

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:)

CASE NO. 12,857

APPLICATION OF BURLINGTON RESOURCES)
OIL AND GAS COMPANY, LP, BP AMOCO AND)
ENERGEN RESOURCES CORPORATION FOR)
APPROVAL OF A PILOT PROJECT INCLUDING)
UNORTHODOX WELL LOCATIONS AND AN)
EXCEPTION FROM DIVISION RULE 104.D.3)
FOR PURPOSES OF ESTABLISHING A PILOT)
PROGRAM IN THE PICTURED CLIFFS FORMATION)
TO DETERMINE PROPER WELL DENSITY)
REQUIREMENTS FOR PICTURED CLIFFS WELLS)
IN SAN JUAN, SANDOVAL AND RIO ARRIBA)
COUNTIES, NEW MEXICO)

02 MAY 16 AM 8:45

OIL CONSERVATION DIV.

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: MICHAEL E. STOGNER, Hearing Examiner

May 2nd, 2002

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, MICHAEL E. STOGNER, Hearing Examiner, on Thursday, May 2nd, 2002, at the New Mexico Energy, Minerals and Natural Resources Department, 1220 South Saint Francis Drive, Room 102, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

* * *

STEVEN T. BRENNER, CCR
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May 2nd, 2002
Examiner Hearing
CASE NO. 12,857

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A P P E A R A N C E S

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(Continued...)

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* * *

1 WHEREUPON, the following proceedings were had at
2 8:23 a.m.:

3 EXAMINER STOGNER: This hearing will come to
4 order. Please note today's date, May 2nd, 2002. This is
5 for Docket Number 13-02.

6 And at this time I will call Case Number 12,857,
7 which is the Application of Burlington Resources Oil and
8 Gas Company, LP, BP Amoco and Energen Resources Corporation
9 for approval of a pilot project including unorthodox well
10 locations and an exception from Division Rule 104.D.3 for
11 purposes of establishing a pilot program in the Pictured
12 Cliffs formation to determine proper well density
13 requirements for said Pictured Cliffs wells in San Juan,
14 Sandoval and Rio Arriba Counties, New Mexico.

15 Call for appearances at this time.

16 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin of
17 the Santa Fe law firm of Kellahin and Kellahin. I'm
18 appearing on behalf of the Applicant, and there are three
19 witnesses to be sworn.

20 EXAMINER STOGNER: Any other appearances?

21 MR. CARR: May it please the Examiner, William F.
22 Carr with Holland and Hart, L.L.P., Santa Fe, New Mexico.
23 We're entering our appearance on behalf of BP Amoco, and we
24 will have a statement.

25 EXAMINER STOGNER: No witnesses?

1 MR. CARR: No witnesses.

2 EXAMINER STOGNER: Other appearances?

3 MR. BRUCE: Mr. Examiner, Jim Bruce of Santa Fe,
4 representing XTO Energy, Inc. I have no witnesses.

5 EXAMINER STOGNER: Other appearances?

6 Can I have the three witnesses stand at this time
7 to be sworn in?

8 (Thereupon, the witnesses were sworn.)

9 EXAMINER STOGNER: Mr. Kellahin?

10 MR. KELLAHIN: Thank you, Mr. Examiner.

11 EXAMINER STOGNER: While they're getting set up,
12 I will invite everybody that's interested to kind of shift
13 around, because it appears that you're going to be shooting
14 the screen and covering the material over here on the east
15 wall; is that correct?

16 Let's go off the record for a while and let's get
17 set up first. We're off the record at this time.

18 (Off the record)

19 EXAMINER STOGNER: Okay, let's go back on the
20 record now.

21 Mr. Kellahin?

22 MR. KELLAHIN: Thank you, Mr. Examiner. We have
23 a collective presentation on behalf of all three companies
24 that are participating in the pilot project. The witnesses
25 are going to be:

1 Mr. Mike Dawson. Mr. Dawson is a geologist with
2 Burlington. He's going to give you a quick overview of
3 what he anticipates to be the issues involved in the study.
4 He is also a geologist, and he's going to set the
5 background in the Pictured Cliff pools in the San Juan
6 Basin to give you a sense of the geologic characteristics
7 of the pool.

8 Mr. Eric Broacha is a petroleum engineer. He
9 works for Burlington, and he is going to provide you the
10 engineering basis for the project area.

11 And then Mr. Matt Gray is a landman with
12 Burlington. He's going to illustrate for you the
13 satisfactory compliance with the notice requirements,
14 identify for you each of the plats that we have for the 24
15 pilot wells that are at standard locations. They will be
16 increased density wells in a standard 160-acre spacing
17 unit. There are an additional six wells that could not be
18 located at standard locations, and we'll talk about those,
19 and they're separately indexed in the exhibit book.

20 With that introduction, then, we'll have Mr.
21 Dawson commence his presentation and discuss with you the
22 framework of the study and the geology.

23 EXAMINER STOGNER: Okay now, I have Mike Dawson,
24 Eric Broacha, and what was the third one again?

25 MR. KELLAHIN: Matt Gray.

1 EXAMINER STOGNER: Now, they all work for
2 Burlington?

3 MR. KELLAHIN: They do.

4 EXAMINER STOGNER: All right, please continue.

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

8 DIRECT EXAMINATION

9 BY MR. KELLAHIN:

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

12 A. I'm Mike Dawson, I'm a petroleum geologist. I've
13 worked for Burlington Resources and its predecessors for
14 over 20 years.

15 Q. On prior occasions have you qualified as a
16 petroleum geologist and testified before the Division?

17 A. Yes, sir, I have.

18 Q. What are your responsibilities concerning this
19 pilot project area in the Pictured Cliff reservoirs in the
20 San Juan Basin?

21 A. I've been instrumental in designing a test
22 program and furnishing geologic support to our reservoir
23 studies.

24 Q. And you are part of the technical team that's
25 involved with the various companies to make a study of the

1 opportunity for increasing the density in the Pictured
2 Cliff pools in the Basin?

3 A. Yes, sir.

4 MR. KELLAHIN: We tender Mr. Dawson as an expert
5 witness.

6 EXAMINER STOGNER: Any objections?

7 Mr. Dawson is so qualified.

8 Q. (By Mr. Kellahin) Mr. Dawson, we've put up the
9 first display. If you'll turn into the hardbound exhibit
10 binder and turn to Exhibit Tab 2, the first display after
11 the indexed tab is the colored pool map that's on the
12 display screen, Mr. Stogner.

13 In addition, if there's people in attendance that
14 would like copies of the exhibit book, we do have them
15 available on a CD disc that you can view and install
16 through your computer. If you'll give me your name and
17 address, we'll have Burlington provide you with the disc
18 copy of the exhibit book.

19 EXAMINER STOGNER: Yes, Mike Stogner --

20 MR. KELLAHIN: Yes, sir.

21 EXAMINER STOGNER: -- 1220 South St. Francis.
22 Would you -- Do you all have those available today?

23 MR. KELLAHIN: Yes, we have some sets today, and
24 we will hand those out to the extent we have them, and in
25 addition you have the hard copy and the book.

1 EXAMINER STOGNER: I'd like to reserve one, but
2 there's everybody else here that wants one, then I can get
3 one later.

4 MR. KELLAHIN: There's no music.

5 EXAMINER STOGNER: Oh, well, in that case...

6 (Laughter)

7 EXAMINER STOGNER: This will be an interesting
8 way for me to go back and review and utilize this. This is
9 something new, and I appreciate that, so...

10 MR. KELLAHIN: We'll see if it works on a regular
11 basis, certainly.

12 Q. (By Mr. Kellahin) All right, Mr. Dawson,
13 describe for us what we're seeing on this first display
14 that's identified as the Pictured Cliff Pool Map.

15 A. This map defines the 29 pools that we have
16 identified as having Pictured Cliffs production. We've
17 included it as sort of an introductory index map to show
18 the distribution of the productive areas of the Basin.

19 From the 29 pools that we've identified, we
20 believe that approximately 3.6 trillion cubic feet of gas
21 have been produced from approximately 6220 wells. The
22 Pictured Cliffs, of course, is nearly entirely a gas-
23 productive formation. It's only produced a reported
24 784,000 barrels of oil, so it's essentially a dry gas
25 reservoir.

1 Let's see, the discovery well, I think, is very
2 interesting. It was the first commercial Pictured Cliffs
3 production. It was completed in November of 1927. It was
4 the Number 1 Frank Garland in the southeast of Section 34,
5 29 North, 11 West. That is in the Fulcher-Kutz Pool.
6 That's Section 34, 29-11.

7 Of interest to me is the fact that the same
8 quarter section has produced nearly continuously since
9 1927. It's now on its third wellbore, but that well is
10 producing 80 MCF a day as a current rate. So I think this
11 typifies the long-lived production that we see from the
12 Pictured Cliffs reservoirs.

13 Q. Mr. Dawson, let me ask you the source of the map
14 that is displayed here. How did you get the various pool
15 configurations and boundaries?

16 A. Those came from the OCD Aztec office.

17 Q. Do you have a summary that shows us what in you
18 opinion, or the collective opinion of the technical group,
19 is the reasons that justify pursuing the opportunity to
20 increase the density in the Pictured Cliff pools?

21 A. Yes, sir, in the next slide we'll list some of
22 our key observations that lead us to ask the critical
23 question, is increased density needed in the Pictured
24 Cliffs? I'd like to just briefly summarize these
25 observations and these lines of investigation. Each will

1 be elucidated in a lot more detail later in the testimony.

2 One of the first things that lead us to ask this
3 question are the results of a four-township pilot
4 volumetric study. What we found was that we actually had a
5 relatively low recovery factor from the Pictured Cliffs
6 formation relative to other tight gas formations throughout
7 the Rocky Mountain province.

8 A second observation that we've made that leads
9 us to ask the critical question is that, looking at
10 historic pressure data and some data that we've acquired in
11 the last couple years, within the productive field areas of
12 the Pictured Cliffs, we see highly variable pressures
13 today.

14 Another thing that we've recognized is that we
15 are fairly inefficient in completing the lower Pictured
16 Cliffs, which tends to have very low matrix permeabilities.
17 And that sort of leads us to want to investigate whether
18 we're recovering all the gas that we can from that
19 interval.

20 A fourth area of investigation involves wells
21 that have produced concurrently from the Pictured Cliffs
22 within 160-acre blocks, and historically we were able to
23 find about 80-some-odd examples of that, and about 45 or so
24 had clear enough data, including pressure and rate data, so
25 that we could at least address the production trends and

1 look for interference and so forth.

2 Then the final thing that we've looked at, that I
3 think bears on the question of increased density, is our
4 successful redrill and restimulation programs in the
5 Pictured Cliffs. In particular, in the redrill program we
6 go into areas where we've abandoned production, and we're
7 able to drill a new well and have economic results.

8 So in summary, we've addressed each of these
9 areas. None of the areas give us conclusive evidence that
10 increased density is appropriate. Each leads us to want to
11 further our investigations and gather more data.

12 Q. Do you have a slide, Mr. Dawson, that summarizes
13 for us the major objectives of the pilot project?

14 A. Yes, sir, this next slide also poses a critical
15 question that we ask ourselves: Why should we implement a
16 pilot program? And it summarizes some of our data needs in
17 order to thoroughly evaluate how appropriate infill
18 drilling might be in the Pictured Cliffs formation.

19 One of the first things we find that we need is
20 some new core, and we plan to core wells to be drilled with
21 foam so that we can minimize the invasion of drilling
22 fluids. We find the limited data that's available in our
23 files and in our partners' files suspect in terms of water
24 saturation in particular.

25 The other thing that's lacking is much analysis

1 in the lower part of the Pictured Cliffs formation, which
2 represents a very low-permeability reservoir.

3 A second thing that we feel we need to address is
4 the efficiency of our drilling and completion techniques.
5 When we look at the Pictured Cliffs, especially with the
6 historical perspective, what we realize is that the
7 reservoir doesn't really behave as it did 20, 30 or even 50
8 years ago. It's a much lower-pressured reservoir. Also,
9 drilling and completion technologies have changed over the
10 years.

11 So we want to examine drilling and completion
12 techniques in the context of a comprehensive reservoir
13 optimization program.

14 The same thing goes for compression. We know
15 it's an important component of Pictured Cliffs production.
16 We need to learn all we can about compression and its
17 effects on the reservoir in order to adequately evaluate
18 increased density.

19 We need to collect more data for reservoir
20 simulation studies and modeling. The best data we can get
21 would be empirical data resulting from the pilot completion
22 and drilling program that we're proposing today.

23 Finally, we feel like where the rubber really
24 meets the road is going to be where we do pilot projects
25 and actually look for interference, look for efficiencies

1 or inefficiencies, try to document whether or not we
2 actually can increase ultimate production.

3 So each of these areas of investigation and data
4 acquisition will be explained in a lot more detail during
5 the course of our testimony.

6 Q. Mr. Dawson, do you have a slide that gives us the
7 outline of the presentation book and the various chapters
8 that --

9 A. Yes, sir.

10 Q. -- you and the other technical people are going
11 to present this morning?

12 A. Yes, sir, we do. This next slide shows that
13 we're starting out with a geologic overview.

14 We're going to present the results of our four-
15 township volumetrics study in some detail.

16 We're going to discuss the historical performance
17 and production trends of wells that are produced
18 simultaneously from the Pictured Cliffs in 160-acre drill
19 blocks. They're described here as 80-acre well pairs, and
20 we'll use this term several times through the presentation.

21 We want to present to you our 2001 layer pressure
22 test program and the results of that program.

23 We want to show some of the results of the
24 redrill and restimulation program that Burlington, in
25 particular, has been very active in, as have our partners.

1 We want to define our proposed pilot program.

2 And finally, we want to review current pool rules
3 and setback regulations and discuss some of the regulatory
4 considerations.

5 Q. All right, Mr. Dawson, let's turn to Exhibit Tab
6 3 and look at the first geologic summary, if you will.

7 A. What we want to accomplish with this geologic
8 summary is to give you a feel for the degree to which the
9 reservoir stratigraphy and geology is consistent through
10 the productive field area and sort of set out the ability
11 to evaluate whether our proposed program will be
12 representative of the entire productive area of the
13 Pictured Cliffs.

14 Q. From a geologic perspective, Mr. Dawson, are the
15 various Pictured Cliff pools, some 29 pools in the area, is
16 the geology sufficiently consistent that we can treat the
17 Pictured Cliff under a common set of geologic conclusions?

18 A. Yes, sir, it is.

19 Q. Is it, in your opinion, necessary to have pilot
20 wells within each and every one of the pools involved?

21 A. No, it isn't, but we have tried within the
22 constraints of our leasehold and economics to put tests in
23 as many pools as possible, between Burlington Resources,
24 Energen and BP.

25 Q. Give us a summary of the geology, then, Mr.

1 Dawson.

2 A. Okay, we're going to start out looking at a PC
3 cum map.

4 Q. How is this useful in understanding the geology?

5 A. For the Pictured Cliffs, the cumulative
6 production map reflects the depositional system and the
7 geologic trends perhaps even more clearly than a gross
8 sandstone or a net sandstone map.

9 Certainly structure is not a very important part
10 of the Pictured Cliffs story. The structural contours
11 basically parallel the production trends that we see on
12 this map.

13 The production trends shown in red here represent
14 wells that have cum'd over a BCF in general. What you see
15 are very long, linear trends of high permeability reflected
16 in this map. This represents deposition in a wave-
17 dominated deltaic system, and it represents the
18 accumulation of cleaner, better-sorted sands in the upper
19 shore face and in the beach parts of the system. Those
20 high-permeability sands aren't present everywhere, and when
21 we get between the high-capacity trends we still have thick
22 gross sandstone, but we don't have the high permeability
23 that results in production and cum totals over a BCF.

24 The Pictured Cliffs depositional system prograded
25 from the southwest -- try to use the pointer here -- in

1 this area. And the red, by the way, is the outcrop of the
2 PC, commonly taken to be a reflection of the outline of the
3 San Juan Basin. But it prograded from the southwest to the
4 northeast. As the sea level dropped, in effect, relative
5 to this local area, we filled the accommodation space, and
6 this represented the last regression of the large
7 epicontinental seaway that covered most of North America.
8 So in our local area, this was the last gasp of marine
9 deposition.

10 As this shoreline system prograded to the
11 northeast, it deposited trends of very high permeability
12 rock with the best reservoir potential, and it sort of
13 marched along. And we happen to know through some recent
14 USGS work how long it took for it to build through the San
15 Juan Basin from this outcrop down south of Bisti up to the
16 Colorado border area. It took about two million years.

17 So our Pictured Cliffs reservoir rock -- it's wet
18 near the outcrop, of course, but it's about 75 million
19 years old. And as we get up into the Colorado area, it's
20 about 73 million years old. And just for fun, we tried to
21 find an analog to that, and that rate of progradation turns
22 out to be just about the same speed or the same rate that
23 your hair grows. So that's how long it took for us to fill
24 in this basinal area with Pictured Cliffs sandstone.

25 Q. Do you have a slide that gives us a cross-

1 sectional view of the Pictured Cliff so that we can have a
2 visualization or a characterization of what this looks in a
3 vertical --

4 A. Yes, sir, we do, and if we could back up one,
5 I'll show you where this schematic cross-section is. It's
6 located right here. And while we're on this index slide,
7 this is the volumetric study area, the four-township area
8 that we'll discuss in some detail later, and this is the
9 location of a type log that we've included.

10 EXAMINER STOGNER: Okay, when you said the cross-
11 section, it's marked on the exhibit as the cross-section,
12 there's a line there --

13 THE WITNESS: Yes, sir.

14 EXAMINER STOGNER: -- going from the northeast to
15 the southwest, and then you have your type log within that
16 magenta box --

17 THE WITNESS: Yes, sir.

18 EXAMINER STOGNER: -- is that correct?

19 THE WITNESS: Yes, sir.

20 EXAMINER STOGNER: Okay.

21 Q. (By Mr. Kellahin) This is the cross-section, Mr.
22 Dawson.

23 A. This cross-section is called a schematic cross-
24 section. It's actually based on very detailed log
25 correlations. But what we really wanted to show here is

1 something that could conceptually set us up for an
2 understanding of the Pictured Cliffs reservoir and the
3 depositional mechanics and the reservoir stratigraphy.

4 This is about 12 miles from end to end. This is
5 updip to the left, and this is downdip, both structurally
6 and stratigraphically. When we look at the Pictured
7 Cliffs, the dip section in particular, we see parasequences
8 prograding out, marching out into the sea, as our clastic
9 system builds out onto a very gently dipping shelf upon
10 which the Lewis Sea muds were being deposited.

11 The exaggeration here vertically is about 125 to
12 1, so this looks like it's quite a steep shelf situation.
13 But if you put it in sort of the true geometry, the dip of
14 the shelf would be around a degree or less. So it's a very
15 shallow, just barely dipping shelf, dipping seaward.

16 What we want to show here is the distribution of
17 the high permeability sandstones, and this is approximately
18 to scale and fits our cum map fairly well. What we see in
19 the upper shore face environment and the beach environment
20 are sandstones that today have, say, greater than one
21 millidarcy of permeability. Each of the parasequences has
22 preserved somewhere, in general, some of these facies that
23 provide the best reservoirs.

24 What you'll notice, though, is that most of the
25 sandstone here -- and we're showing this as maybe 80 to 90

1 feet of gross sandstone -- most of it shown as the pale
2 yellow color here has much lower permeability, very much
3 tighter. In general, it has higher water saturation. And
4 when we talk about an upper and a lower Pictured Cliffs,
5 commonly we're talking about the tight stuff at the bottom,
6 in contrast to the permeable stuff at the top.

7 Q. Is there a way to generally characterize the
8 range of permeability for a low-perm area and then the
9 ranges for a high-perm area?

10 A. Yes, sir, there is. The permeabilities at
11 reservoir conditions in the updip part of the field could
12 be as high as 30 millidarcies.

13 As we go deeper into the Basin we have changes in
14 clay type and more compaction and thermal alteration. That
15 maximum permeability might be as low as a millidarcy.

16 As we look at the Pictured Cliffs vertically, we
17 have permeabilities that might range from that maximum of
18 30 all the way down to thousandths of a millidarcy, and
19 essentially even with core, the permeabilities are not
20 measurable. Yet there is gas stored in that extremely
21 tight matrix system.

22 Q. Do you have a type log that you can describe for
23 us?

24 A. Yes, sir, the next exhibit, please.

25 We've included this exhibit to define what we

1 mean when we refer to upper and lower Pictured Cliffs.
2 This is a well in northwest 25, 27 North, 9 West. It is a
3 Mesaverde well, but it twins one of our recent Pictured
4 Cliffs redrills.

5 If you'll look at the log, looking at
6 approximately 90 feet of PC section here, you'll see that
7 the lower Pictured Cliffs essentially is about as clean in
8 terms of the shaliness as determined by the gamma ray as
9 the upper Pictured Cliffs. You'll see that the porosities
10 are actually fairly similar. There's a little higher
11 porosity in the upper Pictured Cliffs.

12 The big contrast that we see in typical logging
13 suites is in resistivity. The lower Pictured Cliffs has
14 much lower resistivity. This is one of the phenomena that
15 we hope to define and learn more about from our core
16 program. What we believe is going on here is that we have
17 in the upper Pictured Cliffs slightly coarser grain size,
18 better sorting, lower water saturations. And we believe in
19 order to adequately create a petrophysical model, that we
20 need to distinguish between upper and lower Basinwide and
21 perhaps actually have different log parameters, such as A,
22 m and n in the Archie equation for the upper and lower.

23 This well is of particular interest since it
24 twins a redrill and -- that was part of our layer pressure
25 program. We measured the pressure in the upper and the

1 lower separately and found that the upper Pictured Cliffs
2 had 342 pounds of remaining pressure, the lower about 406
3 pounds. I think this pressure stratification is
4 significant.

5 This redrill was drilled 310 feet from the old
6 abandoned Pictured Cliffs well. Original pressures in this
7 area were something like 500 pounds.

8 Q. In summary, then, Mr. Dawson, do you have a slide
9 that gives us the general Pictured Cliffs characteristics
10 that you have investigated?

11 A. Yes, sir, the next slide. We have listed here
12 some of the key characteristics that we feel should be
13 considered in particular in evaluating our proposed pilot
14 program. I won't go into each one of these in detail.

15 In general, the Pictured Cliffs reservoirs were
16 deposited in the same system as it prograded to the
17 northeast. Grain sizes are similar throughout the
18 productive area.

19 There are some systematic changes that you see
20 going from the updip edge of the production to the downdip
21 edge to the northeast, and the most significant, if course,
22 is the lower permeabilities. Those result from greater
23 depth of burial, more compaction.

24 There's actually a systematic change in clay type
25 so that as we get toward the axis of the Basin, as we

1 approach it from the southwest, we see more illite-
2 smectite. Nearly all these clays are orthogenic or
3 secondary, they weren't deposited with the sand grains.
4 And so the greater burial has led to more swelling clay and
5 more core-bridging clay in the downdip parts, and that's a
6 big part of the story why it gets tighter as we go downdip.

7 But we feel that we have -- with the program that
8 we're presenting to you today, we've sampled both updip and
9 downdip areas of the productive area of the San Juan Basin,
10 and we've also attempted to try to pick areas that were on
11 trend, such as the -- greater than the BCF trends that we
12 saw on the cum map, and off-trend in areas where cum
13 productions have been less.

14 Q. Have you satisfied yourself, Mr. Dawson, that the
15 pilot project wells have been dispersed and located
16 throughout the Basin in such a way that you can sample the
17 typical characteristics of the pool?

18 A. Yes, sir, we did that to the best of our ability.
19 Of course, that's dependent on our leasehold and what
20 wellbores are available to us for recompletions and what
21 areas are available to us for new drills.

22 MR. KELLAHIN: Mr. Stogner, that completes Mr.
23 Dawson's presentation.

24 At this time we would move the introduction of
25 the exhibit material behind Exhibit Tabs 2 and 3.

1 EXAMINER STOGNER: Any objections?

2 The information in the booklet behind Tabs 2 and
3 3, Exhibit Tab 2 and Exhibit Tab 3, will be admitted into
4 evidence at this time.

5 Mr. Carr, any questions? I guess not.

6 Mr. Jim Bruce, any questions? I guess not.

7 EXAMINATION

8 BY EXAMINER STOGNER:

9 Q. You talk about some new coring to be done --

10 A. Yes, sir.

11 Q. -- is that correct?

12 How many cores are you talking about? Will this
13 be through the whole Pictured Cliffs interval?

14 A. Yes, it will, two cores approximately 120 feet.
15 We plan on taking four trips and recovering 30 feet of core
16 each trip for two different wells.

17 What will be different about this core from
18 what's been done in the past is that we're foam-drilling.
19 We're doing that in order to preserve the water saturation
20 to the best of our ability.

21 It turn out that the volumetrics in the
22 petrophysical model is extremely sensitive to your
23 assumptions on water saturation. And in the past the
24 Pictured Cliffs, when we core it, it's almost always
25 invaded by drilling fluid. And in particular, when we're

1 looking at a situation where the pore pressures have
2 already been depleted, we expect a very deep invasion
3 whenever we mud-drill.

4 So what we hope to do is analyze this core, and
5 it will be the whole section. And we'll get from the very
6 top, upper shore face, hopefully, and beach sandstones, all
7 the way down to the distal, deltaic very tight sandstones
8 that interfinger with Lewis shale.

9 Q. Have you or will you be investigating any of the
10 cores that have been taken in the past?

11 A. Yes, sir, we will. In fact, we have a couple of
12 our older cores at Texas Tech University. As we speak,
13 they're trying to do some work relating water saturations
14 to log resistivity. We've reviewed all the core reports
15 that we can get our hands on.

16 Most of the wells through history have been
17 analyzed only -- the PC cores only for water saturation,
18 porosity and permeability, and actually most of those cores
19 are no longer available. They've ended up in --
20 unfortunately, in landfills somewhere. But we've reviewed
21 all of that data to get as much as we can from it.

22 After that review, we realized that there's some
23 missing components that we need in order to give us
24 confidence in our petrophysical model.

25 Q. Is this work being done at Texas Tech or New

1 Mexico Tech?

2 A. It's Texas Tech.

3 Q. Texas Tech. Did those old cores come from a
4 certain era?

5 A. Yeah, in general the 1950s and 1960s is when
6 most of the coring took place. That was a time when the
7 field was evolving. The Pictured Cliffs, historically, was
8 developed just by extending along production, and when you
9 got a low-rate well, why, you didn't go any further in that
10 direction.

11 So in general, they found the high-permeability
12 parts of the reservoir and they extended it along strike.
13 And many of those extensional wells were cored.

14 Q. Now, your presentation today has pretty much been
15 an overview of the Pictured Cliffs formation. Will you
16 be -- What kind of geological parameters will you be
17 looking at in the different pilot programs? A closer look
18 at the -- what the results in the -- What exactly will you
19 be looking for with the pilot project?

20 A. Well, I'll try to look at the performance of the
21 infill wells in a stratigraphic context so that we can come
22 up with a predictive model. Our suspicion is that in order
23 to most efficiently manage the Pictured Cliffs reservoirs,
24 we're going to need to be able to predict whether infills
25 in a certain drill block are going to be economic,

1 uneconomic, whether there's going to be interference,
2 whether there's not going to be interference, whether or
3 not -- that the stratigraphy is controlling the reservoir
4 performance. We're going to try to determine the
5 contribution of natural fracturing to Pictured Cliffs
6 production.

7 In general, we'll try to use geology to help us
8 with a predictive model for infill well performance.
9 Basically, we'll take those empirical results from each of
10 the pilot infills and put those in a geologic context.

11 Q. How about you as a geologist, in determining the
12 completion of the new infill wells? What kind of
13 parameters are you going to be using? Are you going to be
14 picking and choosing certain perforated intervals, or are
15 you going to do an overall kind of perforation, or --

16 A. Well, that's a great question. We're studying,
17 first of all, the sensitivities to various completion and
18 drilling fluids, and we'll be doing some more of that work
19 with our new core.

20 We know that the Pictured Cliffs formation has a
21 very high clay content, ranging from -- About as low as it
22 ever gets is, say, five percent, and intervals that we
23 still call pay can have up to 35 percent clay. Nearly all
24 orthogenic. And we know that, particularly in the downdip
25 areas where we have the mixed-layer illite-smectites and

1 when we have some chloride, that the reservoir is going to
2 be very sensitive to drilling and completion fluids. So
3 we're going to do some of that testing.

4 In terms of how much of the interval to complete,
5 we've already done some work with that. We've looked at --
6 after frac logs and a limited number of production logs,
7 trying to determine what the contribution of the lower
8 Pictured Cliffs is. We know in general that it is likely
9 to have a little more pressure than the upper, high-
10 permeability part. We're trying to figure out whether we
11 can actually get much of a contribution from that and
12 whether it actually pays off to put perforations in it, or,
13 alternatively, whether you should just concentrate on the
14 high-permeability part.

15 One interesting thing that we've learned is
16 that -- through our layer-pressure-testing program, that
17 the lower, very, very low-permeability part of the
18 formation is being depleted in terms of pressure, at least
19 in the tests that we've performed where we've taken
20 redrills out in excess of 1000 feet from the old well, we
21 do find that that lower rock has been depleted. It has as
22 much as 30 or 40 percent more pressure than the upper,
23 high-permeability part, but still we are managing to drain
24 it over the course of the 40 or 50-odd years that we have
25 in most of our established field areas.

1 Q. In referring now to the map -- call that the base
2 map behind the Exhibit Tab Number 2, when I look at this,
3 there's obviously a grouping of pools together sort of in -
4 - we'll call that the center, going from the northwest down
5 to the southeast, in the center of the San Juan Basin. And
6 then as you work yourself back to the north and the east,
7 you've got some pools that kind of stand out by themselves.
8 And in between there I'm assuming that's an area of
9 nonproduction. I'm sure that it's probably been tested,
10 but geologically speaking, what happened in this interval?

11 A. Well, that's the part of the Basin where the clay
12 type has become dominantly illite-smectite, and what we're
13 doing in that part of the Basin, for instance in the 29-7
14 area, we're still doing some extensional drilling in the
15 Pictured Cliffs there. What we're trying to find are the
16 sweet spots. You can find sweet spots that result from two
17 things.

18 One would be to find where we've built up a beach
19 and foreshore and built up and preserved those reservoir
20 facies. Those tend to occur in rather narrow trends. It
21 might only be a mile wide. And as we go down into the
22 Basin, if we can't find that trend it's unlikely that we'll
23 establish commercial production. Although there still may
24 be gas stored in the rocks, the matrix permeabilities are
25 so terribly low that you have a hard time even recovering

1 100 million cubic feet of gas.

2 The second thing you could look for is, there are
3 places where apparently dissolution of cements and where we
4 had a -- more unstable feldspar grains in our sandstone,
5 where that's been dissolved, so where we have anomalies in
6 that secondary porosity, unexpectedly. And those aren't
7 necessarily associated with the reservoir facies. Those
8 are usually found by accident, just by finding good shows
9 while drilling and so forth.

10 The variations that we considered in selecting
11 our pilot tests, the systematic variations, are gradational
12 as we go from the updip pools down into the Basin, in the
13 downdip pools. And so the white areas, obviously, are
14 areas where no one's been able to establish commercial
15 rates.

16 But it has not yet been fully developed, so there
17 still is an effort to extend PC production down into the
18 Basin, and I would kind of categorize that as exploratory
19 extensional drilling.

20 Q. Or recompletions of existing wells?

21 A. Yes, sir, absolutely.

22 Q. Now as you know, there's several pools, or many
23 pools out there that include the Fruitland sand portion of
24 the Pictured Cliffs and the Pictured Cliffs.

25 A. Yes.

1 Q. Are those going to be looked at in a different
2 manner, or are any of those going to be cored, or how will
3 those be handled?

4 A. We don't have -- The three companies involved in
5 the effort we're describing today, in general we don't have
6 large leaseholds in some of the peripheral pools where the
7 Fruitland sands are more prolific and where essentially we
8 commingle Pictured Cliffs and Fruitland.

9 What we hope to do in the next year or even two
10 years is to at least take a look at those pools and the
11 geology, perhaps, work a little bit with the active
12 operators there and see whether or not it's reasonable to
13 extend by analogy the conclusions that we reach from our
14 test program to those pools.

15 In general, we don't have a lot of data in-house
16 now, and we don't have much leasehold to work with.

17 EXAMINER STOGNER: Any other questions of this
18 witness?

19 Thank you, you may be excused.

20 THE WITNESS: Thank you, sir.

21 EXAMINER STOGNER: Before we continue, just for
22 those that are in here, we're going to essentially go
23 through the docket, the remaining cases. And this will be
24 the Burlington case, and then we're going to have the Devon
25 Energy case, that's 12,778. This is a re-opened case of a

1 matter heard by Dave Catanach, I believe, a couple weeks
2 ago. And then I have a short presentation from David
3 Arrington on 12,858.

4 And if anybody is here for the remaining two
5 cases -- this is 12,862 and 12,758-A -- both of these are
6 what we refer to as the inactive well hearings, and these
7 are wells in -- a group up in Chaves County and another
8 group in the Lea, Roosevelt and Chaves County, that portion
9 of District 1. These will not be called -- these two
10 inactive well cases won't be called until after lunch.

11 So I just wanted to make that announcement, so if
12 there's anybody here in the audience that are just
13 interested in those cases, feel free to take a long lunch
14 break and show back up about one o'clock. You will be safe
15 then to show back up. Due to some scheduling of our
16 witnesses, the Division witnesses won't be available till
17 then. So if we get through with these cases this morning,
18 I'm going to take a break anyway until lunch.

19 So I just wanted to make that announcement. If
20 there's anybody here for those two cases, the inactive well
21 cases, feel free to take off and come back at one o'clock,
22 and either we'll call those or you will see that we're
23 still on the Burlington case or one of the other two cases.

24 Thank you, Mr. Kellahin, you may continue.

25 MR. KELLAHIN: Thank you, Mr. Examiner.

1 At this time we'd like to call our engineering
2 expert, Eric Broacha, is the next witness.

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

6 DIRECT EXAMINATION

7 BY MR. KELLAHIN:

8 Q. Will you please state your name and occupation?

9 A. My name is Eric Broacha. I am a petroleum
10 engineer with Burlington Resources.

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

13 A. No, I have not.

14 Q. Summarize for us your education.

15 A. I have a bachelor of science degree in chemical
16 engineering from Colorado School of Mines.

17 Q. In what year was that?

18 A. 1978.

19 Q. All right.

20 A. I have worked in the industry as a petroleum
21 engineer for the last 23 years with both majors and
22 independents. For the last 18 years my area of focus has
23 been tight gas reservoirs in the Rocky Mountain region, all
24 basins. My experience spans from petrophysics to reservoir
25 modeling to general reservoir-engineering issues.

1 Q. What has been your involvement in the design of
2 the Pictured Cliff pilot project?

3 A. I've been a member of a team for the last year.
4 My contribution has mainly focused around the design of a
5 new petrophysical model of a testing program with a new
6 core, also the collection of data for reservoir simulation
7 and the calculation of gas in place and volumetrics in the
8 four-township area and across the Basin.

9 MR. KELLAHIN: Mr. Stogner, we tender Mr. Broacha
10 as an expert witness.

11 EXAMINER STOGNER: No objection, Mr. Broacha is
12 so qualified.

13 Q. (By Mr. Kellahin) Let's start with Exhibit Tab 4
14 and explain to Mr. Stogner the volumetric portion of the
15 study.

16 A. Other slide, please. Other way.

17 The purpose of this study and what I'm going to
18 show you here is, we need to understand what the -- at the
19 current spacing, what our recovery factors were. We have
20 picked, selected an area which I believe is representative
21 of how the PC has produced across the Basin. We picked a
22 four-township area, which includes 27 to 28 North, Range 9
23 West to 10 West. The study area included 559 PC wells.

24 The objective of the study area was to first
25 calculate the gas in place in the Pictured Cliffs per 160-

1 acre-spaced area, calculate the main resource and then
2 estimate what the recovery factor would be for a typical
3 well on 160-acre spacing.

4 Two types of analysis method were used. We used
5 volumetrics using the well logs to calculate gas in place,
6 and we used the decline curves from each individual
7 producing PC well to calculate the EUR of each well.

8 Q. Can you summarize for us the characteristics
9 you've selected to define why you chose this four-township
10 project area?

11 A. Yes, I can. This slide here illustrates the main
12 selection criteria we used to select the four-township
13 area. I'll show you on the map that proceeds this that the
14 area we've selected encompasses a portion of five different
15 PC pools. It also includes what we'll call on- and off-
16 trend wells, or high-permeability wells and low-
17 permeability PC wells.

18 The area is also in one of the highest cumulative
19 production areas in the Basin, or an area at the highest
20 level of depletion.

21 Also in the four-township study area, the large
22 majority of the wells have been restimulated, which means
23 that they are currently producing at their optimum
24 productivity, which will also enable us to calculate EURs
25 of optimally completed PC wells.

1 In the study area we have a large number of
2 digitized logs, 163 wells. This is very important since we
3 used these logs to calculate volumetrics. We have
4 production data on all the wells in the area, and we have
5 pressure data on approximately 50 percent of the wells in
6 the area.

7 Q. All right, let's turn to the map and get
8 ourselves oriented.

9 A. As you can see on this display here, the red
10 square outlines the four-township area that we studied, and
11 also you can see that it encompasses a portion of five
12 different PC pools.

13 Q. If I was to take a four-township area to try to
14 do conventional volumetrics on and wanted to select as a
15 target an area of the Pictured Cliff that might give me my
16 greatest opportunity to see how well I had done in
17 recovering the maximum amount of gas on current spacing,
18 where would I place the project?

19 A. We believe that the four-township area we select
20 probably represents an area of the most efficient depletion
21 under current operating conditions of the PC, mainly,
22 because of the behavior of the current wells, that they've
23 been recompleted or redrilled, that the line pressures are
24 at the lowest possible right now with our system, and we're
25 looking at PC wells that are producing out of both the

1 high-permeability PC and the low-permeability PC.

2 Therefore, the recovery factors that we calculate
3 for this area are probably the highest you'll see in the
4 whole Basin right now.

5 Q. So if I take this project area, do the
6 volumetrics, it will give me a sense of how well I am doing
7 under current spacing --

8 A. That is correct.

9 Q. -- to recover the gas in place?

10 A. That is correct.

11 MR. KELLAHIN: Mr. Stogner, Mr. Broacha has a
12 number of individual slides in the exhibit book that are
13 layered, so you'll have available for your own
14 investigation the cum production map, an EUR gas-in-place
15 map, an estimated-recovery map, the remaining-reserve map.
16 But you finally get down to a summary page after you look
17 at the maps, and that's where I'd like him to focus his
18 next part of the presentation.

19 Q. (By Mr. Kellahin) Let's go to the volumetric
20 conclusions, after you do all the volumetric work in the
21 four-township area.

22 A. Okay. As you can see by this slide, from our
23 current petrophysical model we calculate a gas in place in
24 this four-township study area of approximately 1.3 TCF. In
25 doing the decline-curve analysis in all 559 wells, we have

1 calculated an EUR from the existing wells in this area of
2 approximately 500 BCF. By subtracting the two, you have a
3 remaining resource of 789 BCF remaining in the PC.

4 If we go ahead and divide our EUR by our gas in
5 place you come up with a recovery factor. The current
6 recovery factor that we're predicting for this area is only
7 39 percent.

8 Q. If this is one of my best areas, how do I know
9 how well I am doing when I compare this to what would be
10 your forecast of ultimate recovery from a tight-sand PC
11 reservoir?

12 A. Typical tight gas reservoirs in the Rocky
13 Mountains that are very similar to this recovery factors
14 range from 60 percent to 75 percent. So the significance
15 of this recovery factor is to -- either our petrophysical
16 model needs further refinement, or some type of additional
17 recovery mechanism -- either a change in completion
18 technique or additional well spacing -- will be needed to
19 recover the rest of the PC gas.

20 Q. What will you achieve with the pilot well program
21 that would allow you to more accurately define the
22 engineering parameters that go into the volumetric
23 calculation?

24 A. The pilot well program, as I'll illustrate later
25 in this presentation, has several parts. In each of the

1 parts the program focuses on a different issue that we have
2 identified as a weakness in our current model. Mike has
3 already talked to you about the new core, and I will
4 explain to you what we're going to do with that and how
5 that will refine our petrophysical model to improve our
6 gas-in-place calculation.

7 We are also going to be looking at -- With the
8 drilling of the pilot wells, we'll be able to actually
9 monitor whether we have -- see interference and what kind
10 of rates we can expect, and also be able to collect data so
11 we can do reservoir simulation for future prediction of
12 increased-density wells.

13 Q. When we look at your conclusions from the
14 volumetric analysis, one of the things that you need to
15 investigate further is the probability that current density
16 within the volumetric area is inadequate to maximize your
17 recovery?

18 A. That's correct.

19 Q. All right. In addition, you're going to examine
20 the parameters such as water saturation and resistivity and
21 other components of the calculation?

22 A. That is part of the petrophysical program that we
23 have designed. Those are -- Some of the main weaknesses in
24 our gas-in-place calculation right now is our inability to
25 calculate current water saturation in the PC.

1 Q. Mr. Dawson made reference to the fact that
2 historically in the Pictured Cliff there are occurrences
3 where a 160-acre spacing unit has had two wells producing
4 at the same time.

5 A. This is correct.

6 Q. Let's turn to Exhibit Tab 5 and talk about what
7 you have identified as the 80-acre well pairs. Is there a
8 display that shows where those wells are scattered?

9 A. Not in the presentation. We have a large map
10 that does show the distribution of these wells across the
11 Basin. Once we had finished the volumetric area analysis
12 and realized that increased density may be an option, we
13 did research and tried to find in the Basin where
14 historically wells had produced simultaneously on an 80-
15 acre-type spacing or two wells per 160.

16 Q. Before you start talking about this part of the
17 chapter, let me identify what I've handed the Examiner.
18 This is an additional display we will separately mark after
19 the hearing. It shows, I believe the 49 well pairs. There
20 were originally, I think, 80 investigated, and the map you
21 now have doesn't have all 80. It shows what Mr. Broacha
22 finally studied.

23 You have a distribution of those areas?

24 A. That's correct.

25 Q. Their location is not unique or confined to an

1 individual well?

2 A. That's correct.

3 Q. Give us the time frame of where you discovered
4 the occurrence of two wells within a 160 spacing unit.

5 A. Most of these well pairs produced between the
6 mid-1970s and the early 1990s. We identified --

7 Q. Go ahead.

8 A. We identified approximately 85 pairs, although we
9 only had sufficient information on approximately 49 where
10 we could do any type of analysis. Most of the well pairs
11 which I'll refer to as original and second well were
12 approximately 1000 feet apart, so they -- kind of was
13 analogous to a current infill situation.

14 Although we looked at all 49 pairs, production
15 and pressure data turned out to be inconclusive from our
16 analysis. But I will review some of the observations that
17 we did see by looking at all 49 pairs.

18 The first observation that we noticed was
19 approximately -- 40 to 50 percent of the well pairs
20 appeared to exhibit some type of interference in later
21 years, and I will give you an example of what we mean by
22 interference after we finish the observations.

23 The second observation we noticed, if we looked
24 at the total producing rate from the lease while the
25 original well was producing and while both the original and

1 the second well was producing, lease production increased
2 during the period of time when two wells were producing off
3 the lease, as compared to only the one.

4 The third observation was, if we did a decline-
5 curve analysis on the original well, both while it was
6 producing by itself and while it was producing with the
7 second well, it appeared that in most of the cases we
8 actually had an increase in reserves while the two wells
9 were producing.

10 Now again, the analysis, we felt, was
11 inconclusive because -- and I'll show you on this
12 example -- much of the time when the two wells were
13 producing was a time of gas curtailment in the Basin due
14 to basically lack of sales with the marketing companies
15 forcing the operators to choke back many of the wells.

16 Q. It wasn't a regulatory gas-allowable curtailment?

17 A. No, it was not, it was more an overabundance of
18 gas in the marketplace at the time.

19 Next slide, please.

20 Here is an example of what I'll call one of our
21 best or one of the wells we felt we can do the most
22 analysis on. You'll notice there are two wells, the Kutz
23 Government Number 8, which I'll refer to as the original
24 well, and the second well, the Kutz Government Number 8J,
25 the J designation, again, indicating infill.

1 The original well produced from October of 1953
2 until September of just last year, 2001. You can see it's
3 a fairly good well, an on-trend well. Cum production is
4 approximately 1.35 BCF.

5 The second well was located approximately 732
6 feet away from the original well. It produced from
7 November of 1973 until April of 1992.

8 Next slide, please.

9 This is a semi-log plot of the production trends
10 of both the original and the second well. The original
11 well is in the blue here, the second well is in the red.
12 As you can see from this plot, it's very difficult to see
13 any type of interference between the two wells.

14 This plot is based on monthly production data, so
15 what I did was, I converted the monthly production data to
16 annual data -- next slide, please -- to try to understand
17 if there was interference between the wells.

18 On this plot here, you can see production data on
19 the Y axis and time on the X axis. The red dots there are
20 the original well, and the blue squares are the second
21 well, and the green curve right here represents total lease
22 production.

23 You can see from this plot that when the second
24 well came on line, the production did not change in the
25 original well. Also notice that between the early 1980s

1 right here and the early 1990s, this is the period I'll
2 refer to as gas takes or curtailment when both wells were
3 choked back.

4 Now, sometime at the early 1990s, 1992, the
5 second well was converted to a coal well and no longer
6 produced from the PC. At that same time the original well
7 was worked over, and that's why you see the increase in
8 production.

9 The importance of this plot is to notice that
10 while both wells were producing, you don't see a decrease
11 in the rate from the original well.

12 This is one of our best cases. The rest of them,
13 as you can see, interpretation is very difficult.

14 One thing you will notice -- next slide, please
15 -- if I draw a decline curve through the original
16 production -- this is a green line represented right here
17 -- I don't see any change in the decline except for the
18 period of time when they worked over the well. In other
19 words, I can't really see a direct effect of the second
20 well producing simultaneously with the original.

21 Now, if I can draw this same decline curve on our
22 original plot, which is a semi-log plot of production --
23 and again, you can see here, it appears flat and appears
24 like you don't see any effect from the second well.

25 Now, this well pair also had pressure data on it.

1 So if we look at the next slide, we can observe the
2 pressure data of both the original well and the second
3 well. The blue diamonds here represents the pressure data
4 collected on the original well, and the red circles
5 represents the pressure data collected on the second well.

6 You can see the decline in the pink curve here.
7 This is the decline of the original well. When the second
8 well came on line the pressure was approximately 120 p.s.i.
9 higher than the pressure in the original well. However,
10 after about four years the pressure of the two wells became
11 about the same. This does not necessarily indicate
12 interference, but it indicates that the pressure around
13 both producing wells came down to the same point.

14 Again, we can't really -- from this example here,
15 I can't really tell you yes or no, whether the two wells
16 are affecting each other.

17 Q. Do any of these pairs currently produce -- any of
18 these spacing units with pairs currently produce both wells
19 at the same time?

20 A. Currently? No, they do not.

21 Q. That practice is stopped, for whatever reason?

22 A. Early 1990s, all of the second wells were
23 converted to some other formation for some reason. I do
24 not know why.

25 Q. If we're trying to decide well density in the

1 Pictured Cliff, the strategy that you have investigated
2 here is to see if we had ample data on wells that were on
3 effective 80-acre density and whether that was enough
4 evidence to show you that all of these pools needed to have
5 that type of density?

6 A. That is correct. We were hoping by looking at
7 these historical well pairs that it would answer our
8 question about whether increased density was needed or not
9 and which areas it was needed. As we went through the
10 analysis, it became evident that because of curtailment and
11 other issues, we did not have enough data to make that
12 decision.

13 And that's one of the reasons for going forward
14 with our recommendation for a pilot program, is to collect
15 this data under more controlled conditions. Some of the
16 other analysis that we saw, you did see interference with.
17 But again, we can't really model that because there is
18 insufficient data to be able to do that.

19 Q. Have you studied the pressures in the Pictured
20 Cliff to see if there is sufficient pressure data from
21 which you can use that database to draw definitive
22 engineering conclusions about well density?

23 A. Yes, we did. We conducted in 2001 an extensive
24 layer pressure measurement program, which we are continuing
25 this year also.

1 Q. Let's talk about that. If you'll turn to Exhibit
2 Tab 6, let's go through the pressure data.

3 A. This slide shows the synopsis or summary of what
4 we did in 2001. We measured what I'll refer to as layer
5 pressures in 16 different PC wells. Five of these wells
6 were new drills and 11 were what we refer to as redrills.

7 The distance for the redrill case, the distance
8 between the original well and the redrill well, ranged
9 anywhere from only 10 feet to over 1000 feet. Shut-in
10 times varied from five days to 13 days.

11 To obtain better data, we used downhole bombs and
12 we also used plugs, downhole plugs, to minimize wellbore
13 storage.

14 Next slide, please.

15 The results of the layer pressure measurement
16 program are summarized in this slide.

17 Pressure measurements indicated we had some level
18 of depletion in all wells that we did test. Original well
19 pressures across the Basin ranged anywhere from 500 pounds
20 in the shallow areas to 1250 pounds in the deeper PC areas.

21 You can see there that the upper, middle and
22 lower PC, the pressure ranges that we got from a test, they
23 ranged anywhere from extremely depleted at 61 pounds, all
24 the way up to almost virgin pressure at 1195 pounds.

25 You also notice that there was a difference in

1 pressure at each different interval within the PC. We saw
2 higher pressures in the lower, tighter zones, and we saw
3 more depletion in the upper zones. But the bottom line is,
4 we saw depletion in all the zones, in every well that we
5 did test.

6 I have a couple of examples here where I compared
7 the pressures we measured today with the historical
8 pressures to see if they were on trend with what we saw in
9 the past. You've already seen that we did have some
10 pressure data on older wells. I have three examples here
11 at different distances between the original well and the
12 redrill well to kind of show you what we saw with all the
13 wells we looked at.

14 First example here is a well in the 27-5 unit,
15 Well Number 92. Again, the blue diamonds are the
16 historical pressure data, and the red represents the
17 pressure measurements that we conducted in 2001. This well
18 here is an off-trend well. It had only cum'd about .3 BCF.
19 The redrill was drilled only ten feet away from the
20 original well.

21 You can see from the decline in the red right
22 here of the original pressure data, the original well
23 stopped producing here in 1991. The green line represents
24 where the pressures should be when we measured them in
25 2002. And as you can see, we measured pressures that are

1 very close to where they should have been. Again, we would
2 expect this, since the two wells are only ten feet apart.

3 Now, the second example here shows two wells that
4 are almost 1000 feet apart. And again, the blue represents
5 the historical pressure data, and again the red line is the
6 decline. This well here is a fairly good well. It
7 produced about .7 BCF from 1962 to 1985, and then again in
8 1985 it was shut in.

9 The green line represents the pressure level in
10 that well when it was shut in. The red right here
11 represents the pressures that we measured in the upper,
12 middle and lower PC last year. And as you can see here,
13 the pressures we measured almost 1000 feet away were about
14 200 to 300 pounds higher than what was in the original
15 well, again indicating that we had some depletion out that
16 far, but not very much. Again, this example, the wells are
17 actually 965 feet apart, but this is not always the case.

18 The next example shows two wells that are also
19 923 feet apart. Again, the blue is the historical pressure
20 data, the red is the pressures we measured last year. You
21 can see that in this case, the pressures we measured last
22 year fall right on the decline of the original, showing
23 that in this situation where you're almost 1000 feet away,
24 you do have pressure depletion.

25 So we saw with all 16 wells every case was

1 different, no matter where you are in the Basin. There was
2 no pattern, there was nothing to say that on-trend wells
3 had a certain depletion and off-trend wells had a certain
4 different depletion, or by pool. It was completely random.

5 Again, this type of behavior leads us to believe
6 that in some areas we're going to have to either need some
7 type of completion enhancement or increased density to be
8 able to produce all the resource, and some areas we may
9 not. But we have to define that.

10 So again, the results of the pressure program
11 leads us to believe that we need a pilot program to collect
12 more data.

13 Q. Let's talk about your conclusions for this
14 chapter.

15 A. Okay. The main conclusions are, first, as I've
16 stated, all the redrills measured indicate some sort of
17 depletion, both in the upper PC and the lower PC. The
18 measurements indicated the existence of more vertical perm
19 than we ever believed was possible in the lower PC. As
20 Mike explained to you, the matrix perm in the lower PC is
21 very tight, yet we saw a depletion in every well in the
22 lower, indicating some sort of fracture-enhancement
23 production.

24 There appeared to be relationships between the
25 pressure we measured in the redrill and the original well

1 cumulative production. The -- Next. The distance between
2 the original well and the redrill. The azimuth between the
3 original well and the redrill gave us an indication, and
4 the area of the Basin or reservoir quality. Again, these
5 relationships were very -- were not specific, but we did
6 see some minor trends.

7 Q. Can we improve our recovery efficiencies without
8 an increased density program by simply restimulating or
9 redrilling the existing Pictured Cliff wells? Is that
10 going to satisfy your problem?

11 A. We looked at our historical redrill and restim
12 programs and the results we saw, that it will probably not
13 satisfy it everywhere in the Basin. And I can go over next
14 the results of our analysis of both our redrill and restim
15 program to show you what we found, again indicating the
16 need to collect a little more data to better understand
17 this.

18 Q. Let's turn to Exhibit Tab 7 and have you give us
19 that presentation.

20 A. First, let's look at the results of our analysis
21 of our historical restimulation programs. Between the
22 period of 1995 and 2001, Burlington Resources restimulated
23 approximately 374 PC wells. All the restims were very
24 successful. And what we mean by that was, we saw an
25 increase in production. Our average increase was

1 approximately 160 MCF a day.

2 What made the analysis more difficult is, in many
3 cases after the restimulation the well was put on
4 compression. So it was very difficult for us to
5 distinguish the increase due to the restimulation and the
6 increased rate due to the compression by itself.

7 However, five or six years later now, we have
8 seen that many of these wells have returned to their
9 original decline. In other words, the restimulation hasn't
10 maintained the production of the well. We don't completely
11 understand why the restimulations work. That is part,
12 again, of the pilot program. We feel that if we can
13 improve our knowledge of why these work, we can further
14 improve how we're restimulating the wells and maybe in some
15 areas replace the need for an increased density well with a
16 restimulation of the existing well if possible.

17 I have two examples to show you what I'm talking
18 about out of those 374 wells. Here is what I'll call an
19 on-trend well. It is in the Ballard area, Ballard Number
20 7, Township 26 North, Range 9 West. It is a very good
21 well. It was originally put on production in 1954, and
22 since then it has cum'd about -- almost 2 BCF.

23 It was restimulated in April of 1995. You can
24 see here immediately production went from about 1500 MCF a
25 month to over 9000 a month. And it immediately started to

1 decline. Right now, the producing rate on this well has
2 almost returned to its original decline from six years ago.
3 This well was not put on compression, so we couldn't
4 analyze the results.

5 Now, we compare this with what we'll call an off-
6 trend well or a lower-perm well. This is in the Township
7 26 North, Range 8 area, it's the Luthy Number 2. It is an
8 off-trend well. You can see that it was first completed in
9 1952, and when the recompletion was done on this well, or
10 the restimulation in 1996, the well had only cum'd about
11 .15 BCF.

12 As soon as we recompleted the well production
13 increased, as you can see by the production curve here.
14 And it has stayed flat ever since; it has not returned to
15 its original decline.

16 So this is the two types of situation that we've
17 looked at. Again, we're trying to understand exactly why
18 the restimulation works, why it works better in some areas
19 than others, and can we improve it? So it is part of the
20 PC resource optimization program that we're looking at and
21 does affect increased density. It is an alternative if it
22 will work.

23 Q. Can the poor recovery efficiency out of the
24 Pictured Cliff be explained in terms of the vintage of the
25 original wellbore compared to our technology now? Can you

1 solve your depletion dilemma by simply redrilling your
2 Pictured Cliff wells, rather than adding density to your
3 spacing units?

4 A. Not necessarily. We have looked at a redrill
5 program that we have been doing for the last five years
6 also. A lot of times we'll have mechanical problems with
7 some of the PC wells, which will force us to redrill them,
8 and I'll go over the results of that program. In many
9 cases, the redrill program will emulate what we'd see with
10 an 80-acre-spaced well, only you'd only have one well
11 producing.

12 Between 1995 and 1999, we redrilled approximately
13 52 PC wells. The redrill was placed anywhere from 10 feet
14 to over 1600 feet away from the original. Two observations
15 could be made from the review of the data.

16 One, we have some weak relationship between rate
17 and distance from the original well, and also we had a weak
18 relationship between the rate in the redrill well and the
19 azimuth from the original well.

20 I have a plot here that shows the results of
21 actually 79 redrill wells that we looked at. And you can
22 see there's a lot of scatter here, for two reasons. One,
23 this plot shows both off-trend and on-trend wells, so high-
24 perm and low-perm wells, and some of these wells are on
25 compression and some are not on compression.

1 But the general trend you see here is, as you get
2 further away from the original well your average rate, for
3 the first year, at least, is what we looked at where the
4 redrill actually increases. And it starts increasing quite
5 significantly when you pass about 400 feet.

6 Again, there's a lot of scatter, but it gives you
7 the general trend, what we would expect from a redrill.

8 Q. Let's turn your attention now to the summary of
9 the pilot program itself. If you'll look at Exhibit Tab 8,
10 let me have you explain that to us.

11 A. Okay, again this is probably -- this pilot
12 program is set up a little different than maybe pilot
13 programs you've seen in the past. What we're looking at
14 here is more than just, do I need an increased density
15 well? We are actually trying to collect the data so that
16 we can optimize the production of the PC resource at the
17 same time.

18 So one of our goals here, or the main goal, is to
19 investigate the need for increased density to optimize
20 recovery and develop guidelines that tell us where and when
21 we would need such an increase.

22 Our strategy is to first evaluate historical
23 production pressure, core data, which we have done already.
24 The conclusion is, we'll need to acquire new core data,
25 refine our petrophysical model and revise our current

1 volumetrics in the Basin.

2 Next, please.

3 We are planning to complete a number of pilot
4 wells, monitor and evaluate the production trends from
5 these pilot wells, also investigate and refine our current
6 drilling completion techniques. As Mike has told you, the
7 conditions in the PC have changed, which has forced us to
8 re-look at how we're drilling and completing wells.

9 We're also intending to perform pilot well
10 simulation studies and then from those studies to ahead and
11 try to predict what infill or increased density performance
12 would look like.

13 Now, in this endeavor we have two partners. We
14 are partnered with BP and Energen, and we're working this
15 together, this project.

16 Next slide, please.

17 Q. Let's turn to the summary.

18 A. What I'm going to -- I'm not going to go through
19 every program here, but the difference in color is, these
20 are the separate programs that we have divided the pilot
21 program into, so that each one focuses on a different area
22 where we need additional data so we can evaluate how to
23 optimize the PC resource.

24 The first four there, in the white lettering,
25 indicate programs that are already underway and we're

1 already studying. The programs in the yellow down here
2 indicate programs that will be initiated as soon as the
3 pilot program is initiated.

4 Q. Mr. Broacha, let me ask you to take a moment and
5 give us the characteristics that you selected to identify
6 what would qualify as a project pilot well.

7 A. I believe these are outlined on the -- Actually,
8 before I do that, let me show you on the map where we've
9 placed the pilot wells, and then what I'll do is, I'll go
10 through the criteria of how we selected these.

11 This is a map you've seen before. Again, our
12 study area, our four-township study area, is in the red.
13 What you're seeing now on the screen is the proposed pilot
14 program to be implemented by Burlington. We have divided
15 it into three different well types.

16 The black dots here are the new drills that we
17 intend to do in 2002, and there are four of them.

18 The red dots are the recomplete pilot wells we
19 intend to do in 2002. There are six of them.

20 And then the blue dots there represent the
21 recomplete pilot wells we intend to do in 2003, and there
22 are an additional nine of them.

23 Now, also you'll see here the wells Energen is
24 proposing. They are proposing to do their wells in 2003.
25 They're mainly concentrated on pools where we have very

1 little leasehold. They are intending to do four new-drill
2 pilots and two recomplete pilots.

3 And then BP Amoco, they're intending to do six
4 recompletion pilots, and they will all be done in 2002.

5 So from this distribution you can see that we
6 have at least one test in each of the pools where we have
7 acreage available to do the tests.

8 Now, the next slide will kind of outline the
9 criteria we use to select the pilot wells. As I mentioned,
10 we wanted to do at least one pilot test per pool if we
11 could. We looked at the distance at the pilot well and the
12 offsetting producing PC wells to try to get a distance that
13 simulated 80-acre spacing, so we tried to have a minimum
14 900 feet, a maximum of 1600 feet if possible.

15 We also wanted to place a pilot well in an area
16 where the offset PC wells were in good producing condition.
17 In other words, they had either been restimulated or
18 redrilled, so they were at their optimum producing
19 condition, so if any type of interference was going to
20 happen we would be able to see it.

21 We also picked pilot wells, both on trend and off
22 trend, since those are the two types of reservoirs that
23 we're going to have to look at how do we drain optimally.

24 Now, when we looked at recompletion pilot wells,
25 rather than just drilling the new ones, we also had to

1 consider the existing producing horizon.

2 We tried to pick ones where the existing
3 producing horizon was making less than 50 MCF a day, where
4 the condition of the wellbore, the cement and casing were
5 in good condition, so we could recomplete to the PC, and
6 where the current formation could be commingled with the
7 PC. In other words, where the current formation was not
8 producing large amounts of water that may make it difficult
9 to produce the PC later on when the pilot program is over
10 and we end up commingling both zones together.

11 So these are the main criteria we used to select
12 our pilot wells.

13 The one other piece that's not here is, we tried
14 to minimize the number of new drills so we'd minimize the
15 amount of surface disturbance. So that's why you see a mix
16 between new drills and recompletes in the PC.

17 MR. KELLAHIN: Mr. Stogner, this slide is not in
18 the exhibit book. We'll -- after the hearing, I'll supply
19 you a copy of that, but it did not get in the book you're
20 looking at.

21 Q. (By Mr. Kellahin) When I look at the 30 pilot
22 wells, you were able to satisfy this criteria on 24 of
23 those wells and keep them at standard locations?

24 A. That's correct.

25 Q. There are six that are at unorthodox locations?

1 A. That's correct.

2 Q. Can you turn to the exhibit tab that shows under
3 Exhibit Tab 10 and show us what has caused the unorthodox-
4 location wells to be at unorthodox locations?

5 A. Mainly what -- the reason these wells were --
6 I'll call NSL wells are not -- unorthodox locations, we
7 were trying to satisfy the rest of the criteria, mainly
8 distance from existing producing wells.

9 For example, this one right here, the Canyon
10 Largo 204E, we tried to place this well 1226 feet away from
11 the closest offset producing PC well. Topography did not
12 allow us to go in certain directions, therefore forcing us
13 to go into an NSL-type location.

14 We tried to minimize these. Out of all our pilot
15 programs we only ended up with six of these out of the 30
16 that we had.

17 Q. Out of six NSLs, have you compromised any of your
18 criteria in terms of selecting why you're using that as a
19 pilot well?

20 A. No, we did not. In fact, the need for the NSLs
21 came about by trying to get a test in every pool and
22 minimizing surface disturbance by not having to drill a
23 brand-new well. We could get around the NSLs if we limited
24 our testing only to certain pools where we have the
25 available wellbores or we drilled a new well. So that was

1 a compromise that we made with these six wells.

2 Q. And those answers are consistent for all six of
3 these?

4 A. That is correct.

5 Q. Let's go back to your presentation on the
6 program, and let's look at the next slide. There you are.

7 A. Okay, my next slide is to answer the question,
8 what kind of rate can we expect from the -- I'll call it
9 typical pilot or typical infill well during our pilot
10 program?

11 What we did was, we looked back at the results of
12 all the redrills that we'd done, which emulate what a pilot
13 will perform at. This is the compilation of that data here
14 in a typical type curve. We expect a typical pilot well to
15 IP at about 165 MCF a day and to decline starting
16 hyperbolically, to exponential decline, eventually to cum
17 about .7 B's in about 44 years. That is what our
18 prediction is at this time with the data we have available.

19 Now, we can also look at typical costs of PC
20 wells. And what I've done here is looked at not only the
21 costs of the pilot wells but what kind of costs and
22 economics we would see for development wells if we went
23 into a program.

24 As you can see here, on the new-drill pilot wells
25 the economics were actually negative because we've got a

1 lot of testing we put into the program.

2 The pilot well recompletes here are more
3 positive.

4 If we went into increased density and we had a
5 drill well, as you can see, the economics are here.

6 Our best economics would be to take an existing
7 wellbore and recomplete it to the PC or do a commingle,
8 let's say the Fruitland Coal and the PC together.

9 Just to give you an idea of how all the economics
10 compare in these various cases.

11 You have two more slides in there which I'm not
12 talking about, but those slides are the background data for
13 that graph. They give you the decline-curve parameters and
14 the costs that we use in the economics.

15 Q. Let's talk about the slide that gives us our
16 target dates for the project.

17 A. Okay, this slide summarizes our time line that
18 we're predicting for the pilot program in general.

19 The first item here is, Burlington plans to
20 drill/recomplete ten 80-acre pilot tests by December of
21 this year.

22 BP Amoco plans to recomplete five 80-acre pilot
23 tests by December of this year also.

24 Burlington also plans to take two new cores, as
25 we've talked about, and complete the routine analysis by

1 December. The advanced core analysis is anticipated to be
2 completed by July of 2003.

3 Burlington also plans to recomplete nine
4 additional 80-acre pilot tests by July of 2003, and then
5 complete our petrophysical model revisions and Basin
6 volumetrics by August of 2003.

7 Energen has anticipated to drill and complete
8 their six pilot programs by December of 2003.

9 And then our model simulation work should all be
10 finished by December of 2003 also.

11 So by the end of next year we should have a good
12 idea of the impact of increased density and where it will
13 be effective and where it would not be effective.

14 MR. KELLAHIN: Mr. Stogner, that concludes my
15 examination of Mr. Broacha.

16 We move the introduction of the exhibits behind
17 Exhibit Tabs 4 through 8.

18 EXAMINER STOGNER: Exhibits between 4 through 8
19 will be admitted into evidence at this time.

20 EXAMINATION

21 BY EXAMINER STOGNER:

22 Q. I'm going to refer to Tab Number 5, and you
23 talked about the Kutz Government Number 8 and Number 8J.

24 A. Yes, sir.

25 Q. Where were those wells located?

1 A. Those are -- Oh, I don't have the -- The location
2 should be on the graph there. I don't have a copy in front
3 of me.

4 Oh, thank you very much, sir.

5 Those two wells were located in Section 21,
6 Township 28, Range 10 West.

7 Q. And that's within your project area, the four-
8 township area in which --

9 A. Yes.

10 Q. -- you identified earlier?

11 A. Yes, those two wells are.

12 Q. The completion method used on the 8 over the 8J,
13 was there much difference, or was there a difference?

14 A. Yes, there was. From what we can tell, the 8 was
15 an open-hole completion shot with nitro, and the 8J was a
16 frac'd well. It was also open-hole.

17 Q. Now, in your initial introduction today, I
18 believe you introduced yourself as a tight-formation
19 specialist, or that's what you have been working on for the
20 last several years?

21 A. That's -- 18 years, yeah, that's correct.

22 Q. And has that all been in the San Juan Basin?

23 A. No, it has also been in the Green River Basin,
24 Wattenburg, Hugoton, Cotton Valley, Texas, most of the
25 tight gas fields in the US.

1 Q. Okay, and when did you move down or come down to
2 the San Juan Basin area?

3 A. I worked in San Juan for Amoco back in the early
4 1990s and then recently with Burlington.

5 Q. Are you familiar with the gas vuggy studies of
6 the Pictured Cliffs formation done back in the 1960s?

7 A. No, I am not, that was -- We did similar tests up
8 in Wyoming, but I was not familiar with that. My main
9 concentration was Mesaverde and Dakota in the San Juan
10 Basin.

11 Q. So the Pictured Cliffs is somewhat of a recent
12 study for you, essentially?

13 A. My last assignment with Amoco was a petrophysical
14 model on the Pictured Cliffs back in -- I believe it was
15 1991.

16 Q. Now, it's my understanding that some of these
17 will not only be an infill well, but the old well will be
18 restimulated. Is that your plan or -- on some of the
19 wells?

20 A. If the old well has not been restimulated
21 already, then our plans is to do it before we complete the
22 infill well so that all offset wells are at their optimum
23 producing capacity, that's correct.

24 Q. Did you find some sort of a criteria on these
25 restimulated wells, what created that, or at least what

1 kind of conditions were present in that well before those
2 wells were restimulated? Did you see some sort of a
3 pattern?

4 A. No, and that's kind of disconcerting to us.
5 That's one of the things we want to investigate during the
6 pilot program is, what conditions caused the original well
7 or the restimulated well to decline so much, and then why
8 did the restimulation work?

9 Many of the restimulated wells originally
10 completed open hole with a frac or with nitro, yet they did
11 have high cums, so they were effective. Now, some of the
12 reasons that we have come up with but we haven't been able
13 to prove yet is, at the lower pressures we may be seeing
14 some condensate drop out around some of these wells, which
15 causes a relative perm problem. When you refrac the well,
16 you actually frac past that perm damage.

17 That is something that we will be investigating
18 when we have the new core, because right now, you know,
19 we've looked at it, and our original theory of fines
20 migration, we have consulted with some of the core
21 companies, and they do not believe that that is what's
22 occurring right now with the type of clays that we do have.

23 Q. Now, of the wells -- or I should say the 160-acre
24 tracts that are going to have infill pilots on them, has
25 there been some sort of a pattern which you have chose --

1 the original wells, were they from the 1950s and some from
2 the 1970s or different eras?

3 A. That was not a criteria, but by default that's
4 what turned out. There's a good mixture. We were more
5 concerned with distance and condition of the offset wells
6 to make sure that it was going to be representative and
7 then whether it was on or off trend. And it turned out
8 that many of the wells are spread all through the
9 development. Some are 1950s, 1960s, 1970s.

10 Q. Now, are any of these 160-acre tracts -- did they
11 have an old well from the 1950s that was plugged and
12 abandoned with a replacement well, if you will allow me
13 that definition --

14 A. Uh-huh.

15 Q. -- where this one, the new drill, will
16 essentially be a third well, not concurrent production but
17 a third well on a tract?

18 A. Yes, several of those tracts, the original well
19 was replaced by a redrill.

20 Q. Okay. So that will give you some additional --

21 A. Yes.

22 Q. -- information on that.

23 A. We tried to cover every situation that we could
24 foresee.

25 Q. Now, referring to the map, and if I remember

1 right from the previous witness, production started in 1927
2 up there just a little bit north and west of your area.
3 Did the historical beginnings of the production stay within
4 the Bloomfield area, within this area that you're planning
5 to do most of the infill projects, this 28-10, 27-9 area?

6 A. I don't understand the question.

7 Q. Okay. The oldest production in the San Juan
8 Basin, is it within the area of what you're looking at?

9 A. It started there, but actually you'll see that
10 wells started popping up in a lot of different areas, and
11 that's how the different pools started to be developed.

12 Q. Okay.

13 A. They didn't just concentrate on one area to start
14 with.

15 Q. Okay, so it wasn't a --

16 A. It wasn't just a migration out from that one
17 area, just sort of sporadically.

18 EXAMINER STOGNER: Any other questions of this
19 witness?

20 MR. JONES: Yeah, I've got a couple. Thanks,
21 Michael.

22 EXAMINATION

23 BY MR. JONES:

24 Q. Mr. Broacha, I didn't hear either one of you guys
25 mention the imaging logs. Are you looking at -- Obviously

1 fractures are a big part of this problem with the random
2 production, so are you going to run some imaging logs?

3 A. We have historically run imaging logs with mixed
4 success. We have not finalized our logging programs for
5 these wells as yet, and we're still looking at maybe trying
6 them once again and seeing if the evolution with tools will
7 improve the results. But the fracturing, as I understand
8 it, in the PC is more random than, let's say, in the
9 Mesaverde, and you don't have as much success identifying
10 where those fractures are with imaging logs. It's almost
11 luck to be able to see them.

12 Q. What about fracturing in the lower PC? Is that
13 more prevalent than the upper PC with the portioning upward
14 sequence?

15 A. The production indicates that it has to be
16 because of the level of depletion.

17 Q. Right.

18 A. The imaging logs show some, but you can't really
19 map it, let's say, if you're trying to do a mapping of the
20 fracturing. We're still investigating how to look at that
21 and gather the data before we start the infill program, or
22 the pilot program, I should say.

23 Q. Okay, do you do two fracs in the PC, a lower frac
24 and an upper frac?

25 A. No, right now we've only done one frac in the PC.

1 We have done some experiments with two fracs in the PC.

2 Q. Do you have stress data that shows that it's
3 confined to -- the fracture being confined to the PC?

4 A. Yes. In fact, one of the programs that's ongoing
5 right now is a fracture diagnostic program. Even though
6 the results aren't all in, preliminary results show that we
7 are confined to the PC interval.

8 Q. Okay, so you have your closure pressures on
9 your --

10 A. Correct.

11 Q. -- PC?

12 On your drilling, do you use a closed mud system
13 in your drilling?

14 A. No, we do not.

15 Q. And there is no coal tubing drilling planned for
16 this?

17 A. Not for these wells, no.

18 Q. And I guess the biggest question I've got is what
19 you've brought from the greater Green to this reservoir as
20 far as what you predict, such as, you know, Parachute field
21 and the Piceance, Barrett or Williams is doing a lot of
22 infill drilling. Do you predict the same results here?

23 A. The PC is a lot different than those formations
24 that they're infilling right now. The problem we get into
25 is, our clay content is much higher and our pressure is

1 much lower, and it gives unique completion problems in,
2 one, trying to unload the wells, and also the pore-throat
3 geometry. We tend to have very small pore throats, so by
4 capillary forces you tend to trap completion fluids, and
5 you don't have the reservoir pressure to clean them up.

6 And that's kind of the situation we believe we're
7 seeing now as the reservoir is depleted. That's why we're
8 investigating new ways of drilling and completing wells,
9 even though when we do this we always get rate, we're still
10 investigating, can we get more rate, can we get it better?

11 Pressure is what hurts us out here in the San
12 Juan Basin, or the lack of it, I should say, compared to
13 Green River.

14 Q. So you're still planning on setting casing
15 through the PC and frac'ing the wells?

16 A. Well, actually in some of the wells, yes. In
17 other wells we have actually intended on topsetting the PC,
18 drilling open hole with a non-water fluid and seeing what
19 kind of production we can get first without fracturing,
20 with compression, and then with fracturing, to try to kind
21 of get the components of what each of those operations does
22 for the total rate of the well.

23 Q. Can you do air drilling in this Basin?

24 A. We can in some areas where we don't have water
25 problems from the coals or from some of the upper zones,

1 and it has been done too.

2 MR. JONES: Okay, thank you. That's all my
3 questions.

4 EXAMINER STOGNER: Any other questions of this
5 witness? You may be excused.

6 How long do you reckon your next witness will
7 take?

8 MR. KELLAHIN: Oh, less than 30 minutes.

9 EXAMINER STOGNER: Let's go ahead and take a
10 short five-minute break.

11 (Thereupon, a recess was taken at 10:10 a.m.)

12 (The following proceedings had at 10:30 a.m.)

13 EXAMINER STOGNER: This hearing will come to
14 order.

15 Mr. Kellahin?

16 MR. KELLAHIN: Thank you, Mr. Stogner. Our next
17 witness is Mr. Matt Gray.

18 MATT GRAY,

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

21 DIRECT EXAMINATION

22 BY MR. KELLAHIN:

23 Q. Mr. Gray, for the record would you please state
24 your name and occupation?

25 A. Matt Gray. I'm a landman for Burlington

1 Resources.

2 Q. On prior occasions have you testified as an
3 expert petroleum landman before the Division?

4 A. Yes, I have.

5 Q. What has been your responsibility for the
6 Pictured Cliff project?

7 A. I've been responsible for identifying all of the
8 owners offset to any of our projects, as well as
9 coordinating with BP and Energen landmen to identify owners
10 offset to their projects.

11 Q. In addition, are you familiar with the location
12 and spacing-unit requirements for the Pictured Cliff pools?

13 A. Yes, I am.

14 MR. KELLAHIN: I tender Mr. Gray as an expert
15 witness.

16 EXAMINER STOGNER: Mr. Gray is so qualified.

17 Q. (By Mr. Kellahin) Let's turn to the Exhibit Tab
18 11, and behind this tab are a number of individual
19 displays. Let's take the first one as an illustration, and
20 the first one I have is the San Juan 32-9 Unit Well 98J.

21 A. Uh-huh.

22 Q. All right. For this exhibit set, what have you
23 prepared?

24 A. I prepared a map that will identify each
25 individual pilot well, along with the parent well for that

1 infill well, and I've also identified the distance between
2 the pilot well and the parent well.

3 Q. Now, under a different exhibit tab we have set
4 aside the six plats that relate to the six unorthodox well
5 locations?

6 A. Yes, we have.

7 Q. Within the current population of 24 plats that
8 we're looking at, in terms of notification to affected
9 interest owners that are adjacent to the spacing unit
10 containing the pilot well, or the proposed pilot well, what
11 have you done about notification?

12 A. On these wells we notified all offset operators
13 to the spacing unit. In the cases where the party drilling
14 the well was the operator of the offset, we went to the
15 working interest owner level. In cases where there was no
16 PC well drilled, so therefore no operator, we identified
17 the working interest owners in that formation and notified
18 them.

19 Q. All right.

20 A. And there were no instances where the minerals
21 were unleased.

22 Q. So for example, in each of these instances, if we
23 take 160 acres where the pilot well is to be located, if
24 the immediately adjacent 160 is operated by Burlington, you
25 notify the working interest owners?

1 A. Yes, we do.

2 Q. And if the adjacent operator is Energen or BP
3 Amoco, you also notify the working interest owners?

4 A. Yes.

5 Q. Okay. When we come to the population of wells
6 under the tab for unorthodox well locations -- it's Tab
7 10 --

8 A. Uh-huh.

9 Q. -- if you'll turn to that first display, there's
10 a Gallegos Canyon Unit Well 204E In this example it shows
11 that the offset ownership is Burlington. In this case
12 would you have notified the working interest owners?

13 A. Actually, this is an instance where BP Amoco is
14 the operator of this well, and Burlington just happens to
15 be the offset owner of the interest.

16 Q. Oh, and so you have 100 percent --

17 A. Yes.

18 Q. -- of the offset?

19 A. Yes.

20 Q. Is that true of all the rest of the NSL's?

21 A. No, it's not. There's actually just -- The only
22 one that different is the Congress Number 18, in which we
23 did have offset ownership that did not have a PC well
24 already drilled in it, and in that case I went to the
25 working interest owner level and notified those working

1 interest owners.

2 Q. As part of the notification, did you send these
3 parties a copy of the Application and a notice of the
4 hearing today?

5 A. Yes, I did.

6 Q. As a result, are you aware of any objection to
7 the Application?

8 A. None that I'm aware of.

9 Q. If we go behind Exhibit Tab Number 1, which
10 contains the Application, what have you enclosed for the
11 Examiner behind that Application?

12 A. We had the Application, which is the letter of
13 notice to all the owners, and behind that we have enclosed
14 a list of all the owners that we notified, along with
15 return receipts from any certified mailings that we sent
16 out.

17 Q. And to the best of your knowledge, you have
18 complied with the notice requirements of the Division?

19 A. To the best of my knowledge, yes.

20 Q. Let's turn now to Exhibit Tab Number 9 and show
21 Mr. Stogner some illustrations concerning the current
22 requirements.

23 A. Okay. The first map is just another map of the
24 Pictured Cliffs. We can skip over that.

25 Q. This is our base source map that Burlington has

1 prepared?

2 A. Yes, it is, and that's just in there to identify
3 the Pictured Cliffs pools and to notify you that we did
4 receive all those pool outlines from the Aztec OCD office.

5 Q. All right, let's turn to the next slide. If
6 we're looking at all 20-something, 29 PC pools in the pilot
7 project area, have you found any of those PC pools that
8 have special rules and regulations?

9 A. None that we've been able to come by. That's not
10 to say that there's some that we couldn't just find.

11 Q. The best of your knowledge --

12 A. To the best of my knowledge --

13 Q. -- the current search, they were all subject to
14 Rule 104 in terms of well locations and well density?

15 A. That's correct.

16 Q. If we're going to illustrate to the Examiner the
17 current location requirements under Rule 104, is that we
18 can see on this display?

19 A. Yes, this display shows that the PC is developed
20 on 160-acre drillblocks. The current setback distance, as
21 you're aware, is 660 from the exterior of the spacing unit.

22 And one interesting point is that with these
23 setbacks on 160-acre drillblocks, that only leaves 25
24 percent of the drillblock area available for drilling. And
25 as Eric and Mike have alluded to, this could possibly lead

1 to a negative influence on drainage of the drillblock, as
2 we've seen in previous slides that the farther away you get
3 from an existing well, the better it seems to be at this
4 point. And we plan on studying that further in our pilot
5 projects.

6 Q. Well, if the technical people determine there's a
7 need for an additional well in the PC on an existing 160-
8 acre spacing unit, that technical group is also going to
9 have to deal with the well-location requirements of the
10 rule?

11 A. Correct.

12 Q. All right. Are there some other illustrations
13 that you can give us to identify the location problem?

14 A. Yes, this next slide shows the difference between
15 the Pictured Cliffs formation and the Mesavade formation.
16 And as Eric demonstrated earlier in our economics, the most
17 economic way to develop these 80-acre Pictured Cliffs wells
18 will be to commingle or to recomplete an existing well,
19 which means that -- in order to get in a proper location
20 for an existing well makes it very difficult, in that the
21 setback issues are different in the two separate
22 formations.

23 As you can see in the Pictured Cliffs, like I
24 said, the area ratio that you have to drill in is 25
25 percent, while in the Mesaverde and Dakota the area ratio

1 is 37 percent because you have that interior setback to the
2 quarter section.

3 Q. All right, let me ask you this. Let's assume
4 that we have a Mesaverde spacing unit in the east half of
5 the section as you've illustrated here, you've got a 320.

6 A. Uh-huh.

7 Q. We've got a Mesaverde infill well that we want to
8 exercise the opportunity to also produce the Pictured
9 Cliff. It's likely that the Pictured Cliff is going to be
10 at an unorthodox location unless we consider well distance
11 requirements --

12 A. Correct.

13 Q. -- or the setback requirements in addition to
14 density?

15 A. Correct, and that can be demonstrated in our
16 pilot project. We spent numerous hours looking at hundreds
17 of different situations to try to find these pilot
18 projects, and in the instances where we were going to
19 commingle these wells in order to find a standard location
20 for the Pictured Cliffs it was very difficult. And as
21 you've seen, we had six that we had to pick that were
22 nonstandard, so...

23 Q. Do you find a situation where the ownership of
24 the oil and gas in the Pictured Cliff is different between
25 the two quarter sections in, say, a Mesaverde 320 spacing

1 unit?

2 A. Yes, the majority of the time the ownership
3 between the two Pictured Cliffs drillblocks is going to be
4 different than the Mesaverde because of the allocation of
5 the 160-acre spacing compared to the 320-acre spacing.

6 Q. So we can't solve our location problem by having
7 common ownership in the 160 acres towards which you're
8 making the encroachment?

9 A. Typically that's not the case, we cannot.

10 Q. Okay. Let's look at your last illustration, Mr.
11 Gray. What are you showing us here?

12 A. This is just an illustration to kind of show some
13 of the limitations that we're up against in trying to find
14 infill wells.

15 Q. We are looking at a full section?

16 A. We're looking at a full section, and each one of
17 these quarter sections, the green dots represent a current
18 well drilled in that quarter section.

19 What this shows is that the setbacks -- with the
20 660-foot setbacks in the 160-acre spacing, the original
21 well was oftentimes drilled just directly in the center of
22 that 160-acre spacing unit. And that was done for various
23 reasons: topography -- Infill was never even thought of
24 when most of these wells were drilled, so there was never
25 any concern as to where they put those wells.

1 And as you can see from our demonstration here,
2 in order to have a standard location for our infill well,
3 if a well happened to be in the very center of the
4 drillblock the maximum distance you can get away with a
5 standard location is 933 feet.

6 Q. So one of the things the technical group is going
7 to study is to determine what may be a minimum distance
8 between the infill well and the parent well?

9 A. Correct.

10 Q. And whether or not we need to examine altering
11 setback requirements for the PC?

12 A. Yes, that's correct.

13 Q. In addition to well density, then, the well
14 locations is a topic for investigation by the pilot
15 project?

16 A. That is correct.

17 MR. KELLAHIN: That concludes my examination of
18 Mr. Gray, Mr. Stogner. We move the introduction of his
19 exhibits that he's talked about. I think they're Exhibits
20 9, 10, 11 and 1.

21 EXAMINER STOGNER: Exhibits 9, 10, 11 and 1 will
22 be admitted into evidence at this time.

23 EXAMINATION

24 BY EXAMINER STOGNER:

25 Q. Mr. Gray, let me make sure I'm getting this

1 straight. Behind Tab Number 9 -- this is the last page --

2 A. Uh-huh.

3 Q. -- you're considering the minimum distance of 933
4 -- 933 feet as the minimum from wellbores --

5 A. That was --

6 Q. -- or just the infill wells?

7 A. Well, this was just an illustration. In looking
8 for these pilot projects, one of the main things, as I
9 previously told you, we look for distance away from initial
10 wells, from the initial well in the drillblock.

11 In doing that, we noticed that a number of the
12 wells that we looked at were drilled directly in the center
13 of the drillblock, which makes it very difficult to get
14 very far away from that initial well. And in the cases of
15 a recompletion it makes it impossible in a lot of cases to
16 use the same wellbore and be on a standard location.

17 And this illustration is just to show you that if
18 a well is drilled directly in the center of a drillblock,
19 the maximum that you can get away from that well and be in
20 a standard location is 933 feet. That's not to say that
21 that's the maximum or minimum that we are looking to drill
22 infill wells from the parent well, that's just to show you
23 what kind of limitations we're up against in this
24 situation.

25 Q. What kind of responses did you get from your

1 notification, other than the people that are here today?

2 A. We have not heard anything, really, from anybody,
3 as far as I know. I believe some people have supported it
4 just verbally, but no letters of support. But I have not
5 heard anything negative about our Application.

6 EXAMINER STOGNER: Any further questions of this
7 witness?

8 MR. KELLAHIN: No, sir.

9 EXAMINATION

10 BY MR. JONES:

11 Q. Mr. Gray, can I ask you one question?

12 A. Yes.

13 Q. On the information-sharing for this project it
14 looked like there was only one scenario where you will have
15 a negative present worth index for -- I think that was for
16 the drilling and complete new well on the infill wells. So
17 the information-sharing, is it going to be just between
18 Energen and Burlington and --

19 A. -- BP.

20 Q. -- BP?

21 A. Yes, that's the people who are participating in
22 the project and who will contribute information to the
23 pilot?

24 MR. JONES: Okay, thanks.

25 EXAMINER STOGNER: Any other questions?

1 MR. KELLAHIN: That concludes our presentation,
2 Mr. Stogner.

3 EXAMINER STOGNER: All right, you may be excused.
4 Anything further, Mr. Kellahin?

5 MR. KELLAHIN: No, sir.

6 EXAMINER STOGNER: Would you provide me a rough
7 draft?

8 MR. KELLAHIN: I'll be happy to.

9 EXAMINER STOGNER: And I'm assuming that for the
10 presentation today there will be some sort of a
11 revisitation paragraph included. What is the plan on that?
12 2003 of December or --

13 MR. KELLAHIN: Well, that's the conclusion, I
14 think, of the simulation-study portion. It's December, is
15 completion of the simulation work, and we're going to have
16 to have some time to talk to the operators in the pool, not
17 only about the results but what to do with those results in
18 terms of density of well location. So I would think in the
19 spring of the following year.

20 EXAMINER STOGNER: Okay.

21 MR. KELLAHIN: So I'll put some kind of reporting
22 requirement in the draft order for you to consider,
23 advising the Commission on the status of the pilot.

24 EXAMINER STOGNER: Okay, would appreciate that.

25 MR. KELLAHIN: One last thing, I would like to

1 mark that large display which was not otherwise identified.
2 We'll mark that as Exhibit, I guess, 12 to the hearing.

3 In addition, if you find it necessary, Mr.
4 Examiner, I have larger copies of some of the other
5 displays which are already in the book, but there are
6 larger copies available if you need them.

7 EXAMINER STOGNER: I don't believe that will be
8 necessary at this time. However, we'll know how to get
9 ahold of you if that be the instance. And I do have a copy
10 of the CD-ROM you've provided me. I appreciate that.

11 And if you'll get a rough draft to me --

12 MR. KELLAHIN: I think Mr. Carr indicated he had
13 a statement he wanted to make.

14 EXAMINER STOGNER: Oh, yes, Mr. Carr? Statements
15 at this time?

16 MR. CARR: Mr. Hawkins is going to make a
17 statement for BP.

18 EXAMINER STOGNER: Why don't you come up here
19 since we've got some noise, and that way it will at least
20 be recorded more clearly.

21 Identify yourself and your affiliation, and
22 please feel free to comment.

23 MR. HAWKINS: Okay, my name is Bill Hawkins. I
24 am a petroleum engineer for BP.

25 BP is an Applicant in this case with Burlington

1 and Energen, and we are participating in the PC pilot
2 program with five infill wells. We hope to learn more
3 about the potential for incremental recovery with these
4 wells, and from the work that's been done by Burlington we
5 see there is a significant potential for 80-acre infill
6 development in the PC and the San Juan Basin.

7 One important issue which will need to be
8 addressed in the future is how best to locate these wells,
9 the 80-acre infill wells, to maximize recovery of gas. We
10 believe this will most likely require modification of the
11 current well-location setbacks, and we look forward to
12 working with other operators and the NMOCD to address that
13 important issue.

14 And that concludes our statement.

15 EXAMINER STOGNER: Thank you, any others?

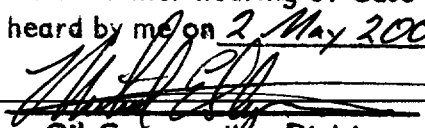
16 Okay. With that, I'll take this matter under
17 advisement and anticipate a rough draft from you, Mr.
18 Kellahin.

19 MR. KELLAHIN: All right, sir. Thank you.

20 (Thereupon, these proceedings were concluded at
21 10:48 a.m.)

22 * * *

23 I do hereby certify that the foregoing is
24 a complete record of the proceedings in
the Examiner hearing of Case No. 12857
25 heard by me on 2 May 2002 ~~at~~.


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

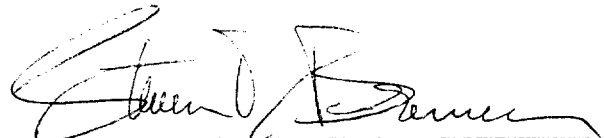
CERTIFICATE OF REPORTER

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 May 6th, 2002.



STEVEN T. BRENNER
CCR No. 7

My commission expires: October 14, 2002