

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 APPROVAL OF A PILOT)
PROJECT INCLUDING AN EXCEPTION FROM RULE)
2(b) OF THE SPECIAL RULES AND REGULA-)
TIONS FOR THE BLANCO-MESAVERDE GAS POOL)
FOR PURPOSES OF ESTABLISHING A PILOT)
INFILL DRILLING PROGRAM WITHIN ITS SAN)
JUAN 27-5 UNIT WHEREBY UP TO FOUR WELLS)
MAY BE DRILLED ON A STANDARD GAS PRORA-)
TION UNIT TO DETERMINE PROPER WELL DEN-)
SITY AND WELL LOCATION REQUIREMENTS FOR)
MESAVERDE WELLS, RIO ARRIBA COUNTY,)
NEW MEXICO)

CASE NOS. 11,879

APPLICATION OF BURLINGTON RESOURCES OIL)
AND GAS COMPANY FOR APPROVAL OF A PILOT)
PROJECT INCLUDING AN EXCEPTION FROM RULE)
2(b) OF THE SPECIAL RULES AND REGULA-)
TIONS FOR THE BLANCO-MESAVERDE GAS POOL)
TO INSTITUTE A PILOT INFILL DRILLING)
PROGRAM WITHIN A FOUR-SECTION AREA)
INCLUDING SIX UNORTHODOX GAS WELL LOCA-)
TIONS FOR PURPOSES OF ESTABLISHING A)
PROGRAM TO DETERMINE PROPER WELL DENSITY)
AND WELL LOCATION REQUIREMENTS FOR)
MESAVERDE WELLS, SAN JUAN COUNTY,)
NEW MEXICO)

and 11,880

(Consolidated)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner
November 6th, 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, November 6th, 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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November 6th, 1997
 Examiner Hearing
 CASE NOS. 11,879 and 11,880 (Consolidated)

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A P P E A R A N C E S

FOR THE APPLICANT:

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* * *

1 WHEREUPON, the following proceedings were had at
2 10:26 a.m.:

3 EXAMINER CATANACH: Okay, at this time I will
4 call Case 11,879, Application of Burlington Resources Oil
5 and Gas Company for approval of a pilot project including
6 an exception from Rule 2(b) of the special rules and
7 regulations for the Blanco-Mesaverde Gas Pool for purposes
8 of establishing a pilot infill drilling program within its
9 San Juan 27-5 Unit whereby up to four wells may be drilled
10 on a standard gas proration unit to determine proper well
11 density and well-location requirements for Mesaverde wells,
12 Rio Arriba County, New Mexico.

13 Call for appearances in this case.

14 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of
15 the Santa Fe law firm of Kellahin and Kellahin, appearing
16 on behalf of the Applicant.

17 At this time, Mr. Examiner, we would request your
18 permission, for presentation of the evidence, to have you
19 call Case 11,880.

20 EXAMINER CATANACH: At this time I'll call Case
21 11,880, which is the Application of Burlington Resources
22 Oil and Gas Company for approval of a pilot project,
23 including an exception from Rule 2(b) of the special rules
24 and regulations for the Blanco-Mesaverde Gas Pool to
25 institute a pilot infill drilling program within a four-

1 section are including six unorthodox gas well locations for
2 purposes of establishing a program to determine proper well
3 density and well location requirements for Mesaverde wells,
4 San Juan County, New Mexico.

5 At this time I will call for additional
6 appearances in these cases.

7 No additional appearances.

8 MR. KELLAHIN: Mr. Examiner, I have three
9 witnesses to be sworn.

10 EXAMINER CATANACH: Will the witnesses please
11 stand to be sworn in at this time?

12 (Thereupon, the witnesses were sworn.)

13 MR. KELLAHIN: Mr. Examiner, Burlington Resources
14 is examining the feasibility of the well density in the
15 Blanco-Mesaverde Pool. As you know, we currently have 320-
16 acre gas spacing in that pool with an optional second well.

17 Burlington is continuing to engage in pilot
18 projects in various portions of the pool to develop
19 geologic and reservoir engineering data to determine
20 whether or not there are remaining gas reserves to be
21 recovered in each of those spacing units which are not
22 currently being recoverable by that spacing pattern we now
23 have.

24 Back in October of 1996 you heard the first of
25 three pilot project areas. You heard at that time the

1 presentation for the San Juan 29-and-7 unit. That was Case
2 11,625.

3 It was Division Order R-10,720. I have a copy of
4 that order here for you, because it forms an outline by
5 which we'll ask you to examine the second two projects we
6 have.

7 The second project that is on the docket today is
8 the project that deals with the 27-and-5 unit. The 27-and-
9 5 unit is in the southern portion of the pool.

10 The third and final pilot project area is what we
11 call the drillblock project. It is called that because
12 it's not contained within a unit. It is in the
13 northwestern portion of the pool.

14 The reason it's not in a unit is, there are no
15 units in that area in which to test the pilot project. We
16 had to find a four-section area in which we substantially
17 controlled the working interest where there were few other
18 interest owners, where there were few correlative-rights
19 issues, and Mr. Alexander and the other employees of
20 Burlington have found such an area, and they have chosen
21 that as a suitable one to provide the third test area for
22 the pilot project.

23 If you'll approve these other two for us, at
24 the -- other two projects for us, at the conclusion of the
25 test of all three we believe we'll have sufficient

1 information to come back to the Division and propose to you
2 increasing the density for the entire pool.

3 My proposal, Mr. Examiner, is that we would start
4 with the 27-and-5 case, which is the Exhibit Book 11,879,
5 and then after we go through parts of that we will pick up
6 Case 11,880, which is the drillblock exhibit book. Mr.
7 Alexander and I will go through each of those two books
8 separately to satisfy you about the ownership and the
9 correlative rights issues.

10 Thereafter, the geologic witness and I will go
11 through each exhibit book concurrently so that we can make
12 a direct comparison of each geologic component between the
13 two areas.

14 We will set the stage geologically for you by
15 having Mr. Babcock, who is the geologic expert that
16 testified before you back in October of 1996, give you a
17 summary of the results of the effort in 29 and 7, which was
18 the unit you approved this project for back in October of
19 1996.

20 Finally, we will present an engineering witness
21 who will go through with you, Mr. McNeil, and compare,
22 then, what he has done from the engineering discipline.

23 And at the conclusion we'll ask you to approve
24 both of these projects.

25 My first witness is Mr. Alexander.

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ALAN ALEXANDER,

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

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

A. Yes, my name is Alan Alexander.

Q. On prior occasions have you testified before the Division as a petroleum landman?

A. Yes, sir, I have.

Q. As part of your duties and responsibilities, have you made yourself informed about the ownership of both the 27-5 unit and what we've called the drillblock project?

A. Yes, sir, I have.

Q. In addition, have you been responsible for providing notification of this hearing to all the interest owners involved in each project?

A. I did.

MR. KELLAHIN: We tender Mr. Alexander as an expert witness.

EXAMINER CATANACH: He is so qualified.

Q. (By Mr. Kellahin) Mr. Alexander, let's take a moment, sir, and I'm going to ask you to look at Exhibit Book 11,879. Turn behind Exhibit 1, and let's start with

1 Exhibit 2. Identify and describe for us what we're seeing
2 on this display.

3 A. Behind Exhibit Number 2 we have an area plat that
4 shows the original project 29 and 7. It's approximately in
5 the center of the Basin.

6 Q. How is that identified?

7 A. It's identified in red. It's a red solid field,
8 and it says 29-and-7 unit.

9 We also have -- are showing on there the two
10 additional pilot projects. The one to the southeast would
11 be the 27-and-5 unit, again, filled in red. And to the
12 northwest we have the drill- -- what we call the drillblock
13 area pilot project.

14 You can see those projects in relationship to the
15 other federal units which are in green, and also in
16 relationship to the Pictured Cliffs outcrop for the San
17 Juan Basin definition.

18 Q. Let's turn behind that display and look at the
19 next display. What are you illustrating here?

20 A. This display is a plat showing the San Juan 27-5
21 federal unit, and it shows all of the existing production
22 in that unit, and the production code is displayed at the
23 bottom of the plat.

24 Q. Describe for us how production from the Mesaverde
25 formation is allocated back to the interest owners under

1 this unit concept.

2 A. Well, if we would flip to the next exhibit, I'm
3 showing there a plat again of the 27-and-5 unit, but this
4 time I'm only showing the wells -- the Mesaverde wells in
5 that unit.

6 And all of the unit area is currently
7 participating in the Mesaverde participating area, and that
8 participating area was last expanded, fully expanded, back
9 in 1981.

10 Q. Let me see if I understand how that works. If I
11 am an owner entitled to receive Mesaverde production, and
12 my ownership is confined to Section 28, will I participate
13 in Mesaverde production if the well is located in Section
14 9?

15 A. Yes, sir, you would.

16 Q. On what basis will I do that?

17 A. You would participate on an acreage basis, the
18 total amount of acreage that you have in the unit, as
19 compared to the total amount of acreage in the
20 participating area.

21 Q. So regardless of where the Mesaverde well is
22 drilled in the unit, I will share in that production based
23 upon my percentage in the unit?

24 A. That's correct.

25 Q. Identify on this display what the significance is

1 of the green dots.

2 A. The green dots, I've indicated where we intend to
3 drill the first pilot wells within the 27 and 7 unit.

4 Q. There are seven initial infill -- increased
5 density wells in the unit that are proposed?

6 A. There are eight of them.

7 Q. Eight of them.

8 A. Yes, sir.

9 Q. What's the significance of the boundary just
10 inside the outer dimensions of the unit that's in the blue-
11 hatched mark?

12 A. That is a boundary that we are proposing as a
13 buffer zone because we are asking the Division to give us
14 approval for a pilot project, including all of the unit
15 area, not just limited to these eight initial increased
16 density wells. And that buffer is a half-mile buffer, and
17 that would protect the correlative rights of any of the
18 offsetting owners outside of the San Juan 27-and-5 unit, in
19 our opinion.

20 Q. Let's go back to Exhibit Tab 1 and talk about
21 notification. Have you had notification made?

22 A. Yes, sir. Immediately behind Exhibit Tab Number
23 1 you'll see our certificate of mailing whereby we
24 furnished all of the parties, including royalties and
25 overriding royalty owners, with a certified copy of the

1 Application and a subsequent letter that I will also talk
2 about.

3 Behind that certified mailing is a copy of the
4 Application.

5 Q. They received the actual Application itself?

6 A. Yes, sir.

7 Q. And the Application itself details specifically
8 what Burlington is proposing to do?

9 A. It does.

10 Q. Okay, it goes so far as to describe the footage
11 setbacks and the various components of your Application?

12 A. It does.

13 Q. After the Application itself, you have provided
14 the affected parties with a plat of the unit, have you not?

15 A. Correct.

16 Q. And then beyond that are the actual wells in the
17 unit?

18 A. The actual Mesaverde wells --

19 Q. Yes, sir.

20 A. -- that's correct.

21 Q. And beyond that, what then do we find?

22 A. Beyond that we find the list, copies of -- Well,
23 we find a list of the royalties and overriding royalties
24 and working interest owners that are in the 27-5 unit.

25 And then immediately behind that you will see

1 copies of the certified mailings that we have provided.

2 Q. That notification went to the working interest
3 owners, the royalty interest owners and the overriding
4 royalty interest owners within the entire unit that were
5 entitled to share in Mesaverde production?

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

7 Q. Just after this mailing -- and I apologize for
8 not tabbing it for you, Mr. Examiner, but about halfway
9 through the Exhibit Tab 1, there's a letter dated October
10 1st, 1997.

11 Let me direct your attention to that letter, Mr.
12 Alexander, and ask you what was the purpose of that letter?

13 A. Mr. Catanach, I don't know if you found it, but
14 it's right behind the first set of certified mailings. You
15 have to go to the end of those.

16 It is a letter dated October the 1st of 1997. We
17 wanted to additionally advise all of the royalty and
18 overriding royalty owners of our proposed pilot project, so
19 we sent them an additional notification prior to sending
20 them the Application, and to date we have not heard back
21 with any concerns from the royalties or the overriding
22 royalty interest owners in the 27-and-5 unit.

23 Q. As to either mailing?

24 A. That's correct.

25 Q. Okay. Let me ask you to direct your attention to

1 a copy of the order I was describing to Mr. Catanach. It's
2 the Order R-10,720. And let me ask you to look at the
3 first finding there. When Mr. Catanach prepared and had
4 this order issued, he summarized what Burlington was
5 seeking to do with regards to the pool rules.

6 He first identifies what the current rules are
7 for the pool. Is your understanding of these rules
8 consistent with his finding?

9 A. It is.

10 Q. All right. Let's turn and find the next finding.
11 Finding 3, he summarized what you propose to do with this
12 pilot infill drilling program for the 29-and-7 unit. Did
13 he correctly summarize for you what you were proposing in
14 that pilot project area?

15 A. He did.

16 Q. Did he, in fact, approve your request for the 29-
17 and-7 unit as you had requested it?

18 A. Yes, he did.

19 Q. And he authorized you to drill up to an
20 additional four wells per section for the pilot project
21 area; is that not true?

22 A. That is correct.

23 Q. In addition, he provided you some details about
24 well locations and then specifically approved the eight
25 project wells?

1 A. That's correct.

2 Q. As part of that request, did you request any
3 change, modification or other items concerning gas
4 prorationing in this pool?

5 A. No, we did not.

6 Q. And are you maintaining that same request with
7 regards to these other two project areas?

8 A. That's correct. We do not desire any change to
9 the current proration schedules.

10 Q. In terms of well locations within the drill block
11 project and the 27-and-5 project area, what are you
12 proposing for well locations?

13 A. We're proposing -- we haven't identified -- In
14 the prior order for the 29-and-7 unit we had identified
15 some particular seven or eight wells -- eight wells.

16 However, in this request we are asking permission
17 from the Division to simply locate any of the wells in
18 accordance with the setbacks that we're proposing. And
19 that setback would, again, be ten feet from any section,
20 quarter section or quarter-quarter section line, with the
21 understanding that we would not drill any increased density
22 wells within the half-mile buffer surrounding the unit.

23 Q. Now, that concept works for the unit projects,
24 does it not, where you can be that close to a boundary?

25 A. Yes, sir.

1 Q. Have you -- Do you desire to have that
2 flexibility established for the drillblock area?

3 A. No, sir, we do not.

4 Q. Okay. Let's turn to the drillblock case, if
5 you'll find that exhibit book. Again, let's skip past
6 Exhibit 1 and look at the information behind Exhibit Tab
7 Number 2.

8 A. Yes, the information that we have provided behind
9 Exhibit Number 2 contains a letter --

10 Q. I'm sorry, Mr. Alexander, I have not taken you
11 far enough back --

12 A. All right.

13 Q. -- in the exhibit book. Let's -- I've got a
14 better idea. Let's look at Exhibit Tab 2 and look at the
15 last page under that tab. There's a plat. It says,
16 "increase density study area Mesaverde formation" Do you
17 find that?

18 A. Yes, sir.

19 Q. All right. You have scribed an area that
20 contains four sections, correct?

21 A. Correct.

22 Q. Within that area, there's 160 acres out of the
23 corner of each of those sections that consolidated in the
24 center of that project area. Do you see that?

25 A. Yes, sir.

1 Q. Outside of that area, there are some diagonal
2 hatched lines. What does that represent?

3 A. Again, this is the same buffer concept that we
4 were using in the federal units. This is the half-mile
5 setback buffer zone where we're proposing not to drill any
6 increased density wells in order to not impact any of the
7 surrounding sections.

8 Q. The increased density wells, for purposes of the
9 pilot project, are identified how on this display?

10 A. They're identified by solid black dots.

11 Q. Okay. Let's turn now to Exhibit 3 and look at
12 the plat that describes the ownership of the various
13 spacing units within the project, the four sections that
14 are involved in the project.

15 A. Yes, this plat is our offset operator plat, which
16 we did make notification in this instance to offset
17 operators.

18 Q. Let's use this for a different purpose. Let's
19 take a moment --

20 EXAMINER CATANACH: Where are we at?

21 MR. KELLAHIN: We are behind Exhibit Tab 3. It's
22 that first illustration. It says "increase density study
23 area".

24 Q. (By Mr. Kellahin) I realize this was to
25 illustrate notice --

1 A. Yes.

2 Q. -- but let's use it for a different purpose. If
3 you'll start in Section 31, describe for us the orientation
4 of the Mesaverde spacing units in that section.

5 A. The orientation of the Mesaverde spacing units in
6 that section are east half and west half, and I have shown
7 those by a hached pattern.

8 Q. Who operates that section in the Mesaverde?

9 A. Burlington operates Section 31.

10 Q. Within Section 31 there is a black dot. Does
11 that represent one of the increased density pilot project
12 wells?

13 A. Yes, sir, it does.

14 Q. Move down into the southwest corner; we're now in
15 Section 6 of a different township, are we not?

16 A. Correct.

17 Q. Describe for us the orientation of the Mesaverde
18 spacing units in that section.

19 A. That orientation is shown to be a west-half
20 orientation, and with the two black dots showing the
21 increased density wells for that particular proration unit.

22 Q. Who operates the two Mesaverde spacing units in
23 that section?

24 A. Burlington operates that spacing unit also.

25 Q. Okay. When we go over to Section 1 in the

1 southeast quarter of the project area, identify and
2 describe for us the orientation of the Mesaverde spacing
3 units.

4 A. Section 1 shows the orientation of that spacing
5 unit, proration unit, to be north half, and it also shows
6 two increased density wells in that spacing unit also.

7 Q. And who operates that section in the Mesaverde?

8 A. Burlington, again, operates that spacing unit.

9 Q. And the finally Section 36 in the northwest
10 corner of the project, identify and describe how that's
11 configured and who operates what.

12 A. The spacing unit for the Blanco-Mesaverde Pool in
13 Section 36 is a laydown south-half spacing unit, and there
14 is one increased density well to be located in that spacing
15 unit.

16 Q. Okay. Have you -- Who are the operators in 36?

17 A. Great Western Drilling Company is the historical
18 operator of that spacing unit.

19 Q. Have you obtained the agreement of Great Western
20 to utilize the spacing unit in the south half of Section 36
21 for purposes of drilling and operating the infill well
22 within that spacing unit?

23 A. Yes, sir, we met with Great Western and Conoco,
24 Taurus and Davoil, who own interest in that spacing unit,
25 down in Midland, Texas, back on October the 9th or the

1 10th.

2 We reviewed this project with them, they were in
3 agreement that it is a project that we do need to do, and I
4 have currently been circulating the AFE for that well,
5 because we have proposed to them that we drill that well
6 along with the other five wells in the study area so that
7 we can accumulate the data.

8 We have proposed to Great Western that we drill
9 the well and that we operate it for six months in order to
10 gather that data, and they were agreeable with that
11 approach.

12 Q. Now, let's use this display for the purpose you
13 intended. How do you identify the offsetting operators to
14 whom notice was entitled?

15 A. We have shown with squares and numbers who the
16 offset operators are in the offsetting drillblocks, and you
17 will note that there are only two. One of them is
18 Burlington and the other one is Amoco Production Company.

19 Q. Have you received any objection from Amoco for
20 approval of this project?

21 A. No, sir, I have not.

22 Q. Concerning the consolidation of the working
23 interest owners for the drilling of these increased density
24 pilot wells within the project area, what's the status of
25 that voluntary agreement?

1 A. We have decided that we will not form or
2 manipulate any of the units, that all of the units will
3 continue to stand on their own. All production from the
4 increased density will be allocated back to the unit that
5 it's drilled upon.

6 Q. And do you have the agreement of the interest
7 owners to do that?

8 A. Yes, sir, we do.

9 Q. And how will the cost of these wells be
10 apportioned among the interest owners?

11 A. They will -- Again, all of the cost will be borne
12 by the party upon whose drillblock the well is drilled. We
13 will pay for and bear all of the costs except for the one
14 well which is located in Section 36, the Great Western-
15 operated unit. And Great Western and its partners will --
16 and I have sent them the AFEs and have several of them
17 back. We're asking them to bear their share of those well
18 costs.

19 Q. Let's turn to the topic of notification of the
20 interest owners within the project area. Have you
21 tabulated what you believe to be an accurate list of the
22 working interest, royalty and overriding royalty interest
23 owners within the project area?

24 A. Yes, sir, I have.

25 Q. And have you caused notification of this hearing

1 to be sent to those parties?

2 A. Yes, sir. Behind Exhibit Tab Number 1 I have
3 shown our certificate of mailing. And behind that, of
4 course, the mailing consisted of the Application in today's
5 hearing.

6 And again, in another section of the book, we
7 also notified by separate mailing the royalties and the
8 overriding royalty owners in advance of the mailing of the
9 Application.

10 Q. Have you received any objection from any of those
11 parties concerning the approval of this Application?

12 A. No, sir, I have received no objections.

13 Q. Okay. Let's turn to Exhibit Tab 2 and have you
14 identify and explain the first letter contained here, dated
15 October 24th.

16 A. There's a sequence of letters behind this
17 exhibit, the first one being October the 24th, the most
18 recent letter, and it is the letter that we sent to the
19 parties owning the interest in the south half of Section
20 36, which Great Western normally operates.

21 You'll see those parties listed at the top.
22 You'll also see their interest in this particular increased
23 density well in the middle of the letter. And we have
24 enclosed with that our cost estimate and authority for
25 drilling, for them to execute and return to us.

1 Q. Behind that, then, is a summary of -- It says
2 "Completion Procedures" for the well?

3 A. Yes, sir.

4 Q. If you'll turn past that -- there are four pages
5 of completion procedures -- you get to a letter dated
6 September 29th. What's the purpose of this letter?

7 A. This is the letter that we wanted to give advance
8 notice to the royalty and overriding royalty owners in this
9 pilot project. Since we are in a drillblock area, this is
10 different from being in the federal unit where we have
11 other mechanisms to help share the revenue to prevent any
12 correlative-rights violations.

13 And so we wanted them to be aware of the project,
14 and if they had any questions or problems with it at all we
15 wanted to hear from them about it.

16 Q. Did the notification to the royalty and
17 overriding royalty interest owners include the Application,
18 and specifically directing their attention to the
19 unorthodox location of the pilot infill wells?

20 A. It did.

21 Q. Let's go back to Exhibit 3 now, which is our
22 little locator map, and let's talk about your opinions
23 concerning those unorthodox location wells, and whether or
24 not you think there's an opportunity for the violation of
25 correlative rights.

1 A. We looked all over this portion of the Basin
2 where we needed to do a pilot project and it is very
3 difficult to find an area that we -- in fact, it was
4 impossible to find an area that we completely controlled
5 and that had identical ownership in it. So this was our
6 best choice to minimize the impact of any correlative-
7 rights violations.

8 After we chose this area, knowing that we have
9 slightly different royalties and overrides -- For instance,
10 Section 31, Section 6 and Section 1 are federal leaseholds;
11 Section 36 is state leases; and the overrides do vary
12 slightly among all of those drillblocks. This is the best
13 example that we could come up with.

14 So after knowing that we had some differences in
15 ownership, the next thing was to place the well so that we
16 felt that we had some compensating drainage patterns so
17 that nobody would be adversely affected, or that we would
18 minimize the effect of any drainage that would occur
19 between the various spacing units. And that was one of the
20 reasons on why these wells are located where they are.

21 The geologist will go into more detail about the
22 extent of those drainage patterns, and I think it will
23 become even more clear on how this setup, we feel, is a
24 good pilot project area and will minimize any correlative-
25 rights issues.

1 Q. For each of these increased density wells that
2 are drilled at unorthodox locations, how far set back from
3 the side boundary of a spacing unit are they?

4 A. We tried to keep them all approximately about 330
5 feet. The Application does list exactly where they're
6 located, but that was our goal, was to try to keep them
7 approximately 330 feet off of the drillblock boundaries.

8 Q. In each instance, then, you have told all
9 interest owners, including the overriding interest owners,
10 of these well locations and of this project?

11 A. Yes, sir, we have.

12 Q. And have you received any objection to the
13 Division approving these unorthodox well locations?

14 A. We have not.

15 Q. Let's go back to Order R-10,720, which is the
16 order that approved the 29-and-7 unit. When we deal with
17 the drillblock area, are you seeking approval to do the
18 same kind of operation in the drillblock?

19 A. Insofar as it's a pilot project, that's true.
20 But insofar as the setbacks are concerned, it is not true.
21 We're asking specifically for nonstandard locations for
22 each of these increased density wells in the drillblock
23 area, and that would be the difference between the two
24 Applications.

25 Q. If there is a desire to expand or increase the

1 density in the drillblock area, then we're going to have to
2 come back and get further approvals?

3 A. That is correct.

4 Q. When we get to the 27-and-5 unit the idea is, as
5 more wells are drilled in the Mesaverde in that unit to
6 test this pilot, we would not need additional approvals?

7 A. That's correct.

8 Q. All right, sir. Anything else, Mr. Alexander?

9 A. No, sir, I believe not.

10 MR. KELLAHIN: That concludes my examination of
11 Mr. Alexander, Mr. Catanach. We move the introduction in
12 Exhibit Book 11,880 of Exhibits 1 through 3 and, in Exhibit
13 Book 11,879, Exhibits 1 and 2.

14 EXAMINER CATANACH: Exhibits 1 and 2 in Case
15 11,879 and Exhibits 1, 2 and 3 in Case 11,880 will be
16 admitted as evidence.

17 EXAMINATION

18 BY EXAMINER CATANACH:

19 Q. Mr. Alexander, dealing with the unit case first,
20 the entire unit, again, is in the Mesaverde PA?

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

22 Q. And that's been established since 1981?

23 A. Yes, sir.

24 Q. Okay. Are there going to be more than eight
25 wells drilled in that pilot project?

1 A. Yes, we anticipate that there will be. However,
2 what I have shown here are just the 1998 project wells.

3 Q. Those are for 1998?

4 A. Yes, sir.

5 Q. Okay. You don't have an idea how many wells will
6 ultimately be drilled in that?

7 A. No, sir, that will be a factor of the results
8 that we find, and I believe the geologists will give you
9 better information concerning why that is later when he
10 testifies.

11 EXAMINER CATANACH: Okay. For the record, I
12 would just like to state that we have received an entry of
13 appearance in this case, Case 11,879, from Scott Hall on
14 behalf of the Ruth Zimmerman Trust, just for the record.

15 MR. KELLAHIN: Mr. Catanach, I don't believe I
16 received that. We may ask Mr. Alexander about her
17 interest, his knowledge of that interest and where it is.

18 Q. (By Examiner Catanach) Do you have knowledge of
19 that?

20 A. Yes, the Zimmerman Trust is a working interest
21 owner in the San Juan 27-and-5 Mesaverde participating
22 area. It has about an 8-percent interest.

23 EXAMINER CATANACH: Okay. Mr. Hall or the
24 Zimmerman interest is not represented here, I gather?

25 MR. KELLAHIN: I believe not.

1 Q. (By Examiner Catanach) Okay. So in the unit
2 case we're basically doing the same thing as we did in the
3 29-7?

4 A. Yes, sir, except this time we're asking for a
5 little increased flexibility to locate the wells, and we're
6 not asking for specific NSL locations for the initial wells
7 at this point.

8 Q. Okay, you're just asking for the flexibility in
9 the setbacks?

10 A. Yes, sir.

11 Q. We did that in that other case, though?

12 A. We did, but also at that time we asked you for
13 some specific NSLs that we don't believe -- that we have to
14 go through that step in this case. We'd be better to be
15 able to locate the wells in accordance with the requested
16 setback.

17 Q. Okay. With regards to the drillblock area, it's
18 my understanding that in Section 31 and Sections 1 and 6
19 Burlington is the operator of those spacing units?

20 A. That is correct.

21 Q. And in Section 36 Great Western is the operator?

22 A. They're the historical operator, although we have
23 asked them for permission to drill and operate this
24 increased density well.

25 Q. Okay, but they currently operate two Mesaverde

1 wells in that spacing unit?

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

3 Q. Burlington proposes to drill and operate the well
4 for six months?

5 A. Correct. We did check with the Aztec Office,
6 with Tax and Revenue --

7 Q. Uh-huh.

8 A. -- and with the Commissioners of the Public Land
9 Office, and they said that that's agreeable with them.

10 Q. Our Aztec Office told you that it was agreeable
11 to have two operators on a spacing unit?

12 A. Well, they're able to accommodate that in ONGARD
13 by a different PIN number. That's what we wanted to
14 validate, to make sure that there wouldn't be any problems.
15 And when we turn this well back, they will assign a PIN
16 number to it for Great Western. And they thought that we
17 would not have any trouble tracking production and the
18 payment of royalties and the overrides during that time
19 period.

20 Q. Can you provide verification of that from the
21 people that you talked to?

22 A. I can ask them for a letter or --

23 Q. Yeah.

24 A. -- what would you -- What you like?

25 Q. If you can get a letter from them, that would

1 help us to determine if that's possible. I was under the
2 impression that that was not permitted or permissible up to
3 this point.

4 A. We were under that same impression. That's why
5 we wanted to call them. We talked with Velvet Money in the
6 Taxation and Revenue and Mr. Albers in the Commissioner of
7 the Public Land Office, and then with both Frank and Ernie
8 in the Aztec Office.

9 Q. Okay. If you can provide me with something that
10 would support your request, that would be helpful.

11 A. All right.

12 Q. Okay, as far as the interest owners -- I mean,
13 the proration units that Burlington does operate, you said
14 that Burlington was going to bear the entire cost of
15 drilling the well?

16 A. In those spacing units, yes, sir, that is
17 correct.

18 Q. Is Burlington the only working interest owner in
19 those spacing units?

20 A. Yes, sir, we own those 100 percent.

21 Q. Okay.

22 A. That is part of the reason why we chose this
23 area. We were trying to minimize the impacts to everybody.

24 Q. Okay. Are there some very -- There are some
25 other royalty interest owners and overrides in those

1 sections?

2 A. Just -- The royalty, as I explained, the Section
3 31, Section 6 and Section 1 are -- those are federal
4 leaseholds --

5 Q. Okay.

6 A. -- and 36 is state.

7 There are various override owners in each of the
8 drillblocks that are ranging from about 2-percent to about
9 5-percent total overrides.

10 Q. Okay. Are those subject to -- what? A joint
11 operating agreement or --

12 A. Only the well in Section 36. The others are 100-
13 percent ownership, so there's no operating agreement on the
14 ones that we own.

15 There is a communitization agreement in Section 1
16 between the two federal leases, there's a communitization
17 agreement and an operating agreement in Section 36 because
18 of the diverse ownership in that drillblock.

19 Q. So there's nothing to preclude you from drilling
20 a third well, as far as any kind of operating agreements or
21 anything, any other agreements?

22 A. Only the operating agreement in Section 36, and
23 we are getting the approvals to increase that density from
24 the owners in that drillblock.

25 Q. Does that -- There is a JOA in that section?

1 A. Yes, sir, there is.

2 Q. Does that have to be amended, or how do you
3 proceed with it?

4 A. No, it's a joint operating agreement that covers
5 the south half for the Mesaverde. So it would cover the
6 increased density well, providing the Division authorizes
7 the increase in the density.

8 Q. So if we authorize it, the JOA allows it?

9 A. Yes, sir.

10 Q. Okay. And so far you've got -- Let's see, in
11 Section 36 have all those interest owners agreed to that?

12 A. Yes. I've currently got back the -- They agreed
13 at the meeting in Midland, in principal, and then I told
14 them that we would furnish them the cost estimates, and
15 currently, as of today, I've received Conoco's and
16 Taurus's. I talked with Great Western, Mr. Simpson, here
17 this morning, and his is up for signature in Dallas or
18 Forth Worth, in their main office.

19 So we're not anticipating any problems in that
20 area.

21 Q. Okay. These are the only six wells that are
22 going to be drilled in this drillblock?

23 A. That's all we're asking authorization to drill at
24 this time, that's correct.

25 Q. Have you talked to any interest owners that have

1 expressed any concern about this, Mr. Alexander?

2 A. No, sir. Everybody, I think, is fairly excited
3 about the prospects and testing for increased density in
4 this formation.

5 EXAMINER CATANACH: Okay, I have nothing further,
6 Mr. Kellahin.

7 MR. KELLAHIN: Thank you, sir.

8 I'd like to call Mr. Babcock.

9 WILLIAM BABCOCK,

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. KELLAHIN:

14 Q. Mr. Babcock, will you please state your name and
15 occupation?

16 A. My name is William Babcock. I work as a
17 geologist for Burlington Resources in Farmington, New
18 Mexico.

19 Q. Mr. Babcock, did you testify before Examiner
20 Catanach back on October 17th, 1996, in Case 11,625,
21 concerning the geologic opinions and conclusions for the
22 San Juan 29-and-7 unit?

23 A. Yes, I did.

24 Q. As part of your efforts for examining increased
25 density wells for the Blanco-Mesaverde Pool have you now

1 established recommendations for the Division to add two
2 more pilot project areas for this study?

3 A. Yes, I have.

4 Q. And based upon that recommendation, do you now
5 have opinions for Mr. Catanach concerning the feasibility
6 of each of those projects?

7 A. Yes, I do.

8 Q. Is the geologic work your work?

9 A. Yes.

10 MR. KELLAHIN: We tender Mr. Babcock as an expert
11 petroleum geologist.

12 EXAMINER CATANACH: He is so qualified.

13 Q. (By Mr. Kellahin) Let's turn to the unit case,
14 Mr. Babcock, and look at case book 11,879. If you'll turn
15 with me behind Exhibit Tab Number 3, there's a fold-out
16 map. Describe for Mr. -- Examiner Catanach what he's
17 seeing.

18 A. This is a map of the drainage areas in the
19 Mesaverde formation. This map was made by using wireline
20 logs and calculating the volumetric original gas in place
21 across the Basin.

22 Q. Were there petroleum engineering experts that
23 helped you in this calculation and the preparation of this
24 display?

25 A. Yes.

1 Q. And the volumetrics and some of the rest of this?

2 A. Most of the volumetrics were done by myself, with
3 some help from outside consultants to determine the proper
4 methodology to use. The reserves -- In order to determine
5 the actual area that was drained, that was done by
6 reservoir engineers and rate-time analysis.

7 Q. Tell me what the color code means.

8 A. The color code, it's -- The black are areas where
9 we feel that the existing wells are draining greater than
10 160 acres.

11 Q. When you talk about existing wells, what are you
12 meaning?

13 A. The wells that are currently spaced on one well
14 per 160 acres.

15 Q. Okay. What's the significance of the pink area?

16 A. The pink areas are where we feel that the
17 drainage recovery of existing wells ranges from 80 to 160
18 acres. And then the blue areas are where we feel the
19 drainage is currently less than 80 acres per existing well.

20 Q. Refresh our recollection about why Burlington
21 chose the 29 and 7 as one of the three pilot project areas.

22 A. As you can see by its location, it's in the heart
23 of the main producing portion of the Basin where on all
24 sides of it the wells are recovering significantly more as
25 a function of the gas in place.

1 We wanted to go into an area like that, which we
2 felt was low risk, but as you can see there's also a
3 significant amount of blue and pink within that pilot area,
4 so we knew that there were additional reserves to be
5 gathered. The pressure drop in that area was low, but we
6 felt that the reserves recovered would be relatively high.

7 So we looked at that as a low-risk area to test
8 the concept of our -- do we need more wells to drill -- to
9 recover the gas in place?

10 Q. If you'll turn with me to Order R-10,720 -- I
11 think you have a copy of it there -- if you'll turn to page
12 3, at the last hearing you discussed Findings 8, 9 and 10,
13 and they had to do with the analysis of the pressure drop
14 in the Mesaverde reservoir.

15 In the 29-and-7 unit, refresh our recollection
16 about the pressure drop and what significance that had.

17 A. In the 29-7 unit, the pressure drop per year
18 was -- ranged from 5 to 15 p.s.i. per year. Now, this --
19 Should I explain how it was calculated, or is that not
20 necessary?

21 Q. I think that's obvious, how it was calculated --

22 A. Okay.

23 Q. -- but you can summarize again, if you like --

24 A. Okay.

25 Q. -- what you were doing.

1 A. Well, it was the shut-in wellhead pressures and
2 the difference between the shut-in wellhead pressures of
3 the wells that were drilled in 1950 and those wells drilled
4 in 1970. So it's effectively looking at the efficiency of
5 the drainage of the original wells.

6 Q. When you mapped out the pressure-drop map, if you
7 had an area that was greater than 30 p.s.i. per year, that
8 was an indication that existing wells were reasonably
9 efficient under that pattern for depletion of Mesaverde
10 gas?

11 A. That is correct.

12 Q. And as you moved down on that p.s.i.-per-year
13 drop, you found areas that were less efficient?

14 A. Correct.

15 Q. And you took it all the way down to 5 p.s.i. per
16 year?

17 A. Yes.

18 Q. Within the 29-and-7 pilot area, what was the
19 range of pressure drop?

20 A. In the pilot area it was 5 to 10 p.s.i. per year.

21 Q. As we move into the San Juan 27 and 5, what kind
22 of pressure-drop area are we in here?

23 A. We're also -- The 27-5 unit is in the 5 to 15
24 p.s.i.-per-year drop.

25 Q. And then finally in the drillblock area, what's

1 the range of pressure drop there?

2 A. Once again, it's 5 to 15 p.s.i. per year.

3 Q. Okay. Let's go back to the 29-and-7 pilot area.

4 Why is it necessary to have two more pilot project areas in
5 addition to the 29 and 7?

6 A. The 29-7 pilot, as you can see by its location,
7 is in the heart of the field, very thick sands, excellent
8 recovery from most of the wells in there.

9 The two pilot areas we're looking at today, the
10 San Juan 27-5 and the drillblock pilot, are out on the
11 edges of the field. The recovery -- The drainage areas
12 generally decrease as you move outwards within the field,
13 and we're getting out to the edges between where there's
14 very little pink and it's mostly just blue.

15 So we felt it necessary to go out into those
16 areas and evaluate both from an economic and from a
17 reservoir-evaluation standpoint.

18 Also, the two pilots that are in -- They're quite
19 a ways away, as you can see, about 25 miles apart, and
20 there are some significant differences in the sand
21 geometries from one area to the other. Based on core, the
22 matrix properties remain similar, but the sand geometries
23 are significantly different, and so we felt it necessary to
24 evaluate both areas.

25 Q. Let's go back and look at Order 10,720, and look

1 at Finding 11. Now that you've got your eight increased
2 density pilot wells in 29 and 7 -- I assume you've examined
3 all that geologic data?

4 A. Yes.

5 Q. -- is there any of that new data that causes you
6 to change any of the conclusions that were reached by the
7 Examiner in Finding 11?

8 A. No, there is not. Everything we're finding
9 confirms what we believe going into the drilling of those
10 wells.

11 Q. As we look at the Findings 11 that were applied
12 to 29 and 7, do you see any geologic reason to change those
13 findings with regards to the approval of a pilot project
14 for the 27-and-5 area?

15 A. No, I don't.

16 Q. When we look at the opportunity for gas in place,
17 thickness in the Mesaverde, is there a difference that we
18 should be aware of when we move from the 29-and-7 to the
19 27-and-5 units?

20 A. The difference -- There is a little bit less gas
21 in place in the 27-5 unit, the permeability is a little bit
22 less, and consequently the well recoveries are a little bit
23 less. We still see very similar pressure drops, so that
24 the overall parameters remain essentially the same, but the
25 wells are not quite as good down in that area as they are

1 in the 29-7 area.

2 Q. Geologically, give us the summary, then, when you
3 compare 29 and 7 to the drillblock.

4 A. The drillblock is somewhat between those two
5 areas, between the 27-5 and the 29-7 unit, as far as the
6 productivity of the wells in that area. The sands are a
7 little bit thicker in the drillblock area. It has
8 approximately as much gas in place as the 29-7 area.
9 Permeability is a little bit less. The sands are not quite
10 as thick; therefore they probably are not quite as
11 continuous, based on our analysis.

12 Q. If you'll turn with me to the next display behind
13 Exhibit Tab Number 3, let's refresh Mr. Catanach's
14 recollection about this drainage pattern orientation
15 concept. Explain to us the concept, and then I'll ask you
16 about the three projects.

17 A. Okay. What this is, it's purely a conceptual
18 diagram which shows our interpretation of the drainage
19 areas of a hypothetical well. Since these -- The drainage
20 areas are controlled by natural fracture systems which tend
21 to be linearly oriented in a north-south direction,
22 according to nearly all of our data.

23 We see a strong permeability anisotropy in that
24 north-south direction. That permeability anisotropy will
25 set up an preferential drainage orientation so that instead

1 of a drainage circle, a circular drainage area, we would
2 have an elliptically shaped drainage area.

3 Now, these ellipses shown here are approximately
4 three to one -- a little less than three to one, actually,
5 and that may very well be representative of certain areas
6 of the Mesaverde.

7 Q. When we look at the display we're seeing in each
8 square, that represents a section?

9 A. Yes, it does.

10 Q. In each section, each red dot represents the
11 existing well pattern drilled to that density?

12 A. That's correct.

13 Q. And as the wells compete for gas in the
14 Mesaverde, the concept is, there is a north-south
15 orientation to the elliptical drainage shapes?

16 A. Yes, sir.

17 Q. If that is the nature and extent of the gas
18 depletion in the Mesaverde, what, then, is the opportunity
19 that you're testing with the increased density plan?

20 A. The opportunity is to get between those ellipses
21 and put another row of ellipses, of elliptical drainage
22 areas. Because of the orientation of the wells, we haven't
23 been draining the gas efficiently between those wells.

24 Q. Okay. Let's turn to Exhibit Tab 4 and go back to
25 the 29-and-7 unit and look at the project there and the

1 eight additional density wells, have you show us where they
2 are, and then we'll talk about what's happened as a result
3 of those wells.

4 A. Okay. The eight wells are located in Sections 1,
5 2, 11 and 12. They should be highlighted in orange on the
6 map. Four of those wells were drilled directionally
7 because of topographic problems, to get to what we felt to
8 be appropriate bottomhole locations to get between the
9 drainage ellipses, so to speak.

10 Q. When you turn past the locator, there is a
11 summary sheet that says "29-7 Infill Results". What are we
12 seeing here?

13 A. This is a table with the first column being the
14 well names. There are eight wells, all of the eight wells
15 that we've drilled in that unit.

16 These wells have been on a time period ranging --
17 have been producing gas and -- have been selling gas
18 between two to four months on these wells. What this
19 represents is the initial 30 days averages that we saw on
20 those wells.

21 The first column -- or the second column after
22 the well name is the actual bottomhole pressure, as
23 measured by a pressure bomb which was lowered into the
24 well.

25 The second column is our simulation model

1 predicted bottomhole pressures.

2 Q. Now, that model presentation and simulation was
3 part of the evidence submitted in the case that approved
4 the 29-and-7 unit project?

5 A. Yes, it was.

6 Q. All right. So you have the model pressure,
7 bottomhole pressure for the model. What's the next row?

8 A. The next row is the actual initial -- the actual
9 30-day average rates for the first month's production, and
10 then that's followed by the model projected 30-day average
11 rates for the first month of production.

12 Q. There are differences here. Summarize for us
13 what the differences mean, and what can we conclude from
14 the results?

15 A. What we see is that in the bottomhole pressures
16 where we've essentially matched the model to the actual
17 pressures, if you look at the average, we're only about 25
18 p.s.i. off.

19 Q. So what does that mean?

20 A. That means that we've modeled it accurately --

21 Q. Okay.

22 A. -- at least as regards the pressure.

23 But the rates, we've underestimated the rates by
24 about 200 MCF per day.

25 Q. The model projected 691 MCF?

1 A. Yes.

2 Q. And the actual for the eight wells was 991 MCF a
3 day?

4 A. 911.

5 Q. I'm sorry, 911 MCF a day. What does that
6 difference mean?

7 A. Several possible explanations for that. One is
8 that potentially we haven't modeled the skin of the new
9 wells, or the efficiency of our completion methods in those
10 new wells. I think that's one of the most likely
11 possibilities of that. That's what I see as probably the
12 reason that our rates are so much higher than what we
13 expected.

14 Q. Once you compare what the model predicted at the
15 last hearing with the actual results, what are the ultimate
16 conclusions that you want to tell Mr. Catanach?

17 A. That we did the right thing in drilling the
18 wells. We're finding the high pressures that we had
19 anticipated between these wells, so that we were correct in
20 assuming that we weren't efficiently draining the wells
21 with the original four wells per section.

22 We may have been a little conservative on our
23 rates, and therefore we only drilled two additional wells
24 per section, and potentially it may be economic for us to
25 drill more than two wells per section, based on these

1 rates.

2 Q. Okay. The pilot at this point has increased the
3 density per section from four wells to six?

4 A. That is correct?

5 Q. And there may still be an opportunity for more
6 wells in a section, based upon economics?

7 A. That's correct.

8 Q. At this point, though, you're satisfied that
9 increasing the density in this project from four to six
10 wells a section had been a good idea and, in fact, is a
11 good idea?

12 A. Absolutely.

13 Q. Okay. Let's turn to the next display. We have a
14 table here. Identify and describe what we're seeing.

15 A. This is just a bar chart summarizing the average
16 values shown in the table from the previous page, and the
17 first bar chart shows the average 30-day gas rates. As you
18 can see, the actual is in blue and the model is in red.

19 And then the next chart is the same type of
20 display, except with the bottomhole pressures shown on the
21 Y axis, with, once again, the actual in blue and the model
22 in red. And you can see our actual pressure is about 25
23 p.s.i. higher than our model-predicted pressure.

24 Q. When we look at the drillblock exhibit book, all
25 the exhibits that were applicable to the Unit case are

1 identical in the drillblock exhibit book?

2 A. That is correct.

3 Q. All right. Let's open both books at this point
4 and start with Exhibit Number 6 in the drillblock case and
5 Exhibit Number 5 in the 27-and-5 unit case. We are looking
6 at two bubble maps, are we not?

7 A. Yes, we are.

8 Q. All right. Let's start with the unit map, and
9 then we'll contrast it to the drillblock map.

10 A. Okay.

11 Q. Identify and describe what we're seeing and what
12 it means.

13 A. This is another display showing the drainage area
14 of each well. As we showed you the regional map of the
15 whole basin, was this same data essentially, but it was
16 contoured. This is just showing exactly the data point at
17 the individual well location.

18 Each bubble represents the actual drained area --
19 or the actual drainage area of a particular well. Now, as
20 I indicated, we feel that these drainage areas are actually
21 ellipses rather than circles, but they're shown as circles
22 on this purely as a graphical display, showing how much
23 space there is between the drainage areas of these
24 individual wells.

25 And you can look at the northern portion of the

1 27-5 unit. Although there's still a lot of white area
2 between the circles, the circles themselves are larger.
3 Then when we get into the middle of the unit the circles
4 get smaller and significantly lower drainage areas. And
5 then down in the southeastern -- southwestern portion of
6 the unit, excuse me, the bubbles once again get larger,
7 indicating that we're more efficiently draining the
8 reservoir. But there's still lots of white space between
9 these bubbles.

10 And also, we should note that this is calculated
11 assuming 80 percent of the gas in place, so that the
12 assumption is made that there's no way we could get beyond
13 that recovery factor, so that therefore this is -- what's
14 left is above and beyond that 20 percent.

15 Q. How is this information useful in terms of your
16 project or your projections about increased density for the
17 pool?

18 A. Well, this clearly shows where we have
19 opportunities for infill drilling. It shows that we are
20 not efficiently draining these areas.

21 Q. Okay. When we turn to the drillblock area,
22 identify and describe what we're seeing on this bubble map.

23 A. The drillblock area, we're looking at the
24 intersection of four townships. The heavy black line
25 represents the township boundaries, with the northeast

1 corner being Township 31 North, 10 West, the northwest
2 corner being 31 North, 11 West, and then the southern
3 corners being 30 North, 10 and 11 West, respectively.

4 I forgot to mention also that there is a cross-
5 section line shown on each of these maps, which is the
6 cross-section we'll be looking at, a later display.

7 Back to the bubbles. On the drillblock area you
8 can see that the bubbles are, in general, a little bit
9 bigger than what they are in the 27-5 unit, although there
10 are some very small bubbles in that area, particularly in
11 36 and over in Section 5 of 30 North, 10 West. And also
12 that the bubbles, in general, increase in size to the
13 northeast portion of the map, which is in agreement with
14 the basinwide map that we saw of the contoured Mesaverde
15 recovery drainage areas, which shows it increasing towards
16 the center of the Basin.

17 Q. Okay. What's the point, then, of the drillblock
18 bubble map?

19 A. Once again, the point is to show that there are
20 areas of undrained acreage with the existing well
21 locations.

22 Q. Let's turn to the next page of each exhibit book,
23 and for each area we are looking at what?

24 A. This is the localized p.s.i.-per-year map. This
25 is the pressure drop over those areas, based on the parent

1 and infill well initial shut-in pressures.

2 Q. Help us read the pressure drop per year, based
3 upon the color code.

4 A. The color code in both maps is the same. And if
5 we would look at the 27-5 map and start in the red, up in
6 the northeast portion of the map, the boundary between that
7 red and the orange is the 5-p.s.i.-per-year contour. The
8 boundary between that orange and the more yellowish orange
9 in the southwestern portion of the map is the 10-p.s.i.-
10 per-year contour.

11 Then you can also see there's a 15-p.s.i.-per-
12 year contour when the colors turn to yellow, and those
13 contours are a function -- There is one well in Section 5
14 that has a higher pressure drop in that area.

15 Q. How was this map used to help you find the
16 location of the eight increased density wells for this
17 project within the unit?

18 A. Well, we felt it important to come into an area
19 with from 5- to 15-p.s.i.-per-year pressure drop, because
20 that's sort of an arbitrary cutoff we took as being --
21 below that we would feel comfortable that we are
22 inefficiently draining the reservoir with the existing
23 wells.

24 Q. Come over and help us understand your conclusions
25 about the p.s.i.-per-year drop in the drillblock area.

1 A. Similar conclusions. In the drillblock area, the
2 vast majority of the area is from 10 to 15 p.s.i., except
3 there is one well in Section 35 with a little higher
4 pressure drop, and then there's one well in Section 32 with
5 a little bit higher pressure drop.

6 Other than that, the trends are pretty
7 consistent, so we feel pretty comfortable that both of
8 these areas are reasonable to go in and increase the
9 density on the Mesaverde formation because of that.

10 Q. Let's look at the cross-sections, if you'll
11 unfold those for us.

12 A. The cross-sections, as we just saw, they are --
13 You saw the locations on the previous maps.

14 The 27-5 cross-section, which you can see it on
15 the well headers -- 26 San Juan 27-5 is the first well --
16 it's significantly thinner-bedded than what we see in the
17 drillblock area in both the Cliff House and the Point
18 Lookout formations. In both locations the Menefee is thin-
19 bedded.

20 But the thin-beddedness of it helps explain why
21 the 27-5 unit has lower drainage areas. It's more
22 difficult to get continuous drainage when you don't have
23 continuous sand layers.

24 But both of them do have a significant amount of
25 gas in place. I've highlighted in yellow what we consider

1 to be net sand. Now, there is some variation in log
2 quality across this cross-section, but you can see that
3 there is a significant amount of sand in both of these
4 cross-sections.

5 In the drillblock area -- The gross thickness of
6 the interval is the same in both the drillblock and the San
7 Juan 27-5, but in the drillblock area you can see that
8 obviously, especially in the Cliff House, we have
9 significantly more gas in place than we do in the San Juan
10 27-5 Unit.

11 Q. When you're trying to develop a base of data to
12 determine how many additional wells ought to be authorized
13 in this huge pool, you need to think about how many more in
14 addition to four a section.

15 Is there any of this information that gives you a
16 point of reference as to how many more wells might be
17 appropriate for the entire pool? Can you tell yet?

18 A. It's going to be highly variable across the pool.
19 In some areas, we clearly need additional -- up to four
20 additional wells, and potentially more, particularly in
21 places like the 27-5 where we're -- as you can see, four
22 additional bubbles in there of the same size probably
23 won't --

24 Q. In the drillblock and in the 27 and 5, based upon
25 geologic differences of thickness, you need to have pilot

1 projects in those areas to see what those drainage patterns
2 are going to be?

3 A. Yes. Yes, we need to gather some more data to
4 really see how efficiently we're going to be draining it
5 and how much we're drawing the pressures down by these
6 additional wells. That would be correct, that -- This data
7 doesn't give us the absolute answer for how many more wells
8 we need to drill, no. It tells us that we need to drill
9 more wells than what we have now.

10 Q. All right. Let's fold up the cross-sections and
11 then have you direct your attention to the information
12 behind the next exhibit tab. It's going to be 6 in the
13 unit case and it's going to be 7 -- Well, it's organized a
14 little differently, I'm sorry --

15 A. Yes.

16 Q. -- Mr. Babcock. In the unit case you have an
17 Exhibit 6 tab which separates the cross-section, and
18 they're not organized quite the same way in the next book.

19 A. Yes.

20 Q. All right. Let's stay with the unit case, then,
21 and go through those displays.

22 A. Okay.

23 Q. Exhibit 6, what do we see, and what does it mean?

24 A. Exhibit 6 is cross-section of our geostatistical
25 model that was used to input into the reservoir simulation.

1 This is of the whole Mesaverde interval, with blue being
2 shale intervals -- And this is a porosity map, and I
3 apologize, the scale isn't shown on there. But the blue is
4 essentially shale, not reservoir intervals, whereas the
5 greenish-yellow, yellow, red and orange colors are sand
6 layers. You can see the discontinuous nature of those
7 sands across the area.

8 Q. For the unit case and the drillblock case, there
9 is a geostatistical modeling that's occurring. Is it the
10 same methodology that you apply to the 29 and 7, that you
11 discussed in great detail with Examiner Catanach last year?

12 A. Yes, it is. There's one slight difference in
13 that, in the drillblock model, which is the last one we
14 did, we did some simulation comparing the detail that we
15 needed to go to, and we ended up going to a little bit less
16 detail in the drillblock area than we did in the 27-5 and
17 the 29-7 simulations, just because we found that that
18 additional level -- There was a point at which the
19 additional level of detail didn't buy us any more accuracy.

20 Q. All right. Go back and give us the summary in 29
21 and 7 of what we were doing with the computerized model,
22 the geologic model.

23 A. A summary of the geostatistics or --

24 Q. Well, the method. What are you doing?

25 A. Well, you're taking all the existing well data --

1 that would be the wireline logs in the area and any core
2 data that's available -- and looking at that on a layer-by-
3 layer basis, along with intervals that the geologist has
4 determined to be continuous, correlatable markers in there.

5 And then you distribute those reservoir
6 properties between the wells and between those correlated
7 markers in the space between the wells, and those
8 properties are distributed in a non-averaging method.
9 Instead of the typical contours which average those
10 properties across an area, these are not averaged.

11 Q. Let's turn back to the order, Order 10,720, and
12 look at Findings 12 and 13. The order provides a concise
13 summary of what you're doing with the reservoir modeling?

14 A. Yes, it does.

15 Q. All right. You're trying to validate this
16 hypothesis about the elliptical shape of the drainage
17 patterns and the orientation, and that's what you were
18 doing in 29 and 7?

19 A. Yes.

20 Q. Is that the same thing that you're doing in 27
21 and 5?

22 A. Yes, it is.

23 Q. And with a small change in the level of detail,
24 you repeated that for the drillblock?

25 A. Yes.

1 Q. Okay. Is that information also utilized by the
2 reservoir engineer in determining the volume of gas to be
3 produced -- or forecasted to be produced by these project
4 areas?

5 A. The geostatistical model is the input into the
6 reservoir simulator. It is the geologic model which is
7 input into the reservoir simulator to forecast production.

8 Q. Without going through each of the last displays
9 here, let's have you summarize for us at this point, at the
10 end of your testimony, your geologic conclusions about the
11 necessity for the two additional pilot project areas.

12 A. All the data I've looked at indicate that we're
13 not -- currently we are not efficiently draining the gas in
14 place in those areas, and the only geologic reason I can
15 see for that is that there is not sufficient permeability
16 in the areas to drain a full 160 acres with -- to drain a
17 full 160 acres.

18 And so we need to drill more wells in order to
19 get the gas in place out, and that there -- it will --
20 That's it, in a nutshell. We need to drill more wells.

21 Q. Okay. And nothing you have found in the current
22 project with these eight wells that have been drilled
23 changes any of your conclusions or opinions?

24 A. No, it doesn't; it reinforces them.

25 MR. KELLAHIN: That concludes my examination of

1 Mr. Babcock, Mr. Examiner.

2 We move the introduction of his geologic
3 displays. They're going to be those information behind --
4 In Exhibit Book 11,879 it's Exhibits 3 through 6, and in
5 the drillblock case it's going to be Exhibits 4 through 6.

6 EXAMINER CATANACH: Okay, in the -- Exhibits 3
7 through 6 in Case 11,879 and Exhibits 4 through 6 in Case
8 11,880 will be admitted as evidence.

9 EXAMINATION

10 BY EXAMINER CATANACH:

11 Q. Mr. Babcock, in terms of the geologic data that
12 was put into the reservoir model, do you feel that was
13 pretty accurate?

14 A. I do. You know, there are inherent uncertainties
15 associated with wireline logs and interpolation of data
16 between wells, but I feel it's as accurate as is possible.
17 Yeah, I feel very comfortable that it reasonably captures
18 the reservoir.

19 Q. Are these -- These are basically the only three
20 pilot projects that Burlington proposes to conduct before
21 coming in with maybe some amended pool rules; is that your
22 understanding?

23 A. That's probably correct, yes.

24 Q. Do you think that's going to be sufficient data
25 with which to do that?

1 A. I think it will give us a wide range of data
2 points. We've specifically chosen these three pilots to
3 get a look at the lower end in terms of economics, which
4 would be the 27-5 unit, what we originally had thought may
5 be the upper end, which would be the 27-7 unit, and then
6 one data point in the middle, which would be the drillblock
7 point. So that would give us a reasonable look at the
8 range.

9 And tying these back to recovery factors, I think
10 that yes, it probably will be sufficient to determine -- to
11 have a reasonable cross-sectional view of the variations we
12 would expect to see in the Basin.

13 What we still wouldn't have, that would be
14 something in the -- what we consider to be the highly
15 drained portions of the Basin. But based on our analysis
16 right now, we don't feel that we would want to go and drill
17 additional wells in those areas.

18 Q. Can you explain to me how the initial infill
19 wells, or those locations within the unit, were determined?

20 A. In the 27-5?

21 Q. Yeah.

22 A. They were determined by looking at the proposed
23 drainage orientations. We feel very strongly that the
24 drainage ellipses are in a north-south orientation, so we
25 want to get out of those existing drainage areas.

1 But also in an area like that where the recovery
2 is relatively small, we felt that we could fit an
3 additional four wells or equivalent four wells per section
4 in there without overlapping, as long as we in general
5 stayed out of that north-south orientation.

6 Q. Now, the 27-5 is not fully developed in the
7 Mesaverde; is that correct?

8 A. That is correct.

9 Q. There's substantial proration units that only
10 have two wells on them, and the reason for that is what?

11 A. The -- If you can look at the bubble map, that's
12 an excellent example to look at. You can see in the
13 central portion of the unit, the bubbles are significantly
14 smaller. Across that area the gas in place is essentially
15 unchanged, so -- There are some changes, but essentially
16 the size of that bubble is a function of the EUR of the
17 well. So the wells in the center part of the unit are not
18 as economic as those wells to the north and to the southern
19 part of the unit.

20 So the majority of the undrilled wells under the
21 existing rules are in that central portion of the unit, and
22 it's purely an economic question, there were better
23 opportunities, better places to spend capital in that area.

24 We are --

25 Q. So --

1 A. Oh, sorry, sir.

2 Q. No, go ahead.

3 A. I was going to say, we are drilling some more
4 wells out there this coming year, on the 160-acre spacing
5 also, sort of pushing the edges of that to determine where
6 the economics are, because we realize we're starting to --
7 We're completing the wells a little bit more efficiently.

8 Q. So the proposed increased density wells will be
9 in the northern part of that unit?

10 A. Yes. In fact, the area that they're going to be
11 drilled in is fully developed.

12 Q. So that's part of the factor in determining where
13 those wells will be located, is, did the existing four
14 wells recover some good EURs?

15 A. That's correct.

16 Q. Is the production basically, or predominantly --
17 In these areas is it Cliff House predominantly, or...

18 A. In the San Juan 27-5 area, we don't have specific
19 production logs in that area to define that. But based on
20 the well logs, I feel that in the 27-5 unit, it's probably
21 fairly similar to the 29-7 unit where we're getting
22 approximately 20 to 30 percent of our production from the
23 Menefee, and the rest of it would be evenly split between
24 the Cliff House and Point Lookout.

25 Now, in the drillblock area it's historically

1 been a little bit different. We're on the edges of the
2 field there, and the Cliff House wasn't even completed on
3 the initial wells, and the Cliff House wasn't even
4 completed until the wells were drilled in the 1970s and
5 they began completing the Cliff House when they realized
6 that where the Cliff House becomes water-bearing is further
7 south.

8 So in those wells the historical production has
9 probably been dominated by the Point Lookout. But current
10 production, we feel, should be relatively consistent,
11 although in the southern part of the area we don't feel
12 that the Cliff House will be a significant producer, the
13 southern -- southwesternmost two wells.

14 EXAMINER CATANACH: That's all I have of this
15 witness.

16 MR. KELLAHIN: Would you like him to explain his
17 well locations in the drillblock, his unorthodox locations?

18 EXAMINER CATANACH: Yeah, why don't we talk about
19 that?

20 FURTHER EXAMINATION

21 BY MR. KELLAHIN:

22 Q. Let's go back, Mr. Babcock, and if you'll look in
23 the drillblock case, let's find Exhibit 3. Do you still
24 have that? That was Mr. -- Alan's map.

25 A. Okay.

1 Q. Have you got one?

2 A. Yes.

3 Q. And let's look at the drainage bubble map -- it's
4 behind Exhibit Tab 6 for the drillblock -- and let's set
5 these side by side and have you explain to us why you have
6 chosen these unorthodox locations in the drillblock project
7 area.

8 A. Well, as we talked about, the drainage
9 orientations, instead of the circles that we see in the
10 bubble map, are actually elliptical in nature, so that if
11 you can envision those circles stretching out by about
12 three times in the north-south direction and thinning by a
13 couple times in the east-west direction, that leaves --
14 that fills in the area in the north-south direction,
15 especially in the eastern portion of the four section, the
16 pilot project we're looking at.

17 But it leaves big gaps in the middle of each
18 section and along that township boundary line, or the
19 section -- the north-south-running boundary lines, and also
20 in the middle of the western sections.

21 Q. All right, let's go back and look at the concept,
22 the drainage concept pattern map, which is behind Exhibit
23 Tab 3 and is the one that's got the green ellipses. Let's
24 use that, then, and show the concept for well locations in
25 the drillblock.

1 A. Okay.

2 Q. Have you got that?

3 A. Yeah. This pretty much explains what it looks
4 like in that -- the only difference being that in the line
5 of wells, the easternmost wells in Section 31 of 31 North,
6 10 West, and in Section 6 of 30 North, 10 West, those wells
7 probably have overlapping ellipses in a north-south
8 direction, and see that they're draining -- they look to be
9 draining about 100 acres or so, for those wells.

10 And so those wells are going to overlap in a
11 north-south direction, but in an east-west direction they
12 aren't going to be touching at all. So we've located the
13 wells to get in those areas in between the drainage
14 ellipses where our existing well locations have not
15 efficiently drained at all. We should find the highest
16 pressures, and therefore the most gas, in those inter-
17 ellipse areas.

18 Q. When we look at how this was set up in the
19 drillblock to take advantage of this elliptical drainage
20 concept, it appears as if each unorthodox location is
21 designed where it will help that spacing unit produce gas
22 that might not otherwise be produced --

23 A. Absolutely.

24 Q. -- and in a part of the spacing unit where it may
25 be exposed to counterdrainage by an offsetting spacing

1 unit, it also has its own well competing for offset gas.

2 Do you see what I'm saying?

3 A. Would you please restate that?

4 Q. Yeah, let me do it again.

5 In the spacing units, you have four of them that
6 are affected. The well locations are located to give you
7 gas you might not otherwise produce. Certain of these
8 locations encroach upon the offset spacing unit at some
9 point. But each of those spacing units, in turn, has its
10 own unorthodox well location which encroaches on the
11 offset.

12 A. Yes.

13 Q. When you package it all together, can you see any
14 equity among all the interest owners with this opportunity
15 to produce gas that might not otherwise be produced?

16 A. Yeah, I think that there is -- As Alan said, we
17 tried to balance the inequities so that each location, as
18 you mentioned, is able to drain the additional -- the
19 neighboring location, so that everybody will get a piece of
20 something else in these.

21 And in order to get the gas -- to recover the gas
22 in place, there's going to have to be some trading across
23 these lines.

24 MR. KELLAHIN: That concludes my examination of
25 Mr. Babcock.

FURTHER EXAMINATION

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BY EXAMINER CATANACH:

Q. I guess I'd have a question, Mr. Babcock, about the well in Section -- Well, you're going to drill a well on the southern boundary of that Section 36, pretty close to that southern line there?

A. Yes.

Q. Why wouldn't you move the well in Section 1 further north?

A. In order to --

Q. To maybe compensate for --

A. -- compensate that a little bit?

Q. -- drainage that may be occurring from the well in Section 36 --

A. Yeah --

Q. -- or may occur.

A. -- we probably -- You're talking about the easternmost well in Section 1. We could have moved that up to the border to get in --

Q. I'm actually talking about the well in the middle.

A. Ah, okay. Well, I wanted to stay away from overlapping these ellipses too much in a north-south sense. We could have moved it up, but then the two wells would have been in direct competition with each other, in a

1 north-south sense.

2 If we -- To explain what I mean, if we would look
3 at the drainage-ellipse concept display, which is behind
4 Tab Number 4, you can see -- In the northwesternmost
5 portion of that, you can see the two ellipses are
6 competing --

7 Q. Uh-huh.

8 A. -- there, and we're trying to avoid that kind of
9 a situation where the new wells, sort of the test wells,
10 are competing against each other. The concept we're trying
11 to evaluate, do these wells compete significantly with the
12 wells that are already in place?

13 I feel very strongly that if we were to put those
14 wells right up next to each other across opposing sides of
15 that border, that they would directly compete against each
16 other and would be -- both of the wells would produce less
17 gas because of that.

18 Q. Well, do you feel like the north half of Section
19 1 is adequately protected from drainage which may occur
20 from that well in Section 36?

21 A. There will clearly be some drainage from Section
22 1 by Section 36. I think if -- That is probably the
23 closest thing to an inequity in this location.

24 At least from an operator and working-interest
25 owner standpoint, Burlington is the hundred-percent owner

1 of Section 1. So we felt from that perspective we were
2 addressing that on a larger scale.

3 Q. Let me ask you about the well location in Section
4 36. Why is it not possible to move that further north and
5 get the same kind of results?

6 A. It probably would have been possible to do that,
7 but we felt that the well in Section 31, even though the
8 ellipse is oriented north-south, we had to move as far to
9 the west as possible because of the 4A well in the north of
10 that section. We wanted to get away from its drainage
11 ellipse.

12 So we moved that well as far west as we could, so
13 there will be some drainage of that drillblock in Section
14 36 from that well, you know, even though it's a lateral.
15 But it is close enough that we would expect that there will
16 be some drainage because of that.

17 The well in Section 36 could have been moved more
18 to the north. There's no question about that. We wanted
19 to avoid draining the drillblock in the north half of
20 Section 36, wanted to avoid any objections from the owners
21 in that half section too, and that's another reason why we
22 wanted to stay as far south as we could, so that we could
23 try and keep this constrained within a relatively few
24 owners.

25 EXAMINER CATANACH: I have nothing further.

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JAMIN McNEIL,

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

DIRECT EXAMINATION

BY MR. KELLAHIN:

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

A. My name is Jamin McNeil. I'm a petroleum engineer for Burlington Resources in Farmington, New Mexico.

Q. Have you testified before the Division on prior occasions?

A. No, I have not.

Q. Summarize for us your education.

A. I graduated from the Colorado School of Mines in 1988 with a bachelor's in petroleum engineering, and I've worked in the oil and gas industry every since.

Q. Summarize for us your employment experience with Burlington.

A. I've been employed with Burlington for the last year, the last six months of which I've specifically worked on this Mesaverde infill project and in reference to the 27-and-5 unit and the drillblock-area unit.

Q. As part of your preparation, did you read the transcript and look at the exhibits from the 29-and-7 case?

1 A. Yes, I did.

2 Q. In addition, you have looked at all that work
3 product generated by the former reservoir engineer, doing
4 the task that you now perform?

5 A. That's correct.

6 Q. As part of your duties, did you also look at the
7 reservoir data that went into the modeling that was done in
8 the 29 and 7?

9 A. Yes, I did.

10 Q. And what you, in fact, have performed is the
11 reservoir simulation for the 27-and-5 unit and the
12 drillblock area?

13 A. That's correct.

14 Q. And based upon that simulation you have
15 recommendations concerning the approval of increased
16 density on a pilot basis for these two projects; is that
17 not true?

18 A. That's true.

19 MR. KELLAHIN: We tender Mr. McNeil as an expert
20 witness.

21 EXAMINER CATANACH: He is so qualified.

22 Q. (By Mr. Kellahin) Let's take the exhibit book
23 for the 27-and-5 unit. Starting with Exhibit 7, let's look
24 how you adjusted the model that was used for the 29 and 7
25 and made it applicable to the 27-and-5 project. Starting

1 with the first locator map, what does this mean?

2 A. This first locator map identifies the four-
3 section pilot area for the 27-and-5 unit. In a similar
4 fashion, the 29-7 unit simulation represented four sections
5 as well, so the areal extent is similar.

6 Q. All right, we flip past that display and we have
7 another one. This represents what, sir?

8 A. This particular slide represents the grid of the
9 simulation for the 27-and-5 unit with the -- This is a map
10 view of the top layer. And again, this reservoir
11 simulation included 65 layers. Each of the individual well
12 markings is located on the grid, as well as the appropriate
13 well number.

14 Q. Mr. Babcock has given you the appropriate
15 geologic parameters to adjust, to make the model specific
16 for the 27-and-5 unit?

17 A. That's correct.

18 Q. And now you're inputting the well data by putting
19 the wells at the proper place in the model?

20 A. Right, the wells are located, due to their proper
21 locations, and the actual production historically for the
22 past 40 years for some of the wells is input into the
23 simulation. And we go from there trying to match
24 pressures.

25 Q. Okay. The last display behind Exhibit Tab 7

1 represents what? It says "Porosity".

2 A. This particular slide represents a single layer
3 in the Menefee. In this particular case it's layer 35.
4 And it's input in here to show the high degree of
5 variability in the porosity within the Menefee.

6 The scale on the bottom indicates that black is
7 from zero to .03 porosity units, the gray is .03 to .06,
8 and the red is .06 to .10. So the majority of the porosity
9 values fall between 3 and 10 percent, yet within a one-
10 grid-block separation you can range from 3 to 10 percent.
11 So it shows the highly discontinuous and highly variable
12 nature of the Menefee.

13 Q. But you're helping the model recognize this
14 variability by putting this data into the model?

15 A. That's correct.

16 Q. All right. The next thing you're going to do is,
17 you're going to take your model and you're going to try to
18 match it to some known values. Let's turn to Exhibit Tab 8
19 and have you tell us which parameters or values you've
20 tried to match.

21 A. Right, in this given model we have input the
22 historical production for all the wells in the four-section
23 simulation area.

24 Q. Again, the history matching is the same
25 methodology used in this 27 and 5 that was done for the 29

1 and 7?

2 A. That's correct.

3 Q. All right. And here you're matching initial
4 shut-in pressures, aren't you?

5 A. In this slide, this depicts the model-predicted
6 versus actual shut-in tubing pressure for each well in the
7 four-section pilot area. Again, this scale is shut-in
8 tubing pressure in p.s.i. versus time in days. So that
9 bottom scale represents about a 40-year time frame.

10 Each of the corresponding pair of red and blue
11 dots represents the original shut-in tubing pressure of
12 each well in the simulation area. And as you can see,
13 we've matched those pressures of model-predicted and actual
14 throughout time very well.

15 Q. Are you satisfied with the match?

16 A. Yes, we are.

17 Q. Let's turn to see if you matched any other
18 parameters. If you'll look at the next display behind
19 Exhibit 8, what are you matching here?

20 A. In addition to the original shut-in tubing
21 pressures, we also matched pressures on an individual-well
22 basis. This particular well is Well Number 25, and this
23 particular plot displays wellhead pressure versus time,
24 again in days.

25 Q. Why would you want a match as to this parameter?

1 A. Again, in the model we're inputting this well's
2 historical gas production rate and trying to match the
3 model-predicted pressure, which is in green, with the
4 observed seven-day shut-in pressures, which are the red
5 hach marks on the upper portion of the trend, as well as
6 the wellhead flowing pressures measured, which are the blue
7 marks.

8 So again, we're trying to get the model-predicted
9 pressures to, number one, follow the trend, but, number
10 two, match the values of the actual observed data.

11 Q. And you did this for all the wells in the unit
12 that were part of the computerized study?

13 A. That's correct, this is just one representative
14 well.

15 Q. And what degree of confidence do you have in this
16 match?

17 A. We have high confidence in this match.

18 Q. You're satisfied that it's matched accurately?

19 A. Yes.

20 Q. Is there any reason to match any other parameter?
21 You've matched flowing tubing pressure historically for
22 each of these wells, you've matched your shut-in tubing
23 pressures. Any reason to match anything else?

24 A. No, I mean, typically with the input of gas
25 production, you're trying to predict pressures. So given

1 one value, you try to match another, and that gives a
2 realistic representation of what the model looks like.

3 Q. Once you can do that and satisfy yourself the
4 model is being able to match known values, then it can
5 forecast future performance of the wells in the unit?

6 A. That's correct, once we get a model that's
7 representative of the 40-plus years of production history,
8 then we'd like to, number one, forecast the performance of
9 the existing wells and also what impact additional
10 increased density drilling will have.

11 Q. Did you follow the same methodology in the
12 drillblock case?

13 A. Yes. Yes, I did.

14 Q. Let's turn to the drillblock case. We're going
15 to turn past all the data and the matching information.
16 Can you conclude for the drillblock that you had had an
17 adequate match on those flowing tubing pressure data
18 points, as well as the shut-in tubing pressure database?

19 A. Again, in a similar fashion for the drillblock
20 four-section simulation area, we were able to match the
21 individual well's original shut-in tubing pressure and the
22 model-predicted shut-in tubing pressure, from the first
23 well back in 1951 through the most recent well in 1990.
24 Again, we're satisfied with the match of those
25 corresponding pressures with time.

1 So that's each well, individual shut-in tubing
2 pressures.

3 Q. All right. Now, let's go back and look at what
4 the model predicted for the unit that was approved last
5 year. For the 29 and 7 it forecasted a certain conclusion.
6 You drilled your eight infill wells, increased density
7 wells. How did you fit that together, and what conclusion
8 did you reach?

9 A. The conclusion from the 29-7 history match and
10 infill performance projection was that our maximum net
11 present value generated was with two additional infills per
12 section.

13 Now, in the two cases where -- the 27 and 5 and
14 the drillblock, this clearly indicates that we need four
15 additional wells per section. So that really magnifies the
16 difference between the two, at least from a performance
17 standpoint.

18 Q. When we go back to the 29 and 7, the original
19 one, you're satisfied that the data from the eight new
20 wells didn't cause you to change any of the values in the
21 model that had been run for that unit? You're satisfied?

22 A. I think the results may have shown, as Bill
23 previously mentioned, that the model may have been somewhat
24 conservative, and specifically with performance of initial
25 skin.

1 But yeah, the actual data suggests that we're
2 happy with two additional infills per section, and the
3 actual data is positive enough that we may actually indeed
4 have potential for additional wells, infill wells.

5 Q. The modeling of 29 and 7 was slightly
6 conservative, because the actual increased density from
7 four per section to six per section showed better results
8 in terms of rate and pressure --

9 A. -- and overall economics, right.

10 Q. -- and overall economics, than the model had
11 forecast?

12 A. Right.

13 Q. When you look at the results to the 27 and 5,
14 what does the model forecast for you?

15 A. For the 27 and 5, the model predicts that we
16 would indeed need four additional wells, infill wells, per
17 section.

18 Q. All right. And so in the drillblock area, what
19 does the model forecast for you?

20 A. And also, similarly, in the drillblock area, we
21 forecast four additional infill wells per section.

22 Q. All right. So our density per section is eight
23 in each of those areas --

24 A. That's correct.

25 Q. And the density in the 29 and 7 is at least six,

1 if not better?

2 A. That's correct.

3 Q. Okay, let's look specifically at 27 and 5, at the
4 conclusions. Starting behind Exhibit Tab 9, you've given
5 us a way to understand the coding for the rest of the
6 displays. When we look at a base case on the rest of these
7 displays, that means a current density of one well per 160,
8 right?

9 A. That's correct.

10 Q. And one section means one additional well per
11 section?

12 A. That's correct.

13 Q. And as you read on down, ultimately you're going
14 to have a total of eight additional wells per section, on
15 top of the original four that are already allowed in the
16 rules?

17 A. Actually, the bottom one is four additional wells
18 per section --

19 Q. Yes.

20 A. -- for a maximum of eight per section --

21 Q. All right.

22 A. -- so that simulates 80-acre density.

23 Q. Okay. Let's turn to the production forecast,
24 which is the color display that follows this, and let's do
25 both books together, because I think you can make a good

1 comparison here. If you'll look in the drillblock and find
2 the same production forecast for the drillblock, starting
3 with the unit case, what does the production forecast tell
4 you?

5 A. Again, the production forecast is depicted with
6 the rate in MCF per day versus time, and the blue curve on
7 the bottom represents the base case of the existing wells,
8 and each subsequent curve includes the base case plus one
9 additional well per section and subsequently two, three and
10 four additional wells per section.

11 Q. So as we start with the base case and read up the
12 curves, every time there's a change in color we've added
13 four more wells?

14 A. To the four-section pilot area, that's correct.

15 Q. Okay. What's the conclusion?

16 A. The conclusion, from this slide you can see all
17 the wells come on line in 1998. And on average, each
18 additional infill well in the 27-and-5 unit has an initial
19 production of 500 MCF per day per well, and you can see
20 that that increases subsequently between the cases, and --
21 from a base case of about 2300 MCF per day to a four
22 additional wells per section of about 11 million cubic feet
23 per day.

24 Q. By adding multiples of four, we can improve our
25 rate of withdrawal of gas from the pool?

1 A. That's correct.

2 Q. And we know we can do it as many as four
3 additional wells per section and still be successful at
4 doing that?

5 A. That's right.

6 Q. Let's look at the drillblock example. What do
7 you see here?

8 A. The production forecast on the drillblock
9 example, again, is rate in MCF per day versus time. Again,
10 the bottom curve represents the base case of the existing
11 wells, which are currently at about 3300 MCF per day. The
12 subsequent curves indicate the base plus one, two, three
13 and four additional wells per section in a similar fashion
14 to the 27-and-5 presentation. In the drillblock area, the
15 average infill initial rate is 650 MCF per day per well.

16 Q. You've got a little higher rate --

17 A. Yeah.

18 Q. -- You've got a little higher rate in the
19 drillblock than in the unit case, but in the drillblock as
20 well adding density up to four more per section improves
21 the rate for the section?

22 A. That's correct.

23 Q. Let's flip behind that one and let's see what, in
24 addition to rate, what you do with your cumulative
25 forecast. Starting with the unit case, what do you

1 forecast to be the results of the cumulative gas
2 production?

3 A. This chart represents the cumulative forecast in
4 MCMCF versus time.

5 And again, the bottom blue case is the base case
6 performance of the existing wells. And if you pick a time
7 frame out at, say, year 2040, the base case projected
8 recovery is about 37 BCF.

9 By subsequently increasing with one, two, three
10 and four additional wells per section, you increase the
11 recovery to about 60 BCF. So we get a substantial increase
12 of incremental reserve recovery by adding infill
13 candidates.

14 Q. And as we add multiples of four we can, in each
15 instance, improve our ultimate gas recovery from the
16 section?

17 A. That's right. And in the 27-and-5 unit, the
18 average infill well will recover 1.6 BCF per well.

19 Q. At what density?

20 A. And it -- The average is pretty close to 1.6, as
21 you subsequently add one, two, three and four. So that's
22 at four additional wells per section.

23 Q. I didn't follow that. 1.6 BCF?

24 A. BCF.

25 Q. Of gas per well?

1 A. That's right.

2 Q. And so if I start with four and add a fifth to my
3 section I can get 1.6 BCF?

4 A. On average it works out fairly similar, yes.

5 Q. And if I add a seventh I still get 1.6?

6 A. You still get, on average, 1.6.

7 Q. So incrementally I still get more with each well?

8 A. With each well.

9 Q. All right, let's see what happens in the
10 drillblock.

11 A. The drillblock cumulative production forecast,
12 again, is versus time, and this reads -- It should be MCF.
13 And the base case is in blue, and if you pick a time frame
14 out at 2040, we've recovered -- or we're projecting the
15 base case of existing wells to recover 47 BCF.

16 By adding, again, one, two, three and four
17 additional wells, we increase the recovery to about 73 BCF.

18 So to summarize the cumulative forecast for the
19 drillblock simulation, on average an infill well will
20 recover 2.1 BCF per well.

21 Q. Why is the recovery per well better in the drill
22 block than in the 27-and-5 unit, as forecasted?

23 A. I think as Bill alluded to earlier, somewhat due
24 to original gas in place, we have a little bit thicker
25 sands, and additionally permeability is slightly higher in

1 the drillblock as compared to 27-and-5 unit.

2 Q. Okay. We've looked at rate, we've looked at cum
3 gas. Let's see what happens to pressure. If you'll turn
4 to the next display, let's see what happens to the average
5 field pressure, starting with the 27-and-5 unit.

6 A. Again, this depicts the average reservoir
7 pressure versus time.

8 So again, if you pick the corresponding year,
9 2040, the average reservoir pressure in the 27-and-5 unit
10 is projected to be, on the base case, about 900 p.s.i.

11 And as you add additionally one, two, three and
12 four additional wells per section, you can decrease the
13 average reservoir pressure to about 650 p.s.i.

14 So as we increase our recovery of gas, we
15 decrease our average field pressure.

16 Q. So what conclusion should you reach, or what
17 information should -- What's the point of what you're
18 showing?

19 A. Again, the point is, number one, we're drilling
20 wells to increase recovery, we're having a significant
21 decrease in average field pressure.

22 But I think additionally it shows you out at year
23 2040, your average pressure is still above 600 p.s.i.,
24 which I think at some point in the future suggests the
25 investigation of additional infill drilling beyond 80

1 acres.

2 Q. Would this be a suggestion to you that you're
3 recovering additional gas that might not otherwise be
4 recovered, even though you're increasing the number of
5 wells?

6 A. Yes. For example, in the 27-and-5 unit the
7 average recovery is 1.6 BCF per well. Only 15 percent of
8 that is what we would call accelerated reserves, and the
9 remaining 85 percent is truly incremental reserves.

10 Q. All right. Let's look at that display. In both
11 cases that's -- It's the display that's got a table. The
12 bottom half of the table is in green, the top part is in
13 blue, it says "Year 2040 Cumulative Production"?

14 A. That's right.

15 In the 27-and-5 unit, we have a cumulative
16 production in MMCF for the base case, and then each
17 subsequent infill case.

18 The green curve depicts the performance of the
19 existing wells. So in the base case again, we're projected
20 to recover 37 BCF.

21 The blue portion represents the additional
22 increase in production you'll gain with the infill wells.

23 So again, our cumulative production increases to
24 60 BCF in the base case, plus four additional wells per
25 section.

1 And the amount that the existing well, or the
2 green bar, drops, that reflects the acceleration portion of
3 the infill recovery.

4 Q. All right, let me see if I can illustrate this.
5 On the drillblock case, if I take a horizontal line on top
6 of the base case and draw it horizontally across the
7 display, everything below the red line, till I get to the
8 top of the green line, represents rate acceleration?

9 A. That's correct.

10 Q. Everything above the red line is incremental
11 reserves that I would not have otherwise produced?

12 A. That's right. And the drillblock area, the
13 acceleration piece represents 25 percent and the
14 incremental piece represents 75 percent.

15 And conversely at 27 and 5, the acceleration
16 piece represents 15 percent, and the incremental piece
17 represents the remaining 85 percent.

18 Q. In each of those examples, then, for those two
19 project areas, you've demonstrated that we can increase the
20 density -- we can double the density from four to eight and
21 still get gas that we would not otherwise produce?

22 A. That's right.

23 Q. Let's turn and see if we can afford to pay for
24 this. Move past the -- Well, let's talk about recovery
25 factor; it won't take but a minute. Let's see how much of

1 this gas we're getting.

2 Looking at the unit in the year 2040, what
3 percentage of the gas are we going to get?

4 A. Again, this is recovery factor in year 2040. On
5 the left is the performance projection for the existing
6 wells. In the 27-and-5 unit the projected EUR is 31
7 percent, or a 31-percent recovery factor.

8 With the existing wells plus 16 total infills in
9 the four sections, or four additional infills per section,
10 we can increase our recovery factor to 50 percent.

11 So again, we saw decreasing reservoir pressures,
12 increasing recoveries, and it's represented here as
13 increase in recovery factory.

14 And again, this applies, really, to just the
15 four-section pilot area in 27 and 5.

16 Q. And there still may be a future opportunity to
17 improve that recovery; I thought I heard maybe up to 80
18 percent was what might ultimately be produced?

19 A. Typically, in the more efficient parts of the
20 Basin, our recovery factors have ranged in the 70 to 80
21 percent.

22 So yes, this would indicate that there may be
23 future potential, that's correct.

24 Q. Have you done present-value calculations in each
25 of the two project areas?

1 A. Yes, we have.

2 Q. Let's turn to those displays and look at them
3 together. Let's start with the unit case that says net
4 present value. On the vertical scale we're reading what?

5 A. This is after tax, net present value in thousands
6 of dollars.

7 Q. Okay.

8 A. And again we have economic cases for one, two,
9 three and four additional wells per section.

10 Q. All right, let's start with the bottom plot. It
11 starts off with the blue squares and the solid blue line.
12 This one per section means we've added one well to the
13 section?

14 A. One well to the section.

15 Q. And the assumption is that it's a dollar fifty?

16 A. On the bottom curve that is a dollar fifty per
17 MCF, flat. And then we also risked the incremental
18 reserves --

19 Q. What was the risk component?

20 A. Seventy five percent.

21 Q. Seventy-five percent risk?

22 A. Right.

23 Q. Okay. If that is the scenario, can you drill one
24 more well in a section?

25 A. Yeah, based on our most conservative and most

1 pessimistic look, which was represented in the bottom curve
2 of the dollar fifty with risked reserves, again we generate
3 our maximum net present value at four additional wells per
4 section, and in a most conservative look or snapshot this
5 is the type of project that generates a positive net
6 present value, and it's a project that's worth pursuing.

7 Q. All right. If you go to the four-section study
8 area and add the maximum density, which would be 16 wells
9 -- you've added four more per section -- what does it show
10 you under the dollar-fifty risk analysis?

11 A. Again, in the most conservative case, on the
12 bottom curve with four additional infills per section, we
13 generate roughly \$1.3 million of after-tax net present
14 value.

15 And again, our maximum net present value on this
16 chart occurs with four additional infills per section.

17 Q. And you've tried this under three other
18 scenarios. There's the unrisked at a dollar and a half,
19 there's the two-dollar risked and unrisked. And in each
20 example you can demonstrate in the unit that it's
21 profitable to increase the density up to a maximum of four
22 additional wells per section?

23 A. That's correct.

24 Q. When we look at the drillblock area we come to
25 the same conclusion, don't we?

1 A. Right, that's correct.

2 Q. All right. Let's turn past that and look at the
3 profit-to-investment ratio. Now, these will be specific
4 per company, would they not?

5 A. Sure, they would. Each company would have their
6 own directives as far as the targets they would like to
7 meet.

8 Q. All right. Let's look in the vertical scale, and
9 you have a profit-to-investment ratio, and a company could
10 decide what profit-to-investment ratio that they want to
11 have?

12 A. That's correct.

13 Q. And if they choose .5, what are they choosing?

14 A. The profit-to-investment ratio represents the
15 after-tax net present value divided by the discounted net
16 investment.

17 So again, even in our most conservative case
18 we're between a .1 and a .2. And considering a two-dollar
19 risked gas price and risked reserves or a dollar fifty with
20 unrisked reserves we get to that .4-type project.

21 So either -- Both of those cases are projects
22 that we would pursue, and to some extent even on the lower
23 and the most conservative case between a .1 and a .2 would
24 still come close to competing under this most conservative
25 case.

1 Q. Okay. Give us the conclusions for the drillblock
2 area.

3 A. Again, we've got after-tax net present value
4 divided by the net investment, and that is representative
5 of the after-tax profit-to-investment ratio. And again,
6 here at the most conservative case of a dollar fifty flat
7 with a 75-percent reserve risk, we generate a profit-to-
8 investment ratio of .2 to .3, which is slightly better than
9 the 27-and-5 unit.

10 Q. For both the drillblock and the 27-and-5 unit,
11 the model forecasts that we can drill up to an additional
12 four per section, the maximum requested, and in doing so we
13 can improve daily rate, we can increase ultimate recovery,
14 we can produce gas that we might not otherwise produce, and
15 we can do so profitably?

16 A. That's correct.

17 Q. Any other conclusions?

18 A. That in a nutshell wraps up the summary of both
19 pilots.

20 MR. KELLAHIN: Thank you, sir.

21 We move the introduction of the engineering
22 exhibits. They're the exhibits behind Exhibit Tab 7 and
23 they are 7 and 8 in both books.

24 EXAMINER CATANACH: Okay. Exhibits 7 and 8 in
25 Case 11,879 and 7 and 8 in Case 11,880 will be admitted as

1 evidence.

2 EXAMINATION

3 BY EXAMINER CATANACH:

4 Q. I just want to verify some numbers that you gave
5 us, Mr. McNeil. Within the 27-5 units, additional recovery
6 per well, per infill well, is estimated to be 1.6 BCF?

7 A. 1.6 BCF per well, that's correct.

8 Q. Of that 1.6 BCF, 85 percent are incremental
9 reserves, 15 percent are just accelerated?

10 A. That's correct.

11 Q. Okay. In the drillblock, can you give me the
12 numbers on that?

13 A. In the drillblock area the average recovery is
14 2.1 BCF per well, of which 25 percent is accelerated
15 reserves and 75 percent is incremental reserves.

16 Q. Okay. Now, within the 27-5 unit, you just looked
17 at the four-section project area; is that right?

18 A. That's right, and the four-section pilot.

19 Q. So these numbers could all change depending on
20 drilling in a different area within that unit; is that
21 right?

22 A. I think this particular pilot would be more
23 representative of -- along the north half of the unit and
24 the south half, but could vary somewhat according to the
25 middle of the section and the production performance we

1 see.

2 Q. Okay.

3 A. I think the overall recoveries would probably
4 decrease as you went towards the middle of the section, but
5 from a relative standpoint of, you know, roughly 85 percent
6 being incremental reserves, I think that would stay fairly
7 constant.

8 Q. Within the 29-7 unit, are you -- You said that
9 you determined that two additional infill wells is
10 sufficient?

11 A. The simulation and the projection at that time
12 indicated that two additional wells per section was
13 optimum.

14 However, with some of the positive results we've
15 seen, I think it suggests that we may be able to go above
16 that two additional per section.

17 Q. Okay. So your model for these two addition pilot
18 areas suggests that four wells per section would be
19 appropriate?

20 A. That's right.

21 Q. Do you think the model that you've done for these
22 two new areas is -- will be conservative, as were the last
23 one?

24 A. The methodology was similar, so it could be
25 slightly conservative.

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 November 18th, 1997.



STEVEN T. BRENNER
 CCR No. 7

My commission expires: October 14, 1998