General Survey \$77.12 Initial Completion TYPE OF REPORT - (X) ×

RESERVOIR PRESSURE REPORT

	PEFORE EXAMINER MORROW OIL CONSERVATION DIVISION ARCO EXHIBIT NO. A CASE NO. 10376 + 10357	Section to the second section to the section to the second section to the section to the second section to the section to the second section to the second section to the section to	Citgo Empire Abo Unit	LEASE	Box 1919, Midland,	At incu.	Cities Service Co	Constat Man(1)
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per cent; gas gravity shall be determined by analysis; liquid level shall be feet above datum plane. SEE RULE 302. All depths plus or minus sea level; all pressures psi; Bomb shall be calibrated frequently enough against a dead weight tester to ensure an accuracy of one

* Well shall be produced at least 24 hours prior to shutting in for sonic test.

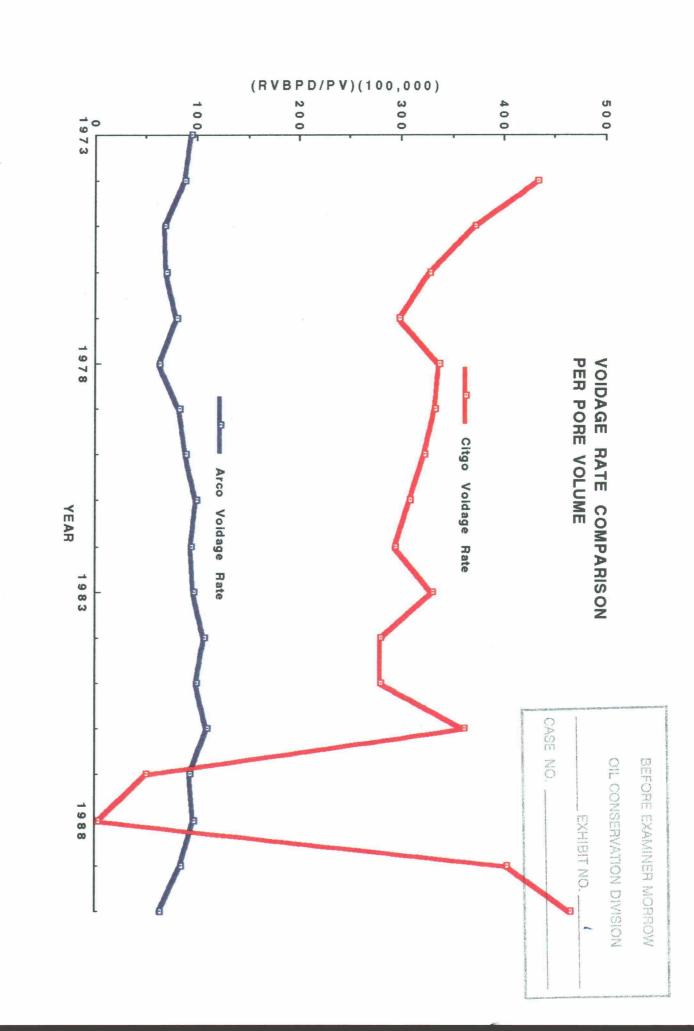
I hereby certify that the above information is true and complete to the best of my knowledge and belief.

Engineering

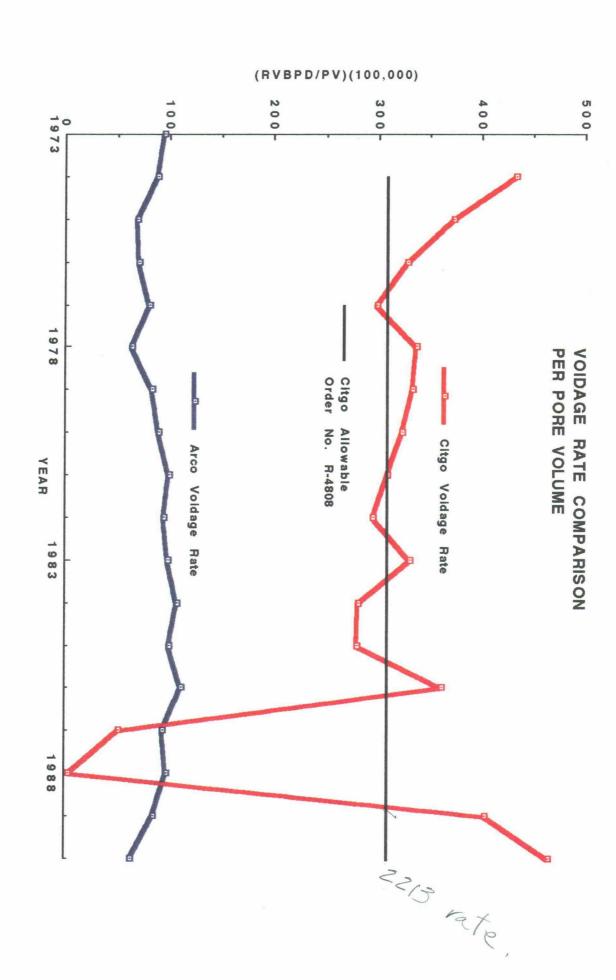
To J. Milroyer

77910 chnician

November 11, ___80

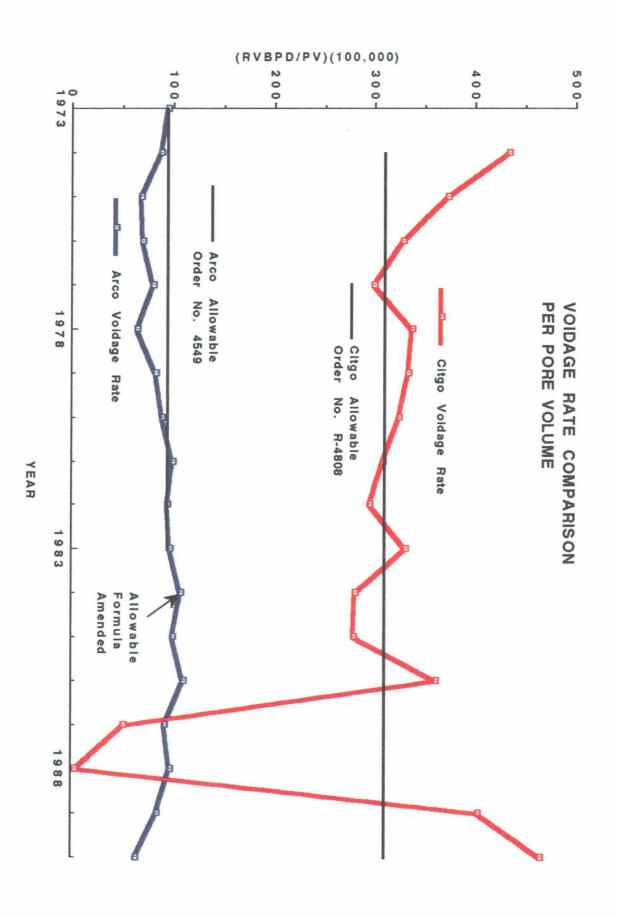


The CITGO UNIT has been voided 3.3 times faster than the ARCO UNIT



The Citgo Unit has consistently overproduced its allowable except when it had no gas market.

The ARCO UNIT has produced within its allowable limit for the life of the unit.

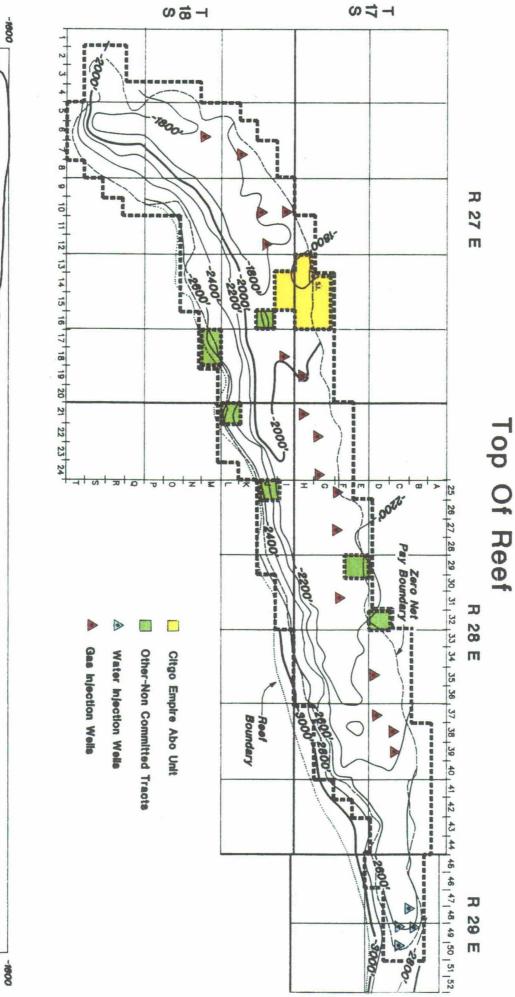


In 1984 the ARCO allowable was changed from a subsurface voidage rate to a surface allowable.

The allowable was changed because it was demonstrated with a reservoir simulation model that the units total voidage would change only slightly and that recovery of NGL's would be increased by 3,300,000 barrels.

"Reinjection of all available residue gas" is required to receive a surface allowable of 65 MMCFPD by Order No. R-4549-F.

EMPIRE ABO POOL Eddy County, New Mexico



West-East Front Elevation

-2800

-3200

-2000

-2400

-2800

-2400

From Order No. R-4808 Case No. 5213 June 11, 1974

Application of Cities Service for a pressure maintenance project

Rule 3. The maximum daily project allowable shall be an amount of oil which will result in reservoir voidage no greater than the average daily reservoir voidage for the project area for the calendar year 1972 (2213 reservoir barrels) or 852 barrels of oil per day, whichever is less.

Rule 8. That all calculations of reservoir voidage shall be in accordance with the formula set out in Attachment "A" to this order utilizing the Table of Fluid Properties set out in Attachment "B" to this order.

To calculate reservoir voidage using Attachment A & B the following must be known:

- 1. Oil production
- 2. Gas production
- 3. Gas injection
- 4. Average reservoir pressure @ -2264' subsea

From the operators monthly Allowable Request Letters, Pressure Project Maintenance Report, Reservoir Pressure Report Form C-124 and the NMOCD Statistical Reports we have prepared on the following pages a detailed pressure history to be used for calculating voidage.

Row 1 is the year in which pressures were recorded in the NMOCD Statistical Report.

Row 2 is the subsea depth at which the pressures were reported.

Rows 3-8 are the reported pressures of the six wells in the Citgo Unit.

Row 9 is the arithmetic average pressure for the unit.

Row 10 is the porosity-feet weighted average pressure for the unit.

Row 11 is the porosity-feet weighted average reservoir pressure at the correct datum of -2264'.

Row 12 are the pressures reported by the operator in monthly allowable request letters to the NMOCD.

CITGO EMPIRE ABO BHP II REV

12	=	10	ဖ	&	7	6	UI	4	ယ	N	_
Press Reported by the Operator in Allowable Letters to the NMOCD	Press@Res. MP -2264 SS	Porosity-ft. Wt. Avg.	Arithmetic Avg.	Tract 4 Wright State #4B	Tract 3 STate CE #5	Tract 1 Russell C #10	Tract 1 Russell C #9	Tract 2 Magruder A #14	Tract 2 Magruder A #13	DATUM	YEAR
*	1273	1278	1250	1384		1198	1079	1213	1375	-2400	1974
*	1153	1158	1158			1158				-2400	1975
1380	1219	1204	1218	1173	1214	1296	1302	1160	1160	2100	1976
1321	1218	1223	1253	1149	1190	1371	1487	1075	1246	-2400	1977
1321	1155	1160	1169	1123	1142	1034	1368	1320	1025	-2400	1978
1192	1216	1221	1216	1227	1171	1176	1272	1328	1120	-2400	1979
1192	1099	1111	1108	1129	1065	1110	1191	1184	967	-2400	1980
1191	1087	1049	1040	1088	1017	1007	1072	1133	923	-2100	1981

CITGO EMPIRE ABO BHP II REV

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1 22	=	10	G	©	7	တ	0.	_				
Press Reported by the Operator in Allowable Letters to the NMOCD	Press@Res. MP -2264 SS	Porosity-ft Wt. Avg.	Arithmetic Avg.	Tract 4 Wright State #4B	Tract 3 STate CE #5	Tract 1 Russell C #10	Tract 1 Russell C #9	Tract 2 Magruder A #14	ITACL & Magindon A. H	To Mooridor A #13	DATUM	YEAR
1191	1047	1042	1036	1074	994	1012	1108	1131		8 9 5	-2100	1982
1035	993	999.3	994.2	1026	942	900	0.60	1007	1080	860	-2400	1983
1035	961	965.3	959.3	991	909	1 (Q33	1026	1047	841	-2400	1984
1035	906	921.1		90	ο α 1 σ	5 (5)	896	959	1006	795	-2400	1985
1035	898	858.6	858.2	9	ж С Э	8 0 8	859	941	956	739	-2100	1986
1035	900	000.7	848		892	800	811	868	931	786	2.00	1987
1030	821		787.9))		761	857					1988

CITGO EMPIRE ABO BHP II REV

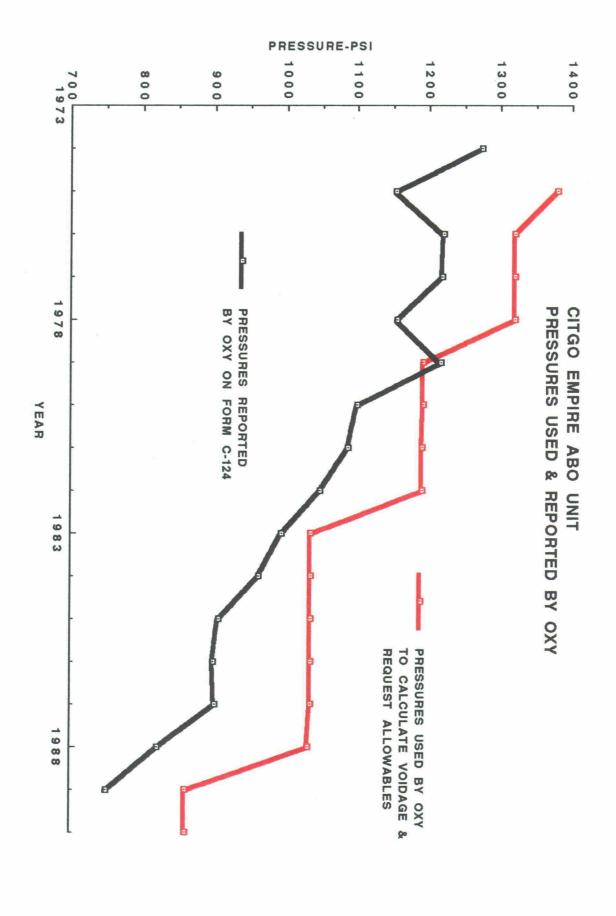
_	YEAR	1989	1990
N	DATUM	-2400	•
ယ	Tract 2 Magruder A #13	762	*
4	Tract 2 Magruder A #14	*	•
(Ji	Tract 1 Russell C #9		*
o	Tract 1 Russell C #10	•	•
7	Tract 3 STate CE #5	739	•
&	Tract 4 Wright State #4B	*	*
Ø	Arithmetic Avg.	751	:
10	Porosity-ft. Wt. Avg.	756	•
1	Press@Res. MP -2264 SS	751	•
12	Press Reported by the Operator in Allowable Letters to the NMOCD	860	860

Citgo Unit Average Reservoir Pressure Summary

YEAR	PRESS. USED BY OPERATOR IN ALLOWABLE REQ.	PRESSURE FROM C-124's & STATISICAL RPTS.
1974	***	1273
1975	1380	1153
1976	1321	1219
1977	1321	1218
1978	1321	1155
1979	1192	1216
1980	1192	1099
1981	1191	1087
1982	1191	1047
1983	1035	993
1984	1035	961
1985	1035	906
1986	1035	898
1987	1035	900
1988	1030	821
1989	860	751
1990	860	* * * *

The operator has used a higher pressure to calculate voidage in 14 of the 15 years that we can compare from the table above than what is supported by the statistical data.

Using a higher than actual pressure to calculate voidage yields voidage amounts that are lower than actual. This enables the operator to produce more than they are entitled to by Order No. R-4808.



CITGO EMPIRE ABO UNIT AREA

Reservoir Voidage Formula - Gas Injection Credit

Equation 1: Vrvb = Qo [Bo + (Rpn - Rs) Bg]

Where:

Vrvb = Reservoir voidage, bbls. per day

Qo = Oil Production rate, Stock tank bbls. per day

Bo = Oil formation volume factor (1), reservoir

volumetric bbls/stock tank bbl.

Rpn = Net producing gas-oil ratio, NCF/S.T.B.O.

$$Rpn = Rp (1.0 - Gi)$$

$$Gp$$

Where:

Rp = producing gas-oil ratio, MCF/BO

Gi = daily volume of gas injected

MCF/Day

Rs = Solution gas-oil ratio (2), MCF/STBO

Bg = Gas formation volume factor (3), RVB/MCF

(1), (2), (3): These values calculated from Table of Fluid Properties, Attachment "B".

Attachment "A" Order No. R-4808

CITGO EMPIRE ABO UNIT AREA

Table of Fluid Properties

P base = 15.025 psia Pbp = 2231 psia Tres = 109°F (569° R)

7.	g,		>	£
15.025	1.000	194.696	0	1.0
100	1.125	28.229	.180	.965
200	1.163	13.749	.235	.940
300	1.193	8.970	.290	.920
400	1.218	6.692	.345	.915
500	1.244	5.236	.395	.895
600	1.263	4.276	.445	.877
700	1.285	3.644	.495	.872
800	1.304	3.108	.540	.850
900	1.325	2.746	.585	.845
1000	1.344	2.437	.625	.833
1100	1.364	2.178	.675	.819
1200	1.384	1.962	.725	.805
1300	1.404	1.790	.775	.795
1400	1.425	1.649	.825	.789
1500	1.445	1.516	.875	.777
1600	1.465	1.404	.925	. 768
1700	1.485	1.304	.975	.758
1800	1.505	1.220	1.025	.751
1900	1.525	1.147	1.075	.745
2000	1.548	1.053	1.125	.720
2100	1.573	1.000	1.175	.718
2200	1.597	.953	1.225	.717
2231	1.606	.939	1.250	.716

Pr = Reservoir average pressure at datum -2264' subsea, lbs/in absolut:

Bo = Oil formation volume factor, reservoir volumetric bbls/stock tank bbl.

Rs = Solution Gas/Oil Ratio, Thousand std. cu. ft/stock tank bbls. oil.

Z = Gas Compressibility Factor

YV w/o RVBG w/Rev Pres

CITGO EMPIRE ABO UNIT YEARLY VOIDAGE CALCULATIONS

		A	В	C	Ð	E	F
							**
					ACTUAL		YRLY. VOID.
		GAS	GAS	OIL	YEARLY	YEARLY	MINUS
		PROD.	INJ.	PROD.	VOIDAGE	ALLOWABLE	YRLY ALL.
	YEAR	(MCF)	(MCF)	(STB)	(RVB)	(RVB)	(RVB)
1	*1974	343882	0	72865	631530	451452	180078
2	1975	1016087	486807	117151	971456	807745	163711
3	1976	1441799	1007840	94879	859737	809958	49779
4	1977	1310454	905104	66327	780269	807745	-27476
5	1978	1301134	852494	51582	879926	807745	72181
6	1979	1191601	760916	37793	870544	807745	62799
7	1980	1241728	818955	27132	846103	809958	36145
8	1981	1313541	944714	19706	805322	807745	-2423
9	1982	1279490	936239	19370	768845	807745	-38900
10	1983	1299282	930701	16857	861067	807745	53322
11	1984	1270003	973741	13801	733159	809958	-76799
12	1985	1148885	868164	9909	728584	807745	-79161
13	1986	1058923	712448	8489	943205	807745	135460
14	1987	461636	412548	5842	133481	807745	-674264
15	1988	23680	19478	838	11414	809958	-798544
16	1989	339764	0	4919	1051978	807745	244233
17	1990	360629	0	3226	1214095	807745	406350

^{*}Production data starts at the unitization date of 6/74

^{**}Positive values are overproduction

CITGO EMPIRE ABO UNIT YEARLY VOIDAGE CALCULATIONS

Columns A,B & C are production data as supported by the operators letters reporting voidage to the NMOCD and by the NMOCD statistical reports.

Column D is the yearly voidage as calculated by the voidage equation of Attachment A of Order No. R-4808.

Column E is the voidage allowable from Order No. R-4808 times the number of days in the year. (2213 RVBPD)(365)=807745

Column F is the yearly voidage (Col. D) minus the yearly voidage allowable (Col. E). Overproduction is therefore positive.

Order No. R-4808 provides for a method to accumulate a gas bank during times of gas injection. The gas bank was intended to allow the unit to "maintain allowable production during times of injection compressor shut downs and similar problems". The status of the gas bank must be considered before any theoretical overage/underage calculation can be completed.

From Order No. R-4808 Case No. 5213 June 11, 1974

Application of Cities Service for a pressure maintenance project

<u>Rule 3.</u>	The maximum daily project allowable shall be an amount of oil
	in reservoir voidage no greater than the average daily reservoir
voidage for the	project area for the calendar year 1972 (2213 reservoir barrels) or
852 barrels of oi	l per day, whichever is less.

- Rule 7. That the volume of gas required to be injected in any month to maintain average daily reservoir voidage in the project area at 2213 reservoir barrels shall be known as "Reservoir Voidage Balance Gas."
- Rule 8. That all calculations of reservoir voidage shall be in accordance with the formula set out in Attachment "A" to this order utilizing the Table of Fluid Properties set out in Attachment "B" to this order.
- Rule 9. A gas "bank" shall be established for the project against which injection credit may be drawn in order to maintain allowable production during such times as injection compressor shutdowns and similar problems. The gas bank shall operate under and be subject to the following provisions:
 - (a) That volume of gas injected in the project in any month in excess of Reservoir Voidage Balance Gas shall be credited to the gas bank and be carried cumulatively forward.
 - (b) The gas bank balance shall not exceed a maximum of the average monthly total Reservoir Voidage Balance Gas volumes for the previous three (3) month, not including the month being reported.
 - (c) The operator shall report monthly to the Commission the status of the gas bank in a form acceptable to the Commission. The report shall be designed to show the status of the gas bank over a twelve (12) month period and shall be revised monthly to a current basis.
 - (d) The accumulated gas bank may be applied to the injection volume during any future month in which the gas injection volume is less than the Reservoir Voidage Balance Gas volume.
 - (e) In the event there are insufficient credits accrued to the gas bank to bring actual injection plus applied credits up to the Reservoir Voidage Balance Gas requirement during any given production month, production for that month shall be reduced to an amount commensurate with the average daily reservoir voidage set forth in Rule 3 above. Production beyond this amount shall be considered overproduction and shall be compensated for by underproduction during the following month.

Rule 7 & Rule 9(a) indicate that the gas bank increases when the amount of gas injected in a month is enough to make calculated reservoir voidage less than 2213 RVBPD.

Therefore, the amount of gas that would have to be injected to maintain voidage at 2213 RVBPD must be calculated. This is called Reservoir Voidage Balance Gas by the Order. When actual gas injection is greater than Reservoir Voidage Balance Gas then the gas bank is credited and becomes larger.

When actual gas injection is less than the Reservoir Voidage Balance Gas the gas bank is debited and becomes smaller. A negative bank status indicates the unit is overproduced and should be shut in the following month to make up overproduction as per Rule 9 (e).

The following pages are calculations of the gas bank status and the Citgo Units theoretical overage/underage position.

CITGO EMPIRE ABO UNIT YEARLY VOIDAGE CALCULATIONS

																*1974	YEAR					
360629	339764	23680	461636	1058923	1148885	1270003	1299282	1279490	1313541	1241728	1191601	1301134	1310454	1441799	1016087	343882	(MCF)	PROD.	GAS			>
0	0	19478	412548	712448	868164	973741	930701	936239	944714	818955	760916	852494	905104	1007840	486807	0	(MCF)	Ę	GAS			α
3226	4919	838	5842	8489	9909	13801	16857	19370	19706	27132	37793	51582	66327	94879	117151	72865	(STB)	PROD.	잍			C
1214095	1051978	11414	133481	943205	728584	733159	861067	768845	805322	846103	870544	879926	780269	859737	971456	631530		VOIDAGE	YEARLY	ACTUAL		C
807745	807745	809958	807745	807745	807745	809958	807745	807745	807745	809958	807745	807745	807745	809958	807745	451452	(RVB)	ALLOWABLE	YEARLY			п
406350	244233	-798544	-674264	135460	-79161	-76799	53322	-38900	-2423	36145	62799	72181	-27476	49779	163711	180078	(RVB)	YRLY ALL.	MINUS	YRLY. VOID.	*	ד
650583	244233	<u>,</u> 0	0	528716	393256	472417	549216	495894	534794	537217	501072	438273	366092	393568	343789	180078	(RVB)	0/0	CUM		*	c

*Production data starts at the unitization date of 6/74

**Positive values are overproduction

CITGO EMPIRE ABO UNIT YEARLY VOIDAGE CALCULATIONS

Columns A,B & C are production data as supported by the operators letters reporting voidage to the NMOCD and by the NMOCD statistical reports.

Column D is the actual yearly voidage as calculated by the voidage equation of Attachment A of Order No. R-4808.

Column E is the voidage allowable from Order No. R-4808 times the number of days in the year. (2213 RVBPD)(365)=807745

Column F is the yearly voidage (Col. D) minus the yearly voidage allowable (Col. E). Overproduction is therefore positive.

Column G is a cumulation of column F. Positive numbers represent overproduction. Under production does not accumulate after overage is made up in 1987 because the gas bank balance is still not positive. The gas bank would have become positive in 1988 had the unit been injecting gas.

SUMMARY CITGO EMPIRE ABO UNIT VOIDAGE CALCULATIONS

There has never been a positive gas bank in the Citgo Empire Abo Unit from which overproduction could occur. Therefore, any amount produced in excess of 2213 RVBPD is overproduction.

Column F indicates that the unit has been overproduced in 10 of the 17 years since it was unitized.

Column G indicates that overproduction from as far back as 1974 was not made up until 1987. Order No. R-4808 requires that overproduction be compensated for with underproduction in the following month. Col G also shows that as recently as 1986 the unit was overproduced by 528,716 reservoir volumetric barrels and, is overproduced by 650,583 RVB at the end of 1990.

Citgo Prod. History/Yrly

CITGO EMPIRE ABO UNIT PRODUCTION HISTORY

	A	В	С	D	E	F
YEAR	NP/YR BO	CUM NP BO	GP/YR MCF	CUM GP MCF	GI/YR MCF	CUM GI MCF
1959		0		0	0	0
1962	327278	327278	561233	561233	0	0
1963	148166	475444	197881	759114	0	0
1964	147946	623390	196429	955543	0	0
1965	159828	783218	210072	1165615	0	0
1966	180344	963562	266591	1432206	0	0
1967	198311	1161873	295305	1727511	0	0
1968	191125	1352998	332122	2059633	0	0
1969	245095	1598093	379936	2439569	0	0
1970	268000	1866093	467976	2907545	0	0
1971	278239	2144332	494085	3401630	0	0
1972	225764	2370096	488012	3889642	0	0
1973	210634	2580730	627091	4516733	0	0
1974	142525	2723255	628420	5145153	0	0
1975	117151	2840406	1016087	6161240	486807	486807
1976	94879	2935285	1441799	7603039	1007840	1494647
1977	66327	3001612	1310454	8913493	905104	2399751
1978	51582	3053194	1301134	10214627	852494	3252245
1979	37793	3090987	1191601	11406228	760916	4013161
1980	27132	3118119	1241728	12647956	818955	4832116
1981	19706	3137825	1313541	13961497	944714	5776830
1982	19370	3157195	1279490	15240987	936239	6713069
1983	16857	3174052	1299282	16540269	930701	7643770
1984	13801	3187853	1270003	17810272	973741	8617511
1985	9909	3197762	1148885	18959157	868164	9485675
1986	8489	3206251	1058923	20018080	712448	10198123
1987	5842	3212093	461636	20479716	412548	10610671
1988	838	3212931	23680	20503396	19478	10630149
1989	4919	3217850	339764	20843160	0	10630149
1990	3226	3221076	360629	21203789	0	10630149

Gas Recovery = 21.2 BCF - 10.6 BCF = 10.6 BCF

ORIGINAL GAS IN PLACE CITGO EMPIRE ABO UNIT

- 1. Original Reservoir Pressure = 2359 psi.
- 2. Boi = 1.606 RVB/STB
- 3. Bgi = 0.933 RVB/MCF
- 4. Rsi = 1250 SCF/STB
- 5. OOIP = 4,449,530 STB This came from their testing.
- 6. OGIP = FREE GAS + SOLUTION GAS
- 7. FREE GAS =
 (38 Ac-Ft)(7758 Bbl/Ac.Ft) / (0.933 RVB/MCF)
 =316 MMCF
- 8. SOLUTION GAS = OOIP(Rsi) = (4449530 STB)(1250 SCF/STB)= 5.562 BCF
- 9. OGIP = 5.562 + .316 = 5.878 BCF

% GAS RECOVERY

- 1. Produced gas = 10.6 BCF
- 2. OGIP = 5.878 BCF
- 3. % Recovery = (10.6/5.878)(100) = 180 %

CITGO EMPIRE ABO UNIT

В C D E F Α CALCULATED **AVERAGE** CUM OIL **CUM GAS CUM GAS** CUM GAS RES. PRESS. **PRODUCTION** INFLUX **PRODUCTION** INJECTION **YEAR** PSI STB MCF MCF MCF 1959 2359 0 0 0 0 1962 1952 327,278 561,233 0 228,576 1963 1937 475,444 759,114 0 437,865 0 1964 1875 623,390 955,543 537,964 0 1965 1771 783,218 1,165,615 555,546 1966 1688 963,562 1,432,206 0 659,695 0 1967 1605 1,161,873 1,727,511 773,222 0 1968 1528 1,352,998 2,059,633 921,724 0 1376 2,439,569 1969 1,598,093 896,484 1970 1222 1,866,093 2,907,545 0 935,183 1971 2,144,332 3,401,630 0 1194 1,342,861 0 1972 1147 2,370,096 3,889,642 1,673,529 1973 1066 2,580,730 4,516,733 0 2,034,192 2,723,255 1974 1273 5,145,153 0 3,320,007 2,840,406 1975 1153 6,161,240 486,807 3,460,582 2,935,285 1976 1219 7,603,039 1,494,647 4,111,375 3,001,612 1977 1218 8,913,493 2,399,751 4,512,638 1978 3,053,194 10,214,627 3,252,245 4,747,743 1155 1979 1216 3,090,987 11,406,228 5,384,392 4,013,161 1980 1099 3,118,119 12,647,956 4,832,116 5,416,900 3,137,825 1981 1087 13,961,497 5,776,830 5,741,904 1047 3,157,195 15,240,987 1982 6,713,069 5,947,848 1983 993 3,174,052 16,540,269 7,643,770 6,143,510 961 3,187,853 17,810,272 1984 8,617,511 6,335,238 906 3,197,762 18,959,157 9,485,675 6,451,887 1985 1986 898 3,206,251 20,018,080 10,198,123 6,774,228 1987 900 3,212,093 20,479,716 10,610,671 6,829,193 1988 821 3,212,931 20,503,396 10,630,149 6,596,890 -1989 751 3,217,850 20,843,160 10,630,149 6,709,195

21,203,789

10,630,149

7,069,392

751

3,221,076

1990

CITGO EMPIRE ABO UNIT MATERIAL BALANCE SOLUTION

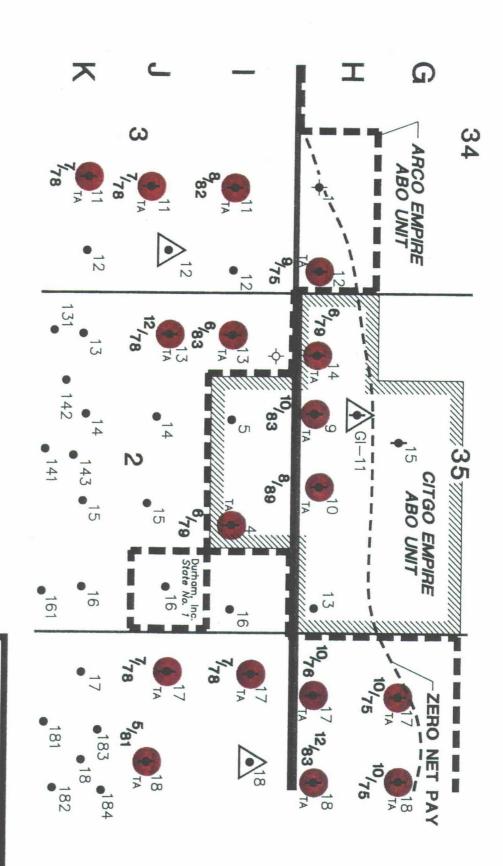
Columns A, B, C & D are a tabulation of the average reservoir pressure and cumulative production by year.

Column E is a listing of the Cumulative Gas Injection by year.

Column F is a solution to the material balance equation indicating a total gas influx into the Citgo Unit of 7.1 BCF at the end of 1990.

Notice that the near shut in condition of the Unit for 1988 caused the calculated influx to be reduced from 6.8 BCF to 6.6 BCF. Had the Unit been shut in earlier in the life of the reservoir, when reservoir energies were higher, the calculated influx would have been much less.

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PLUGGED ABANDONED



GAS INJECTOR

PRODUCER



TEMPORARY ABONDONED

Scale 1"=1500'

Dept: ROCKY MT./N.MEX. AREA Dwg No. Ci

Date: 4/90 Date: 5/91 OUT NMPLTO1

Date: 4/90

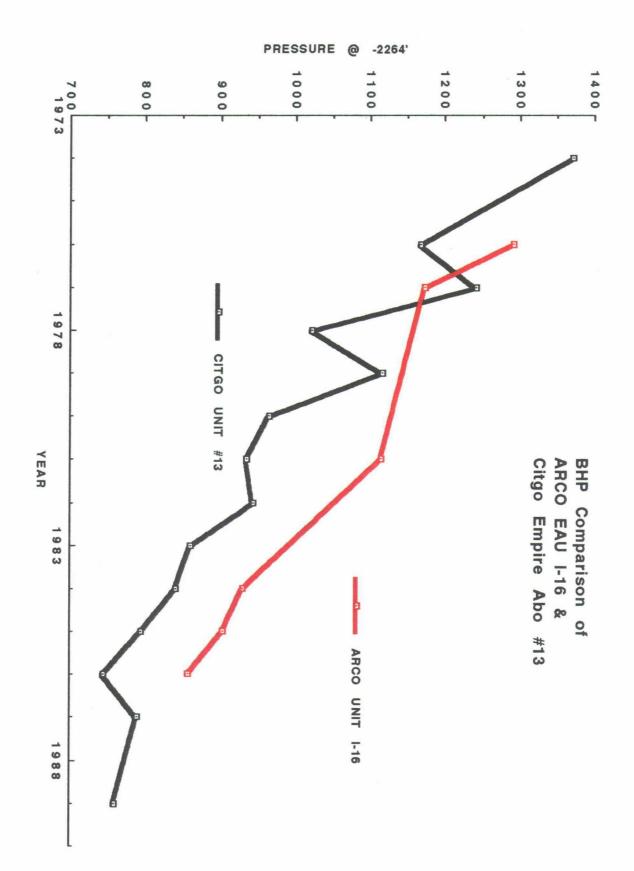
SHUT IN DATES Eddy Co., New Mexico EMPIRE ABO FIELD

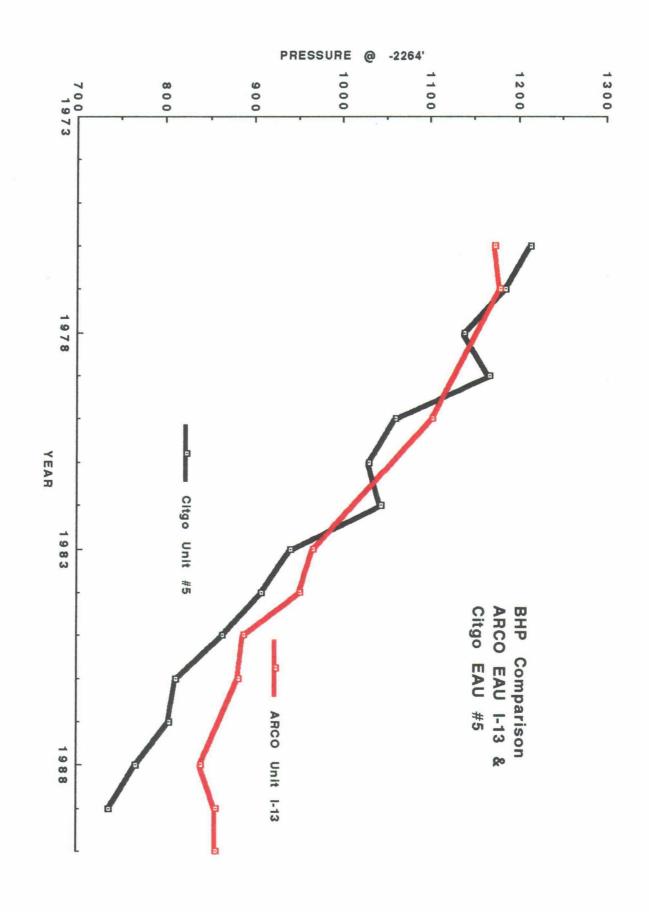
ARCO Oil and Gas Company

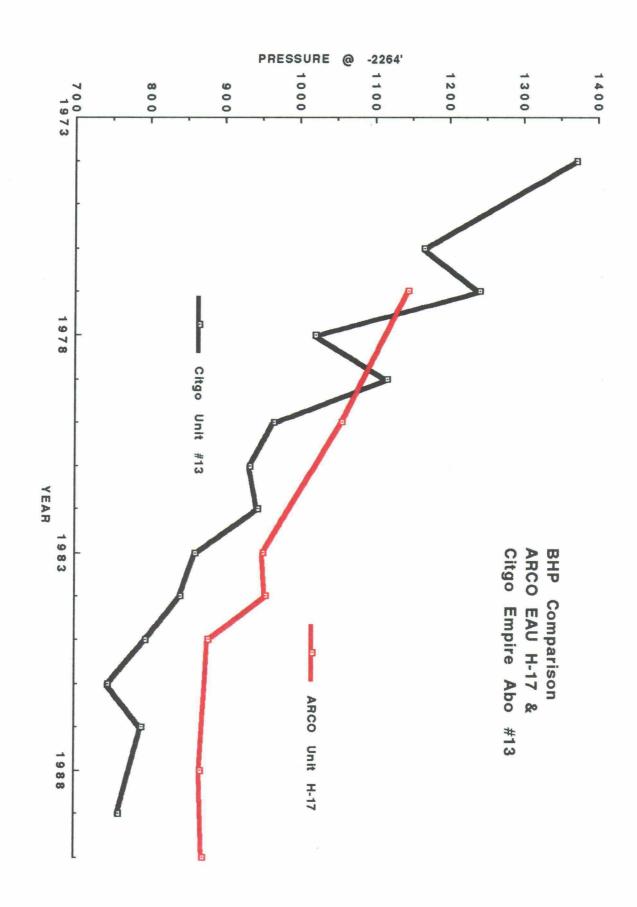
Division of AtlanticRichfieldCompany

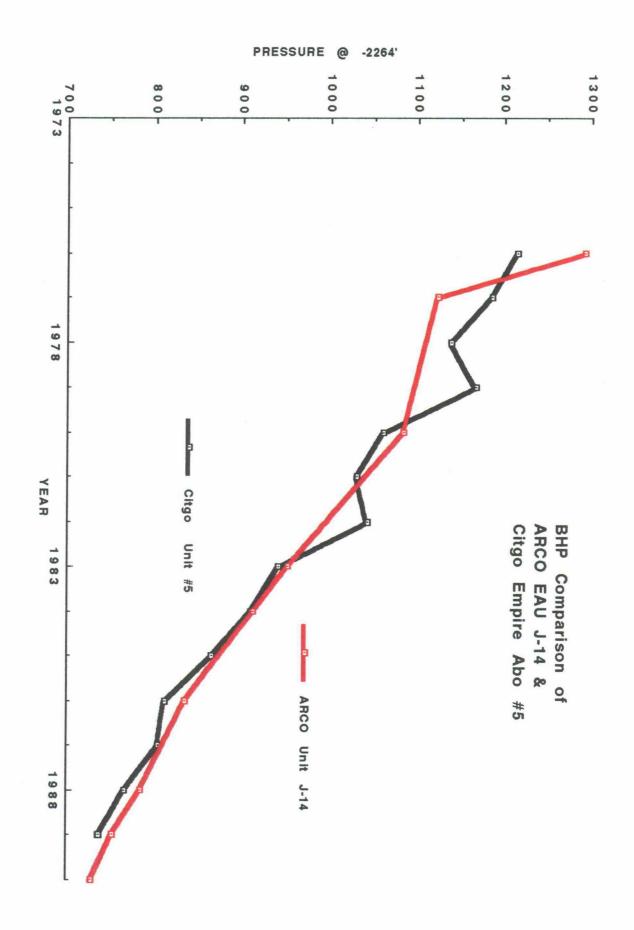
Central District Midland,

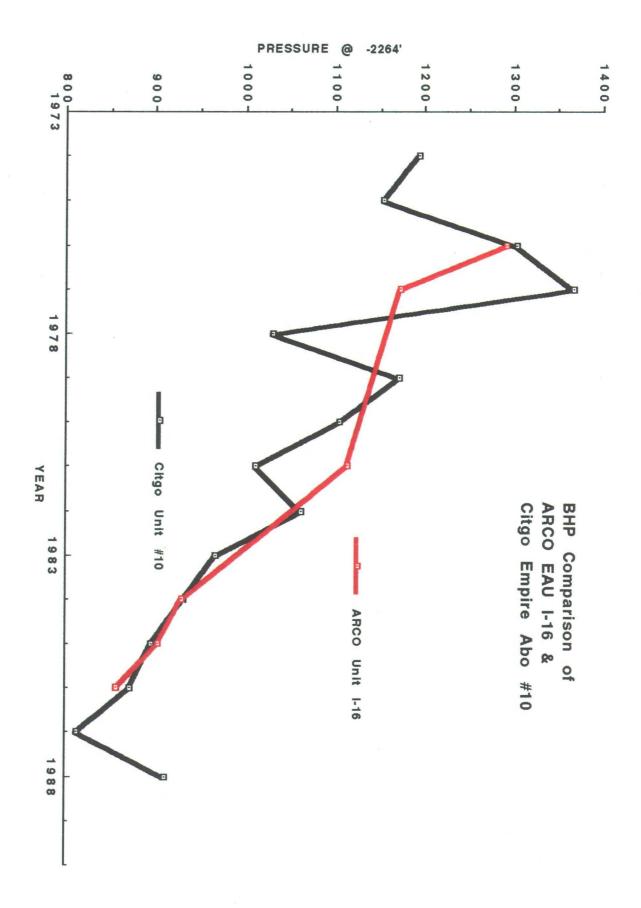
Texas

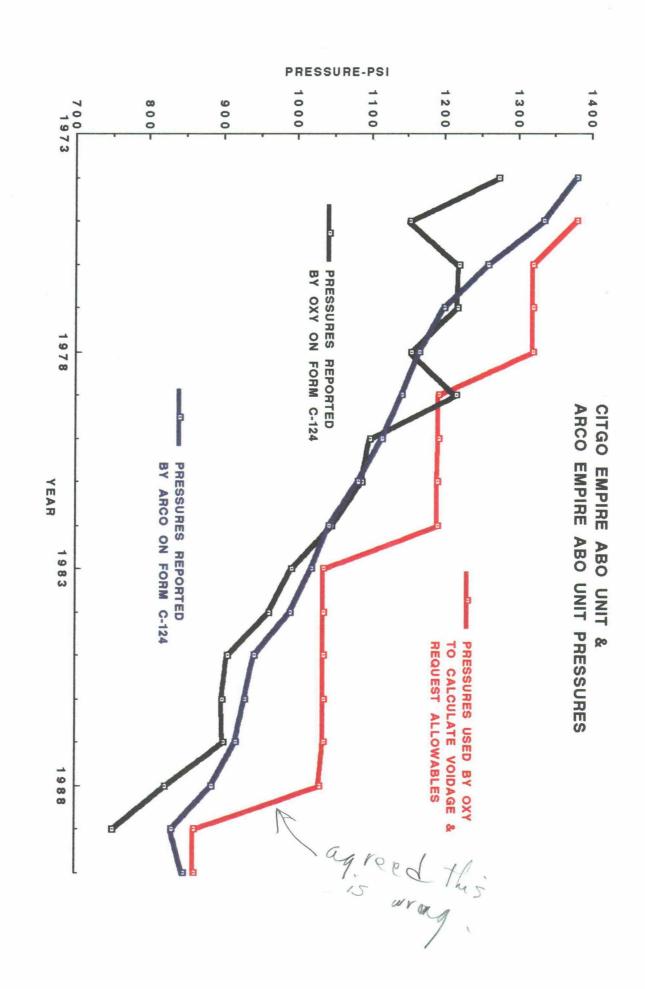


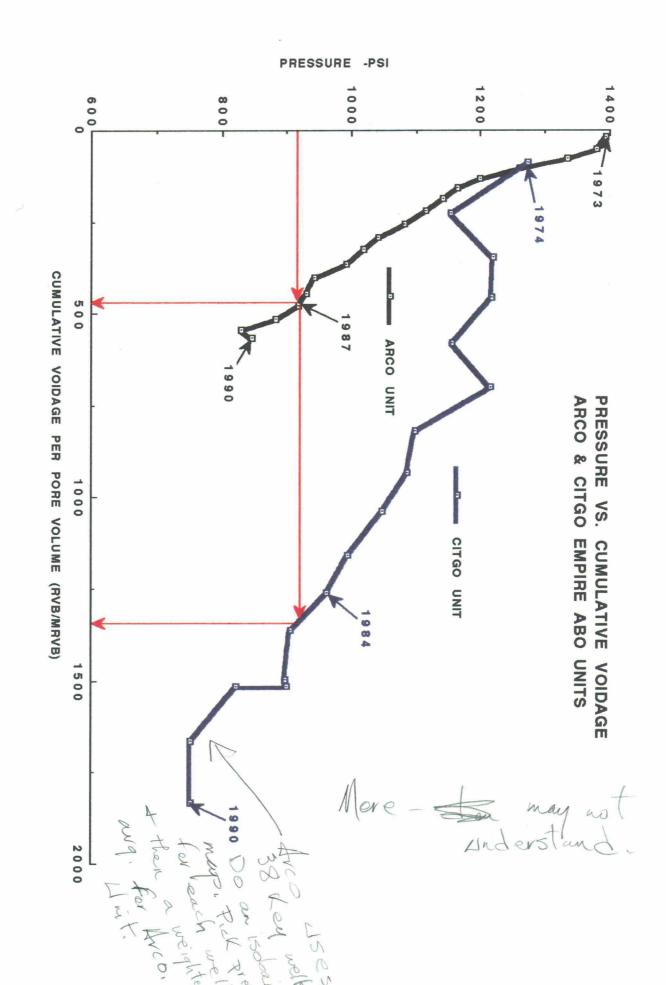


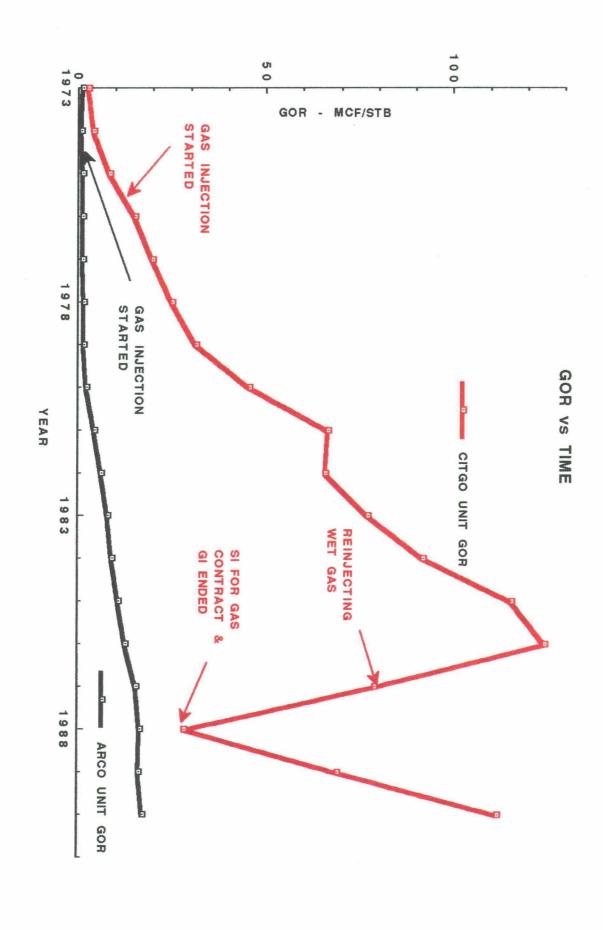


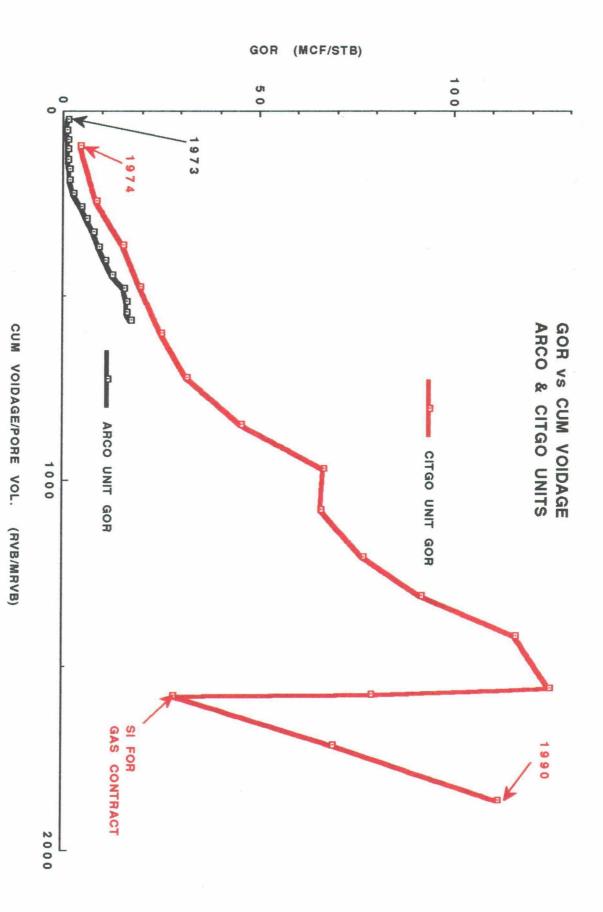










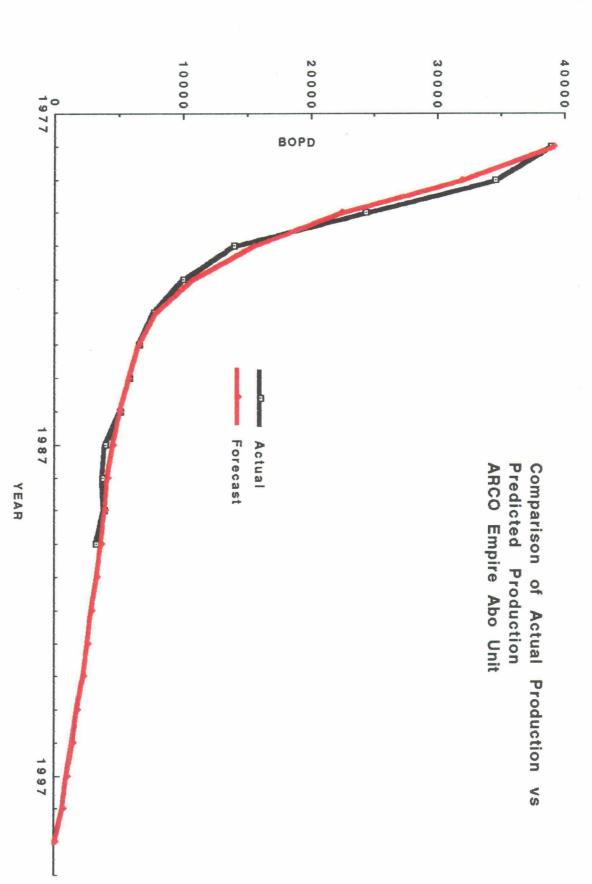


EMPIRE ABO POOL Eddy County, New Mexico Comparison of CITGO and ARCO Operated Units

1.	<u>OPERATOR</u>	CITGO	ARCO
2.	Original Oil in Place, MMSTB	4.45	374
3.	Oil Filled Pore Volume, MMRVB	7.15	600.7 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
4. *	Hydrocarbon Pore Volume, MMRVB	7.15	600.7
5.	Gas Recovery % OGIP	180 %	36 %
6.	Oil Recovery % OOIP	72 %	56 %
7.	1990 Voidage MMRVB	1.044	13.77

In 1990 the Citgo Unit was drained 6.37 times faster than the Arco Unit. The cumulative average is 3.3 times as fast.

^{*} The initial pore volume occupied by free gas is so small that it takes more significant figures for the hydrocarbon pore volumes (line 4) to appear different than the oil filled pore volume (line 3)



RECOMMENDATION

We recommend shutting in the Citgo Unit until all overproduction is made up.

With the current surface voidage allowable of the ARCO Unit of 65 MMCFPD, which is contingent upon reinjection of all available residue gas, the estimated subsurface voidage of the ARCO Unit is 18,800,000 RVB per year.

The ARCO Unit is 84 times larger than the Citgo Unit.

We recommend an allowable for the Citgo Unit of 1/84th of the estimated ARCO voidage of 18,800,000 RVB per year or, 613 reservoir volumetric barrels per day. Lovient = 2213

We recommend that Rule 3 of Order R-4808 be amended to read as follows: "The maximum daily project allowable be an amount of oil which will result in reservoir voidage no greater than 613 reservoir volumetric barrels per day."

No other changes are recommended for Order No. R-4808.