

## NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARINGSANTA FE, NEW MEXICO

Hearing Date

MAY 6, 1993Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
Karan Aubrey	Law Office of Karan Aubrey	Santa Fe
Kathleen Volk	Hollywood Petroleum, Inc	Denver, CO
KEVIN O'CONNELL	Hollywood Petroleum, Inc	Denver, CO
W. Kelblin	Kelblin & Kelblin	Santa Fe
Larry Scott	Pronghorn SWD	Hobbs
Marc Wine	Pronghorn SWD	Hobbs NM
James Bruce	Humble Case Firm	Santa Fe
Ned Kendrick	Montgomery & Andrews	Santa Fe
DERRY SEXTON	OCD	Hobbs.
Michael Wallace	Pronghorn SWD (RE/SPEC INC)	Albuquerque.
Andrew Core	State Engineer Office	Santa Fe
Peggy Barcoll	State Engineer Office	Santa Fe
Susan Kay	SEO	"
Tom Morrison	SIEC	"
Louise Deokert	Mc Adams Estate	Hobbs
Sexton	OCD	Hobbs



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION  
CASE 10,727

EXAMINER HEARING

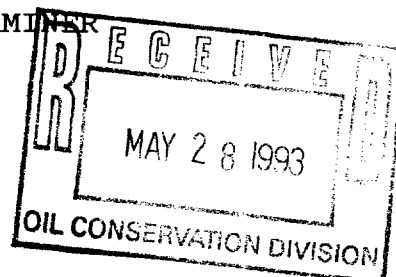
IN THE MATTER OF:

Application of Mobil Exploration and Producing  
U.S., Inc., for downhole commingling, Lea County,  
New Mexico

TRANSCRIPT OF PROCEEDINGS

**ORIGINAL**

BEFORE: DAVID R. CATANACH, EXAMINER



STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO

May 6, 1993

## A P P E A R A N C E S

FOR THE DIVISION:

ROBERT G. STOVALL  
Attorney at Law  
Legal Counsel to the Division  
State Land Office Building  
Santa Fe, New Mexico 87504

FOR THE APPLICANT:

MONTGOMERY & ANDREWS, P.A.  
Attorneys at Law  
By: EDMUND H. KENDRICK  
325 Paseo de Peralta  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

\* \* \*

## I N D E X

## Page Number

Appearances

2

DANIEL HAWE

Direct Examination by Mr. Kendrick

4

Examination by Examiner Catanach

28

Further Examination by Mr. Kendrick

36

Examination by Mr. Stovall

37

Certificate of Reporter

40

\* \* \*

## E X H I B I T S

APPLICANT'S EXHIBITS:

Exhibit 1

7

Exhibit 2

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Exhibit 3

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Exhibit 4

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Exhibit 5

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Exhibit 6

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Exhibit 7

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Exhibit 8

12

Exhibit 9

16

Exhibit 10

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Exhibit 11

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1 WHEREUPON, the following proceedings were had  
2 at 8:30 a.m.:

3 EXAMINER CATANACH: At this time we'll call  
4 Case 10,727.

5 MR. STOVALL: Application of Mobil  
6 Exploration and Producing U.S., Inc., for downhole  
7 commingling, Lea County, New Mexico.

8 EXAMINER CATANACH: Are there appearances in  
9 this case?

10 MR. KENDRICK: May it please the Examiner,  
11 I'm Ned Kendrick with Montgomery and Andrews law firm  
12 in Santa Fe, appearing on behalf of Mobil Exploration  
13 and Producing U.S., Inc.

14 I have with me one witness who needs to be  
15 sworn.

16 EXAMINER CATANACH: Okay, any other  
17 appearances?

18 Will the witness please stand to be sworn in?

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

22 DIRECT EXAMINATION

23 BY MR. KENDRICK:

24 Q. For the record, please state your full name  
25 and employer.

1           A.    My name is Daniel Hawe.  I'm employed by  
2 Mobil Exploration and Producing U.S.

3           Q.    What is your position at Mobil, and what are  
4 your responsibilities?

5           A.    I'm a senior staff reservoir engineer with  
6 the mid-continent group, and my responsibilities are  
7 for various properties in the West Texas and the mid-  
8 continent area.

9           Q.    Okay.  Does that geographical area include  
10 Lea County, New Mexico?

11          A.    Yes, it does.

12          Q.    How long have you held this position with  
13 Mobil?

14          A.    I've been in this position for approximately  
15 one month.

16          Q.    Okay.  Have you appeared before the New  
17 Mexico Oil Conservation Division, either examiner, or  
18 the New Mexico Oil Conservation Commission and had your  
19 qualifications as an expert in petroleum engineering  
20 made a matter of record?

21          A.    I have not.

22          Q.    Okay.  In that case, would you briefly  
23 summarize your educational background and, as it  
24 relates to petroleum engineering, your work experience?

25          A.    I have a bachelor's degree, 1976, from

1 Montana Tech in Petroleum engineering, and my  
2 experience has been 17 years of various aspects of  
3 reservoir production operations, various areas, six  
4 years with Amerada Hess Corporation, three years the  
5 Superior Oil Company, and the remainder of the time  
6 with Mobil.

7 Q. Have you appeared before any conservation  
8 commissions in other states?

9 A. I've appeared in North Dakota and Oklahoma  
10 and in Montana.

11 Q. Okay. Are you registered as a petroleum  
12 engineer in any state?

13 A. Yes, I'm registered in Colorado and in  
14 California.

15 Q. Okay, are you familiar with the Application  
16 of Mobil in this case today?

17 A. I am.

18 MR. KENDRICK: And Mr. Examiner, I request  
19 that Mr. Hawe be qualified as an expert in the field of  
20 petroleum engineering.

21 EXAMINER CATANACH: Mr. Hawe is so qualified.

22 MR. STOVALL: Could you spell your name for  
23 the --

24 THE WITNESS: H-a-w-e.

25 MR. STOVALL: Thank you.



1 Q. (By Mr. Kendrick) Okay, Mr. Hawe, would you  
2 briefly describe the Application that Mobil has filed  
3 and basically what you seek to do in it?

4 A. Mobil has requested permission to commingle  
5 two producing zones in this field, the Wolfcamp and the  
6 Upper Penn, in five wells, in order to efficiently  
7 produce each of these reservoirs.

8 Q. Okay. Have you prepared certain exhibits for  
9 introduction in this case?

10 A. I have.

11 Q. Okay, let's turn to what has been marked as  
12 Exhibit 1, Mobil's Exhibit 1. Would you first identify  
13 the exhibit and review the information contained on the  
14 exhibit for the Hearing Examiner?

15 A. This is a map of the immediate area of the  
16 South Shoe Bar field, which is the field in question  
17 for our Application. It shows all of the producers  
18 within an approximately 12, 16 township area that are  
19 producing -- currently producing either the Wolfcamp or  
20 the Upper Penn. It shows the Wolfcamp producers as  
21 circles, the Upper Penn producers as squares.

22 The five wells in our Application are  
23 highlighted in red. They are -- You'll note that there  
24 are three Wolfcamp producers immediately adjacent to  
25 our Application wells. These are three wells operated

1 by Mobil in the South Shoe Bar field, which are the  
2 subject of an earlier or a different application for  
3 commingling.

4 The two wells to the north, one to the  
5 northeast, operated by -- is a Wolfcamp producer  
6 operated by El Ran, Incorporated. The well off a mile  
7 and a half or so to the northwest is operated by  
8 Kaiser-Francis.

9 Q. Okay. As far as you know, these are the only  
10 wells in the area depicted by this map that are  
11 producing in the Wolfcamp or Upper Penn zones?

12 A. They are.

13 Q. Let's turn to Exhibit 2. Could you please  
14 identify and review it for us?

15 A. Exhibit 2 is a map of the area, of the South  
16 Shoe Bar field, which illustrates the Wolfcamp pool  
17 outline and the Upper Pennsylvania outline. The Upper  
18 Pennsylvanian pool is those six quarter sections  
19 outlined with hatching. The Wolfcamp pool is  
20 essentially the same with the exception of that one  
21 quarter section in Section 1.

22 Q. Okay, and it looks like there are eight wells  
23 on here, and could you just clarify again which ones  
24 are subject to the Application and which ones aren't?

25 A. Okay, starting from the top in the southeast

1 part of Section 36, the Lovington Deep Yates Number 1  
2 is part of the earlier application.

3 Going east to the southwest quarter of  
4 Section 31, the Kriti Number 1 is part of that earlier  
5 application.

6 The well all the way down in the bottom of  
7 the page, the LD Amoco Number 3, is part of that  
8 previous application.

9 The five wells in that center area of that  
10 field are our current Application.

11 Q. Okay. Let's turn to Exhibit 3. Would you  
12 identify and review it for us, please?

13 A. Exhibit 3 is actually two pages, each a lease  
14 -- or a plat showing -- The first page is Lovington  
15 Deep State lease. It shows the three wells in this  
16 Application and the acreage associated with each well.

17 Page 2 is the Lovington Deep Amoco State  
18 lease. It shows the wells in the Application and the  
19 acreage associated with each of those wells.

20 Q. What is the spacing involved here?

21 A. The Pennsylvania is spaced 80 acres.

22 Q. Okay, let's turn to Exhibit 4. Please  
23 identify and review it.

24 A. Exhibit 4 is a map which shows those lease  
25 holders immediately adjacent to the Application area,

1 other than Mobil. There are three leases that fall  
2 under this category, highlighted with the colors, owned  
3 by Greenhill Petroleum, Texaco and Exxon. All the  
4 leases immediately adjacent other than that are owned  
5 by Mobil.

6 Q. Okay. Did Mobil notify the owners of these  
7 three offsetting leases?

8 A. No, they did not. These leases do not  
9 contain any wells in either of the subject zones.

10 Q. Okay, let's turn to Exhibit 5. Would you  
11 identify and describe them, please?

12 A. Exhibit 5 is a -- It's five pages, a wellbore  
13 schematic for each of the five wells in the subject  
14 Application, one for each of the wells, showing the  
15 configuration of the equipment and plugs in place,  
16 perforations.

17 And rather than go through each of them, a  
18 good example would be page 3. I'll draw your attention  
19 to that. Page 3 is a schematic for the Lovington Deep  
20 State Number 3. This is the only well in the  
21 Application that actually has been perforated and been  
22 produced in both of the zones that we are dealing with.

23 You'll see Pennsylvanian perms at the bottom,  
24 a cast-iron bridge plug with 35 feet of cement on top,  
25 separating that zone from the current Wolfcamp

1 perforations indicated just above that. This is  
2 typical of all the schematics.

3 Q. Okay, and I take it the other four schematics  
4 show perforations in the Pennsylvanian?

5 A. That's right.

6 Q. And not in the Wolfcamp?

7 A. Right.

8 Q. Okay. Let's turn to Exhibit 6. Would you  
9 please identify and review it for us?

10 A. Exhibit 6 -- There's several pages, there's  
11 12 pages. What they consist of is the Form C-105 and  
12 C-103 that had been submitted to the State earlier for  
13 each of the five wells in the Application.

14 Q. Okay. Is there anything remarkable or  
15 anything worthy of note right now?

16 A. These just -- These contain information which  
17 you also find in wellbore schematics, but it's the  
18 information necessary for completion or subsequent  
19 work. But they are just as a matter of record,  
20 information that is not necessarily pertinent to the  
21 issue, really.

22 Q. Okay, in that case, let's move on to Exhibit  
23 7. Identify and review that for us.

24 A. Exhibit 7 are three pages that show recent  
25 gas/oil ratio tests for each of the wells in the field.

1     There are eight wells in the field. Five of them are  
2     part of this Application.

3             These were filed some time ago with the  
4     State, and they are just included for information  
5     purposes.

6             Q.    Okay, and it looks to me like the first page  
7     has only one well that's one of the subject wells that  
8     we're dealing with today?

9             A.    Right.

10            Q.    And then it has three other wells that are in  
11    the same field?

12            A.    Right.

13            Q.    But not subject to today's Application?

14            A.    The Lovington Deep State 3 is the only one on  
15    this page which is part of the Application.

16            The second page has the Amoco State 1, the  
17    Deep State 1 and Deep State 2, and the last page has  
18    the Amoco State 2.

19            Q.    Okay. And I take it you provided this just  
20    to complete the Application, but that you aren't  
21    necessarily going to use this data --

22            A.    No.

23            Q.    -- for an allocation between the zones?

24            A.    No, this is not my intent.

25            Q.    Okay, let's turn to Exhibit 8. Could you

1 identify and review this exhibit?

2 A. Exhibit 8 is a set of production decline  
3 curves, and immediately behind each decline curve is  
4 the tabular production data for each of the wells in  
5 the Application.

6 The curves themselves depict average daily  
7 producing rates for each month, oil, gas and water.

8 We'll point out that the scales in the  
9 schematic of these curves, the rate oil rate  
10 indicated -- oil in barrels per day is indicated by the  
11 step-type line, more or less of a bar fashion.

12 The heavyweight solid line is the water  
13 production in barrels per day.

14 The lighter solid line is gas, MCF per day.

15 Q. Just so I understand how these graphs work,  
16 is this the exact same information that you have in  
17 tabular form?

18 A. Yes, the tabular form is actually the oil,  
19 gas and water volumes for each month and the days,  
20 producing days, included. The average daily rate  
21 that's plotted on the plot is determined from this --  
22 the production for the month divided by the days in the  
23 month, to get the average daily rate for that month.

24 Q. Okay. So you have 12 data points per year?

25 A. Right.

1 Q. One per month, based on averages?

2 A. Right.

3 Q. Okay.

4 A. And there is one curve for each well. And  
5 rather than go through each of them, they're  
6 essentially all Pennsylvanian with the exception -- and  
7 I'll just draw your attention to the Deep State Number  
8 3, beginning on page 7 of the exhibit. This is the  
9 well that has production data for both zones. It  
10 currently is producing from the Upper Wolfcamp.

11 Page 7 shows the Wolfcamp production curve.

12 Page 8 is the tabular data from which this  
13 curve was derived.

14 Page 9 is the Pennsylvanian production curve,  
15 which -- That's the zone the well was producing from,  
16 prior to being recompleted in the Wolfcamp.

17 Page 10 is the tabular data for the  
18 Pennsylvanian curve.

19 You'll note that the production curve on page  
20 9 stops in January, 1991, as does the Wolfcamp curve  
21 begin in January, 1991, when the well was recompleted.

22 Q. Okay, what strikes me here is the production  
23 looks pretty good out of the Wolfcamp.

24 A. Yes, this Wolfcamp producer is somewhat  
25 anomalous to typical Wolfcamp production in the field.



1           The rate has been holding fairly steady.  
2       You'll note that the well began production at well over  
3       300 barrels a day and experienced a rapid drop.  
4       Typical Wolfcamp production would see that drop  
5       continue for some time and stabilize at much lower  
6       rates.

7           We seem to be holding at the 80 to 100  
8       barrels per day, and have been for about a year or so.

9           I did some research and found out that there  
10      was some evidence of natural fracturing in this  
11      Wolfcamp, in this well, that would certainly increase  
12      the producibility of the -- natural permeability of the  
13      well and the producing rate that we could get.

14           The --

15           Q.    So that if you were to extrapolate outward,  
16      what would you predict from this well?

17           A.    Well, I see a downward trend. But what we  
18      really are experiencing right now could be described as  
19      production from the fracture system.

20           And then once the fracture system is depleted  
21      -- In fractured reservoirs, the fracture system  
22      depletes first, and then you experience your typical  
23      decline, as with the other Wolfcamp wells, matrix  
24      permeability.

25           Q.    Okay. Let's -- While we're talking about the

1     Wolfcamp well, let's go to Exhibit 9.

2             A.     Exhibit 9 is actually the -- producing  
3     decline curves and data for the three wells, the other  
4     three wells in this field that are not part of this  
5     Application. They're part of a previous application.

6             But these three wells produce from the Upper  
7     Wolfcamp.

8             Q.     Now, just so we know what wells you're  
9     talking about, I believe these are the wells that are  
10    depicted on Exhibits 1 and 2?

11            A.     On Exhibit 1, you would note them as the  
12    three black circles immediately around our subject  
13    wells.

14            So they're in the field, producing from the  
15    Wolfcamp, and these are the wells that give us the  
16    indication of typical Wolfcamp production, typical  
17    Wolfcamp rates and decline -- production decline rates.

18            Q.     Okay, what -- Can you describe further what  
19    those rates appear to be?

20            A.     Well, we have current rates in these three  
21    Wolfcamp wells of -- It looks like 19 barrels a day,  
22    around eight barrels a day, and 20 barrels a day,  
23    current rates.

24            Q.     Okay. Maybe give us a little production  
25    history, if you compare over a similar time period

1 total production from these three Wolfcamp wells with  
2 the Wolfcamp well that's the subject of our Applica-  
3 tion --

4 A. I did look at that. These three Wolfcamp  
5 wells averaged in their first 18 months -- Essentially  
6 that's about all the life they have so far. In the 18  
7 months they averaged 15,000 barrels per well recovery.

8 The Lovington Deep State Number 3, shown in  
9 Exhibit 8, the well we suspect has fracture  
10 permeability to enhance it, produced 70,000 barrels in  
11 its first 18 months of production. That's a vast  
12 difference, really, and the point that I would make is  
13 that the explanation what seem to be the existence of  
14 additional permeability that we just don't typically  
15 find in Wolfcamp producers.

16 Q. Okay, and that's not what you find when you  
17 complete these subject wells into the Wolfcamp  
18 formation?

19 A. Our expectations really are to find Wolfcamp  
20 more like these three wells in Exhibit Number 9 than  
21 what we've seen in the Deep State Number 3.

22 Q. Okay.

23 A. There is some additional data that tends to  
24 support that, that will fall in a later exhibit that I  
25 will address later.

1           Q.    Okay.  Do you have any more remarks on  
2   Exhibit 9 at this time?

3           A.    I don't.

4           Q.    Okay.  Now that we've discussed decline  
5   curves in Exhibits 8 and 9, how would Mobil propose to  
6   allocate future commingled production between these two  
7   zones?

8           A.    Four of the wells in the Application are  
9   producing only from the Upper Penn and have no history  
10   other than that.

11                   What we would do is anticipate that the  
12   producing rate from the Pennsylvanian would be  
13   subtracted from total production, and the difference be  
14   allocated to the Wolfcamp, that we have a -- we can  
15   forecast what Pennsylvania production would be in the  
16   future, at any point in time.  We can deduce, then,  
17   what -- the difference between being Wolfcamp  
18   production from the commingled stream.

19           Q.    Okay.  Is the ownership of these two zones  
20   common?

21           A.    Yes, it is.

22           Q.    Okay.  Let's turn to Exhibit 10.  Could you  
23   identify and review it for us?

24           A.    Exhibit 10 are three pages.  What we have  
25   attempted to show is the compatibility of the water

1 from these two zones.

2 This water -- The first page is actually a  
3 water analysis on two water samples. Sample Number 1  
4 is produced water from the adjacent Greenhill Lovington  
5 unit. If you note on Exhibit 1, it's immediately to  
6 the southeast of the unit. This is where all the  
7 produced water is currently going from all of our  
8 producing wells.

9 The West Lovington unit is a waterflood.  
10 They use this water to supplement their water  
11 production for their waterflood.

12 So what they have done is take a sample,  
13 which is labeled Number 1, do an analysis. Then they  
14 have a sample labeled Number 2, which is our water  
15 production from the Deep State unit, which actually is  
16 commingled water from both zones.

17 What they were doing is testing the  
18 compatibility of our water with their water, and found  
19 no scaling tendencies, no compatibility problems.

20 Q. No precipitation?

21 A. No precipitation, no problems whatsoever.

22 Page 2 and page 3 are actually the surface  
23 commingling permit that we currently have to combine on  
24 the surface all production or all fluids from each of  
25 the wells in our South Shoe Bar field.

1           So currently all of the Wolfcamp and Upper  
2 Penn water is being commingled at the surface in  
3 production facilities. And we have not exhibited --  
4 evidenced any scaling problems, precipitants or any  
5 compatibility problems.

6           Q.    Okay. Do you know anything about the  
7 gravities of the production from those two zones?

8           A.    The oil gravities are very similar. I've  
9 seen a Wolfcamp gravity of 41 and an Upper Penn gravity  
10 of 46, and they are currently commingled at the surface  
11 and sold as a blend from the field.

12          Q.    Is there any evidence that the value of the  
13 commingled production is any less than the sum of the  
14 value of the separate productions?

15          A.    No, there's no evidence that the gravity of  
16 the blend is -- The value of that gravity would be the  
17 same if it would be sold separately.

18          Q.    Okay. Let's turn to Exhibit 11. Would you  
19 identify and review it for us?

20          A.    Exhibit 11 is some pressure data that we have  
21 obtained for the wells in this Application, in this  
22 field.

23                The first page of Exhibit 11 was actually  
24 some original pressure data taken from drill stem tests  
25 when these wells were drilled. You'll see most of them

1 are Wolfcamp pressures.

2 Midway down the page, a date of November 3rd,  
3 1987, is the Lovington State Number 2, an Upper  
4 Pennsylvania drill stem test. The others are all  
5 Wolfcamp drill stem tests and original pressures.

6 What this indicates, basically, is that  
7 original pressure in both zones is in the 4500- to  
8 4700-pound range with really very little difference  
9 between the two zones in original pressure.

10 Q. Okay. Would you say that these are typical  
11 Wolfcamp and Penn pressures, as far as you know?

12 A. I would expect these to be typical for any  
13 virgin pressure, any original pressure, before any  
14 depletion, that -- There's some other information that  
15 I've noted on this data that I would point out.

16 The third drill stem test, the Lovington  
17 State Number 2 at 10,357, shows an initial and a final  
18 drill stem pressure. Drill stem tests typically have  
19 two buildups done, initial and a final, as is the next  
20 drill stem test, have one, and the one after that.

21 That Upper Pennsylvania drill stem test shows  
22 an initial shut-in pressure of 4715, a final shut-in  
23 pressure of 4708.

24 The next drill stem test in the Lovington  
25 State Number 3 at 10,191 feet in the Wolfcamp shows an

1 initial drill stem shut-in pressure of 4633.6, the  
2 final shut-in pressure, 4546.3.

3 The fact that in each of these cases that the  
4 final pressure is lower, somewhat lower than the  
5 initial shut-in pressure for the same reservoir at  
6 essentially the same time is due to the length of the  
7 buildup, length of the drawdown in each of those two  
8 tests. The initial test is run for a shorter period of  
9 time.

10 It's been my experience that to note a lower  
11 pressure in the final is usually an indication of  
12 somewhat lower permeability. And I would note that the  
13 last drill stem test, Lovington Deep State Number 3, in  
14 a lower portion of the Wolfcamp, had an initial and  
15 final shut-in pressure that are identical, something  
16 you might expect to see in some extraordinary  
17 permeability or in the presence of fractures.

18 Q. Okay. Generally when the subject wells are  
19 completed into the Wolfcamp, I understand you would  
20 expect an initial pressure to be in the range of 4600  
21 to 4700?

22 A. I have no reason to believe that where we  
23 have not produced Wolfcamp that the pressure should be  
24 any less than what these original pressures were.

25 Q. Okay. Let's go to page 2.



1           A.    Page 2 is a recent shut-in static fluid level  
2   that was measured in the Loving Deep State Number 2,  
3   which is a Pennsylvania producer. This is a method by  
4   which we can get a pretty good estimate of what  
5   bottomhole pressure is. This is a 24-hour shut-in  
6   pressure, so this is not necessarily interpreted as a  
7   reservoir pressure.

8           Since these are very tight reservoirs, a very  
9   long drawdown -- a very long shut-in period would be  
10  required to arrive at any real reservoir pressure.

11           But what we do see here is that at the end of  
12  the 24 hours, noting the surface casing pressure  
13  measured and the final fluid level above the pump, a  
14  shut-in bottomhole pressure at 24 hours was indicated  
15  to be 500 pounds.

16           Q.    Okay. Would you say this is a typical or  
17  expected pressure for a Penn well that's been producing  
18  for a few years?

19           A.    It seems to be reasonable for the nature of  
20  the reservoir and the production from the well.

21           Q.    Okay.

22           A.    I would expect that this well -- This well  
23  would continue to build up pressure, that it's hard to  
24  say as to what its ultimate buildup pressure would be  
25  in a given -- ten days or two weeks, it might approach

1 something in the nature of 1000 pounds, but certainly  
2 not much more than that in my estimate.

3 Q. Okay. And could you just discuss for a  
4 moment page 3 of the exhibit?

5 A. Page 3 is a similar shut-in fluid level  
6 measured on the Deep Yates State Number 1, which is  
7 actually a Wolfcamp producer well, not part of this  
8 Application. It's one of the Wolfcamp producers of  
9 that three that we've been referring to.

10 It shows essentially the same pressure, 500  
11 pounds, for the same shut-in period, in a different  
12 zone.

13 Q. Okay. So basically after a Pennsylvanian  
14 well or a Wolfcamp well produced for several years, it  
15 looks like the pressure pretty much is equal?

16 A. Well, that -- it's obvious that -- The  
17 Wolfcamp is spaced at 40 acres; that fits its typical  
18 permeability profile. Tighter reservoirs are not able  
19 to drain as large an area.

20 The Wolfcamp is typically a tighter reservoir  
21 than the Pennsylvanian, and that although the time  
22 frames for these two wells is about the same, the  
23 Pennsylvania producer had actually produced more oil  
24 than the Yates State 1 from the Wolfcamp. Yet the  
25 pressure depletion seems to be about the same.

1           Q.    Okay.  Now, let's -- What's obvious, I guess,  
2   to any of us is that it looks like there's quite a  
3   disparity between what we expect to be an initial  
4   Wolfcamp pressure where you go into those zones in the  
5   subject wells and the current Penn pressure in one of  
6   those wells.

7           A.    Right.  That is obvious, that in the four  
8   wells that are producing from the Pennsylvania in this  
9   Application, current Pennsylvania pressure would have  
10  to be -- is actually -- one of them measured, and we  
11  know it's going to be very low, and the Wolfcamp is  
12  most likely in the 4500-pound range.

13                   That's mitigated by the fact that the  
14  Wolfcamp is most likely very tight.

15                   But I would expect that appropriate procedure  
16  to do the commingling or to recompleat and add the  
17  Wolfcamp would be to set a temporary -- a retrievable  
18  bridge plug immediately above the Pennsylvania  
19  perforations, open the Wolfcamp and test its pressure  
20  and its producibility, and if, in fact, it is -- has  
21  that disparity in pressure and if it is capable of  
22  producing at a very high rate for a short period of  
23  time, to draw the reservoir down somewhat until the  
24  producing rates and flowing -- bottomhole flowing  
25  pressures are more similar.

1           At such time, the retrievable bridge plug  
2     could be retrieved and the wells commingled without a  
3     problem.

4           We have seen from both of these static fluid  
5     levels that they keep the wells pumped down to -- so  
6     there's no working fluid level. They keep all the --  
7     All fluids that are produced by the Pennsylvania are  
8     being lifted by the pump.

9           If this working fluid level is kept down at  
10    the pump, that each zone will be free to produce  
11    without any interference.

12          Q.    Would you expect this temporary bridge plug  
13    would be necessary in every case, or that you might  
14    check a couple wells first?

15          A.    I would recommend that we -- at least the  
16    first couple wells, that we follow this procedure, set  
17    a bridge plug and open the Wolfcamp, test it.

18                We're finding that there doesn't seem to be  
19    the need for it that I would expect, perforate the  
20    Wolfcamp without that separation.

21                We've seen in the -- in all the Wolfcamp  
22    producers, actually, the initial high producing rate  
23    that we see, and high bottomhole pressure, drops pretty  
24    rapidly. So it's not a long period of time that we  
25    would expect the need for that -- to have that bridge

1 plug.

2 Q. And I expect if you set this bridge plug,  
3 there would be an added benefit of, again, some initial  
4 production data from the Wolfcamp?

5 A. That's true. If we leave it that we can  
6 produce the Wolfcamp for a month or so and get  
7 additional information that could be used for  
8 allocation, we would have a Wolfcamp producing rate  
9 immediately before such time they were commingled. It  
10 would help us to allocate a little more accurately.

11 Q. Okay. Were Exhibits 1 through 11 prepared by  
12 your or compiled by you?

13 A. Yes, they were.

14 MR. KENDRICK: At this time, Mr. Examiner,  
15 I'd like to offer Exhibits 1 through 11.

16 EXAMINER CATANACH: Exhibits 1 through 11  
17 will be admitted as evidence.

18 Q. (By Mr. Kendrick) Mr. Hawe, are you aware of  
19 any other nearby wells where downhole commingling and  
20 production from the Wolfcamp and upper Pennsylvanian  
21 zones has occurred?

22 A. I'm told that in the Vacuum field, which is  
23 very nearby, that Mobil has two wells, the Bridges  
24 States Number 102 and Number 104, which actually are --  
25 have commingled production from both these zones.

1           Q.    Okay.  In your opinion, Mr. Hawe, would the  
2           granting of this Application be in the best interests  
3           of the prevention of waste and the protection of  
4           correlative rights?

5           A.    Yes, it would.

6                   MR. KENDRICK:  Mr. Examiner, that concludes  
7           my examination of this witness.

8                                   EXAMINATION

9           BY EXAMINER CATANACH:

10           Q.    Mr. Hawe, I'm a little bit unclear about the  
11           temporary bridge plug.  Are you proposing to do this in  
12           every well?

13           A.    I would suggest to the -- when we write a  
14           completion procedure, that we at least do it in the  
15           first couple of wells.

16                   And if the need doesn't appear to be there  
17           after -- Because we're not really sure what we're going  
18           to find in each of these Wolfcamp.  We would anticipate  
19           that it should be original pressure.  We don't know  
20           what kind of permeability and what kind of  
21           producibility we will find.

22                   I would expect that it will -- at the very  
23           least, the first well that we try, we would follow this  
24           method.

25           Q.    Is it your opinion that the discrepancies in

1 reservoir pressure won't in any way, as long as the  
2 wells are kept in a pumped-off condition, that it won't  
3 adversely affect or cause any cross-flow to occur?

4 A. I expect that there would be no cross-flow if  
5 the wells are kept pumped off.

6 Q. If we could go through well by well and kind  
7 of give me an idea what the current production is, if  
8 we can do that, Mr. Hawe --

9 A. Sure. I have some -- The data that's  
10 contained in Exhibit 8, the monthly data, I have the  
11 last monthly production, just a daily rate for each  
12 well, and I'll just go through and...

13 The Lovington Deep State Number 1, in -- I  
14 have a December of 1992 rate from the Upper Penn of 11  
15 barrels per day, zero water, and 41 MCF a day gas.

16 Q. Okay.

17 A. Deep State Number 2, Upper Penn --

18 Q. Wait, hang on a second. Okay.

19 A. -- December, 1992, 15 barrels of oil per day,  
20 five barrels of water per day, 50 MCF per day.

21 Q. Okay.

22 A. The Lovington Deep State Number 3, November  
23 of 1992, from the Upper Wolfcamp, I have a rate of 100  
24 barrels of oil per day, 145 water, 122 MCF per day.

25 Q. Okay.

1           A.    The Amoco -- The Lovington Deep Amoco State  
2   Number 1, December of 1992, 16 oil, zero water, 102 MCF  
3   per day.

4           Q.    I'm sorry, the last number was --

5           A.    -- 102.

6           Q.    Okay.

7           A.    The Amoco State Number 2, December, 1992, 34  
8   oil, one barrel of water per day, 141 MCF per day.

9           Q.    That production is all from the Pennsylvania  
10   except for the Deep State Number 3?

11          A.    That's correct.

12          Q.    Okay. Is that typical production, the  
13   numbers that you've just cited? Is that pretty much  
14   average production for wells?

15          A.    Right, the average production for the  
16   Pennsylvanian appears to be at 16 barrels per day.

17                EXAMINER CATANACH: Okay.

18                MR. KENDRICK: And I might reiterate that the  
19   production from the Wolfcamp is not what you would  
20   consider to be average.

21                THE WITNESS: Right, the State Number 3 is  
22   not typical Wolfcamp production. The other three wells  
23   that we brought into evidence average 15 or 16 barrels  
24   a day themselves.

25          Q.    (By Examiner Catanach) Okay, that was my



1 next question. What do you expect to get from the  
2 Wolfcamp in these four recompletions?

3 A. Initially we expect some -- You know, it's  
4 not reasonable to expect that the first month it might  
5 average a hundred barrels a day.

6 But they drop so rapidly that within a very  
7 short period of time they're going to be in the 15- to  
8 20-barrel-per-day range, in a matter of months.

9 Q. You don't expect to encounter any more  
10 Wolfcamp production like you encountered in the Number  
11 3 well?

12 A. It's not expected. It's not an  
13 impossibility. It would be welcome, but it's kind of a  
14 fluke in this area.

15 Q. If you did encounter such production, how  
16 would you propose to handle that?

17 A. If we were to find a Wolfcamp well in one of  
18 these wells similar to the Deep State Number 3, I would  
19 expect that we would postpone commingling that well  
20 until it had produced -- declined down to a point more  
21 conducive to the others.

22 If you end up with a hundred barrels a day,  
23 you don't want to really mess with it until it's  
24 necessary.

25 Q. Is the Wolfcamp formation, is that a high-

1 water-production formation?

2 A. It appears to be essentially the same. This  
3 doesn't appear to be any more or less wet than the  
4 Pennsylvania there; they have similar rates.

5 Actually, it's somewhat lower, with the  
6 exception of the State Number 3. It's producing 145  
7 barrels of water per day, but the fracture system would  
8 -- could account for that as well.

9 Q. Okay. So that's not generally typical --

10 A. Right.

11 Q. -- of a Wolfcamp completion?

12 A. Typical Wolfcamp is -- The other wells are  
13 averaging about five barrels of water per day.

14 MR. KENDRICK: If I might interject, it might  
15 be useful for you just to give the figures, the oil and  
16 water figures from the three Wolfcamp wells that are  
17 not subject to this Application but that are nearby.

18 THE WITNESS: Okay, I have those here.

19 Q. (By Examiner Catanach) Why don't you go  
20 ahead and give those to me?

21 A. The Amoco State Number 3, the Wolfcamp  
22 producer, December, 1992, 20 barrels of oil per day,  
23 three barrels of water per day, 40 MCF per day.

24 Q. Okay.

25 A. The Yates State Number 1, Wolfcamp producer,

1 December 1992, eight barrels of oil, one barrel of  
2 water per day, 12 MCF per day.

3 Q. Okay.

4 A. The Kriti -- K-r-i-t-i -- 31, Number 1,  
5 Wolfcamp producer, December 1992, 21 barrels of oil per  
6 day, 11 barrels of water per day, 35 MCF per day.

7 Q. Okay. Mr. Hawe, you referenced an earlier  
8 application. Have you already made application to  
9 downhole commingle three additional wells?

10 A. These three wells, three Wolfcamp producers  
11 have been part of an application that was sent in  
12 administratively.

13 Q. Has that been approved?

14 A. I am not aware of the status of that yet.

15 Q. And I believe you testified that the  
16 ownership within the two zones on all the wells is  
17 common?

18 A. Yes, it is.

19 Q. Mobil is the only working interest owner?

20 A. Mobile is the operator. Mobil is not the  
21 only working interest owner.

22 Q. Okay, but the working interest ownership is  
23 common?

24 A. Yes, it is.

25 Q. Okay. And these are all state leases

1 involved?

2 A. I'm not aware of the type of leases they are.  
3 I believe that -- I don't know the answer to that.

4 Q. Okay. On your Exhibit Number 6 packet, it  
5 looks like you've got checked off state leases on all  
6 these well completions. That doesn't necessarily mean  
7 everything is on state leases, but --

8 A. I believe they are, but I just am not  
9 certain. I've not had a chance to really go over some  
10 of the particulars with the landman, but I'm going to  
11 assume they are.

12 Q. Okay. The Commissioner of Public Lands has  
13 its own regulations regarding downhole commingling, and  
14 I believe you're going to have to file an application  
15 with them to do this procedure. That's my  
16 understanding. So you might want to check with them,  
17 Mr. Kendrick, after the hearing.

18 If in fact these are all state leases,  
19 they're under the jurisdiction of the Commissioner of  
20 Public Lands.

21 Our approval is not contingent upon their  
22 approval, but we generally like to see you at least  
23 have talked to them or notify them or something.

24 MR. STOVALL: After you've talked to them, if  
25 you'd let us know what -- if they give you an approval

1 or any conditions, just submit a copy of it.

2 MR. KENDRICK: Okay, we will.

3 EXAMINER CATANACH: I did talk with a  
4 representative yesterday, and they were aware of the  
5 Application this morning. That was Mr. Pete Martinez.  
6 So you might want to talk to him about what you may  
7 need to do with them.

8 Q. (By Examiner Catanach) Mr. Hawe, these are  
9 all currently pumping, and they will remain being  
10 pumped --

11 A. Yes, sir.

12 Q. -- upon commingling?

13 A. (Nods)

14 Q. And the allocation, you propose just to  
15 utilize the subtraction type method to determine  
16 Wolfcamp production?

17 A. Uh-huh.

18 Q. Do you plan -- When you do the Wolfcamp  
19 recompletions, do you plan to do any additional work to  
20 the Pennsylvanian?

21 A. There is none planned.

22 Q. So nothing to enhance the Pennsylvanian  
23 production?

24 A. No.

25 Q. So it shouldn't change?

1           A.    It should not change, no.

2           Q.    Have you looked at the value of the crude  
3 from each zone, and will that be diminished by  
4 commingling?

5           A.    It will not be diminished. The value of the  
6 crude is based on its gravity. They are similar  
7 composition content. The gravity, the blend, is  
8 obviously some ratio mixture of the two. It currently  
9 is being sold as a blend. All the crude is commingled  
10 at the surface as per the surface commingling permit  
11 that we do have, so that nothing will change as far as  
12 that.

13                   EXAMINER CATANACH: Okay, I believe that's  
14 all I have.

15                   MR. STOVALL: I have no questions.

16                               FURTHER EXAMINATION

17 BY MR. KENDRICK:

18           Q.    Final question, Mr. Hawe: About how long ago  
19 did you submit the administrative application for the  
20 other three -- commingling the other three wells in  
21 this field?

22           A.    It was, I'm going to say, three weeks ago,  
23 maybe four, give or take. I'm not certain of the  
24 actual date, but it was within the last month.

25                   MR. KENDRICK: Okay, thanks. And Mr.

1 Examiner, I understand there was a -- some inadvertence  
2 in the notice that went out to, I think, the Lovington  
3 paper. Ms. Davidson informed me of this, that the  
4 wrong date was what was put on the hearing notice, the  
5 date of May 16 rather than May 6, which I understand  
6 means we have to hold this open till June 3rd. Is that  
7 -- That's what Ms. Davidson informed me. I just wanted  
8 to --

9 MR. STOVALL: That's correct, Mr. Kendrick,  
10 yeah. The ad appeared, and Lovington typed a "1" in  
11 there in front of the "6", so that does...

12 MR. KENDRICK: Okay.

13 MR. STOVALL: Now, with respect to other  
14 notice, Mr. Kendrick, am I correct that you have not  
15 identified other operators, offset operators in these  
16 pools that required notice?

17 MR. KENDRICK: Correct, we identified three  
18 offsetting lease owners, and there are no wells  
19 completed into these two zones on those leases, so on  
20 that basis Mobil did not notify those three offsetting  
21 lease owners.

22 EXAMINATION

23 BY MR. STOVALL:

24 Q. And let me ask, Mr. Hawe, I mean, would there  
25 be any impact on offsetting undeveloped tracts, as far

1 as you're concerned, from commingling?

2 A. No, none whatsoever.

3 Q. It would not change production any way,  
4 really, drainage effects or --

5 A. It would not.

6 MR. STOVALL: Mr. Examiner, Mr. Kendrick and  
7 I discussed that before the hearing, and, you know,  
8 unclear -- The rule requires notice to offset  
9 operators, and you're simply saying there were -- there  
10 are no offset operators in these pools?

11 MR. KENDRICK: Correct.

12 MR. STOVALL: So I think that satisfies that,  
13 and as soon as we get the publication notice corrected,  
14 that will satisfy that requirement.

15 MR. KENDRICK: Okay, and I think Mobil is  
16 anxious to begin work on this commingling. And in view  
17 of the fact that there will be a hearing -- Well, the  
18 record has to stay open for four weeks until June 3rd.  
19 I guess Mobil would enter a plea that to the extent  
20 possible the Examiner could consider our Application,  
21 pending that -- the additional notice, so that  
22 hopefully the decision might not take as long after the  
23 3rd as it would after the 6th today.

24 EXAMINER CATANACH: Okay, it's your  
25 understanding I cannot issue an order until after the



1 3rd?

2 MR. KENDRICK: Understand that, yes.

3 EXAMINER CATANACH: Okay, but you're  
4 requesting that just as soon as the 3rd passes, that an  
5 order be ready to go?

6 MR. KENDRICK: Right, and we'd appreciate  
7 that.

8 EXAMINER CATANACH: Okay.

9 MR. KENDRICK: I have nothing further.

10 EXAMINER CATANACH: There being nothing  
11 further, Case 10,727 will be taken under advisement --  
12 I'm sorry, it will be continued to June 3rd.

13 (Thereupon, these proceedings were concluded  
14 at 9:17 a.m.)

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I do hereby certify that the foregoing is  
a complete record of the proceedings at  
the Examiner hearing of Case No. \_\_\_\_\_,  
heard by me on \_\_\_\_\_.

\_\_\_\_\_, Examiner  
Oil Conservation Division

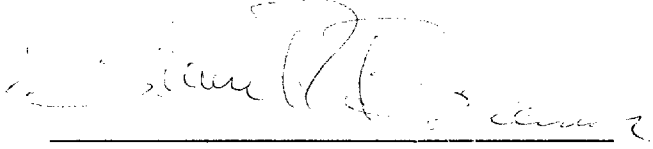
## 1 CERTIFICATE OF REPORTER

2  
3 STATE OF NEW MEXICO )  
4 ) ss.  
COUNTY OF SANTA FE )

5  
6 I, Steven T. Brenner, Certified Court  
7 Reporter and Notary Public, HEREBY CERTIFY that the  
8 foregoing transcript of proceedings before the Oil  
9 Conservation Division was reported by me; that I  
10 transcribed my notes; and that the foregoing is a true  
11 and accurate record of the proceedings.

12 I FURTHER CERTIFY that I am not a relative or  
13 employee of any of the parties or attorneys involved in  
14 this matter and that I have no personal interest in the  
15 final disposition of this matter.

16 WITNESS MY HAND AND SEAL May 21st, 1993.

17  
18   
19 STEVEN T. BRENNER  
CCR No. 7

20 My commission expires: October 14, 1994  
21  
22  
23  
24  
25