BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO September 5, 1973 EXAMINER HEARING dearnley, meier & associates IN THE MATTER OF: Case No. 5062 The Application of Continental Oil Company for a waterflood project, Lea County, New Mexico BEFORE: ELVIS A. UTZ, Examiner 209 SIMMS BLDG. P.O. BOX 1092 PHONE 243-6691 • ALBUQUERQUE. NEW MEXICO 87103 1216 FIRST NATIONAL BANK BLDG. EAST • ALBUQUERQUE, NEW MEXICO 87108 TRANSCRIPT OF HEARING

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MR. CARR: Case 5062, Application of Continental
Oil Company for a waterflood project, Lea County, New Mexico.
MR. KELLAHIN: Tom Kellahin, Kellahin & Fox, Santa
Fe, New Mexico, appearing on behalf of the applicant Continenta
Oil Company. May the record please reflect that my witness is
the same as in the previous two cases, that Mr. Lyon has been
accepted as an expert witness.
MR. UTZ: Let the record so show.

VICTOR T. LYON,

was called as a witness and after being duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. KELLAHIN:

- Mr. Lyon, will you please state briefly what the applicant is seeking by this Application?
- Case No. 5062 is the Application of Continental Oil Company for authority to institute a waterflood project Maljamar Grayburg-San Andres Pool on its Grace Mitchell lease by injecting water into two wells; its Grace Mitchell Wells Nos. 2 and 6 located in Section 5, Township 17 South, Range 32 East, Lea County, New Mexico.
- Please refer to what has been marked as Exhibit No. 1, Ö identify it, and explain what information it contains.
- Exhibit No. 1 is a location plat showing the Grace Mitchell lease outlined in red, and I think that the girl made a

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mistake in outlining it, and it shows the location, the ownership of the offsetting leases, and the wells located on them, to the best of our knowledge and belief.

The proposed injection wells, which are Wells Nos. 2 and 6, are shown with red circles inscribed about them. The Grace Mitchell lease actually consists of the east half, the east half of the northwest quarter, and the northeast quarter of the southwest quarter of Section 5, the outlined area. The map that I am looking at isn't marked that way, so if it includes the northeast of the southwest, then your map is correct.

We propose to inject water into Well No. 2, which is located 660 feet from the south and east lines of the Section 5; and No. 6, which is 1980 feet from the south and east lines of Section 5.

- Would you please refer to what has been marked as Applicant's Exhibit No. 2 and identify it?
 - Exhibit No. 2 is a schematic diagram showing how Well No. 2 will be equipped for injection. It shows the size, depth, and amount of the cement used in setting the casing It shows the cement-lined tubing to be set on a packer at 3960. The well is a completed open hole and injection well. Now, the well has been plugged back to 4110, so the injection will be between the seat of the four and 1/2 tubing at 4025 to the plugged-back depth of 4110.

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		page 5
1	٥	This is for the Grace Mitchell B Lease Well No. 2, is
2		that correct?
3	A	Right.
4	Q	All right. Would you please refer to Exhibit 3?
5	A	Exhibit 3 is a schematic diagram showing the same
6		information for Well No. 6.
7	Q	What is the zone of injection here?
8	A	This is the San Andres, actually the Lovington sand, which
9		we commonly refer to as the 8th zone in the Maljamar Pool.
10	Q	Is the completion of these two wells as shown in Exhibits
11		2 and 3 consistent with sound engineering practices?
12	A	I might add that the annular space above the packer will
13		be filled with inert fluid, and the surface connections
14		will be so arranged that any presence of pressure will be
15		readily detectable.
16	Q	That's with regards to both wells?
17	A	Both wells.
18	Ω	Please refer to Exhibit 4 and identify it.
19	A	Exhibit 4 is the copy of the a acoustic gamma ray log
20		for the Grace Mitchell B No. 2. We have shown, by a line
21		at 3925, the top of the San Andres.
22	Ď	Will you please refer to Exhibit 5 and identify it?
23	A	Exhibit No. 5 is the sonic log on Grace Mitchell B No. 6,
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and here again we have shown the top of the San Andres

by the horizontal line at 3925.

1	Q	How many producing wells do you have on this lease,
2		Mr. Lyon?
3	A	It says 3925, but it doesn't look like 3925 to me. I
4		believe that should be 3828. That's where that line
5		is located.
6		MR. UTZ: It would be 38 something?
7		THE WITNESS: Yes, 38 something. 3828.
8	Q	(By Mr. Kellahin) Do you have six producing wells on
9		this lease, Mr. Lyon?
10	A	Yes, that's true.
11	Ω	What's your total production?
12	A	The lease has produced a total of 254,839 barrels as of
13		January 1, 1973, and the production on the lease at this
14		time is negligible. This is probably very close to the
15		cumulative production at this time.
16	Q	What is your estimate of the additional oil to be
17		recovered by the secondary recovery?
18	A	Our engineers estimate that we will recover an additional
19		amount of oil representing approximately 31 percent of the
20		primary production or about 80,000 barrels.
21	Q	What's to be the source of your injection water?
22	A	When this project was first under consideration, we had
23		been promised injection water from the Chevron-operated
24		Maljamar Grayburg unit over here to the east and the south

which we have a cooperative agreement building, and since that time they have indicated they will not be able to furnish us water; so it appears that we will need to transport water from our NCA unit injection station up to this property. And, if we do this, it will be necessary to return the produced water back to that station for reinjection. Our alternative is to build a water injection station on that lease. We have not decided which of those two courses of action we will take.

- What is your estimate of the volume of produced water?
- I really don't have a very good feeling on that. Fluid production right now is virtually negligible, and, of course, the water production will increase as the flood progresses.
- Q It's your intention to reinject produced water?
- Yes, it will be reinjected here or in -- well, either on this property, if we build the injection station on the lease, or it will be returned to the injection station in the NCA unit and just placed into that system and be reinjected wherever it goes in that system.
- Q What do you anticipate to be the volume of injected water?
- A We will expect to inject about 300 barrels per day at no pressure initially; but we expect maximum injection

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1	pressure of about 2500 pounds.
2	Ω Is this 300 barrels per day?
3	A Per well.
4	Q Will this proposed waterflood result in the recovery
5	of oil that would otherwise not be recovered, thereby
6	preventing waste?
7	A Yes, it would.
8	Q What, if any, effect, will this have on the correlative
9	rights of others?
10	A We believe that correlative rights are adequately
11	protected in that the injection is balanced across the
12	lease line and we are cooperating with the offset
13	waterflood project.
14	Q Do you have anything else you would like to add, Mr.
15	Lyon?
16	A I don't believe so.
17	MR. KELLAHIN: Mr. Examiner, we move the introduction
18	of Applicant's Exhibits 1 through 5.
19	MR. UTZ: Exhibits 1 through 5 will be entered into
20	the record of this case.
21	MR. KELLAHIN: We have nothing further.
22	CROSS-EXAMINATION
23	BY MR. UTZ:
24	Q What is the injection zone of this project?

The injection zone is the Lovington sand, which is a

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1	part of the San Andres formation.
2	Q And the Grayburg is not involved?
3	A Right.
4	Q As stated in the advertisement?
5	A Well, this is the name of the pool, essentially, and I
6	use that because of that. To my knowledge, we don't have
7	any intention of injecting into the Grayburg.
8	MR. UTZ: Are there other questions of the witness?
9	(No response.)
10	MR. UTZ: You may be excused. Are there statements
11	in the case?
12	(No response.)
13	MR. UTZ: The case will be taken under advisement.
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STATE OF NEW MEXICO)
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COUNTY OF BERNALILLO)

I, JOHN DE LA ROSA, a Court Reporter, in and for the County of Bernalillo, State of New Mexico, do hereby certify that the foregoing and attached Transcript of Hearing before the New Mexico Oil Conservation Commission was reported by me; and that the same is a true and correct record of the said proceedings to the best of my knowledge, skill and ability.

COURT REPORTER

i do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Care less 0.6.7, neard by me on 9-5-73, 19

New Mexico Oil Conservation Camaission