Q. Are there Fruitland Coal wells? No, there are
2 not?

3 A. Looking at the first map, I see one Fruitland
4 Coal symbol in Section 4 of 24-6. That's the only one I
5 can see --

6 Q. Okay.

7 A. -- in the entire unit.

8 EXAMINER CATANACH: I have nothing further of
9 this witness.

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

13 DIRECT EXAMINATION

14 BY MR. KELLAHIN:

15 Q. Mr. Hornbeck, for the record, sir, would you
16 please state your name and occupation?

17 A. My name is James Hornbeck, and I'm a geologist
18 with Burlington Resources.

19 Q. Mr. Hornbeck on prior occasions have you
20 testified before the Division as a petroleum geologist?

21 A. Yes, I have.

22 Q. What is your responsibility with regards to the
23 Canyon Largo Unit?

24 A. I'm the project geologist.

25 Q. As part of those duties have you become

1 knowledgeable and familiar with the geology of all the
2 producing formations within the Canyon Largo Unit?

3 A. Yes, I have.

4 MR. KELLAHIN: We tender Mr. Hornbeck as an
5 expert petroleum geologist.

6 EXAMINER CATANACH: He is so qualified.

7 Q. (By Mr. Kellahin) Let's take a moment, Mr.
8 Hornbeck, and review the geologic displays that you've
9 enclosed behind Exhibit Tab Number 5, and then let me talk
10 to you about what you foresee as the future development
11 opportunities within the Canyon Largo Unit for the various
12 reservoirs.

13 Let's start with the Pictured Cliff. Take a
14 moment and describe for us what it is we're seeing with the
15 first display, which is this Pictured Cliff isopach behind
16 Exhibit Tab Number 5.

17 A. The Pictured Cliffs isopach map submitted is an
18 outline of -- it includes the Canyon Largo Unit outline,
19 which is in red on these four townships.

20 The scale -- These are section lines, and a
21 square mile is a section. Those are the smaller squares.
22 These are Townships 24 and 25 north, 6 and 7 West.

23 And on them we have the gross thickness of the
24 Pictured Cliffs interval, which is one of the producing
25 horizons within the unit. The contour interval is 10 feet,

1 and there are some slight variations in thickness across
2 the unit from the southwest to the northeast, but only on
3 the range of a 20- to 30-foot thickness difference in the
4 overall thickness of the Pictured Cliffs.

5 Also included in this map is a cross-section that
6 is submitted as Exhibit 6, which will give you a cross-
7 section across the unit, illustrating the stratigraphic
8 continuity of all the producing horizons in the Cretaceous.

9 Q. Subsequent to the hearing, if the Examiner
10 chooses to look at the cross-section, describe for us what
11 you conclude as a geologist about that cross-section.

12 A. Well, the cross-section is constructed and is
13 interpreted by me to be representative of the formation --
14 the relationships in all the formations across the unit.
15 It's constructed in a dip direction, which is perpendicular
16 to depositional strike of all these Cretaceous pay zones.
17 And if there were any significant changes in reservoir
18 stratigraphy or quality, they would be depicted and picked
19 up on this cross-section.

20 And it's my professional opinion that there is
21 not a great amount of change across the unit in these
22 horizons.

23 Q. For the Pictured Cliff reservoir, give us a sense
24 of where the Canyon Largo Pictured Cliff lies in relation
25 to the Pictured Cliff in the San Juan Basin.

1 Is there a pattern of productivity in the
2 Pictured Cliff that can be mapped so that you would have a
3 sense of the size and the shape where the better Pictured
4 Cliff wells are located?

5 A. This Pictured Cliffs development lies along
6 depositional strike, with some of the more prolific
7 Pictured Cliff sandstone developments, the reservoirs that
8 are productive of gas in the San Juan Basin.

9 Generally, for the most part, the better Pictured
10 Cliffs is concentrated in the very northeast corner of the
11 unit, and we are along trend to the shore -- the Pictured
12 Cliff shoreline development, but for the most part landward
13 and therefore not nearly as prolific reservoirs as further
14 into the Basin to the north and northwest.

15 Q. From a geologic perspective, what do you see the
16 opportunity to be for further development of the Pictured
17 Cliff in the Canyon Largo unit?

18 A. Well, based on historical performance, the
19 forward opportunities from this point would be marginal in
20 nature.

21 Q. Let's turn to the next display and look at the
22 structure map. You've included a structure map on the base
23 of the Pictured Cliffs?

24 A. Yes, I have.

25 Q. What's your interpretation of structure?

1 A. Well, it's a fairly common theme for all
2 horizons. There are additional structure maps included,
3 and what we see is a very uniform monoclinial dip into the
4 Basin towards the northeast with an average dip rate of
5 about 100 feet per mile.

6 Q. Is structure going to be a component in the
7 reservoir where you as a geologist are going to be able to
8 pick well locations for further development based upon
9 structure?

10 A. Structure will not influence this -- the Pictured
11 Cliffs or -- As we go through the other structure maps you
12 will see a very uniform dip, and therefore structure is not
13 considered to be a significant influence on additional
14 locations.

15 Q. Let's turn to the Mesaverde. Again, in the
16 Mesaverde reservoir, we're looking at a gross isopach that
17 you've prepared?

18 A. That's correct.

19 Q. The data on the map, is this data confined to
20 data out of the Mesaverde reservoir?

21 A. That is correct.

22 Q. All right. So all the symbols in here indicate
23 data points in that reservoir?

24 A. (No response)

25 Q. (By Mr. Kellahin) Is there a distinction between

1 those dots that are black, as opposed to the well symbols
2 that are open colored?

3 A. Yeah, yeah, it's a standard convention. This
4 database that we used to construct this map includes deeper
5 penetration. For example, the Gallup and the Dakota
6 penetrations, which do have a Mesaverde pick on them.

7 So some of these wells are -- especially the oil-
8 well symbols, the solid black circles, are Gallup producers
9 that have to drill the Mesaverde and therefore have control
10 points to be used in isopaching the overall Mesaverde
11 thickness.

12 Q. So despite the fact that you only have five
13 Mesaverde wells producing in the unit, you do have
14 substantial geologic data on the Mesaverde reservoir?

15 A. That is correct.

16 Q. Based upon that data, do you have an opinion as a
17 geologist as to the future development opportunities in the
18 Mesaverde reservoir within the Canyon Largo unit?

19 A. Well, based on the penetrations and the well
20 control, mud-log information that we have, there's limited
21 opportunities in the Mesaverde, and it would be again
22 considered marginal.

23 Q. Let's turn to the Point Lookout structure. Give
24 us a quick summary of the significance of this display.

25 A. Well, it's just merely indicating that the

1 Mesaverde as a whole conforms with the Pictured Cliffs
2 structure that overlays it. There's a gentle dip, about
3 the same rate, into the Basin towards the northeast, at
4 about 100 feet per mile.

5 And I guess I'll also say, the Point Lookout is
6 one of the major markers in the Mesaverde, so it's a very
7 consistent pick.

8 Q. Okay. Let's go to the Dakota. Identify and
9 describe the Dakota isopach for us.

10 A. The Dakota isopach is based on significantly less
11 data, because there are much fewer well control points.

12 What we've done is tried to take a look at all
13 well control in the unit that have penetrated both the top
14 and the bottom of the Dakota producing interval. Most of
15 that is concentrated on the northeastern quarter of the
16 unit, and what it shows is that there's a variance in
17 thickness from anywhere from 250 to 280 feet, in gross
18 overall thickness.

19 That's it.

20 Q. Is there a geologic explanation to the fact that
21 in some 40 years of unit operations, you have very few
22 Dakota penetrations in the unit?

23 A. Well, there have been a lot of attempts to make
24 commercial wells in the Dakota over the course of the
25 development of the unit.

1 What we see is that regionally, with respect to
2 the major producing trends in the Dakota, in the San Juan
3 Basin, we're out of some of the better bar developments and
4 better reservoir developments, which are associated with
5 the upper Dakota marine section, two wells in Paguate
6 intervals, and those developments are significantly further
7 away to the north and west in the more central portion of
8 the Basin.

9 Q. As a practical matter, what do you as a geologist
10 see to be the future development opportunities in the
11 Dakota reservoir within the unit?

12 A. We feel that it's -- it will be a marginal
13 target, and although we are taking a look at additional
14 opportunities, hoping that there may be additional
15 compartmentalization and opportunity, for the most part the
16 conventional reservoir is still considered a marginal
17 target.

18 Q. Burlington is still considering, then, the high-
19 risk experimental Dakota well within the unit where you
20 would drill that at least initially as in a stand-alone
21 attempt in the Dakota?

22 A. Yes, that's correct.

23 Q. If that fails, then, you could still use it as a
24 commingled well?

25 A. That is correct.

1 Q. All right. Let's look at the Graneros. What's
2 the story on the Graneros structure map?

3 A. Again, it's a very uniform structural
4 interpretation, based on the well control. This is a
5 marker directly overlying the Dakota, the Graneros shale.

6 What it shows is, again, a very consistent
7 uniform dip to the northeast at about 100 feet per mile,
8 again, very similar to the other two overlying structural
9 horizons.

10 Q. Mr. Hornbeck, we don't have a specific display on
11 the Chacra. That is one of the reservoirs or the zones
12 shown as a participating area on Mr. Strickler's map.

13 Can you give us a verbal representation of the
14 Chacra? We might go back to one of his participating area
15 maps, just to have a sense of where that Chacra development
16 has occurred.

17 A. Exhibit 3.

18 Q. Yes, sir, it's the display that shows the Chacra
19 PA and apparently all the participating areas confined to
20 the northeast corner of the unit.

21 A. Yes, the Chacra participating area pretty much
22 outlines a very excellent quality sandstone reservoir
23 developed within the Chacra interval. And the Chacra
24 interval is a sandstone stratigraphic trap that produces
25 gas, sandwiched in the Lewis shale, which is in between the

1 Pictured Cliffs and the Mesaverde producing horizons.

2 And what we see there is that within that PA
3 that's developed currently there is adequate reservoir
4 thickness and good conventional matrix reservoir-quality
5 sandstones, which are producing very, very good production
6 histories for those wells.

7 About where that PA ends to the southwest,
8 there's a rapid pinchout and shaling out of that excellent
9 quality sandstone reservoir, and therefore to the southwest
10 in the remainder of the Canyon Largo Unit we do not see
11 that well-developed quality of reservoir, and it's marginal
12 at best. Again, modern wireline logs, porosity logs and
13 mud logs show us that it does not have nearly the
14 productive potential as the wells developed within the PA
15 that currently exists.

16 Q. Mr. Hornbeck, are you familiar with the Division
17 rule that established the Chacra demarcation line in
18 establishing the vertical limits in the Blanco Mesaverde
19 Pool?

20 A. Yes, I am.

21 Q. And that line is generally north and east, I
22 believe, of this area, is it not?

23 A. Yes, it is.

24 Q. So when we're looking at the Chacra here, we're
25 not looking at a Chacra that is a portion of the Mesaverde

1 in a different portion of the reservoir?

2 A. That's correct.

3 Q. The Chacra in the Canyon Largo Unit is a distinct
4 reservoir, separate from the Mesaverde.

5 A. That's right, south of the demarcation line, and
6 it's truly a stratigraphic gas trap.

7 Q. Why has the Chacra development in the unit
8 stopped at the participating area shown on the display?

9 A. It's related to a deterioration of reservoir
10 quality.

11 Q. Do you foresee a reasonable probability that
12 Chacra can be developed in the balance of the unit, as a
13 viable reservoir target?

14 A. Based on the current well control and the
15 information we have, it does not seem that that's an
16 option.

17 Q. If you get lucky, you may find it. Otherwise,
18 it's probably not going to be productive?

19 A. Well, there have been enough penetrations through
20 it, testing deeper horizons, that we perceive it as being
21 nonproductive. It shales out and becomes a very tight
22 reservoir.

23 Q. Okay. Summarize for us your conclusions, then,
24 as a geologist with regards to this Application.

25 A. Based on currently what we know within the Canyon

1 Largo Unit, future development of all the horizons that we
2 have discussed will be pretty much in a marginal nature.

3 We are still considering ways to try and find
4 additional opportunities in the horizons, based on
5 improving technology. But right now, based on everything
6 we see from a historical perspective, most of these zones
7 will be marginal -- all of these zones will be marginal.

8 MR. KELLAHIN: That concludes my examination of
9 Mr. Hornbeck.

10 We move the introduction of his exhibits behind
11 Exhibit Tab Number 5 and 6, 5 and 6.

12 EXAMINER CATANACH: Exhibits 5 and 6 will be
13 admitted as evidence.

14 EXAMINATION

15 BY EXAMINER CATANACH:

16 Q. Mr. Hornbeck, you didn't discuss anything about
17 the Fruitland Coal. Do you know anything about that within
18 the unit?

19 A. Yes, I do. There's been some testing of the
20 Fruitland Coal in and around the Canyon Largo Unit area,
21 and as far as I'm aware, it is in the underpressured area
22 outside the prolific productivity associated with --
23 further north in the Central Basin around the 30-and-6
24 unit, and there has not been a lot of encouragement with
25 prolific rates and things like that in the Fruitland Coal,

1 and it's been basically a recompletion target in deeper
2 wellbores.

3 Q. There's only one Coal well in the unit, to your
4 knowledge?

5 A. That is correct.

6 Q. Are any of these zones -- do you drill -- Do you
7 still drill any stand-alone wells to test any of these
8 zones?

9 A. The only potential at this time for a stand-alone
10 project would be in search of gathering data for
11 compartmentalized, separate sands in the Dakota. Other
12 than that, there's no other horizon that warrants a stand-
13 alone project.

14 Q. What do you see as the development within these
15 marginal zones? Do you see that they're economically --
16 have the potential to where you can, say, drill a
17 Mesaverde-Dakota commingled well, something --

18 A. Well, it certainly will improve the economics.
19 And we will present some -- I will not personally present
20 some information, but our reservoir engineer expert will be
21 presenting some information that will show you the
22 improvement when we are able to commingle some of these
23 zones together.

24 Q. As far as the commingled situation within this
25 unit, do you see that as maybe -- recompletions as being

1 the majority of the wells you'll commingle within the unit?

2 A. Well, we would certainly -- You know, we would
3 like to take advantage of any opportunities to improve
4 recoveries, and there will be numerous attempts to
5 commingle through recompletions.

6 We have currently a lot of wells that, based on
7 liquids in some of the horizons, specifically the Gallup
8 and the Dakota, and gas associated with the Dakota and the
9 Mesaverde and the Pictured Cliffs, that we'd improve
10 lifting efficiencies on the liquids and also hopefully
11 attempt to improve overall recoveries out of all these
12 zones.

13 EXAMINER CATANACH: That's all the questions I
14 have, Mr. Kellahin.

15 JOAN M. EASLEY,

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

18 DIRECT EXAMINATION

19 BY MR. KELLAHIN:

20 Q. Would you please state your name and occupation?

21 A. My name is Joan Easley and I'm a petroleum
22 engineer.

23 Q. Ms. Easley, on prior occasions have you testified
24 before the Division as a petroleum engineer?

25 A. No, I have not.

1 Q. The microphone is just for the court reporter; it
2 doesn't amplify your voice. So it won't help you, you'll
3 have to speak up.

4 A. Okay.

5 Q. When and where did you obtain your degree?

6 A. I graduated from Mississippi State University in
7 1994 with a bachelor of science in petroleum engineering.

8 Q. Summarize your employment for us.

9 A. Since 1994 I've been employed by Burlington
10 Resources in their Farmington/San Juan Division.

11 Q. And that's where you currently reside?

12 A. Yes, sir.

13 Q. What are your engineering responsibilities for
14 the Canyon Largo Unit?

15 A. Since March, 1995, I have been an engineer in the
16 area that manages the Canyon Largo unit, mainly in
17 production engineering.

18 Q. As part of your responsibilities, have you made
19 yourself familiar with past reference cases Burlington has
20 filed with the Division and had approved by the Division?

21 A. Yes, sir, I have.

22 Q. And have you used the methodologies and
23 information in those prior cases to aid you in your
24 preparation for today's case?

25 A. Yes, I have.

1 Q. As part of your work, have you made an
2 investigation of the cost components for the various
3 reservoirs in the unit?

4 A. Yes, I have.

5 Q. And do you have an engineering opinion with
6 respect to how to best further develop all the reservoirs
7 in the unit?

8 A. Based on the information we've put together, all
9 of the formations in this unit would be best developed in a
10 commingled state to improve the economics.

11 MR. KELLAHIN: We tender Ms. Easley as an expert
12 petroleum engineer.

13 EXAMINER CATANACH: She is so qualified.

14 Q. (By Mr. Kellahin) Let's talk about the
15 reservoirs in the unit.

16 The Dakota reservoir, what is the current status
17 of that development, and what do you as an engineer see as
18 the future for further development in the Dakota?

19 A. The Dakota has a lot of potential throughout the
20 unit. We have lots of open locations for the Dakota.

21 In the past, stand-alone Dakotas on average have
22 been marginally economic due to lower reserves.

23 Currently we're planing to drill two tests, as
24 Jim referenced, testing the compartmentalized lower Dakota
25 that we're testing.

1 Other than that, any future development should be
2 commingled, in order to make it economic.

3 Q. The well count in Pictured Cliff is about 140 in
4 the unit?

5 A. Yes, sir.

6 Q. What do you see as the future development
7 opportunities in the Pictured Cliff reservoir?

8 A. We've in the past -- not myself, but in the past
9 we've basically developed the Pictured Cliffs. Any future
10 opportunities would be tests in an existing wellbore or in
11 a wellbore that we drill as another formation that we're
12 adding.

13 Q. What do you see as the opportunities in the
14 Fruitland Coal gas, within the unit?

15 A. As Jim said, based on what we've seen through the
16 drill bit and wireline logs, et cetera, we don't foresee
17 any development of the Fruitland Coal at this time, and it
18 definitely would be marginal. It's probably the most
19 marginal reservoir we have out there right now.

20 Q. Merrion Oil and Gas is the sub-operator of the
21 Gallup formation?

22 A. Yes, sir, they are.

23 Q. And in what portion of the unit does the Gallup
24 development occur?

25 A. Mainly in the southern part of the unit, what's

1 called the Devil's Fort field and the North Devil's Fort
2 field. Those wells are economic. It's an oil reservoir,
3 basically, from two different Gallup formations.

4 North of that, we've had six tests, which are the
5 six ones that we operate, and those have all been
6 marginally too uneconomic.

7 Q. So when we move in other areas of the unit
8 outside of the conventional historic oil production that's
9 being produced by Merrion --

10 A. Right.

11 Q. -- then we're into a part of the Gallup that
12 represents high-risk marginal production?

13 A. Yes, sir.

14 Q. The Mesaverde reservoir, characterize that for us
15 in terms of future development.

16 A. Basically, anything there will be in a commingled
17 status. We've done some dual wells and are currently
18 hoping we can commingle those, because they are marginally
19 economic as a dual state.

20 Q. And finally the Chacra?

21 A. Chacra, as Jim said, has been productive in the
22 northeastern part of the unit. We haven't had any Chacra
23 tests outside of the sweet spot, but they do look like they
24 would be marginally economic, and we would develop those
25 only in a commingled state.

1 Q. Have you prepared for the Examiner's benefit the
2 cost components of drilling and operating wells in the
3 various reservoirs and segregated it in such a way that we
4 can illustrate and describe the costs attributed to a
5 single completion, contrast that to a dual completion, and
6 finally be able to characterize those two with commingled
7 completions?

8 A. Yes, sir.

9 Q. Well, let's do that now. If you'll turn behind
10 Exhibit Tab Number 7, take us through your presentation.

11 A. Okay, the first page we see is basically cost for
12 Chacra, PC or Fruitland Coal wells. Basically, they're
13 very close and similar in depth, and so this cost would be
14 very similar.

15 Single completion total cost, on average, about
16 \$300,000; dual, \$250,000; and commingling drops down to
17 \$209,000. We've broken those out into drilling completion
18 facilities, tangible and intangible.

19 We've done the same thing for the Mesaverde.

20 Q. All right, let me see if I understand how you did
21 this. If we look on the first page and I look under the
22 dual completion column, I find the total costs attributed
23 to the Chacra-PC-Fruitland of \$250,000, give or take?

24 A. Yes, sir, and that would be the cost attributed
25 to that formation.

1 Q. All right. If I want to take a wellbore and
2 commingle PC with Mesaverde --

3 A. Okay,

4 Q. -- where do I get the -- I'm sorry, I want to
5 dual it.

6 A. Okay, dual.

7 Q. I want to dual it with Mesaverde and PC. So I've
8 got \$250,000 attributed to the PC. What are my costs
9 attributed to the Mesaverde?

10 A. Look under dual completion, and the total would
11 be \$351,000, and so the total would be \$600,000.

12 Q. All right. So I've got a \$600,000 wellbore for a
13 dual in Mesaverde-PC?

14 A. Yes, sir.

15 Q. If I want to commingle those two, what's going to
16 be my total cost?

17 A. Roughly \$275,000 plus \$208,000. So it would be
18 \$475,000, \$480,000.

19 Q. Okay. And so you can use that method to make a
20 comparison to see how the estimated costs compare based
21 upon the type of well you want to drill and produce?

22 A. Yes, sir.

23 Q. Where did the cost numbers come from?

24 A. We took an average of all wells we have completed
25 or will complete in the future for these areas, estimates

1 on what work has been done, and projected costs for the
2 future.

3 Q. All right, and that's the kind of thing you would
4 do not only for this hearing, but for your own information?

5 A. Yes, sir.

6 Q. These are current costs, they're based upon AFES
7 and estimates and bidding and all that process by which you
8 assimilate information for costing wells?

9 A. Yes, sir.

10 Q. Once you have determined an expectation of cost,
11 you also have to apply some type of rate of return or
12 profit, minimum profit percentage, to the calculation, do
13 you not?

14 A. Yes, sir.

15 Q. And what percentage did you use?

16 A. Twenty percent.

17 Q. And that is the percentage we've used before
18 Examiner Catanach in past reference cases?

19 A. Yes, sir.

20 Q. All right. Once we have those two components,
21 cost and a minimum-profit percentage, what have you done
22 when we look at this curve that's got the blue, green and
23 red lines on it?

24 A. Basically, we've run the economics for different
25 cases of ultimate recovery and initial rate and plotted

1 with those economic parameters this on a graph, so that
2 what we can do is, if we have an average expected EUR and
3 an average expected initial rate, we can take that, plot
4 this on this chart and see under what circumstances this
5 well would be above marginal economics, i.e., would dual,
6 commingle or stand alone.

7 Q. In past presentations before the Division, we
8 have urged the Commission to adopt and, in fact, the
9 Commission has adopted, two components to identifying
10 whether a well was marginal or not. It was an initial rate
11 plus an estimated ultimate recovery.

12 A. Yes, sir.

13 Q. And you have done the same thing here in this
14 case?

15 A. Yes, sir.

16 Q. Initial rate alone is not going to tell you if
17 the well is going to be economic; is that not true?

18 A. Yes, that is true. I mean -- Yes.

19 Q. That is true?

20 A. Yes.

21 Q. Give us a sense on this display, when we're
22 looking at the Fruitland, PC or Chacra, what you would
23 forecast to be the point on the curve that you're likely to
24 be placed for the development in those reservoirs.

25 A. Well, the average PC estimated ultimate recovery

1 in this unit has been about 675 million cubic feet. The
2 average initial rate has been about 120 MCF a day. And so
3 if you take 120 MCF a day and plot it against 800 -- What
4 did I say? 875?

5 Q. Yes, ma'am.

6 A. 675.

7 Q. 675.

8 A. 675. That plots just below even the commingle
9 line. So we're talking about a very marginal reservoir
10 that we would only develop if economic parameters improved.

11 Q. In order to meet your economic threshold, you
12 would like to be above the red line?

13 A. Yes, sir.

14 Q. And you can't justify it as a dual well if it is
15 below the green line?

16 A. That is correct.

17 Q. Okay. When you fill out the commingling form,
18 you fill out and sign the form 107, you fill in the blank
19 where it says that you forecast that particular zone to be
20 marginal or nonmarginal?

21 A. Yes, sir.

22 Q. You would put the blank for the PC as marginal?

23 A. Yes, sir.

24 Q. And then you could attach this display to your
25 application so the Examiner could see the basis upon which

1 you've made the conclusion that that zone is going to be
2 marginal, based upon your calculation of EUR and rate?

3 A. Yes, sir.

4 Q. Let's look at how you might do that if it was a
5 Mesaverde zone in the well. If you'll look at the next
6 curve.

7 A. On average in this unit, the Mesaverde estimated
8 ultimate recovery for a single well is about 840 million,
9 with an initial rate of about 260.

10 So if you plot 260 against 840, you come in
11 between the commingle line and the dual line, meaning that
12 this well would be economic or above marginal economics as
13 a commingle, but as a dual it would fall below the marginal
14 economic limit.

15 Q. And then the challenge for you as an engineer is
16 to try to package these reservoirs into a multiple
17 opportunity in single well, and with the total combination
18 hopefully meet your economic threshold by which you can at
19 least justify it as a commingled wellbore?

20 A. Yes, sir.

21 Q. Let's look at the Gallup economics, if you'll
22 turn to the next curve. I've got the Gallup economic
23 limit. Are you with me?

24 A. Yes, sir.

25 Q. Where would you forecast the opportunities for a

1 Dakota development to be if you were to test the -- I'm
2 sorry, the Gallup, where would we fall on the curve?

3 A. This is plotted according to barrels of oil per
4 day, because most of the Gallup production is oily. So
5 average EUR is about 45,000 barrels of oil over the life of
6 the well. Initial rates are usually around 14 or 15
7 barrels of oil a day.

8 So if you plot 15 with 44, it falls right on and
9 just below the dual line, basically, just on the bottom
10 side of the dual line.

11 So this one is economic, or above marginal
12 economics as a commingle; it is almost on the line as a
13 dual, but it still falls slightly below.

14 Q. Okay, let's look at the Dakota curves.

15 A. Same story, average EUR for Dakota is about 1 B,
16 or a million cubic feet. Average rate is 196 MCF a day.
17 So at the 200-MCF-a-day line plotted against 1 B, it falls
18 even below -- at that initial rate, even below the
19 commingled line. So it's on average throughout the unit a
20 marginally economic formation.

21 Q. If we turned behind Exhibit Tab Number 8, Ms.
22 Easley, let's look at the first spreadsheet behind that
23 exhibit tab. What are you displaying here?

24 A. That's the information I've been referencing.
25 What we did is took the population all the different

1 formations in the unit, and basically listed or averaged
2 estimated ultimate recovery, remaining recovery, average
3 initial rates.

4 And also we listed what we -- the initial
5 bottomhole pressures for all these zones before they were
6 depleted were, and current bottomhole pressure conditions.

7 Q. All right. Again, when you fill out the
8 commingling application form, part of the form requires you
9 to disclose your opinion of what you think the original
10 reservoir pressure is of the lowest-pressured reservoir to
11 be commingled?

12 A. Yes, sir.

13 Q. You would fill a blank in, and then you could
14 attach this sheet to your application, so that Mr. Catanach
15 could see how you went about deriving that information?

16 A. Yes, sir.

17 Q. Or you could also supplement it and attach the
18 immediate offset pressure information if that was
19 appropriate?

20 A. Yes, sir.

21 Q. Those would be judgments you would make as the
22 reservoir engineer that is signing off on the form, having
23 attested to the fact that you have authenticated all the
24 information that is shown to the Division on that form?

25 A. Yes, sir.

1 Q. Let's thumb through the rest of the picture
2 display showing pressure so that Examiner Catanach
3 understands what you're trying to illustrate to him with
4 the subsequent displays behind Exhibit 8.

5 A. We have four maps here, two for the PC and two
6 for the Dakota. The reason we chose these two are, these
7 are the two formations that currently we would definitely
8 not be able to commingle due to the pressure situation.

9 The first is a contour map of initial pressures
10 in the PC. It ranges from 700 p.s.i. to 900 p.s.i.
11 bottomhole pressure.

12 The next map is a contour map of the current
13 pressure in the PC, which is about 200 pounds, 200 to 300
14 pounds.

15 And so the initial pressure of the lowest-
16 pressured formation currently in the unit was 700 pounds.

17 And the next map is Dakota initial pressure, 2700
18 to 2800 pounds. And current pressures in the Dakota with
19 the information we have is about 800 to 1200 pounds. And
20 so that's above the initial pressure of the PC. And we're
21 just illustrating the fact that we definitely would not be
22 able to commingle these two zones because of the pressure
23 requirements.

24 Q. If the Division decides it's useful to use the
25 unit concept in which to package data for processing

1 commingling applications, then this would be a way to
2 review that information?

3 A. Yes, sir.

4 Q. It is not intended to be an exception from the
5 pressure limitations in the current rules?

6 A. Right.

7 Q. If we get a Dakota zone that has a higher
8 pressure than the original bottomhole pressure in the
9 Pictured Cliff reservoir, if that's to be the commingled
10 zone, then obviously you can't commingle unless you get
11 special relief?

12 A. That's correct.

13 Q. Let's talk about the allocation formulas. Let's
14 start with the issue of Merrion and Burlington each dealing
15 with a particular type of reservoir substance, one has got
16 an oil component in the reservoir, and you may qualify it
17 with gas.

18 How are you going to handle the allocations, and
19 what will you do?

20 A. In our informal discussions with Merrion, what
21 we've determined is that if we had two reservoirs producing
22 similar streams, like a gas combination or an oil-oil
23 combination, but not gas-oil, we'll go with what we've
24 historically done, which is a fixed percentage method,
25 which we've established with the NMOCD in Aztec and with

1 the BLM.

2 If we have mixed streams where we have oil and
3 gas produced together, what we've discussed with Merrion
4 and what we anticipate doing is going to a BTU-adjusted
5 fixed rate percentage. And in that instance what we would
6 do is take the common BTU value of the combined streams,
7 and we have known values for the separate streams, and
8 through a calculation figure out what percentage is coming
9 from one formation and the other.

10 And we do the same thing with gravities for oil,
11 so that we get a fair representation of each formation and
12 the optimum revenue from each stream, based on these
13 things.

14 Q. In all instances, will the commingled production
15 have a value equal to or greater than the value of the
16 separate production?

17 A. Yes, sir.

18 Q. Yeah, you --

19 A. You can't --

20 Q. We're not permitted to commingle zones --

21 A. Right.

22 Q. -- in such a way that we result in an ultimate
23 commingled product that's worth less than if you had
24 produced them separately?

25 A. That's correct.

1 Q. And so this is not going to cause that to occur?

2 A. No, sir.

3 Q. Let's look at the illustrations of the allocation
4 methods for the Examiner so that he can now see
5 specifically the methodology you're proposing for optional
6 methods of allocating production within the Canyon Largo
7 unit.

8 If you'll turn to Exhibit Tab 9, let's look at
9 the first display.

10 A. Basically here we've just documented very simply
11 the two different methods that I just mentioned.

12 The first one is performance fixed percentage for
13 similar streams, and it's just based on past historical
14 performance of an existing formation that we're commingling
15 with another one. Or if it's a new drill and both
16 formations are -- you know, new completions, the production
17 tests that we've established with the NMOCD and the BLM as
18 being acceptable.

19 The next method would be the BTU adjusted, for
20 the mixed streams. And we just went through a simple
21 calculation there where we just showed an average -- our
22 initial rate of 100 MCF a day and a BTU content of 1245,
23 and just setting that up with the known values for both the
24 Dakota and the Gallup, which are our example formations, we
25 come out with a 44-percent allocation to the Dakota and 56

1 to Gallup, based on BTU content.

2 And that should accurately represent the
3 contributions from each reservoir.

4 Q. Okay. The Division has expressed recent concern
5 that some of the administrative applications being filed
6 were not sufficiently complete so that the application
7 could be reviewed without a lot of research by the Division
8 to go and look up supporting information.

9 The concern was expressed that the use of the
10 reference case had been misunderstood, whereby the
11 applicants were using the reference case and not giving
12 sufficient supporting documentation.

13 A. Right.

14 Q. When you file these for your unit, will you
15 provide the necessary documentation to justify the
16 allocation formula so the Division doesn't have to do your
17 research, and so they can look at the Application as a
18 stand-alone application?

19 A. Yes, we will.

20 Q. If they desire to have more information, they
21 could look at this reference to this transcript, and if
22 that's not enough then they certainly can call you or ask
23 you for more information?

24 A. Yes.

25 Q. Let's turn, then, to this second page and see the

1 last part of your discussion with regards to the BTU
2 content. Set this up. What are we looking at?

3 A. Basically, this is just an illustration of the
4 consistency and constancy, I guess, of the BTU content of
5 the different flow streams. It's 1988 to 1996, and we just
6 pulled BTU analysis from those years and made this graph.

7 It shows over a period of eight years, basically,
8 the BTU content has remained very constant.

9 BTU content is another thing that's very easy to
10 go do a check on. We have to because we sell gas based on
11 BTU content to get our price, and so therefore this is
12 going to be that will be constantly updated.

13 Q. Give us a summary from your perspective, Ms.
14 Easley, of what the advantage is in the unit of engaging in
15 a development plan that uses commingling as a major
16 strategy for extracting those resources from the units

17 A. Sorry, repeat the question, please.

18 Q. Yes, ma'am. Give us your engineering summary of
19 the advantages you see in having the Division approve this
20 Application.

21 A. Based on what we've seen in this unit, the
22 formations, all six that we've mentioned here today, are
23 marginally economic as a stand-alone or a dual. In order
24 to access all the reserves in the unit and produce them in
25 a prudent matter, we do need to be able to commingle these

1 zones to get maximum economic impact.

2 MR. KELLAHIN: That concludes my examination of
3 Ms. Easley.

4 We move the introduction of her Exhibits 7 and 8.

5 EXAMINER CATANACH: Exhibits 7 and 8 will be
6 admitted as evidence.

7 EXAMINATION

8 BY EXAMINER CATANACH:

9 Q. Ms. Easley, I have not seen the BTU allocation
10 before now. Is it something that you would just -- would
11 you use this in conjunction with some other data, some
12 other production history or testing data, or just simply
13 this formula here?

14 A. What we plan to do is that on new drills, for
15 instance, we are required to do the production tests that
16 we've established, and so we would use that production
17 test, and what it tells us in conjunction with the BTU-
18 adjusted fixed percentage to make sure that they check each
19 other. There's an obvious difference between the two,
20 there would be reason for us to look at it further before
21 we submit an allocation formula.

22 Q. Okay, so you will use other data besides this?

23 A. Yes, sir.

24 Q. Okay. Your initial producing rates and your EURS
25 were all calculated from existing wells within the unit?

1 A. Yes, sir.

2 Q. I'm lost. Where is that at?

3 A. That spreadsheet?

4 Q. Yeah.

5 A. It's right behind Exhibit 8, first page behind
6 Exhibit 8.

7 Q. Here it is.

8 So for example, you've taken all the Pictured
9 Cliffs wells within the unit, and you've averaged their
10 initial producing rate and EURs to come up with these
11 numbers?

12 A. Yes, sir.

13 Q. Okay. Where you don't have a lot of data, how
14 confident are you in these numbers?

15 A. Well, obviously if we don't have a lot of data,
16 then there's always the potential that we'll find something
17 different.

18 And then some of the more risky Dakota wells that
19 we've drilled in the last year looking for that lower
20 Dakota, we have encountered higher pressures than the
21 current ones that are listed here. In that case, obviously
22 we wouldn't be able to commingle those if they're higher
23 than the other formations.

24 So there will be exceptions to these without a
25 doubt, especially if the less developed formations like the

1 Mesaverde and the Dakota and the north part of the unit in
2 the Gallup.

3 Q. In those -- In the Dakota tests that you were
4 talking about, did you encounter higher initial producing
5 rates?

6 A. In one well, out of 11 or 15 that we've completed
7 recently in the last few years, and it did have a much
8 higher rate and much higher EUR. It was the exception,
9 though.

10 The other wells were -- fell into this average.
11 And actually, that well was the lower Dakota that we're
12 looking for.

13 Q. As far as the other formations are concerned, do
14 you feel like the numbers that you would get in
15 subsequently recompleted wells are similar to those you
16 have listed here?

17 A. Yes, sir.

18 Q. They're not going to vary much?

19 A. No, sir.

20 Q. As far as the pressure data that you supply on
21 the applications, you're not going to simply provide the
22 pressure data that you've got listed here. You're going
23 to -- Say you've got a recompletion.

24 Are you -- You're actually going to supply the
25 pressure you encountered when you recomplete the well?

1 A. Yes, sir.

2 Q. Do you feel like the pressure that you've got
3 listed here is going to be pretty much representative of
4 what you might encounter in subsequent wells?

5 A. Yes, sir.

6 Q. Except for the Dakota you listed?

7 A. Yes.

8 Q. On all your curves where you've got the -- that
9 we talked about, in the commingled situations is that --
10 That's not just two zones, that could be two or more zones
11 commingled?

12 A. Yes, sir, that's correct.

13 Q. You're just relying on the EUR, on the initial
14 rates?

15 A. Right.

16 Q. Okay. In a practical sense, what do you see as
17 the potential for, say, commingled situations, like -- Do
18 you see potential for three zones to be commingled?

19 A. Yes, sir, and just north of here, just north of
20 the unit we have done that with the Mesaverde and the
21 Gallup and the Dakota.

22 Q. Is that typically what you would do?

23 A. Yes, sir. At least two, but possibly three.

24 A. Okay. On your Dakota-Gallup well costs, is it my
25 understanding that if you've got a -- say a Dakota-Gallup

1 commingled completion, that that's going to cost you 364
2 times two?

3 A. Times two, on average, in the past, yes, sir.

4 Q. Have you got an estimate of maybe how many
5 wellbores within this unit are going to be ultimately
6 commingled? Any ideas?

7 A. Off the top of my head -- there's probably -- I
8 can think of at least ten that we have dualled right now,
9 that we would want to commingle. Some of those pressures
10 might be a restriction, but ten now.

11 Future drills, we would commingle as many as we
12 possibly could.

13 Q. Some of the duals that you have right now, are
14 those uneconomic as duals?

15 A. Yes, sir.

16 Q. So you would want to switch over to commingles?

17 A. Yes, sir.

18 Q. What does that do to -- What does that reduce?
19 Operating costs?

20 A. It reduces operating costs, because when you have
21 a dual well, it's treated as two wells, and so you have an
22 LOE charge that hits each well.

23 For instance, on the Dakota-Gallup operating
24 expenses, that is the direct LOE charge, and so 540 a month
25 per side for a dual well.

1 Also in the initial completion, if it's a new
2 drill you have two strings of tubing and a production
3 packer in a dual situation, whereas in a commingle
4 situation you can run one string of tubing.

5 And also with one string of tubing in the hole
6 usually you've improved your lifting efficiencies, and so
7 you'll get more fluids out of the ground at a more
8 efficient rate than you would otherwise.

9 And so all the way around it improves your
10 economics.

11 Q. On the existing wells, though, all you're -- is
12 it all you're reducing is the operating expense?

13 A. As a matter of fact, we feel like we're really
14 hurting on the lifting liquid side, because the duals that
15 we have, have inch-and-a-half tubing on each side and we
16 have a lot of liquids, oil, and so we're not lifting that
17 very efficiently.

18 We also have paraffin problems. We're not able
19 to inject down the back side or along string. And so we
20 have problems with that too.

21 Q. So by commingling, you could, in fact, increase
22 production on those wells?

23 A. Yes, sir.

24 EXAMINER CATANACH: I have nothing further, Mr.
25 Kellahin.

1 MR. KELLAHIN: That completes our presentation,
2 Mr. Examiner.

3 EXAMINER CATANACH: All right, there being
4 nothing further in this case, Case 11,685 will be taken
5 under advisement.

6 (Thereupon, these proceedings were concluded at
7 9:24 a.m.)

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I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 11685
heard by me on January 23 1997.
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 January 24th, 1997.



STEVEN T. BRENNER
 CCR No. 7

My commission expires: October 14, 1998

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