

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 SANTA FE ENERGY)
RESOURCES, INC., FOR SALTWATER DISPOSAL,)
EDDY COUNTY, NEW MEXICO)

CASE NO. 11,848

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS
EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

RECEIVED

September 4th, 1997

SEP 18 1997

Santa Fe, New Mexico
Oil Conservation Division

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, September 4th, 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.

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I N D E X

September 4th, 1997
 Examiner Hearing
 CASE NO. 11,848

	PAGE
EXHIBITS	3
APPEARANCES	3
APPLICANT'S WITNESSES:	
<u>DON ROGERS</u> (Engineer)	
Direct Examination by Mr. Bruce	5
Examination by Examiner Catanach	11
<u>JOHN HUMPHREY</u> (Geologist)	
Direct Examination by Mr. Bruce	15
<u>PETER J. SCHRENKEL</u> (Product Manager, Downhole Dewatering Systems, Reda Pump Company)	
Direct Examination by Mr. Bruce	19
Examination by Examiner Catanach	19
REPORTER'S CERTIFICATE	27

* * *

E X H I B I T S

Applicant's	Identified	Admitted
Exhibit 1	6	11
Exhibit 2	7	11
Exhibit 3	8	11
Exhibit 4	9	11
Exhibit 5	11	11
Exhibit 6	17	18
Exhibit 7	17	18

* * *

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 11:20 a.m.:

3
4
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6
7 EXAMINER CATANACH: At this time I'll call Case
8 11,848, which is the Application of Santa Fe Energy
9 Resources, Inc., for saltwater disposal, Eddy County, New
10 Mexico.

11 Call for appearances.

12 MR. BRUCE: Mr. Examiner, Jim Bruce from Santa
13 Fe, representing the Applicant.

14 I have three witnesses to be sworn.

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

18 We'd like to enter an appearance in this case for
19 Yates Petroleum Corporation.

20 EXAMINER CATANACH: Any additional appearances?

21 Do you have any witnesses, Mr. Carr?

22 MR. CARR: No, I do not.

23 EXAMINER CATANACH: Okay. Will the three
24 witnesses please stand to be sworn in?

25 (Thereupon, the witnesses were sworn.)

1 DON ROGERS,

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

4 DIRECT EXAMINATION

5 BY MR. BRUCE:

6 Q. Would you please state your name and city of
7 residence for the record?

8 A. Don Rogers, Midland, Texas.

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

10 A. I work for Santa Fe Energy Resources, and I am a
11 petroleum engineer and project manager for Indian Basin.

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

14 A. Yes, I have.

15 Q. And were your credentials as an expert accepted
16 as a matter of record?

17 A. Yes, they were.

18 Q. And are you familiar with the Application today?

19 A. Yes.

20 MR. BRUCE: Mr. Examiner, I'd tender Mr. Rogers
21 as an expert petroleum engineer.

22 EXAMINER CATANACH: He is so qualified.

23 Q. (By Mr. Bruce) Briefly, Mr. Rogers, what is it
24 that Santa Fe seeks in this case?

25 A. Santa Fe wishes to deepen the Jones Canyon "4"

1 Number 2 to the Devonian. We propose to complete the well
2 in the Cisco/Canyon formation, install a downhole separator
3 system to produce oil and gas and water from the
4 Cisco/Canyon, separate the bulk of the water and reinject
5 it into the Devonian, or inject it into the Devonian.

6 Q. Okay. Let's briefly go over the injection
7 operations. What is Exhibit 1, Mr. Rogers?

8 A. Exhibit 1 is the Form C-108.

9 Q. And you prepared this?

10 A. That's correct.

11 Q. Would you give us just a brief summary of the
12 injection operations, the amount injected, the pressures,
13 et cetera?

14 A. Okay. We anticipate producing approximately 400
15 barrels of oil a day from the well and about 5500 barrels
16 of water a day, based on some offset production
17 performance. So we would expect the bulk of that water,
18 that 5500 barrels a day, to be injected into the Devonian.

19 Q. And what about the surface injection pressures?

20 A. We expect the surface injection pressure would be
21 no more than 1000 p.s.i., and under the existing rules I
22 believe at .2 p.s.i. per foot it would be about 2120 p.s.i.

23 Q. That would be the maximum?

24 A. At the maximum.

25 Q. And you're below that level.

1 A. That's correct.

2 Q. Okay. Now, these are fairly large amounts you're
3 talking about injecting. Based on what you've seen in your
4 experience, what can -- what amounts could be injected into
5 the Devonian?

6 A. We've seen Devonian wells take as much as 10,000
7 to 15,000 barrels a day.

8 Q. And so you don't anticipate any problem --

9 A. No.

10 Q. -- with these injection rates?

11 The last page of your C-108 is the area-of-review
12 map. Are there any other wells -- or are there any wells
13 within the area of review which penetrate the Devonian?

14 A. No.

15 Q. And we have a geologist who will discuss this a
16 little bit further?

17 A. That's correct.

18 Q. Could you move on to Exhibit 2 and identify that
19 and discuss what it shows?

20 A. Okay, this is a wellbore diagram of our proposed
21 Jones Canyon well, and what we propose to do here is go
22 ahead and deepen that Fed well down to about 11,300 to
23 11,400. We would set a 4-1/2-inch liner in there, and then
24 we would run this downhole separator unit, which is a -- in
25 this case, is a rented AQWANOT unit.

1 And this is just a schematic of how that unit
2 works and what it looks like. Basically on top you have a
3 production pump which pumps fluid to the surface, the motor
4 below that. And then your injection pump actually takes
5 all of your fluid and sends it through this hydrocycling
6 unit at the bottom where the oil and gas is separated -- I
7 mean the oil and water is separated. The water is disposed
8 of downhole, the oil is transferred up to the production
9 pump through the transfer tube and then produced at the
10 surface.

11 Q. Okay. Now, you've mentioned some of these
12 production rates and water rates. Referring to Exhibits --
13 Why don't we just refer to them together, Exhibits 3 and 4,
14 and --

15 A. Okay.

16 Q. -- discuss what wells they involve and what you
17 expect when you install your system.

18 A. Okay. Exhibit 3 is the Jones Canyon "4" 1. This
19 is the offset to the "4" 2. It's probably 1000 feet to the
20 southwest of this Number 2 well, I would say. And you can
21 see by the graph -- It shows our gas rate. These are daily
22 rates, by the way. Gas rate, oil rate, water rate and our
23 producing bottomhole pressure, and that is actually our
24 pump intake pressure on our submersible pump.

25 And you can see that at least since, say, January

1 of 1995, we've had no significant drop in the bottomhole
2 pressure, the producing bottomhole pressure, and that
3 really corresponds with a dramatic decline in our oil and
4 gas rates.

5 And so we feel like that if we can increase that
6 withdrawal rate significantly, that we could increase our
7 production rate significantly.

8 Q. Okay.

9 A. And then Exhibit 4 is a well a little bit further
10 to the southwest, the Old Ranch Knoll "8" 2, and this is a
11 well that we were successful in increasing the withdrawal
12 rate significantly.

13 And if you look at the pressure responses between
14 April of 1996 down to about January of 1997, you can see
15 that we dropped our producing bottomhole pressure
16 significantly there, and that corresponded to a dramatic
17 increase in our oil and gas rates.

18 And so we're hoping that -- you know, if this
19 Application is successful, that we'll be able to see
20 similar rate increases, not only in our Number 2 well, but
21 possibly even in our Number 1 well.

22 Q. And the Jones Canyon "4" Number 1 well did
23 produce at rates of about 400 barrels of oil per day during
24 original time periods.

25 A. That's correct. That's correct. And right now

1 the 3200 barrels a day that we're producing of total fluid
2 is the physical limitation of the submersible pump. In
3 other words, we can't put a bigger submersible pump in the
4 existing casing.

5 Q. Are there any sources of fresh water in this
6 area?

7 A. No.

8 Q. And did you verify that with the State Engineer?

9 A. Yes, I did.

10 Q. Are there any open faults or other connections
11 between the disposal zone and any drinking water sources in
12 this area?

13 A. Not that we're aware of.

14 Q. What about compatibility between the injection
15 water and the formation water? What can you say about
16 that?

17 A. Well, we don't have any samples of Devonian
18 Montoya water, but the Devonian is used widely in this area
19 for disposal of Cisco/Canyon water.

20 Q. And several companies, Marathon and others, do
21 dispose of Indian Basin or Dagger Draw water into the
22 Devonian?

23 A. That's correct.

24 Q. Was notice of this Application given to the
25 offset operator and to the surface owners required by Form

1 C-108?

2 A. Yes, it was.

3 Q. And is Exhibit 5 my affidavit of notice?

4 A. Yes, it is.

5 Q. In your opinion, is the granting of this
6 Application in the interests of conservation and the
7 prevention of waste?

8 A. Yes.

9 Q. And were Exhibits 1 through 5 prepared by you,
10 under your direction or compiled from company business
11 records?

12 A. Yes, they were.

13 MR. BRUCE: Mr. Examiner, I'd move the admission
14 of Santa Fe Exhibits 1 through 5.

15 EXAMINER CATANACH: Exhibits 1 through 5 will be
16 admitted as evidence.

17 EXAMINATION

18 BY EXAMINER CATANACH:

19 Q. Mr. Rogers, has your company previously utilized
20 one of these?

21 A. No. In fact, I think in the United States only
22 one other unit like this has been run.

23 MR. BRUCE: Mr. Examiner, Mr. Rogers can answer
24 some of these questions. I also have sworn in, although he
25 need not testify, a representative of the company that

1 developed this system, if you have any specific questions.

2 Q. (By Examiner Catanach) The other Application is
3 where? Do you know?

4 A. Rangely. Rangely field in Colorado, western
5 Colorado.

6 Q. Do you have knowledge about how it's performing
7 in that application?

8 A. No, I do not.

9 Q. What's -- Is it run on just normal, regular
10 tubing?

11 A. Yes, it's very similar to a typical submersible
12 pump except you have this hydrocycling unit attached to the
13 bottom, which directs the separated water to the injection
14 zone in the well.

15 Q. Is there a limitation on the volume that this
16 mechanism will handle, this apparatus?

17 A. Well, in our case, the limitation will be
18 approximately 6000 barrels of total fluid a day, which
19 would effectively double our current capacity. And because
20 you're not having to lift that fluid to the surface, you
21 can do that with approximately the same horsepower,
22 electrical horsepower.

23 Q. What caused that declining bottomhole pressure in
24 that Number 2 well? Is it just --

25 A. Well, you're just declining -- that's declining

1 producing pressure, so that's not necessarily indicative of
2 the bottomhole pressure. But it is the producing
3 bottomhole pressure.

4 And I think -- Well, we just increased our rate
5 from 1800 barrels a day up to about 2500 barrels a day, and
6 -- But you can see that in January of 1997 that pressure
7 decline has basically stopped, and we're stabilized there
8 at about 800 or 900 pounds, or about 900 pounds. And from
9 that point forward you can see that the production has
10 started to decline again.

11 Q. Is this an existing well we're talking about?

12 A. The Jones "4" 2?

13 Q. Yeah.

14 A. Yes, it is. In fact, we drilled the well in
15 February of 1996, but we were unable to complete the well
16 because of our facilities limitations. The Jones "4" 1 and
17 wells further up on our system produce so much more water
18 than we expected that they overloaded our system to the
19 point that we couldn't complete the well.

20 And this is one way that we think we can get
21 around that. If we don't have to bring so much fluid to
22 the surface we can add more wells into the system.

23 Q. So this well hasn't produced at all?

24 A. No.

25 Q. Has it been tested?

1 A. No.

2 Q. How did you determine the potential production
3 from this well, the 400 barrels of oil per day?

4 A. Well, the 400 barrels of oil per day is just what
5 we saw in the Jones Canyon "4" 1. It produced at rates
6 over 400 barrels a day initially and declined rapidly from
7 there. But we believe that we could nearly double the
8 water rates in this thing. We haven't seen any pressure
9 decline, significant decline, in the "4" 1, even though
10 we've produced a tremendous amount of water out of the
11 well.

12 Q. Okay. If you had to complete this well
13 conventionally, would you have the same limitations as the
14 other well, the 3200 barrels --

15 A. Yes, we would.

16 Q. If you had that limitation, what do you
17 anticipate the oil production would be in this well?

18 A. I would anticipate something similar to what the
19 Number 1 well is making now. In other words, somewhere
20 between 100 and 200 barrels a day.

21 Of course, the 5000 barrels a day of water that
22 you're injecting you'd have to pay disposal on too, so it
23 would be a great savings and increase the productive life
24 of the well as well.

25 Q. Will there be any way to test this casing to see

1 if it had mechanical integrity?

2 A. Which casing?

3 A. Well, I'm not sure, the liner. I guess the
4 liner.

5 Q. Well, the liner will be tested, and of course
6 we'll circulate cement with the liner and test it. Of
7 course, the production casing is new. It's never been
8 perforated.

9 Q. Would that Devonian necessarily -- would it take
10 it on a vacuum in this area?

11 A. It does, based on surface pressures, it normally
12 takes it on a vacuum. So it's generally underpressured.

13 Q. Do you know what the efficiency of that
14 separation unit is?

15 A. No, I don't, but the --

16 EXAMINER CATANACH: Okay. I guess that's all I
17 have at this point.

18 JOHN HUMPHREY,

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

21 DIRECT EXAMINATION

22 BY MR. BRUCE:

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

24 A. John Humphrey.

25 Q. And where do you reside?

1 A. Midland, Texas.

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

3 A. I'm a senior geologist with Santa Fe Energy
4 Resources.

5 Q. Have you previously testified before the
6 Division?

7 A. No, I have not.

8 Q. Would you please outline your educational and
9 employment background?

10 A. I received my bachelor of science in geology from
11 the University of Texas Permian Basin in 1983 and my master
12 of science in geology from Texas Tech University in 1985.

13 I was employed as a geologist from 1985 to 1992
14 by Sun Exploration and Production Company, which later
15 became Oryx Energy. From 1992 to May of 1997 I was
16 employed by the Eastern Group, a gas company based in
17 Alexandria, Virginia. As of May, 1997, I took a position
18 with Santa Fe Energy Resources as a senior geologist.

19 Q. Does your area of responsibility at Santa Fe
20 include this area of southeast New Mexico?

21 A. Yes, it does.

22 Q. And are you familiar with the geological matters
23 pertaining to this Application?

24 A. Yes, I am.

25 MR. BRUCE: Mr. Examiner, I would tender Mr.

1 Humphrey as an expert petroleum geologist.

2 EXAMINER CATANACH: He is so qualified.

3 Q. (By Mr. Bruce) Mr. Humphrey, would you identify
4 Exhibit 6 and describe its contents for the Examiner?

5 A. Exhibit 6 is a structure map of the top of the --
6 subsea structure map of the top of the Devonian. There are
7 only three wells within this 1-to-4000 map area that
8 penetrated the Devonian, so you don't have a lot of control
9 here, but the control points are indicated in red on the
10 map.

11 And this also shows cross-section A-A', which
12 will be Exhibit 7, which we'll discuss in a minute.

13 The only well of the three control points that's
14 currently disposing into the Devonian is the Marathon
15 Indian Basin Water Disposal Unit 1 in Section 23, 21 South,
16 23 East. And the other two wells were either plugged or
17 produced out of other intervals, and the Devonian was not
18 tested.

19 Q. Okay, but the Devonian isn't productive in this
20 area?

21 A. No, it is not.

22 Q. Would you move on to Exhibit 7 and describe what
23 that shows?

24 A. Exhibit 7 is a stratigraphic cross-section hung
25 on top of the Woodford shale, which is the interval above

1 the Devonian. Basically all I'm trying to illustrate here
2 is that there is sufficient porosity development in the
3 Devonian to take the quantities of water which Santa Fe
4 intends to inject into the Jones Canyon "4" Fed 2.

5 You can see on the dry hole to the southeast, you
6 have a maximum of 18-percent porosity in the Devonian. And
7 the well to the northwest of the Jones Canyon "4" Fed 2,
8 you have upwards of 24-percent porosity. And Marathon did
9 not log the Devonian after they deepened it.

10 Q. Okay. So from a geologic standpoint, you don't
11 see any problem injecting water into the Devonian
12 formation?

13 A. Not at all.

14 Q. Were Exhibits 6 and 7 prepared by you or under
15 your direction?

16 A. Yes, they were.

17 Q. And in your opinion is the granting of Santa Fe's
18 Application in the interests of conservation and the
19 prevention of waste?

20 A. I believe it is.

21 MR. BRUCE: Mr. Examiner, I'd move the admission
22 of Santa Fe's Exhibits 6 and 7.

23 EXAMINER CATANACH: Exhibits 6 and 7 will be
24 admitted as evidence.

25 I have no questions of this witness.

1 MR. BRUCE: That's all I have, unless you have
2 specific questions of the company representative.

3 EXAMINER CATANACH: Let's do that.

4 PETER J. SCHRENKEL,
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. BRUCE:

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

10 A. Peter Jack Schrenkel.

11 Q. And who do you work for?

12 A. Reda Pump Company. It's a division of Camco.

13 Q. And what is your job with that company?

14 A. I'm the product manager for the downhole
15 dewatering systems.

16 Q. And you're familiar with this pump that Santa Fe
17 proposes to use in this well?

18 A. Yes, sir, I am.

19 MR. BRUCE: Mr. Examiner, I would just pass the
20 witness on to you for any particular questions you may
21 have.

22 EXAMINATION

23 BY EXAMINER CATANACH:

24 Q. Okay. The previous witness had mentioned
25 something about another application in Colorado. Are you

1 familiar with that?

2 A. Yes, sir.

3 Q. Can you go into that, or is it a similar type
4 situation?

5 A. It is similar. It was installed in Rangely,
6 Colorado. It ran for on the order of seven or eight
7 months, and it was pulled after that period of time.

8 What specifically would you like to know about
9 it?

10 Q. I mean, was it the same type setup in the
11 wellbore --

12 A. Yes.

13 Q. -- production from higher zones?

14 A. The only difference, it was a one-pump system.
15 The system you're looking at here is what we call a two-
16 pump system. The other system didn't have a production
17 pump on top. There is enough energy in the reservoir to
18 cause the oil to be -- well, to flow to surface, basically.

19 Q. Okay. Was it successful?

20 A. It was -- I'd call it a qualified success. We
21 didn't get the rates we anticipated because the injectivity
22 index was much lower than what we had anticipated. But it
23 was successful in separating oil and water.

24 Q. Okay. What can you tell us about the efficiency
25 of that operation?

1 A. Well, generally the efficiency of a hydrocycling
2 package is, the oil and water that goes into the underflow
3 is on the order of 500 p.p.m. And to give you something to
4 compare that with, typical surface separations are probably
5 200 p.p.m. oil carryover into disposal systems.

6 Q. And yours is 500 p.p.m.?

7 A. Yes.

8 Q. Are there other --

9 A. I guess --

10 Q. Go ahead.

11 A. I guess I should add, just for clarity, there is
12 a range involved. It's not exactly 500 p.p.m. all the
13 time. It depends on some other things like the viscosity
14 of the oil, the bottomhole temperature. You know, things
15 like this influence the separation efficiency.

16 Q. Have you taken a look at the oil that's going to
17 be produced from this reservoir and kind of made a
18 judgement on what the range would be in this --

19 A. Yes, it's high-gravity oil, and it's also fairly
20 warm bottomhole temperature. So those conditions should
21 provide excellent separation.

22 Where we've had some problems with this
23 separation is in wells up in Canada that are very cold and
24 have API gravities on the order of 14, 15.

25 Q. Are there other companies making this type of

1 pump at this time?

2 A. There is one other company that is just now
3 getting into the market.

4 Q. So there's only been -- As far as you know,
5 there's only been well that this has actually been tested
6 in?

7 A. Oh, no, we've installed this system in 16 wells
8 around the world, just one in the United States.

9 Q. Okay.

10 A. Most of them have been installed in Canada, we've
11 also installed one in Indonesia, and then we've got one
12 going in next week in Germany.

13 The technology was developed in Canada, and
14 that's the primary reason the utilization -- most of the
15 applications, most of the installations have been in
16 Canada. I would say of the 16 units that have been
17 installed, 13 have been installed in Canada.

18 Q. Does this actually inject -- Would this inject
19 fluid at a pressure?

20 A. Yes, the pump generates the pressure necessary to
21 force it through the separation system, and there is a
22 small pressure drop going through the separator, but, you
23 know, the pump creates the pressure required to overcome
24 the injection pressure into the reservoir.

25 Q. Do you know what the max pressure that pump

1 generates is?

2 A. Well, the system limitation for a two-pump system
3 is, we have a high-pressure seal that sees a maximum
4 differential pressure of about 3500 pounds. Okay? But
5 what the pump is actually generating is a differential
6 pressure.

7 And so it's really a little bit misleading to
8 talk about the absolute pressures that you can inject into,
9 because it depends not only on your reservoir injection
10 pressure but also on the producing pressure that's above
11 it, because what the pump generates is a differential
12 pressure.

13 But, you know -- Well, I guess I really can't
14 clarify it any more than that.

15 Q. Well, have you calculated what pressure -- what
16 injection pressure you might be working at in this well?

17 A. Yes, sir, what we're anticipating for an
18 injection pressure in the Devonian, I believe the number
19 was on the order of 3300 p.s.i. That's what the static
20 pressure would need to be required to get fluid into the
21 formation.

22 And then we'll also have some hydrostatic above
23 the pump from the Canyon. I think the bottomhole pressure
24 in the Canyon, if I remember right, is about 1200 pounds.
25 And so therefore the differential pressure that the pump

1 would have to generate is the difference between the two.

2 So it's going to be on the order of 2600 pounds.

3 Q. So 2600 pounds is going to be the pressure at the
4 -- in the Devonian --

5 A. Yeah --

6 Q. -- at the Devonian?

7 A. No, that's the pressure the pump will have to
8 generate.

9 Q. Okay.

10 A. The pressure in the Devonian will be something,
11 somewhat higher than the anticipated 3300 pounds reservoir
12 pressure.

13 Q. And that unit is sealed so that it can't -- water
14 can't escape into the annulus; is that correct?

15 A. Well, the way the system works, there is a
16 packer. And, you know, the fluid comes into the intake of
17 the pump, and the pump forces it down through the
18 hydrocycloning separator --

19 Q. Uh-huh.

20 A. -- and the oil reject, as it's referred to, comes
21 out of the top of the separation unit, and it's piped
22 around the motor into the upper pump if one is required.
23 And then the clarified water goes on down through the
24 separator and through the packer.

25 So, you know, one of the things that, you know,

1 you have to have in this system is zonal isolation. So
2 you've got to have a functioning packer and also have, you
3 know, good cement behind pipe. And also formations between
4 the producing zone and the injection zone with good
5 integrity.

6 What the annulus will see is the pressure from
7 the producing zone.

8 Q. That won't be in communication with the bottom,
9 with the Devonian perforations?

10 A. No, sir. If it is, the system won't work.

11 Q. Uh-huh. Is there any way to -- There's not a
12 method to determine what volume you're injecting into that
13 Devonian?

14 A. Well, there is metering that is available, and
15 we're planning on running downhole monitoring on this
16 system.

17 What that amounts to is two pressure measurements
18 with a venturi sandwiched between the pressure
19 measurements. And so knowing the differential between the
20 pressures, you can calculate the flow. That has also been
21 successfully installed in Canada.

22 Q. Do you propose to run that on this well?

23 A. Yes.

24 Q. What do you calculate? A daily rate from that?

25 A. Yes, an instantaneous rate.

1 Q. And will you be able to tell at any given time
2 what pressure is being generated for water injection?

3 A. Yes.

4 EXAMINER CATANACH: I have nothing further of
5 this witness, Mr. Bruce.

6 MR. BRUCE: I have nothing further in this case,
7 Mr. Examiner.

8 EXAMINER CATANACH: Mr. Carr, did you have
9 anything?

10 MR. CARR: I do not.

11 EXAMINER CATANACH: Okay.

12 All right, there being nothing further in this
13 case, Case 11,848 will be taken under advisement.

14 (Thereupon, these proceedings were concluded at
15 11:53 a.m.)

16 * * *

17
18 I do hereby certify that the foregoing is
19 a complete record of the proceedings in
20 the Examiner hearing of Case No. 11848
heard by me on September 1997.

21 David R. Catanach, Examiner
22 Oil Conservation Division
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