

NEW MEXICO OIL CONSERVATION COMMISSION

EXAMINER HEARINGSANTA FE, NEW MEXICOHearing Date MARCH 3, 1994 Time: 8:15 A.M.

NAME	REPRESENTING	LOCATION
R.M. Williams	Quality Production	Hobbs
Bob Cooter	Wiser Oil	Santa Fe
KEITH LOGAN	DAVID ARRINGTON OIL & GAS	MIDLAND
MIKE ROLING	ARMSTRONG ENG	ROSWELL
PERRY L. HUGHES	THE WISER OIL CO.	CARLSBAD
PAUL THOMPSON	BRECK OPERATING	FARMINGTON
Dow Campbell	Marathon Oil Co	Midland
Pat Steward	Marathon	Midland
Meftah TISS	Marathon Oil Co.	Midland.
KURT MILLER	MARATHON OIL	MIDLAND
John Chapman	Marathon Oil	Midland
Craig Young	Marathon	Midland
N. Kellin	Kellin & Kellin	Santa Fe
Jim Barber	Klabzuba Oil & Gas	Ft Worth TX
STEVE THOMPSON	GECKO, INC.	Midland TX
William F. [unclear]	Campbell, [unclear], Budget & [unclear]	Santa Fe

NEW MEXICO OIL CONSERVATION COMMISSION

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NAME	REPRESENTING	LOCATION

1 NEW MEXICO OIL CONSERVATION DIVISION

2 STATE LAND OFFICE BUILDING

3 STATE OF NEW MEXICO

4 CASE NO. 10922

5
6 IN THE MATTER OF:

7
8 The Application of Marathon Oil
9 Company for a High Angle/Horizontal
10 Directional Drilling Pilot Project
and Special Operating Rules Therefor,
Lea County, New Mexico.

11
12
13
14 BEFORE:

15 DAVID R. CATANACH

16 Hearing Examiner

17 State Land Office Building

18 March 3, 1994

19
20
21
22 REPORTED BY:

APR 12 1994

23 CARLA DIANE RODRIGUEZ
24 Certified Shorthand Reporter
for the State of New Mexico

25
ORIGINAL

A P P E A R A N C E S

FOR THE NEW MEXICO OIL CONSERVATION DIVISION:

ROBERT G. STOVALL, ESQ.

General Counsel
State Land Office Building
Santa Fe, New Mexico 87504

FOR THE APPLICANT:

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Post Office Box 2265
Santa Fe, New Mexico 87504-2265

BY: **W. THOMAS KELLAHIN, ESQ.**

-and-

MARATHON OIL COMPANY
Post Office Box 552
Midland, Texas 79702

BY: **DOW CAMPBELL, ESQ.**

I N D E X

Page Number

Appearances 2

WITNESSES FOR THE APPLICANT:

1. JOHN CHAPMAN

Examination by Mr. Kellahin 5

Examination by Mr. Catanach 19

Examination by Mr. Stovall 25

2. CRAIG E. YOUNG

Examination by Mr. Kellahin 27

Examination by Mr. Catanach 34

3. MEFTAH TISS

Examination by Mr. Kellahin 35

Examination by Mr. Catanach 39

Certificate of Reporter 41

E X H I B I T S

Page Marked

Exhibit No. 1 6

Exhibit No. 2 9

Exhibit No. 3 13

Exhibit No. 4 28

Exhibit No. 5 28

Exhibit No. 6 29

Exhibit No. 7 29

Exhibit No. 8 33

Exhibit No. 9 39

1 EXAMINER CATANACH: Call the hearing to
2 order this morning for Docket No. 7-94.

3 I'll go ahead and call the continuances
4 and dismissals first.

5 [And there were proceedings held off
6 the record.]

7 EXAMINER CATANACH: At this time I'll
8 call Case 10922, the application of Marathon Oil
9 Company for a high angle/horizontal directional
10 drilling pilot project and special operating
11 rules therefor, Lea County, New Mexico.

12 Are there appearances in this case?

13 MR. KELLAHIN: Mr. Examiner, I'm Tom
14 Kellahin of the Santa Fe law firm Kellahin &
15 Kellahin, appearing on behalf of the Applicant,
16 and I have three witnesses to be sworn.

17 EXAMINER CATANACH: Any additional
18 appearances?

19 Will the witnesses please stand to be
20 sworn in at this time.

21 [And the witnesses were duly sworn.]

22 MR. KELLAHIN: Mr. Examiner, I'm
23 appearing today in association with Mr. Dow
24 Campbell. He's an attorney with Marathon Oil
25 Company, and he resides in Midland, Texas.

1 My first witness is Mr. John Chapman.
2 Mr. Chapman is a petroleum geologist.

3 JOHN J. CHAPMAN, JR.

4 Having been first duly sworn upon his oath, was
5 examined and testified as follows:

6 EXAMINATION

7 BY MR. KELLAHIN:

8 Q. Mr. Chapman, for the record, would you
9 please state your name and occupation?

10 A. My name is John J. Chapman, Jr. I'm a
11 senior geologist with Marathon Oil, in Midland,
12 Texas.

13 Q. Mr. Chapman, on prior occasions have
14 you testified as an expert petroleum geologist
15 before the Oil Conservation Division?

16 A. Yes, I have.

17 Q. Pursuant to your employment as a
18 petroleum geologist for Marathon, have you made a
19 geologic study of the facts surrounding this
20 application?

21 A. Yes, I have.

22 Q. And, based upon that geologic study, do
23 you have certain recommendations and opinions to
24 the Hearing Examiner concerning the viability of
25 Marathon's project for a high-angle/horizontal

1 drilling pilot project in Lea County, New Mexico?

2 A. Yes, I do.

3 MR. KELLAHIN: We tender Mr. Chapman as
4 an expert petroleum geologist.

5 EXAMINER CATANACH: Mr. Chapman is so
6 qualified.

7 Q. Let me ask you, Mr. Chapman, to take
8 out what we've marked as Marathon Exhibit No. 1,
9 and identify that display for us.

10 A. This is a location reference map. It's
11 actually two maps together. The left-hand map is
12 a map showing the limits and extent of the Denton
13 Devonian pool, outlined in green, showing those
14 wellbores in place which have a TD of greater
15 than or equal to 10,000 feet. Therefore, most of
16 those wells have penetrated the top of the
17 Devonian formation.

18 Q. When we look at the left-hand side of
19 the display, what is the significance of the area
20 shaded in green?

21 A. The area shaded in green covers those
22 wells which have, historically, produced from the
23 Devonian formation.

24 Q. The right-hand side of the display,
25 what does that show?

1 A. It's a detail map of the nine sections
2 surrounding Section 11 of 15 South, 37 East. The
3 Marathon acreage position, which is the acreage
4 of interest this morning, is in the south half of
5 Section 11, 280-acre lease in the center of that
6 plat. It shows the Devonian owners or operators
7 of record, on their respective leaseholds.

8 Q. Have you had the appropriate personnel
9 at Marathon verify for you, based upon current
10 information, the offset operators adjacent to the
11 project area?

12 A. Yes, we have.

13 Q. What is the significance, then, of the
14 yellow shaded area?

15 A. The yellow shaded area is the 280-acre
16 lease which is operated by Marathon Oil. It is
17 the lease for which we are applying for this
18 horizontal/high-angle project.

19 Q. Describe for us the concept. What are
20 you trying to achieve here?

21 A. What Marathon is seeking to do is take
22 the portions of the Denton Devonian field, which
23 are becoming inactive, uneconomic to produce due
24 to high water cuts, and, by utilizing short
25 radius lateral technology, extend the life of the

1 field, to produce oil which currently would be
2 bypassed and wasted under current, conventional
3 wellbore spacing as it exists today.

4 Q. Is there a geologic explanation to why
5 you have chosen this particular lease as the
6 project area?

7 A. Well, beyond the fact that it's the
8 only lease that we own, yes. The Marathon
9 lease--well, the Denton Devonian field is a
10 large, north/south trending anticlinal closure,
11 highly faulted. The Marathon lease on Section 11
12 sits at the very apex of the field, at the
13 highest point. Therefore it is the most
14 attractive lease for capturing what is normally
15 referred to as attic oil, oil above existing
16 perforations in existing wellbores that would
17 otherwise not be produced.

18 Q. So that the Examiner has an outline of
19 where you're going with your presentation, Mr.
20 Chapman, identify for us the initial project well
21 that Marathon has selected to use as the reentry
22 well for the horizontal drilling.

23 A. Marathon would propose that we reenter
24 the Marathon Denton No. 5 well. It's the well
25 that's located in the southeast of the southwest

1 of Section 11. That would be our initial well
2 for short radius lateral technology.

3 Q. Let's turn now to Exhibit No. 2.
4 Identify that display for me.

5 A. Exhibit No. 2 is a structure map on the
6 top of the Devonian formation, covering Section
7 11. It is a map that's been made from a
8 combination of subsurface data, standard wellbore
9 subsurface data, integrated with 3-D seismic
10 data. The map was made by myself and Mr. David
11 Rebenstorf, Marathon's geophysicist in Midland,
12 Texas.

13 Q. Can you use this display to illustrate
14 this concept you're trying to execute with this
15 project?

16 A. Certainly. As can be seen on this
17 exhibit, the center of Section 11, and more
18 specifically the center of the south half of
19 Section 11, is the highest point not only of this
20 lease for the Devonian, but for the entire
21 field. It is, as I stated earlier, the apex of
22 the field. Therefore, it is the most attractive
23 target for attic oil, oil remaining in place
24 above existing perforations in the field.

25 Q. Do you have an explanation as to why

1 you've not sought to include the 40-acre tract,
2 which is the southwest of the southeast?

3 A. The 40-acre tract is not operated by
4 Marathon Oil. It's currently operated by Dinero
5 at the Devonian level. That 40-acre tract was
6 originally farmed out by Marathon Oil in the
7 early 50s. It was the location on which the
8 discovery well for the Denton Devonian Field was
9 drilled.

10 Q. Do you have an opinion as to whether
11 this project area can be approved without having
12 an adverse effect upon the correlative rights of
13 Dinero, or the interest owners within that
14 40-acre tract?

15 A. Certainly. It is our intention to
16 abide by the standard existing 330 stand-offs
17 from exterior lease boundaries, and we feel that
18 in no way will our drilling a short radius
19 lateral endanger correlative rights in the field.

20 Q. Describe for us, Mr. Chapman, whether
21 or not you have an opinion as to why you can't
22 use additional vertical wells in the project area
23 to capture this attic oil.

24 A. Well, we could use additional vertical
25 wells. The question is, what is the most

1 economically attractive and efficient, and what
2 would have the most long life success.

3 The Denton Devonian field is an
4 extremely heterogeneous field. It is a limestone
5 that is both vuggy and fractured. It has tight
6 bands in it, it has some chert layers in it and
7 shaley zones in it. And, being so heterogeneous,
8 there are reservoir compartments which you may
9 not penetrate, may not open with a conventional
10 vertical well. So, in part, our drilling a short
11 radius lateral will open up more of these
12 compartments.

13 In addition, the number one reason is
14 to avoid the vertical coning issue. Most of the
15 fractures in the wellbores, in the Denton
16 Devonian field, are vertical in nature. By
17 drilling a new vertical well, you would be, to a
18 certain extent, back in the same boat you had
19 been previously, it would not be long before you
20 initiated coning again.

21 Q. Have other operators tried to apply
22 this technology to the Denton Devonian pool?

23 A. There have been two other operators who
24 have applied to the State for permission to drill
25 short radius lateral, Kinlaw and Collins & Ware.

1 Those two operators have drilled three wells to
2 date in the Denton Devonian pool, as was approved
3 by the state.

4 Q. Do you know what has been the outcome
5 of those drilling efforts by the other companies?

6 A. All I know, to this point in time, is
7 that, of the three wells, in two of them they
8 were mechanically successful. That is, they were
9 able to drill a short radius lateral of some
10 appreciable distance, 400 to 600 feet. I know in
11 one of the two Kinlaw wells, they had problems.
12 They lost the bit in the hole.

13 They were able to drill their curve,
14 but once they began drilling laterally, they lost
15 a bit in the hole. Right now, my understanding
16 is that well is waiting evaluation to see if they
17 need to sidetrack and try again.

18 MR. KELLAHIN: Mr. Examiner, I have,
19 for your information, copies of the four Division
20 orders we could locate that deal with this
21 subject matter. They're found as Order Nos.
22 R-1016, 1044, 1012, 1023.

23 Q. Do you have a cross-section, Mr.
24 Chapman, that illustrates this concept of the
25 reservoir within the project area?

1 A. Yes, Exhibit No. 3 is just such a
2 cross-section, and I would like to...

3 Q. Give us a moment to find that display
4 and take a look at it. This is a two-well
5 cross-section?

6 A. It's a two-well cross-section. In the
7 lower left-hand corner there's a location index.
8 It shows Section 11 as the green line, labeled
9 A-A', shows the location of the cross-section.
10 It passes through the Marathon Denton No. 5 well,
11 which is the proposed reentry and short radius
12 lateral candidate, and the Marathon Denton No. 3
13 well, which is the highest well in the Denton
14 Devonian pool.

15 Q. The two wells are the Denton No. 3 and
16 the Denton No. 5?

17 A. That's correct.

18 Q. If the objective is to attempt to
19 produce the attic oil that is up-structure from
20 the existing wells, why can't you obtain that
21 production by adding perforations higher in the
22 reservoir than currently exist in either of those
23 wells?

24 A. Well, we could in the Denton No. 3.
25 And, as a matter of fact, it's our intention to

1 do so. Let me step through the elements of this
2 cross-section so you can see all the data is
3 here.

4 The top of the orange represents the
5 top of the Devonian formation. This
6 cross-section is a true scale cross-section, in
7 that both the vertical and the horizontal scales
8 are equal, so it is showing true perspective of
9 the reservoir.

10 As I stated, the top of the orange is
11 the top of the Devonian formation. It's offset
12 in a number of places by faults. The orange band
13 represents a tight cap in the uppermost portion
14 of the Devonian. That's a section Devonian,
15 persistent throughout the entire Denton Devonian
16 field, in which there's very little vuggy or
17 matrix porosity. The porosity that's present in
18 the net portion of the reservoir is primarily
19 fractures.

20 On both of the two wellbores, you can
21 see that I have placed the neutron porosity log.
22 These logs are intended to qualitatively show the
23 presence of porosity, not quantitatively.
24 Because of the vintage of these logs, we didn't
25 feel like they were of such a quality that you

1 could lay a 10 percent porosity line on there,
2 for example; but those areas that I've shaded
3 green, represent those areas of the reservoir in
4 which there is presence of significant matrix
5 porosity.

6 And then, on the side of the wellbores,
7 you can see small black boxes, rectangles and
8 squares. Those represent existing perforations
9 in the wellbore.

10 Finally, I would like to note the three
11 blue lines. The center blue line represents the
12 lease corner between the Marathon-operated lease
13 and the Dinero-operated lease.

14 The two dashed blue lines represent the
15 projection of the standard 330-foot stand-off, as
16 projected into this plane, the North 45 East
17 plane. So, the area between the two dashed lines
18 is what you might refer to as the no-man's-land
19 in the reservoir, in which no one could drill or
20 operate without a change in field rules.

21 Finally, as shown on the location map,
22 there's a red line showing our proposed direction
23 and extent of drilling for the horizontal well.
24 And then, on the Marathon Denton No. 5, there's
25 the actual curve shown again as projected into

1 the plane of this cross-section, showing where
2 the horizontal well would exist. I've marked in
3 a dashed horizontal line, the top of the current
4 perforations in the Marathon Denton No. 3.

5 So, back to your original question.
6 It's quite apparent that, in the Marathon Denton
7 No. 3, there's existing reservoir yet to be
8 opened. Marathon is in the process of doing
9 standard well work in that wellbore right now,
10 and it is our intention here shortly to open
11 additional perfs, to capture some of the attic
12 oil.

13 The extent of that attic oil covers
14 such a large area that, just opening those
15 perforations in No. 3, will not remove all the
16 oil from that attic, again due to the propensity
17 of the Devonian reservoir to cone water up the
18 vertical fractures.

19 Q. The Denton Devonian is on 40-acre oil
20 spacing?

21 A. That's right. It's under conventional
22 40-acre rules, 330 stand-offs from the proration
23 unit boundaries. The allowable is 365 barrels
24 per day, 2,000-to-1 GOR.

25 Q. For a 40-acre oil spacing unit, the

1 maximum oil allowable is 365?

2 A. That is correct.

3 Q. What do you propose to do or request
4 for the assignment of an allowable for this
5 initial well, and any other horizontal well
6 drilled within the project area?

7 A. Our proposal is to keep the current
8 allowables in place. We are not proposing any
9 change thereof. We would maximize our production
10 at 365 barrels per day, 2,000-to-1 GOR.

11 Q. Are you seeking authority from the
12 Examiner to obtain administrative approval for
13 the addition of any further horizontal wells to
14 the project area?

15 A. That is correct. If the short radius
16 lateral drilling that is proposed in the Marathon
17 Denton No. 5 is successful, and is highly
18 successful, there are several other wells on the
19 Marathon lease which would be good candidates,
20 potentially, at least four other of the existing
21 wells.

22 And, rather than have to go through the
23 whole process of the hearing and take up the
24 State's time and our time, as long as we're
25 abiding by the approved rules, it would be our

1 desire to seek a mechanism for having future
2 wells administratively approved.

3 Q. In the event the horizontal producing
4 portion, the lateral of the well crosses into
5 more than a single spacing unit, two or more, do
6 you seek to have the allowable calculated based
7 upon the total number of 40-acre tracts
8 penetrated by that producing lateral?

9 A. If we were to do that, and that's a big
10 if, because it takes quite a lateral extent, but
11 if Marathon were to do that, it would be our
12 proposal that a horizontal well which penetrates
13 two proration units would be assigned the
14 allowable for the same two set of proration
15 units.

16 However, with the restriction that
17 there could be no more than two wells per
18 proration unit, or as far as the entire project
19 area, for any 40-acre proration unit you could
20 produce no more than 365 barrels per day.

21 Q. Have you determined the precise azimuth
22 and the distance that you're going to drill this
23 lateral?

24 A. Our plan is to kick out the well and
25 drill at an angle of north, 30 degrees east. We

1 hope to extend that lateral 500 feet beyond the
2 radius; so, therefore, a total projected distance
3 of 545 feet beyond the existing vertical
4 wellbore.

5 Q. In the event you're required or need to
6 make adjustments in the field as to length or
7 direction, are you seeking approval of the
8 Examiner to have that flexibility, so long as you
9 honor the 330 setback from the outer boundaries
10 of the project area?

11 A. That is correct. We do have that
12 intention.

13 MR. KELLAHIN: That concludes my
14 examination of Mr. Chapman. We move the
15 introduction of his Exhibits 1, 2 and 3.

16 EXAMINER CATANACH: Exhibits 1, 2 and 3
17 will be admitted as evidence.

18 EXAMINATION

19 BY EXAMINER CATANACH:

20 Q. Mr. Chapman, the project area within
21 Section 11, is that one lease?

22 A. The 280 acres that's shaded yellow,
23 yes, that's one lease.

24 Q. Is that a federal lease, or--

25 A. No. If I may refer back to Exhibit No.

1 1, all the leases in that nine-section block are
2 fee leases, with the exception of Section 2.
3 Section 2 is state leases. But the entirety of
4 Section 11, the entirety of our proposed project
5 area, and the remaining seven surrounding leases,
6 are all fee leases.

7 Q. Is the interest ownership in that
8 project area common?

9 A. Under Marathon's 280-acre lease, yes,
10 it is.

11 Q. Is Marathon the only working interest
12 owner?

13 A. No. Marathon is a 50-percent working
14 interest owner, and a number of smaller parties
15 carry the other 50 percent.

16 Q. The project area is currently fully
17 developed, with a well on each 40-acre tract?

18 A. There has been a Devonian test drilled
19 on each 40-acre tract, that is correct.

20 Q. Which wells are producing at this time?

21 A. Currently, the Marathon No. 3, No. 4,
22 No. 6, and No. 7 are actively producing from the
23 Devonian formation. The proposed reentry is an
24 inactive well, due to high water cuts.

25 Q. The No. 5 well has high water cuts, you

1 said?

2 A. Yes. The last time we tried to produce
3 it, it had uneconomic high water cuts.

4 Q. Am I correct in understanding, the
5 interval that you're going for is not currently
6 perforated in the No. 5 well?

7 A. Well, no. That's a little difficult to
8 see. If you'll refer back to Exhibit No. 3
9 again, where I have the red curve for the
10 proposed horizontal well, you can see there's a
11 black box right there. That interval has been
12 perforated.

13 When it was perforated, it made 15,000
14 barrels of oil and then went to water, so it
15 coned water rapidly. It's also in this
16 orange-shaded tight cap, where the only effective
17 reservoir storage is in fractures, and most wells
18 will produce relatively small amounts.

19 There are some historical exceptions in
20 the field, where locally you'll get higher
21 density of fractures in that cap, and some wells
22 have managed to produce quite well from that.
23 But normally, you have very little recovery from
24 it.

25 The first approximately 250 feet of our

1 wellbore will be drilling laterally through that
2 tight cap. It is our intention, by choosing the
3 direction we did, to, based on theory, we should
4 be drilling at approximate right angles to what
5 should be open fractures in the reservoir.

6 This is just based on regional current,
7 in situ, stress regime. We don't have any direct
8 data to corroborate where the open fractures
9 are. But our intention is, the first half of the
10 horizontal wellbore to be opening, if you will,
11 reservoir sales, which currently aren't exposed
12 anywhere in the reservoir, kind of an Austin
13 chalk type play, seeking to maximize the
14 encountering of fractures in the reservoir.

15 The second half of the wellbore will be
16 in the top of the permeable and porous portion of
17 the wellbore, the attic oil, the conventional
18 attic oil portion, if you will.

19 Q. Is this potential throughout your
20 project area, to produce this attic oil?

21 A. Currently, we don't see that potential
22 in the No. 9 or No. 13 wells, the two westernmost
23 wells in our lease. They're considerably downdip
24 and watered out. We don't see those particular
25 wellbores as having potential.

1 If the No. 5 works quite well, and, you
2 know, as the two previous applicants, Collins &
3 Ware and Kinlaw have stated, and I'll state
4 again, this is still, certainly, experimental in
5 nature, but if the No. 5 works quite well, both
6 the No. 3 and 4, which are higher on structure
7 will be candidates for horizontal applications,
8 and the No. 6 and 7, which are high in their
9 individual fault block, would be candidates for
10 horizontal work in that particular fault block.
11 It appears that individual fault blocks in the
12 field act as separate reservoirs.

13 Q. All of those wells are separated by
14 faults?

15 A. The No. 7 and the No. 6 well are
16 separated. If you'll refer back to Exhibit No.
17 2, the Marathon 6 and 7 wells are separated from
18 the remainder of the Marathon wells by a
19 north/south trending fault.

20 Q. Okay. I'm a little unclear about how
21 you want to set up the allowable. Am I correct
22 in understanding, you want to retain the 40-acre
23 allowable for every proration unit?

24 A. That is correct.

25 Q. You don't want to combine the whole

1 project area into one project?

2 A. No, we're not proposing that at this
3 time. Just 365 barrels per 40-acre location,
4 constrained to however many wellbores exist in
5 it. For example, if you look in the north half
6 of Section 11, you'll see a No. 7 and a No. 17
7 well. Those are Phillips'. I think, since the
8 No. 17 well was drilled in the mid-70s, they've
9 produced two wells from one 40-acre allowable,
10 for the last couple of decades, under one 40-acre
11 proration allowable.

12 So, we would be looking at that same
13 type scenario. If we get more than two wellbores
14 in the same 40-acre unit, they would share a 365
15 barrel allowable. We're not seeking to
16 amalgamate the entire 280-acre tract.

17 Q. What's the advantage of forming a
18 project area?

19 A. Well, the one change we are seeking
20 from this current standard 40-acre proration, is
21 that we want to honor the exterior 330
22 stand-offs, the 330 stand-offs between different
23 leaseholds. What we would like the freedom to
24 do, similar to what both Kinlaw and Collins &
25 Ware applied for, is the freedom within the

1 interior of our tract, to drill right up to a
2 40-acre proration boundary and interior 40-acre
3 proration boundary, or even cross such a
4 boundary.

5 And then beyond that, as mentioned
6 earlier, just the freedom to have administrative
7 approval on subsequent wells within that 280-acre
8 project area.

9 EXAMINATION

10 BY MR. STOVALL:

11 Q. Let me follow-up, if that horizontal
12 well crossed two proration units and were
13 successful, would you want, as we have done in
14 the past, that particular wellbore having crossed
15 two sections, to be able to have a double
16 allowable? I shouldn't say a double allowable,
17 but an allowable for each proration unit?

18 A. If one wellbore--my understanding is,
19 if one horizontal wellbore was to cross into two,
20 40-acre tracts, and it was the only producing
21 well in those two, 40-acre tracts, it would have
22 an allowable twice 365.

23 Q. An allowable for each tract?

24 A. An allowable for each tract. But, you
25 know, if there's still an existing vertical well

1 and one 40-acre tract--for example, let's take a
2 scenario. We don't expect to cross, with the
3 drilling of the short radius lateral from our No.
4 5, we don't expect to cross in the 40-acre tract
5 where the No. 4 well was drilling, the northern
6 offset 40-acre tract.

7 But, if we were to drill from the No. 5
8 far enough north that we were to cross into that
9 40-acre tract, then we would look for a shared
10 allowable between the No. 5 and the existing
11 vertical No. 4. Those two wells, together, would
12 share 365 times two.

13 Q. Which one is the horizontal well?

14 A. No. 5.

15 Q. Gotcha. Okay.

16 A. If we kept the No. 4 as an active
17 vertical producer, then the two wells together
18 would have the 365 times two: I think that's 730
19 barrels a day.

20 EXAMINER CATANACH: I think that's all
21 I have for this witness.

22 MR. KELLAHIN: Call Craig Young as our
23 next witness.

24 **CRAIG E. YOUNG**

25 Having been first duly sworn upon his oath, was

1 examined and testified as follows:

2 EXAMINATION

3 BY MR. KELLAHIN:

4 Q. Mr. Young, would you please state your
5 name and occupation?

6 A. Craig E. Young. I'm a drilling
7 engineer with Marathon Oil Company.

8 Q. Mr. Young, on prior occasions, have you
9 testified before the Division as a drilling
10 engineer?

11 A. No, I have not.

12 Q. Summarize for us your education.

13 A. I went to school four and a half years
14 at Texas Tech University, Lubbock, Texas, and
15 received a bachelor of science in mechanical
16 engineering.

17 Q. Summarize for us your employment
18 experience, particularly with the drilling
19 aspects of your employment?

20 A. I worked five years in Midland, Texas,
21 with Texas American Oil Corporation, a small
22 independent there. Duties were operations,
23 production and drilling.

24 Subsequent to that, I worked five and a
25 half years with Marathon Oil Company. About four

1 of those years have been in a drilling capacity.

2 Q. Describe for us your past experience,
3 if any, with horizontal drilling.

4 A. I have designed and drilled 12 short
5 radius holes. I have a patent in short radius
6 technology, completion technology.

7 Q. Approximately how many of these wells
8 have you been involved in?

9 A. 12.

10 Q. All right, sir. And, have you been
11 involved as the drilling engineer for this
12 particular project?

13 A. Yes, I have.

14 MR. KELLAHIN: We tender Mr. Young as
15 an expert drilling engineer.

16 EXAMINER CATANACH: Mr. Young is so
17 qualified.

18 Q. Let me have you turn, sir, to Exhibit
19 No. 4. Would you identify that display for us?

20 A. This is a plane view of our proposed
21 horizontal. It shows our acreage position, the
22 330 setbacks, and our proposed direction and
23 length of horizontal well.

24 Q. All right, sir, let's turn to Exhibit
25 No. 5. Do you have an illustration to show how

1 the well is currently figured?

2 A. Yes, sir. This is a current schematic
3 of the wellbore diagram. This well was drilled
4 in 1951, and this is the situation as the
5 wellbore currently exists.

6 Q. Let's turn to Exhibit No. 6. Identify
7 and describe that display.

8 A. This is a more detailed plane view of
9 our proposal. The center indicates the wellhead
10 location. The clear line, so to speak,
11 represents the natural vertical deviation to the
12 kickoff point, and then the solid line represents
13 our horizontal, showing our planned distances
14 from the north and the east line, being 335 from
15 the east.

16 Q. Okay. Let's turn to Exhibit No. 7,
17 what are we looking at here?

18 A. We are looking at a vertical section of
19 our proposal. The vertical line represents the
20 vertical well. What we plan on doing is kicking
21 off at 11,400 foot, right below the top of the
22 Devonian, and drilling a 45-foot radius curve
23 that has build grades of 127.33 degrees per 100
24 build grades.

25 After that, we build a 45-foot radius

1 curve section, then we would come in and drill
2 the 500 foot long horizontal section, all this at
3 a north-33-degrees-east orientation.

4 Q. How do you propose to know where you
5 are at any given point during the operation?

6 A. The current plans are to use MWD,
7 measurement while drilling technology, to have
8 inclination, azimuth, direction, available on a
9 continuous basis while we're drilling. Using
10 conventional, accepted surveying methods, we'll
11 tie into our base survey from the vertical well
12 and basically know where we are at every point
13 while we're drilling.

14 Q. What's the reason to use 11,400 feet
15 true vertical depth as the kickoff point?

16 A. Basically, this gets us below the
17 Woodford shale that's right on top of the
18 Devonian. We're avoiding that, to minimize our
19 drilling problems and completion problems, but
20 yet maintain as high in the Devonian section as
21 we can.

22 Q. Have you made a determination of
23 whether the existing wellbore has sufficient
24 mechanical integrity to be used for a reentry for
25 this type of procedure?

1 A. All of our information indicates that
2 it does.

3 Q. Once you complete drilling the lateral
4 and make the decision to terminate actual
5 drilling, what then do you do?

6 A. What we will do then is pull out with
7 the motors, run back in, circulate our mud system
8 out of the hole, by running tubing into the
9 wellbore, and then we'll run our completion
10 assembly.

11 What that would consist of is, at least
12 initially, a packer up in the vertical well with
13 tailpipe going around to the base of the curved
14 section. Initial attempts will be to swab the
15 well to see what means, if any, of artificial
16 lift will be necessary.

17 Q. Will the wellbore be completed in such
18 a fashion that any production from the Devonian
19 reservoir will remain confined to that reservoir,
20 and you will not have migration outside, either
21 vertically upwards, or downwards, outside the
22 reservoir?

23 A. That is correct. The casing integrity
24 above the kickoff point will remain the same as
25 it is now, so basically there will be no change

1 in isolation from the Devonian.

2 Q. After completing the well, is there
3 anything else that's done in order to commence
4 production? Is there any type of stimulation
5 program required?

6 A. We have the option of, once we complete
7 the well, of running cold tubing through
8 the--production tubing to acidize the wellbore.

9 Q. Are you familiar with the application
10 of this technology by the other companies within
11 the Denton Devonian pool?

12 A. Yes, I am.

13 Q. And, with what results? Have they been
14 able to successfully, at least mechanically, do
15 the task?

16 A. Out of two of the wells, they have been
17 mechanically successful. One well has had a
18 problem. The service company is working on that
19 problem to alleviate it. It's not a problem
20 isolated to this area, I believe. I think it's a
21 problem with their system, and they've been
22 working to isolate that problem.

23 Q. Are there any unique or unusual
24 features with regard to the application of this
25 procedure to this project?

1 A. No.

2 Q. Let's turn now to Exhibit No. 8, and
3 have you identify and describe that display.

4 A. Basically this is a plane view of the
5 vertical well. At the coordinates 00, at the
6 lower left-hand corner, is the wellhead or
7 surface location.

8 This was based on a survey that was run
9 in 1951 by Eastman. To the top represents north
10 displacement, to the bottom represents south, to
11 the right represents east displacement.
12 Basically, this just plots the natural drift of
13 the vertical well.

14 Q. You can use this information, then, to
15 find where you are in the kickoff point in
16 relation to the two dimensions?

17 A. That is correct. We'll use this survey
18 to tie into our kickoff point, and any subsequent
19 survey will be tied back to this, and we'll know,
20 within three dimensions, exactly where we are.

21 MR. KELLAHIN: Mr. Examiner, that
22 concludes my examination of Mr. Young. We move
23 the introduction of his Exhibits 4 through 8.

24 EXAMINER CATANACH: Exhibit 4 through 8
25 will be admitted as evidence.

EXAMINATION

BY EXAMINER CATANACH:

Q. Mr. Young how would you propose to plug back a well?

A. Referring to Exhibit No. 5, we will initially go in the well and drill out the cast-iron bridge plug. At that point in time, there are some existing perforations that are open below that. We will cement-squeeze those, drill that squeeze out, make sure they test and that we have a good cement squeeze there.

Q. Are you referring to the perforations from 11,390 to 11,476?

A. Yes, sir. Those perforations will be squeezed. The squeeze will be drilled out, the squeeze will be tested. At that point in time, they would start our section milling operations.

Q. The direction of the wellbore isn't going to change. Has that already been set?

A. Yeah. The proposed direction is north, 30 degrees east. That was based upon a geological evaluation in an attempt to intersect natural fractures.

Q. That won't change as a result of additional information you may gather?

1 A. No, sir. What may change that is
2 actual field operations, maybe a little bit one
3 way, a little bit the other.

4 Q. Has Marathon drilled one of these
5 horizontal wells?

6 A. We've drilled over 40 short radius
7 horizontal wells. Primarily those have been down
8 south of Midland in our Yates Unit. We've
9 drilled one south of Big Lake, Texas,
10 approximately 9,000 foot.

11 Q. Have you been involved with other
12 horizontal projects?

13 A. Yes, I have.

14 EXAMINER CATANACH: That's all I have
15 of the witness. The witness may be excused.

16 MR. KELLAHIN: I would like to call, at
17 this time, our reservoir engineer, Mr. Examiner,
18 Mr. Meftah Tiss.

19 **MEFTAH TISS**

20 Having been first duly sworn upon his oath, was
21 examined and testified as follows:

22 EXAMINATION

23 BY MR. KELLAHIN:

24 Q. Mr. Tiss, for the record, would you
25 please state your name and occupation.

1 A. Meftah Tiss, and I'm a reservoir
2 engineer working for Marathon Oil Company in
3 Midland, Texas.

4 Q. Have you testified before the Division
5 before?

6 A. No, I have not.

7 Q. Summarize for us when and where you
8 obtained your degree.

9 A. I obtained a bachelor of science from
10 Louisiana State University in 1985, and a master
11 of science from the University of Oklahoma in
12 1987, both in petroleum engineering.

13 Q. Summarize for us your employment
14 experience, subsequent to graduation.

15 A. I have been working for Marathon since
16 July of 1988. I worked for Marathon in Tunisia,
17 North Africa for five years. After that, I got
18 transferred to Midland, Texas.

19 Q. Do your current duties as a reservoir
20 engineer include reservoir calculations and
21 studies for the Denton Devonian pool?

22 A. That's correct.

23 MR. KELLAHIN: We tender Mr. Tiss as an
24 expert reservoir engineer.

25 EXAMINER CATANACH: Mr. Tiss is so

1 qualified.

2 Q. Summarize for us, Mr. Tiss, from
3 reservoir engineering aspects, what Marathon is
4 trying to accomplish with this application.

5 A. What Marathon is trying to accomplish
6 from this application is to take a nonproducer,
7 No. 5, into a horizontal well, to intersect
8 fractures, and also to stay away from water
9 coning.

10 Q. How does the application of horizontal
11 technology give you a better chance to obtain
12 those two objectives, than a vertical well would?

13 A. A horizontal well, by intersecting more
14 fractures and having a higher productivity index
15 than a vertical well, that will minimize the
16 pressure draw down and, therefore, minimize water
17 coning.

18 Q. What has been the recoveries from the
19 40-acre tract that's identified as the southwest
20 quarter of the southeast quarter of Section 11,
21 the Dinero tract? Do you know what those two
22 wells have cumulatively produced out of that
23 spacing unit?

24 A. Yes, I do. Those two wells,
25 Well No. A-1, which was the discovery well, cum'd

1 over a million barrels of oil from the top 165
2 feet of the Devonian. The No. 1 well cum'd about
3 300,000 barrels of oil from the Devonian.

4 Q. What was the cumulative recovery of oil
5 from the No. 5 well, the well that you intend to
6 initially reenter?

7 A. The cumulative oil recovery from the
8 No. 5 well is 1,142,000 barrels. The majority of
9 that oil was from the Lower Devonian. In the
10 tight cap, it only recovered 15,000 barrels of
11 oil as compared to the No. A-1, the east offset,
12 which recovered, as I said, over a million
13 barrels of oil from that tight zone.

14 Q. Do you have an opinion, as a reservoir
15 engineer, whether approval of this application
16 for Marathon will impair the correlative rights
17 of Dinero and the owners of that 40-acre tract?

18 A. No, it won't impair, because this well
19 here will not extend beyond the 330-foot
20 stand-off.

21 Q. Do the current producing vertical wells
22 in the Marathon spacing unit, the project area,
23 have the capacity to recover all of the attic oil
24 that is in the reservoir?

25 A. That's not right. They don't have the

1 capacity to recover attic oil.

2 Q. So you're going to need additional
3 wellbores of some kind in order to get the attic
4 oil?

5 A. That's correct.

6 Q. In your opinion, the use of the No. 5
7 well in the application of the short radius
8 lateral is the best way to do it?

9 A. That's correct.

10 MR. KELLAHIN: That concludes my
11 examination of Mr. Tiss, and that completes our
12 presentation, Mr. Examiner.

13 Mr. Examiner, I failed to give you a
14 copy of the certificate of notification in this
15 case. I would like to have that marked and
16 entered as Exhibit 9.

17 EXAMINER CATANACH: We'll admit Exhibit
18 9 into evidence.

19 EXAMINATION

20 BY EXAMINER CATANACH:

21 Q. Mr. Tiss, do you have an estimate on
22 how much oil the No. 5 well might recover?

23 A. We're estimating about 250,000 barrels.

24 Q. How did you arrive at that estimate?

25 A. From volumetrics.

1 Q. Would the potential for the No. 3 and 4
2 well be lower than that?

3 A. For No. 3 and 4, the potential would
4 be, I would say, about the same, or a little bit
5 higher.

6 Q. In your opinion, the horizontal
7 technology, that's the only way to really recover
8 this oil at this point in time?

9 A. That's true.

10 EXAMINER CATANACH: I have nothing
11 further, Mr. Kellahin.

12 MR. KELLAHIN: That concludes this case
13 on our application, Mr. Examiner.

14 EXAMINER CATANACH: Okay. There being
15 nothing further in this case, Case 10922 will be
16 taken under advisement.

17 (And the proceedings concluded.)

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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. 10922.
heard by me on March 1994.
David R. Catanach, Examiner
Oil Conservation Division

CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Carla Diane Rodriguez, Certified
Shorthand Reporter and Notary Public, HEREBY
CERTIFY that the foregoing transcript of
proceedings before the Oil Conservation Division
was reported by me; that I caused my notes to be
transcribed under my personal supervision; and
that the foregoing is a true and accurate record
of the proceedings.

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

WITNESS MY HAND AND SEAL April 11,
1994.


CARLA DIANE RODRIGUEZ, RPR
CSR No. 4