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BEFORE T	HE
NEW MEXICO OIL CONSERV	ATION COMMISSION
Santa Fe, New	Mexico
October 27;	1971
Examiner Re	aring
IN THE MATTER OF: Application of Marathon Oil Company for a unit agreement, Lea County, New Mexico.	-)))) Case No. 4615)
Application of Marathon Oil Company for a waterflood project, Lea County, New Mexico.)) Case No. 4616

BEFORE: ELVIS A. UTZ, EXAMINER

TRANSCRIPT OF HEARING



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1 MR. UTZ: Case 4615. 2 MR. HATCH: Do you want to combine these cases for 3 purposes of the testimony? 4 MR. MORRIS: Please. 5 MR. UTZ: We will call Case 4615 and 4616. 6 MR. HATCH: Case 4615. Application of Marathon Oil 7 Company for a unit agreement, Lea County, New Mexico, and Case 8 4616, application of Marathon Oil Company for a waterflood 9 project, Lea County, New Mexico. 10 (Whereupon, Applicant's Exhibits 1 through 7, 7A, 7B, 11 8A, 8B, 9A, 9B, 9C, 9D, 9E, 9F, 9G, 9H, and 10 were 12 marked for identification.) 13 MR. MORRIS: Mr. Examiner, I am Richard Morris of 14 Montgomery, Federeci, Andrews, Hannett and Morris, Santa Pe, 15 and with me is Mr. Jack McAdams of Marathon Oil Company, Houston, 16 Texas. 17 We appear for the Applicant. We will have two 18 witnesses, and I ask that they both stand and be sworn at this 19 time. 20 (Witnesses sworn) 21 MR. UTZ: Are there other appearances? You may proceed. 22 ALVIN W. HANLEY 23 having been first duly sworn, according to law, upon his oath 24 testified as follows: 25

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1	DIRECT EXAMINATION
2	BY MR. MORRIS:
3	Q Mr. Hanley, please state your name, by whom you are
4	employed and in what capacity and where you are located.
5	A My name is Alvin W. Hanley. I am employed by Marathon Oil
6	Company as a land man in Midland, Texas.
7	Q Will you state briefly your education and your experience
8	in the petroleum industry?
9	A I received a B. S. degree in mechanical engineering from
10	Texas Technological College in 1947 before being employed
11	by Gulf Oil Company as an engineer trainee.
12	In 1949 I joined Ohio Oil Company, now Marathon Oil
13	Company, as a scout. Since 1954 I have served Marathon as
14	a land man in Texas and New Mexico.
15	MR. MORRIS: Are the witness' qualifications
16	acceptable?
17	MR. UTZ: Yes, they are.
18	Q What does Marathon seek by its application in Case 4615?
19	A Case 4615 is the application of Marathon Oil Company for
20	approval of the unit agreement for the proposed Marathon
21	South Eunice Seven Rivers Queen unit for authority to instal
22	a waterflood in the unit area.
23	Q Please refer to what has been marked as Exhibit No. 1, the
24	unit agreement, identify it and discuss the agreement.
25	A Exhibit 1 is the proposed unit agreement for the Marathon

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Exhibit A is a plat of the unit area showing the tract numbers assigned to the various leases included in the unit area with the unit boundary being designated by a broken line.

The lessors, lessees and well designations are shown in the usual manner.

9 The unit area as shown on Exhibit A is as follows: 10 all being in Township 22 South, Range 36 East, Lea County, New Mexico, southwest quarter, southwest quarter of Section 11 12 23, south half, southwest quarter of Section 24, west half northeast quarter, northwest quarter, west half southwest 13 quarter and northeast quarter, southeast quarter of Section 14 25, all of Section 26, the east half of Section 35, west 15 half northwest quarter, southeast quarter, northwest 16 17 quarter, southwest quarter, west half southeast guarter and southeast guarter southeast guarter of Section 36, containing 18 1840 acres more or less. 19

20 Exhibit B is a tabulation of each lease showing unit
21 tract number, acreage, lease information, royalty, overriding
22 royalty and working interest ownership data.

23 Exhibit C shows initial and final tract participation
24 factors.

25 Q What type of land is involved in this unit?

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1 |_A The unit area is composed of -- comprised of two state 2 tracts and five fee tracts with state acreage totaling 1360 3 acres for 73.9 percent of the unit area and 480 acres of 4 fee acres or 26.1 percent of the unit area. 5 Is there any federal land involved in this unit? Ю б No federal land. A 7 What formation is unitized? 0 8 The unitized formation is defined in Article 2, Section 11 A 9 as that subsurface portion of the unit area commonly known 10 and described as that certain stratographic interval occurring between one hundred feet above the base of the 11 12 Seven Rivers formation and three hundred feet below sea level, the base of the Seven Rivers formation being 13 identified as occurring at the location depth of 3686 feet, 14 15 214 feet below sea level. On the gamma ray log run by Slummer Jay Well Surveying 16 Corporation and the Marathon Oil Company, formerly the 17 Ohio Oil Company, McDonald State Account 1B, Well No. 21, 18 which well is situated 660 from the west line and the 1980 19 feet from the north line of Section 25, Township 22 South, 20 Range 36 East, Lea County, New Mexico. 21 The Exhibit 2 which will be discussed by our 22 engineering witness shows this in detail. 23 All right. That Exhibit 2 is the log section on the well Q 24

that is the control well for purposes of defining the

unitized formation?

² A Correct.

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Okay. Under the unit agreement what is the base of tract
participation?

A As detailed in Article 13, Paragraph 1, the initial tract participation is based on twenty-five percent of each tract's oil production from the unitized formation during the period from January 1, 1969, until October 1, 1969, and seventy-five percent on each tract estimated primary oil production from the unitized formation after October 1, 1969.

Gas is equated into equivalent oil for these calculations. The final tract participation is calculated one hundred percent on the basis of each tract's estimated ultimate primary oil reserve from the unit formation.

16 If no secondary recovery program is implemented, as
17 stated above these participations for each tract are shown
18 in Exhibit C of the unit agreement.

19 Q Would you point out some of the most important features of
20 the unit agreement?

21 A Article 4 prescribes the procedure for expanding the unit
22 area, although no expansion is now anticipated.

Article 6 designates Marathon Oil Company as unit
operator, and Article 7 and 8 detail procedures for
resignation or removal of operators and election of a

successor operator.

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2 Article 14 provides the requirements for qualifying 3 a tract for unit participation. Article 17 covers the 4 settlement of royalties, and Article 23 provides the 5 effective date and term, the effective date is the first 6 day of the calendar month, next following one, the commitment of eighty-five percent of the unit's area by working interest owners, two, approval of the Commissioner of Public Lands and of the Oil Conservation Commission, and three, the filing of a counterpart of this agreement for records in the office of the County Clerk of Lea County, New Mexico. 13 0 Assuming that you get approval of your unit agreement when 14 would you expect to make it effective? 15 Approximately December 1 of 1971. A 16 0 Have you obtained approval of the unit agreement as to form and content from the Commissioner of Public Lands?

18 Yes, sir. Preliminary approval as to form and content was A secured on May 5, 1971, from the office of the Commissioner 19 and a copy of his letter granting that is entered as 20 Exhibit 10. 21

Okay. Would you inform the examiner as to the extent to 22 0 which this agreement has been approved and ratified by the 23 various working interests and royalty interest owners in 24 the unit area? 25

1	A Yes, sir. At this time one hundred percent of the working
2	interest ownership has ratified the unit agreement, being
3	Marathon, Continental Oil Company, Geddy Oil Company, Shell
4	Oil Company, and Gulf Oil Corporation.
5	We have secured ratification by all of the royalty
б	owners with the exception of Atlantic-Richfield.
7	There is one overriding royalty interest which is also
8	owned by Atlantic-Richfield.
9	The Atlantic's district land man in Midland informed
10	me last Friday that this unit agreement has received the
11	approval of his company.
12	However, since the overriding royalty is subject to
13	the Western natural gas production payment ratification
14	requires three additional signatures of which they have
15	received two, and they anticipate that the third should now
16	have been received and we will be furnished their
17	ratification very shortly.
18	Q So assuming that you have the sign-up of the interests
19	that are according to your understanding are committed to
20	your units you will have a hundred percent sign-up of all
21	working interest and royalty interest and
22	A And overriding royalty interests. I did fail to say that
23	we all fee tracts have qualified under the provision of
24	the unit agreement. The Atlantic-Richfield owns a minor
25	royalty interest in four tracts, and an overriding one tract.

1	We do not have an approval by the Commissioner of
2	Public Lands yet. Those are the only two tracts that have
3	not qualified.
4	Q All right.
5	MR. MORRIS: At this time, Mr. Examiner, we would
6	offer into evidence Exhibits 1, 2 and 10.
7	MR. UTZ: I was looking for 10 here.
8	MR. MORRIS: It is the very bottom of the pile.
9	THE WITNESS: Letter from the Commissioner.
10	MR. UTZ: Without objection Exhibits 1, 2 and 10 will
11	be entered into the record of this case.
12	MR, MORRIS: That's all I have on direct examination.
13	MR. UTZ: Are there questions of the witness? He may
14	be excused.
15	(Witness excused)
16	WAYNE R. MYER
17	having been first duly sworn, according to law, upon his oath
18	testified as follows:
19	DIRECT EXAMINATION
20	BY MR. MORRIS:
21	Q Mr. Myer, please state your name, where you reside, by whom
22	you are employed and in what capacity.
23	A Wayne R. Myer, employed by Marathon Oil Company as a
24	petroleum engineer in Midland, Texas.
25	I am in charge of our waterflood engineering in that

1		office.
2	Q	Will you state briefly your education and your experience
3		in the petroleum industry?
4	А	I graduated from Texas A & I University with a B. S. degree
5		in natural gas and petroleum engineering in 1955.
6		I was employed in June 1955 as a petroleum engineer
7		with the Ohio Oil Company, now the Marathon Oil Company.
8	1	I served over ten years in field reservoir and staff
9		positions, engineering positions at various locations in
10		Mississippi, Louisiana and east Texas.
11		I then served over five years in engineering capacities
12		in Indiana and Illinois, including the last three years as
13		an engineering supervisor of approximately 1000 waterflood
14		wells.
15		I was transferred to Midland, Texas, on August 1, 1971
16		and have been serving in a position of coordinating
17		Marathon's waterflood engineering activities in west Texas
18		and New Mexico.
19		MR. MORRIS: Are the witness' qualifications
20	acce	ptable?
21		MR. UTZ: Yes, they are.
22	Q	Mr. Myer, are you familiar with the South Eunice Seven
23		Rivers Queen pool and Marathon's application for instituting
24		a waterflood project in this case?
25	A	Yes, I am.

1	Q	You have heard Mr. Hanley's testimony with respect to the
2		unit agreement. What is the purpose of this unit?
3	А	This unit is being formed for the purpose of conducting
4		waterflood operations in the unit area.
5	Q	Would you refer now to Exhibit No. 3, being the plat of the
6		unit area and just point out the unit and some of the
7		principal features as shown on this exhibit?
8	A	Exhibit 3 is a plat of the South Eunice Seven Rivers Queen
9		unit area and an area two miles in each direction from the
10		unit boundary.
11		The lease ownership and location and identification of
12		wells are shown on this plat. The formations from which
13		each well is producing is shown by the appropriate symbol
14		and a legend.
15		You will notice that all Seven Rivers Queen oil wells
16		are shown by just a simple dark circle, blue.
17		The oil wells being proposed for conversion to
18		injection are shown by the red colored-in circles.
19	Q	Does this plat show the limits of the unit area?
20	A	Yes, it does. The unit area as you see, it is bounded on
21		the west side and on the southwest edges by adjacent unit
22		there which is currently being formed by the Atlantic-
23		Richfield Company.
24		The very northwest end of our unit, you will notice,
25		is bounded by Continental's unit which is already active.

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1 The north and east sides of the unit corresponds to the 2 outer limits of the oil productivity of the Seven Rivers 3 Queen interval. 4 There are several dry holes shown along the outside 5 of the unit. These wells did not have sufficient б permeability and oil saturation to make commercial wells. 7 There is one well, one producing well located on the 8 outside of the unit area. This is the George W. King Ray 9 Well No. 2 on a Christmas lease. 10 This is in Unit J of Section 25? 0 11 Α That's right. 12 0 Okay. 13 A The King Ray interest was invited to join the unit but he 14 elected to be excluded from unit participation. 15 The south end of the unit corresponds to the south 16 end of the South Eunice Seven Rivers Queen oil pool. 17 The wells shown directly south of Section 36 are in the Langlie Mattix field but are producing from the same 18 19 formation. 20 You will notice these wells on Skelly and Texas 21 Pacific leases. Both these companies, Skelly and Texas 22 Pacific who operate the lease in Section 1 were contacted 23 regarding our proposed unit. 24 Each company stated they had no objection to our proposed unit or waterflood. 25

1 0 All right. Now, please refer back to Exhibit 2 that was 2 referred to by Mr. Hanley in his testimony and point out 3 the specific intervals shown on that log that will be 4 flooded in this project. 5 Exhibit 2 is a gamma ray sonic log on Marathon formerly A 6 Ohio Oil Company McDonald State Account 1B, Well No. 21, 7 the base of the Seven Rivers formation which also is the 8 top of the Queen formation is marked on a log with a solid 9 red line and is shown at a depth of 3686 feet or sub-sea 10 depth of minus 214 feet. 11 The top of the unitized interval is 100 feet above the 12 base of the Seven Rivers formation and is shown on a log 13 with a dashed red line at 3586 feet. 14 This depth also represents the top of the interval 15 cover by the South Eunice Seven Rivers Queen pool field 16 rules. 17 The bottom of the unitized interval is 350 feet below 18 sea level and is shown on the log by a dashed red line at 19 3822 feet. 20 The field rules for the South Eunice Seven Rivers 21 Queen pool covers the interval to the base of the Queen 22 formation which is an estimated 150 feet below the base of 23 the interval logged in this well. 24 The wells in a unit area are primarily completed in 25 a top 100 feet of the Queen formation, and this will be the

1 interval that will be waterflooded. 2 Expansion of the waterflood along the west edge of 3 the unit may also include part of the lower Seven Rivers 4 interval. 5 All right. Will you refer to the Exhibit No. 4, being your Q б structure map, and point out the information shown on that 7 exhibit? 8 Exhibit No. 4 is a structure map in the unit area contoured Α 9 on the top of the Queen formation. The entire oil 10 accumulation appears to be stratographically controlled. 11 Regionally the strata dips to the southwest, and the 12 proximity of the unit area -- however, the structure 13 becomes complicated by local features as a contour show. 14 Actually there is relatively little structural relief 15 in the unit area. The structure would not be expected to 16 have an effect on a waterflood operation. 17 0 Referring to Exhibit No. 5 would you give a brief history of the development and production that has been experienced 18 19 in the unit area? Discovery of the South Eunice pool dates back to May 1930. 20 A However, development in the unit area began in February 21 1957. 22 Exhibit No. 5, showing the monthly oil production 23 fairly well shows the history of the area. Development 24 began in 1957 in the northwest section of the unit and 25

1 spread to the south half of the unit. 2 During 1958 twenty-eight oil wells were completed 3 during these two years and corresponds to the production 4 shown in late 1958. 5 There is no additional development until 1961 and the б beginning of 1962, at which time most of the northeast 7 section of the unit was drilled with an additional fifteen 8 completions. 9 This accounted for forty-three of the forty-five 10 wells in the unit. The other two wells were drilled in 11 late 1963. 12 Other variations shown are due primarily to a small 13 amount of recompletions and stimulation work. The decline 14 in production since 1963 has been rather rapid, as you can 15 see. How were the wells in the unit area completed and what were 16 0 17 their producing characteristics? Most of the wells were drilled about 100 feet into the 18 Α 19 Queen, casing set to total depth, then the same sections 20 were selectively perforated, treatment normally consisted 21 of 10,000 gallons of jelled lease crude with one pound per 22 gallon of sand. Some wells were treated with volumes up to about 23 40,000 gallons. 24

Initial flowing potential generally ranged from 100 to

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1 500 barrels of oil per day with no water, and a g.o.r. of 2 400 to 1 to about 100 to 1. 3 One well which is perforated in the lower Seven Rivers 4 and the Queen had a g.o.r. of 7700 to 1. Some wells were 5 placed on gas left a pumping initial, but most wells flowed 6 for three years or more before requiring artificial lift. 7 G.o.r.'s have generally averaged less than 5000 to 1 8 throughout the primary lift of the wells. Current g.o.r. 9 is approximately 5290 to 1. 10 Most of the wells produced little or no water, generally about one barrel of water per day per well. 11 And what is the current status of the production from the 12 0 wells in the unit area? 13 Well, there are forty-five wells in the proposed unit, but 14 Α only twenty-five of these wells were producing during the 15 month of July 1971. Production for July 1971 averaged 16 78 barrels of oil per day or about 3.3 barrels of oil per 17 day per well. 18 The maximum oil production from any well during this 19 month was 8.7 barrels of oil per day. 20 The above production rates indicate the wells in the 21 unit area are at or very near the economic limit of 22 production. 23 What has been the cumulative production from the wells in 0 24 the unit area? 25

1	А	Production as of 8/1/71 for the unit area totaled
2		2,473,269 barrels of oil.
3	Q	During the primary phase of operation in this area what
4		was the producing mechanism?
5	A	The reservoir drive mechanism for the unit area has been a
6		solution gas drive.
7	Q	Referring to the data sheet marked as Exhibit 6, point out
8		the information shown on that exhibit.
9	A	Exhibit No. 6 is a tabulation of data in regard to the
10		reservoir rock and fluid characteristics and estimated
11		waterflood performance.
12		You will notice the net feet porosity, permeability,
13		water saturation, so forth is shown here.
14	Q	All right. I observed the note that you have on this
15		exhibit that the values given are for the Queen only and
16		would not pertain to those wells in which some Seven Rivers
17		flooding would occur.
18	A	That's right. There would be some additional reserves
19		which could be attributed to the lower Seven Rivers.
20	Q	All right. Would you now refer to your Exhibit 7 and 7B,
21		being the cross-sections, and point out the information
22		shown on those exhibits?
23	A	These are cross-sections showing log reductions of the
24		Queen and lower Seven Rivers formation.
25		Exhibit A is a north-south cross-section. You will

1 notice on Exhibit A on the side where it shows what area 2 this cross-section encompasses from A prime to A, Exhibit B 3 is an east-west cross-section, a porous interval in the 4 lower Seven Rivers formation, approximately fifty feet 5 above the Queen has been correlated across the field. 6 The top of the Queen and two producing intervals 7 within the Oueen have also been correlated across the unit 8 area. 9 Individual stringers cannot always correlated across 10 the unit, but the general productive intervals can be 11 correlated. 12 On the basis of this correlation and the other data shown, Ω 13 in your opinion, will your waterflood project or will 14 waterflooding be feasible in this unit area? 15 Α Yes. Yes. I have reviewed the available data in regard 16 to porosity, permeability, oil saturation, lowered characteristics, a productive zone continuity and oil 17 18 recovery under primary operations. 19 This data was used to calculate waterflood performance 20 by accepted methods. 21 This calculation of waterflood performance is substantiated by generalized analogy of waterflood projects 22 of similar projects currently being carried out in the 23 Queen formation of the immediate area including the Skelly 24

Penrose A and B units, Anadarko's Penrose unit, and Wood,

1 McShane State M lease waterflood. 2 My opinion is that the unit area can be successfully 3 and economically waterflooded. 4 What degree of success would you expect to enjoy in your Q 5 waterflood project? б A We anticipate a recovery of approximately 1.8 million 7 barrels of oil from waterflooding which would not be 8 recovered otherwise. I might point out that the State 9 L Self A-1 eighth regular royalty or approximately seventy-10 six percent of this added recovery which amounts to about 11 17,000 barrels of oil. 12 Will you now refer to the schematic diagrams of your 0 13 injection wells which have been marked as Exhibits 8A and 14 8B and point out how the injection wells would be equipped? 15 Exhibits Nos. 8A and 8B show a schematic diagram Α Okay. 16 of the proposed injection wells and a tabulation of well 17 data for each of the eight wells being requested for 18 conversion to injection service. You will note that data on four wells tabulated on 19 Exhibit No. 8A and data for the other four wells are 20 tabulated on Exhibit No. 8B. 21 The size and setting depth of each casing string, the 22 amount of cement used and the estimated cement tops, packer 23 depths, formation depths, and the interval open to the 24 formation is shown for each well. 25

1 Connections will be included at the surface whereby 2 pressures on both the annulus and tubing can be obtained. 3 The annulus between the tubing and production casing 4 will be loaded with corrosive resistant fluid. 5 The tubing will have an internal protective coating 6 to combat corrosion. 7 0 Now, do you intend to actually install a gauge, a permanent 8 gauge on the annulus for each of the injection wells? 9 A We will not have a permanent gauge installed. We will be 10 taking pressures at least once a month. 11 Q In your opinion is that procedure preferable to having a 12 permanent gauge on these wells? 13 A We feel it is since if you have individual gauges, leave 14 gauges on individual wells they have a tendency to get off 15 in time, and by using one gauge which has been calibrated 16 it does give a better indication of true measures. 17 0 In your opinion will the manner of completing and operating 18 these injection wells adequately protect the water zones 19 and prevent the injection water from entering other 20 formations? 21 A Yes, it will. Surface casing has been set to a depth of 22 203 feet to 442 feet, and in each case the cement was 23 circulated to the surface. Fresh water in the area is 24 obtained from the Ogalala which occurs within 100 feet from 25 the surface.

1	The cemented surface casing should protect this fresh
2	water zone. With regards to protecting other hydrocarbon
3	zones please note that the top of the cement around the
4	production casing as shown on the exhibits. The first well
5	the McDonald State No. 20 had cement up into the surface
б	casing at 235 feet as determined from a temperature log.
7	The next five wells shown have cement circulated out
8	the production surface casing annulus.
9	The last two wells had a calculated top of cement of
10	over 850 feet above the perforated interval.
11	In cementing program in each of these wells will be
12	sufficient to protect any other hydrocarbons known which
13	may exist in the area.
14	Q All right. Will you refer to the group of exhibits marked
15	as 9A through 9H and state what they are and why you are
16	presenting them?
17	A Exhibits 9A through 9H are logs showing the unitized area
18	in each of the wells which we propose to convert to
19	injection service.
20	The top of the Queen is shown on each of these logs.
21	Q These are your eight injection wells?
22	A That's right.
23	Q All of the eight injections?
24	A That's right.
25	Q What type of waterflood pattern is proposed?

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 $\mathbf{1}|_{A}$ I would like to have you refer back to Exhibit No. 3, the 2 proposed eight injection wells are indicated with circles 3 colored in red. 4 As you will note we will be using a basic five spot 5 pattern on 40-acre spacing, three enclosed five spot 6 clements will be developed initially. 7 A total of twenty-two proration units will be located 8 within the project area initially. 9 What are your plans for expanding the waterflood beyond 0 the initial phase? 10 Our current plan is to develop the entire unit area with a 11 A total of twenty-two injection wells. We expect to convert 12 all of these wells to injection service within two to 13 three years after the unit becomes effective. 14 These wells will also be located on basic five spot 15 patterns. We will be cooperating with the offset 16 waterflood unit operators to take mutual advantage of 17 cross-line injection wells and to protect the correlative 18 rights. 19 We request that administrative procedure be set up 20 whereby an approval but a conversion of additional wells 21 to injection service can be obtained without having to show 22 well response. 23 Would that administrative approval facilitate your 24 Q conversion of the additional fourteen wells to injection 25

1 service? 2 Yes, sir. A 3 Would the standard type administrative procedure that has 0 4 been adopted by the Commission for use in unitized areas be 5 acceptable in this connection? б Α Yes, it would be. 7 How much water do you expect to inject in connection with 0 8 this project? 9 We expect to inject approximately 2000 barrels of water Α 10 per day into the eight injection wells, initially before 11 fill-up and the pressure build-up the rate would probably 12 approach about 500 barrels of water per day in some of 13 these wells with the maximum injection pressure being 1400 14 to 1800 p.s.i. 15 Ultimately we anticipate injecting about 5500 barrels 16 of water per day into the twenty-two wells. 17 Q What is the source of this water? 18 Make-up water for injection will be from the Seven Rivers Α 19 reef, water source wells located approximately five miles 20 southwest of the unit. samples of water from this same 21 source, approximately six miles southeast of the planium 22 supply had properties which showed general compatibility 23 with the reservoir rock and fluid in the unit area. 24 Water from this source is being used successfully in 25 several Queen waterfloods in the area. Produced water when

1 it becomes of sufficient quantities will supplement the 2 make-up water. 3 What allowables do you anticipate in connection with this $|\Omega|$ 4 project? 5 There are forty-five wells which would be in operation A 6 during waterflood. Each on a 40-acre proration unit. This 7 number multipleed by the October '71 basic normal unit 8 allowable for southeast New Mexico have seventy barrels per unit per day, that gives a total maximum unit allowable of 9 3150 barrels per day. 10 11 Actual maximum oil production from the unit is anticipated to approach about 800 barrels per day after 12 about four years. 13 Were the exhibits to which you have testified prepared by \mathbf{O} 14 you or under your supervision? 15 A Yes, they were. 16 MR. MORRIS: At this time, Mr. Examiner, we offer 17 into evidence Exhibits 3 through 9H. 18 Exhibits 3 through 9H will be entered into MR. UTZ: 19 the record of this case. 20 MR. MORRIS: That's all we have on direct examination. 21 CROSS-EXAMINATION 22 BY MR. UTZ: 23 Mr. Myer, I believe you testified that surface casing on Q 24 the -- on all the wells including the 200 foot surface 25

1		casing would protect all fresh water in the area.	
2	Α	Yes, we feel it would.	
3	Q	Is there no fresh water flow	
4	A	I am not acquainted with any fresh water that is being	
5		utilized in the area that is below that depth.	
6	ç	Now, have you noted these locations of your eight injection	
7		wells in the application that was submitted by Mr. Morris?	
8	A	Yes.	
9	c	And are they correct?	
10	A	Yes, they are.	
11	Q	All these wells will have internally coated tubing with a	
12		packer?	
13	A	That's right, sir.	
14	Q	And you will be injecting into the packer?	
15	А	That's right.	
16	Q	And you will have facilities for taking annulus pressures	
17		on all these wells?	
18	A	Yes, we will.	
19		MR. UTZ: Arc there other questions of the witness?	
20		MR. HATCH: What will the coating be on this tubing?	
21		THE WITNESS: We haven't decided for sure what it will	
22	be.	It will be some type of epoxy coated most likely. We have	
23	to ta	ake some bids and so forth on this yet.	
24		MR. UTZ: Is epoxy considered to be a plastic?	
25		THE WITNESS: Yes, it is.	

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1	MR. UTZ: Is that what all plastic-coated tubing is?
2	THE WITNESS: Well, I think there is different
3	suppliers, different names to it, and it has different
4	consistencies as far as what is in it, but it is a plastic type
5	coating, yes, which is impermeable to water and oil. Some of it
б	is impermeable to oil to a different degree. It depends on a
7	particular type that is being utilized.
8	MR. MORRIS: Along that line if the Commission required
9	plastic-coated tubing would that be a broad enough thing to
10	take into account the different variations you might run in to
11	in your bids?
12	THE WITNESS: Oh, yes, it would.
13	MR. UTZ: Are there other questions? May be excused.
14	(Witness excused)
15	MR. UTZ: Statements in the case?
16	MR. MORRIS: No, sir.
17	MR. UTZ: Cases will be taken under advisement, and
18	the hearing is adjourned.
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1	STATE OF NEW MEXICO)
2	COUNTY OF BERNALILLO)
3	I, LINDA MALONE, Court Reporter, do hereby certify that
4	the foregoing and attached Transcript of Hearing before the
5	New Mexico Of I Conservation Commission was reported by me;
б	that the same is a true and correct record of the said
7	proceedings, to the best of my knowledge, skill and ability.
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12	Sinder Maden
13	Court Reporter
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