

ALBUQUERQUE, N. M.
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called as a witness, having been first duly sworn on oath, testified as follows:



DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Will you state your name, please?

A A. E. Snyder.

Q By whom are you employed and in what position?

A I am employed by Amerada Petroleum Corporation as District Engineer in Hobbs, New Mexico.

Q Have you previously testified before this Commission as a Petroleum Engineer and made your qualifications a matter of record?

A Yes, sir.

MR. KELLAHIN: Is the Examiner satisfied with the witness' qualifications?

MR. UTZ: Yes, sir.

Q (By Mr. Kellahin) Mr. Snyder, are you familiar with the application of Amerada in Case 2669?

A Yes, sir.

Q Would you state briefly what Amerada proposes under this application?

A In 1952, Amerada drilled and completed its Lambert No. 8, located in Unit B, Section 6, Township 20 South, Range 37 East, in Lea County, New Mexico. It was completed as a Monument Blinebry oil well. By this application, Amerada proposes a conventional dual completion between the Monument Blinebry and the Monument Paddock in this subject well.

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Q Referring to what has been marked as Exhibit No. 1, would you discuss the information shown on that exhibit?

A Exhibit No. 1 is a plat of the area under question. It shows the location of Lambert No. 8 circled in red, and shows the offsetting leases and wells for a distance of one-half mile surrounding the proposed completion, and it designates the zone of completion of each of these wells.

Q Referring to what has been marked as Exhibit No. 2, is that a log of the subject well?

A Yes, sir.

Q What information have you shown on that log?

A On this log near the base of it I have shown in red the base of the San Andres or the top of the Glorieta Paddock.

Q Have there been dual completions in this same zone in the area involved here, Mr. Snyder?

A Yes, sir.

Q You stated that this was a conventional dual. Referring to what has been marked as Exhibit No. 3, would you discuss the information shown on that exhibit?

A Exhibit No. 3 is a schematic diagram of the proposed installation in the well, showing the total depth of the well, 5,715 feet, plugged back depth, 5679, and 5-inch casing set at 5665. There were three other strings of casing set. Each casing string was circulated with cement. We propose to set a permanent type packer between the two zones at 5550, run two strings of



2-3/8ths inch tubing, each string tapered to a smaller string in order to get into the 5-inch casing liner.

Q On account of this tubing, is that the reason that this dual completion does not meet the requirements for administrative approval?

A Yes, sir.

Q You expect oil to be produced from both of these zones, is that correct?

A Yes, sir.

Q Will you be able to pump the zones in the event it's necessary?

A Yes, both zones could be pumped or lifted by gas lift.

Q Do you know what the gravities of the fluids involved are?

A The gravity of fluid from the Paddock zone will be about 38 degrees, and the gravity in the Blinebry zone will be about 40 degrees.

Q Do you know what pressures are found in these two zones?

A The bottom hole pressure in the Paddock zone is about 1515 pounds per square inch, and in the Blinebry zone, 1380 pounds per square inch.

Q What about the GOR's?

A The gas-oil ratio in the Paddock completion is about 700, and in the Blinebry completion, 1150.

Q In your opinion, will this type of completion adequately



protect the two producing horizons?

A Yes, sir.

Q In your well, are all horizons protected throughout?

A Yes, sir.

Q Did the cement circulate on each of these strings as shown on the exhibit?

A Yes, sir.

Q So it's cemented from top to bottom, is that correct?

A Yes, sir, very unusual case.

Q Were Exhibits 1, 2, and 3 prepared by you or under your supervision?

A Yes, they were.

MR. KELLAHIN: At this time I would like to offer in evidence Exhibits 1, 2, and 3.

MR. UTZ: Without objection, Exhibits 1, 2, and 3 will be entered into the record in this case.

(Whereupon, Applicant's Exhibits Nos. 1, 2, & 3 admitted in evidence.)

MR. KELLAHIN: That's all the questions I have of the witness.

CROSS EXAMINATION

BY MR. UTZ:

Q Mr. Snyder, how will you artificially lift the quarter-inch tubing to the Paddock zone other than gas lift?

A We could pump that with a seating nipple set in the



bottom of the 2-3/8ths inch tubing at 3643.

Q Your oil would have to raise up to the 2-3/8ths?

A Yes, sir.

Q That's 1572 feet, or 62 feet, inch and a quarter, you will have to have enough formation pressure to raise the oil up to that point?

A Yes, sir. The performance of the Paddock reservoir indicates it has a substantial water drive. We expect it will be watered out long before the pressure is so low it wouldn't lift the fluid that high.

Q It's a water drive pool?

A It's a water drive.

Q You shouldn't have any pressure problem then?

A No.

Q What was the pressure in that zone again?

A 1515.

Q What was your pressure in the Blinebry zone?

A 1380.

Q I believe you testified to the fact that the cement was circulated?

A Yes, sir.

MR. UTZ: Any other questions of the witness? The witness may be excused.

(Witness excused.)

MR. UTZ: Any other statements in this case? The case

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will be taken under advisement.

* * * * *

STATE OF NEW MEXICO)
) ss
COUNTY OF BERNALILLO)

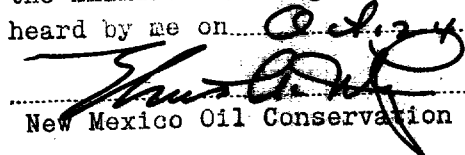
I, ADA DEARNLEY, Notary Public in and for the County of Bernalillo, State of New Mexico, do hereby certify that the foregoing and attached Transcript of Proceedings was reported by me in stenotype, and that the same is a true and correct record of the said proceedings to the best of my knowledge, skill and ability.

WITNESS my Hand and Seal this 19th day of October, 1962, in the City of Albuquerque, County of Bernalillo, State of New Mexico.


NOTARY PUBLIC

My Commission Expires:
June 19, 1963.

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 2462, heard by me on Oct. 24, 1962.

 , Examiner
New Mexico Oil Conservation Commission

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