

1 NEW MEXICO OIL CONSERVATION DIVISION  
2 STATE LAND OFFICE BUILDING  
3 STATE OF NEW MEXICO  
4 CASE NO. 10802  
5

6 IN THE MATTER OF:

7  
8 The Application of Phillips Petroleum  
9 Company for unorthodox oil well location,  
10 Eddy County, New Mexico  
11

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BEFORE:

16

MICHAEL E. STOGNER

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Hearing Examiner

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State Land Office Building

19

August 26, 1993

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ORIGINAL

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23 REPORTED BY:

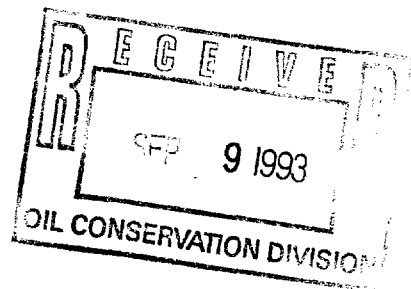
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SUSAN B. SPERRY

Certified Court Reporter

25

for the State of New Mexico



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

2

3 FOR THE NEW MEXICO OIL CONSERVATION DIVISION:

4 ROBERT G. STOVALL, ESQ.

General Counsel

5 State Land Office Building

Post Office Box 2088

6 Santa Fe, New Mexico 87504-2088

7 FOR THE APPLICANT:

8 KELLAHIN AND KELLAHIN

P. O. Box 2265

9 Santa Fe, New Mexico 87504

BY: W. Thomas Kellahin, Esq.

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## I N D E X

## Page Number

Appearances

2

## WITNESSES FOR THE APPLICANT:

1. JACK PICKETT  
Examination by Mr. Kellahin  
Examination by Mr. Stogner  
Examination by Mr. Stovall

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Certificate of Reporter

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## E X H I B I T S

## Page Marked

Exhibit No. 1  
Exhibit No. 2  
Exhibit No. 3  
Exhibit No. 4  
Exhibit No. 5

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1                   EXAMINER STOGNER: I call this hearing to  
2 order for Docket No. 25-93. I'm Michael Stogner, hearing  
3 examiner for today's cases. Please note today's date,  
4 August 26, 1993.

5                   First matter we'll call today will be case No.  
6 10802.

7                   MR. STOVALL: Application of Phillips  
8 Petroleum Company for an unorthodox oil well location,  
9 Eddy County, New Mexico.

10                  EXAMINER STOGNER: Call for appearances.

11                  MR. KELLAHIN: Mr. Examiner, I'm Tom  
12 Kellahin of the Santa Fe law firm of Kellahin and  
13 Kellahin, appearing on behalf of the applicant, and I have  
14 one witness to be sworn.

15                  EXAMINER STOGNER: Are there any other  
16 appearances? Will the witness please stand to be sworn?

17                               JACK PICKETT

18                  After having been first duly sworn under oath,  
19 was questioned and testified as follows:

20                  EXAMINER STOGNER: Mr. Kellahin?

21                               EXAMINATION

22 BY MR. KELLAHIN:

23                  Q. All right. Sir, would you please state your  
24 name and occupation?

25                  A. Jack Pickett, and I'm reservoir engineering

1 supervisor for Phillips Petroleum.

2 Q. Mr. Pickett, would you describe for us when and  
3 where you obtained your degree?

4 A. I received a bachelor of science degree from  
5 Mississippi State in petroleum engineering from  
6 Mississippi State University in 1978.

7 Q. Do you hold any other degrees in engineering?

8 A. No.

9 Q. Subsequent to obtaining your degree, summarize  
10 for us your employment experience as a petroleum engineer.

11 A. I've worked the last 15 years for Phillips in  
12 various engineering functions in production, reservoir  
13 drilling and process engineering. For the last five  
14 years, I've been the reservoir engineering supervisor for  
15 Phillips as Permian Basin region, in Odessa, Texas, which  
16 includes southeast New Mexico.

17 Q. Do you have reservoir engineering or petroleum  
18 engineering duties with regards to the subject well which  
19 is the James "E" Federal Well No. 8 that was drilled in  
20 the Cabin Lake-Delaware Pool of Eddy County, New Mexico?

21 A. Yes.

22 MR. KELLAHIN: We tender Mr. Pickett as a  
23 an expert petroleum engineer, Mr. Stogner.

24 MR. STOGNER: Mr. Pickett is so qualified.

25 Q. (By Mr. Kellahin) Mr. Pickett, let me direct

1 your attention, sir, to what is marked as Exhibit No. 1.

2 Identify for us the plat.

3 A. This is a base map of Phillips's acreage in the  
4 Cabin Lake Field. The acreage colored in yellow in  
5 Section 11, which is Township 22 South, Range 30 East, and  
6 the acreage in yellow in Section 12 is Phillips's James  
7 "E" Lease, which we own 100 percent working interest in  
8 that acreage.

9 Q. When we look at Section 11, and look at the  
10 ownership in Section 11, is the royalty, any overrides and  
11 the working interest ownership all common with regards to  
12 that section?

13 A. Yes.

14 Q. Describe for us, before we look in detail at  
15 your displays, what is the problem that's brought you  
16 before the Examiner today?

17 A. Basically, Phillips made a mistake in targeting  
18 the directional drilling of the James "E" 8 well. And we  
19 encountered the top of the Delaware pay outside an  
20 orthodox location.

21 Q. When you were targeting for Delaware pay, the  
22 members of the Delaware formation, the Bell Canyon, Cherry  
23 Canyon and Brushy Canyon, what was the principal target  
24 involved for potential production?

25 A. The principal target was the Cherry Canyon sand,

1 and with the minor target of the Brushy Canyon. The top  
2 of the Cherry Canyon is the top of the, of the highest  
3 known pay in the Cabin Lake-Delaware Field.

4 Q. What is the spacing for wells drilled in this  
5 pool, Mr. Pickett?

6 A. State-wide rule is 40 acres.

7 Q. And where would a standard well be located from  
8 the site boundaries of a 40-acre tract for this pool?

9 A. Greater than 330 feet from the sides of the  
10 units.

11 Q. You have to at least be 330 or greater from the  
12 side boundaries?

13 A. Yes.

14 Q. When you look at the actual portion of the  
15 wellbore that's intended to be producing, identify for the  
16 Examiner what portion is standard, and what portion is  
17 unorthodox.

18 A. Okay. As measured depth in the well, the Cherry  
19 Canyon sand will be outside the orthodox location. The  
20 Brushy Canyon sands would be orthodox.

21 Q. Approximately how far is the unorthodox  
22 encroachment at its greatest extent within the Cherry  
23 Canyon pay of the pool?

24 A. By 32 feet, we missed. The top of the sand is  
25 found 298 feet from the proration unit line, so we missed

1 it by 32 feet.

2 Q. All right. Let's look specifically, then, at  
3 the information contained on Exhibit No. 1. Have you  
4 indicated to the Examiner the footage locations for some  
5 of the information?

6 A. Yes. You'll find the surface location for the  
7 James "E" 8, which is noted at the bottom of the map, 1558  
8 from the east line of Section 11, 2247 from the south line  
9 of Section 11, which is in Unit J, and the bottom hole  
10 location is found at 590 feet, 599 feet from the east  
11 line, 1782 from the south line of Section 11 in Unit I.

12 Q. The bottom hole location is in what formation?

13 A. Within the Delaware sand.

14 Q. All right. You're in the base of the Brushy  
15 Canyon, or in the Brushy Canyon interval of the pool?

16 A. Yes, in the base of the Brushy Canyon.

17 Q. All right. Let me have you turn to Exhibit 2.  
18 Identify and describe that exhibit.

19 A. This is Administrative Order DD-76, which  
20 authorized Phillips to directionally drill the James "E"  
21 Well No. 8 from the surface location in Unit J to a  
22 regular location in Unit I.

23 Q. Identify for us Exhibit No. 3.

24 A. This is a porosity log from the James "E" Well  
25 No. 8. And what I'd like to show with this is the top of

1 the Cherry Canyon pay zone, which is the uppermost pay in  
2 the Delaware sand in the Cabin Lake Field, at 5768 feet,  
3 and this would be the top perforation in the well.

4 Q. That's a measured depth?

5 A. Yes, that's a measured depth.

6 Q. What is the status of the well at this point,  
7 Mr. Pickett?

8 A. The well's been drilled, cased, and we're going  
9 to, Phillips will commence completing in the Brushy Canyon  
10 probably next week, which is orthodox.

11 Q. Let's look at what is marked as Exhibit 4.  
12 Would you identify that for us?

13 A. This is the directional drilling survey from  
14 James "E" No. 8 well.

15 Q. Take us to that portion of the directional  
16 drilling survey that shows us the information with regards  
17 to the determination that the Cherry Canyon was outside of  
18 the standard well locations for production?

19 A. Okay. Turn to the third page of that exhibit,  
20 which, at the upper right-hand corner, it says, Page 2 of  
21 3?

22 Q. There's a handwritten entry on the left margin,  
23 that directs the reader's attention down to a measured  
24 depth footage of 5744?

25 A. Yes.

1       Q.    Okay.  Describe for us what you're trying to  
2 indicate?

3       A.    This left-hand column is a measured depth of the  
4 directional survey.  We had two points taken bracketing  
5 the top of the Cherry Canyon sand at the top, one at 5744,  
6 the other at 5806.  The top of the Cherry Canyon sand, or  
7 Phillips top perforation plan for this well falls 39  
8 percent of the way down from there.

9            If you then go over to the sixth column over,  
10 which locates the well in the east/west location from the  
11 surface location of the well, a positive number being  
12 east, and interpolate between those, you find that the  
13 wellbore intersected the top of the Cherry Canyon sand 536  
14 feet east of the surface location.

15           Also, you'll note that we intersect a point 568  
16 feet east of the surface location, going back over at a  
17 measured depth of 5930 feet.  And, it's at that point, 560  
18 feet east of the surface location, that the wellbore is  
19 orthodox.

20           So, between those two points, at 5768 measured  
21 depth, to 5930, that we would plan perforations within  
22 that interval, but they would be unorthodox.

23       Q.    Have you taken this information, Mr. Pickett,  
24 and prepared an illustration that demonstrates the  
25 location of the wellbore in relation to its side

1 boundaries?

2 A. Yes. If you look at the last exhibit, the one  
3 with the blue coloring on it, Exhibit No. 5?

4 Q. Describe for us the illustration.

5 A. This is a well deviation diagram. It's an  
6 east-to-west cross-section through units Unit J and Unit  
7 I. On the right-hand side, you'll see the east line of  
8 Unit I noted, which is also the east line of Section 11.  
9 On the left-hand side, you'll see the west line of Unit I  
10 noted.

11 And then, on each side of that 330 foot,  
12 setbacks are marked, so everything that's orthodox is  
13 within those 330-foot setbacks, and shaded in light blue.  
14 You'll notice the surface location, which previously shown  
15 was 1558 from the east line, so that makes it 238 feet  
16 west of the western boundary of Unit I.

17 Q. When you look at that part of the diagram that  
18 shows the top of the Cherry Canyon at 5768 feet measured  
19 depth, from that point down to 5930, is that portion of  
20 the wellbore that you seek approval for being unorthodox  
21 in the pool?

22 A. Yes.

23 Q. And then below the 5930, all the remaining  
24 portion of potential production within that wellbore would  
25 be at a standard location in the pool?

1           A.    That's right.

2           Q.    All right.  Describe for us how the error  
3 occurred in placing a portion of the producing interval  
4 outside of the standard drilling setback.

5           A.    Basically, the geologist that was responsible  
6 for targeting the location was unfamiliar with the rule  
7 that all the perforations have to be orthodox.

8                   They just assumed that if the bottom hole  
9 location was orthodox, the whole thing was orthodox, but  
10 that was incorrect.

11                   MR. KELLAHIN:  That concludes my  
12 examination of this witness.  We move the introduction of  
13 his Exhibits 1 through 5.

14                   EXAMINER STOGNER:  Exhibits 1 through 5  
15 will be admitted into evidence.

16                                   EXAMINATION

17 BY EXAMINER STOGNER:

18           Q.    Mr. Pickett, you referred to Exhibit No. 3.  
19 What is the perforated interval?  I understand the top of  
20 the perforation is 5768.  What is the perforated interval  
21 through the Cherry Canyon?

22           A.    From 5768 to approximately 5820.

23                   MR. KELLAHIN:  Those are the planned  
24 perforations?

25                   THE WITNESS:  The planned perforations of

1 the Cherry Canyon interval.

2 MR. KELLAHIN: You've not yet perforated  
3 that interval, have you?

4 THE WITNESS: That's right. And this would  
5 be the only perforations.

6 Q. (By Examiner Stogner) So, you do not plan to  
7 perforate the Brushy Canyon at this time?

8 A. Only at an orthodox location below 5930.

9 Q. What is that planned perforated interval?

10 A. From approximately 7200 to 7350.

11 EXAMINATION

12 BY MR. STOVALL:

13 Q. I had a question on Exhibit 4, for explanation,  
14 if you'd look at the last page of it? Appears to be your  
15 deviation, and I didn't -- I'm assuming that the last two  
16 pages are deviations you look at from two different  
17 planes; is that correct?

18 A. That's right.

19 Q. And the vertical axis is the surface location at  
20 your starting point?

21 A. Yes.

22 Q. What's the shaded circle area, is that -- why  
23 don't you tell me what that is? See what I'm talking  
24 about? You've got a circle drawn on the last page?

25 A. Oh, okay. Yes. That's the bottom hole target

1 location.

2 Q. Okay.

3 A. And the shaded portion was their optimum  
4 location.

5 Q. Oh, okay.

6 EXAMINER STOGNER: What can you say? A  
7 mistake was made. I have no other questions.

8 MR. KELLAHIN: That completes our  
9 presentation.

10 EXAMINER STOGNER: If there's nothing else  
11 further in case No. 10802, this case will be taken under  
12 advisement.

13 (And the proceedings concluded.)

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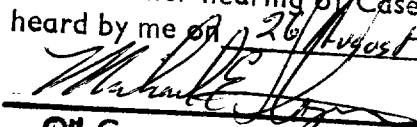
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I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 10802  
heard by me on 26 August 1993.  
  
\_\_\_\_\_, Examiner  
Oil Conservation Division

## 1 CERTIFICATE OF REPORTER

2

3 STATE OF NEW MEXICO )  
4 COUNTY OF SANTA FE ) ss.  
5 )

6

7 I, Susan B. Sperry, Certified Court Reporter and  
8 Notary Public, HEREBY CERTIFY that the foregoing  
9 transcript of proceedings before the Oil Conservation  
10 Division was reported by me; that I caused my notes to be  
11 transcribed under my personal supervision; and that the  
12 foregoing is a true and accurate record of the  
13 proceedings.

14

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

19

20 WITNESS MY HAND AND SEAL September 2nd, 1993.

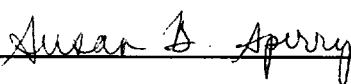
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SUSAN B. SPERRY, RPR, CM  
CCR No. 156