

1 STATE OF NEW MEXICO

2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

3 OIL CONSERVATION DIVISION

4
5 IN THE MATTER OF THE HEARING)
6 CALLED BY THE OIL CONSERVATION)
7 DIVISION FOR THE PURPOSE OF)
8 CONSIDERING:)

CASE NO. 10,984

9
10 APPLICATION OF TEXACO EXPLORATION)
11 AND PRODUCTION, INC.)
1213 **ORIGINAL**14 REPORTER'S TRANSCRIPT OF PROCEEDINGS15 EXAMINER HEARING

16 BEFORE: DAVID R. CATANACH, Hearing Examiner

17 May 26, 1994

18 Santa Fe, New Mexico

19
20 This matter came on for hearing before the Oil
21 Conservation Division on Thursday, May 26, 1994, at Morgan
22 Hall, State Land Office Building, 310 Old Santa Fe Trail,
23 Santa Fe, New Mexico, before Steven T. Brenner, Certified
24 Court Reporter No. 7 for the State of New Mexico.

25 * * *

I N D E X

May 26, 1994
 Examiner Hearing
 CASE NO. 10,984

PAGE

APPEARANCES

3

APPLICANT'S WITNESSES:

DOROTHY BRELIH

Direct Examination by Mr. Carr

4

Examination by Examiner Catanach

13

REPORTER'S CERTIFICATE

18

* * *

E X H I B I T S

	Identified	Admitted
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* * *

A P P E A R A N C E S

FOR THE DIVISION:

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Santa Fe, New Mexico 87504-2208
By: WILLIAM F. CARR

* * *

1 WHEREUPON, the following proceedings were had at
2 12:06 p.m.:

3 EXAMINER CATANACH: At this time we'll call Case
4 10,984.

5 MR. CARROLL: Application of Texaco Exploration
6 and Production, Inc., for amendment of special pool rules
7 and regulations for the Monument-Tubb Pool, Lea County, New
8 Mexico.

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

11 MR. CARR: May it please the Examiner, my name is
12 William F. Carr with the Santa Fe law firm Campbell, Carr,
13 Berge and Sheridan.

14 I represent Texaco Exploration and Production,
15 Inc., in this case, and I have one witness.

16 EXAMINER CATANACH: Any additional appearances?

17 Will the witness please stand to be sworn in?

18 DOROTHY BRELIH,
19 the witness herein, after having been first duly sworn upon
20 her oath, was examined and testified as follows:

21 DIRECT EXAMINATION

22 BY MR. CARR:

23 Q. Would you state your name and place of residence?

24 A. Dorothy Brelih, and I live in Hobbs, New Mexico.

25 Q. By whom are you employed?

1 A. Texaco.

2 Q. And what is your current position with Texaco?

3 A. I'm a production engineer.

4 Q. Have you previously testified before this
5 Division?

6 A. Yes, sir.

7 Q. At the time of that testimony, were your
8 credentials as a production engineer, petroleum engineer,
9 accepted and made a matter of record?

10 A. Yes, they were.

11 Q. Are you familiar with the Application filed in
12 this case on behalf of Texaco?

13 A. Yes, I am.

14 Q. And are you familiar with the Tubb formation in
15 the area that is the subject of this case?

16 A. Yes, I am.

17 MR. CARR: Are the witness's qualifications
18 acceptable?

19 EXAMINER CATANACH: They are.

20 Q. (By Mr. Carr) Ms. Brelih, could you briefly
21 state what Texaco seeks in this case?

22 A. We seek special pool rules for the Monument-Tubb
23 Pool establishing a gas-oil ratio of 10,000 to 1.

24 Q. When was this pool originally created?

25 A. In November, 1959.

1 Q. That was by Order R-1533?

2 A. Yes, it was.

3 Q. What is the current gas-oil ratio for this pool?

4 A. Currently it is 4000 to 1, which was established
5 with the operating rules back in 1964.

6 Originally Conoco, who were the filers of the
7 Application, sought a GOR of 6000 to 1. This was denied at
8 the time.

9 Q. So what is the current allowable for this pool?

10 A. The current allowable is 222 barrels of oil per
11 day, and that's based on 80-acre proration units, which
12 makes the gas allowable 888 MCF per day.

13 Q. Have you prepared exhibits for presentation at
14 this hearing?

15 A. Yes, I have.

16 Q. Let's go to what's been marked as Texaco Exhibit
17 Number 1. Could you just identify this for Mr. Catanach?

18 A. Okay, this is a map of the current pool boundary
19 of the Monument-Tubb Pool. It's been extended from time to
20 time since the establishment of the pool to where it is
21 now, which includes these 5600 acres that are shown on
22 there.

23 Q. Okay, let's go to Exhibit Number 2. What is
24 this?

25 A. This is a map, the same area now, showing the 35

1 wells that are currently operating in the pool, and the
2 ownership is expressed in these bold colors. Conoco is in
3 gray, Texaco acreage is in yellow, and other operators are
4 in green.

5 Q. What percent of this pool is actually operated by
6 Texaco and Conoco?

7 A. Texaco and Conoco combine to operate more than 90
8 percent of the wells in the pool. And I've been in contact
9 with Conoco on two occasions regarding this Application,
10 and they've expressed no opposition to the idea of raising
11 the GOR.

12 Q. At any one time in the life of this pool,
13 approximately how many wells have been producing therefrom?

14 A. Thirty to 35 consistently.

15 Q. And on this exhibit you have shown all wells that
16 have ever produced, or just the current producers?

17 A. A little of both, but they -- It's just current
18 producers now.

19 Q. And this exhibit also identifies the location of
20 Tubb wells within a mile of the pool but not included
21 within the defined pool boundary?

22 A. Yes, I'm sorry, there are five wells that are
23 within a mile of the pool boundary. The one on Section 14
24 is Texaco's and the four in Section 15 are Conoco's.

25 Q. All right. Let's go to Exhibit Number 3. Will

1 you identify and review this.

2 A. This is a structure map drawn on the top of the
3 Tubb structure. Each of the contour lines is a 10-foot
4 increment.

5 The wells are identified. It's the same wells as
6 on the previous map, but now they're identified by their
7 producing GOR, which is color coordinated, and the legend
8 there is across the top.

9 What I want to show with this is that there's no
10 correlation between the structure and the GOR.

11 A few examples of that would be the well in the
12 southeast quarter of Section 10, is in what would be a
13 trough, yet it has a higher GOR than the blue well that's
14 on the west half of Section 10, who is structurally higher.

15 Another example of where structure doesn't pay
16 any -- does not dictate the performance of the wells would
17 be the two blue wells down in Section 23 on the northwest
18 quarter. Again, those are on a structural high, yet their
19 GOR is relatively low compared to the other wells around.
20 This is consistent with a solution gas drive reservoir,
21 which is what we believe this to be.

22 Q. Is there any evidence that you've been able to
23 find of a gas cap or any independent gas-bearing interval
24 in this reservoir?

25 A. No, sir.

1 Q. What we have, in fact, here is just a pool that
2 produces at a very high gas-oil ratio?

3 A. Exactly.

4 Q. And this has been typical of the reservoir since
5 it first produced?

6 A. Yes, it has.

7 Q. That was the basis for Conoco's original 6000-to-
8 1 application; is that not correct?

9 A. I believe so, but they didn't have near as much
10 information as we do today.

11 Q. All right. Let's go to Exhibit Number 4. Would
12 you identify this, please?

13 A. Okay, this is a production map of the entire Tubb
14 Pool from 1970 through the end of 1993. It only goes to
15 1970 because that's how far my database goes.

16 The blue line is water, the green line is oil,
17 the red line is gas, and the teal line is the GOR.

18 And as you can see, the pool consistently
19 produces at high GORs, from 20,000 to 30,000 for the last
20 25 years.

21 The cumulative GOR for the pool is 22,000.

22 Q. And at curtailed rates, what is the result?

23 A. I believe we would produce less oil, and I can
24 speak to that a little bit later if that's okay.

25 Q. Okay, let's go to Exhibit Number 5, and let's

1 review that for Mr. Catanach.

2 A. This is a chart showing the distribution of GORs
3 for all the 35 wells currently in the Monument-Tubb Pool.

4 As you can see, 95 percent of the wells have GORs
5 above the current 4000 allowable. Sixty-six percent of the
6 wells even have GORs above the 10,000 that we're seeking.

7 Q. Okay. Now, what happens when we curtail the
8 rates in terms of the oil production?

9 A. As a result of some recent successful workovers
10 I've done, we've had to pinch back some high-GOR wells.

11 And the nodal analysis that I do on these shows
12 me I'm on the verge of producing them at gas rates which
13 are too low to bring the fluid up to surface with the gas,
14 and that's the problem we're encountering.

15 Q. At a 4000-to-1 GOR, in your opinion, will oil
16 ultimately be left in the ground?

17 A. Yes.

18 Q. And that production will in fact then be wasted?

19 A. Yes, I believe so.

20 Q. Do you see any adverse impact on this reservoir
21 from approval of a 10,000-to-1 gas-oil ratio?

22 A. Not at all. Again, mother nature has given us a
23 20,000- to 30,000-to-1 GOR pool. I don't think 10,000 will
24 affect it at all.

25 Q. Could you go to what has been marked Texaco

1 Exhibit Number 6 and identify and review this for Mr.
2 Catanach?

3 A. This is an equation out of the *Petroleum Engineer*
4 *Handbook* to calculate recovery from a solution gas drive
5 reservoir which is below the bubble point, which again the
6 Monument-Tubb is.

7 Basically what it shows is that your total
8 recovery is a function of fluid properties and your
9 produced GOR.

10 We cannot affect the fluid properties at all, and
11 in a solution gas drive reservoir where there's no gravity
12 segregation, we can't affect the producing GORs either.

13 Again, the producing GOR has been 20,000 to
14 30,000 over the life of the reservoir, and it will remain
15 high. Raising the allowable to 10,000 will only matter to
16 the operators, not to the pools' behavior or to the
17 ultimate recovery.

18 Q. So in effect what you're asking is a gas-oil
19 ratio that is below what the actual producing gas-oil ratio
20 has been throughout the life of the pool?

21 A. That's right.

22 Q. And in this situation there couldn't be a
23 negative impact on the reservoir?

24 A. No, sir, I don't see one.

25 Q. Are you seeking permanent rules?

1 A. Yes, we are.

2 Q. In your opinion, would additional data be
3 developed if these were established on a temporary basis
4 that would at any time change or conflict with the
5 information you've presented here today?

6 A. No, sir, the pool is so old and well established
7 there's no additional data that could really change that.

8 Q. In your opinion, will approval of this
9 Application result in the recovery of hydrocarbons that
10 otherwise will be wasted?

11 A. Yes, sir.

12 Q. Is it otherwise in the best interest of
13 conservation, the prevention of waste and the protection of
14 correlative rights?

15 A. Yes, it is.

16 Q. We pay Mr. Trimmer to sneeze whenever we get into
17 a rough spot.

18 A. Bless you.

19 Q. Has notice of this Application been provided as
20 required by Oil Conservation Division rules?

21 A. Yes, it has, to the operators in the pool, the
22 operators within one mile of the pool and all the royalty
23 interest owners also.

24 Q. And have you in response to this received any
25 objection?

1 A. No, sir, I have not. As I said, Conoco expressed
2 no objection verbally, and we heard nothing else from
3 anyone.

4 Q. Has Cross Timbers Oil company expressed support?

5 A. You told me that they have, yes. You got the
6 letter, I didn't.

7 EXAMINER CATANACH: Coaching your witness again,
8 Mr. Carr?

9 MR. CARR: Yes, I am, Mr. Catanach, and I have
10 received the letter from Cross Timbers in support that I
11 would like to also just tender to be included in the
12 record.

13 Q. (By Mr. Carr) Ms. Brelih, were Exhibits 1
14 through 7 prepared by you?

15 A. Yes, sir.

16 MR. CARR: At this time, Mr. Catanach, we would
17 move the admission of Texaco Exhibits 1 through 7.

18 EXAMINER CATANACH: Exhibits 1 through 7 will be
19 admitted as evidence.

20 MR. CARR: And that concludes my direct
21 examination of this witness.

22 EXAMINATION

23 BY EXAMINER CATANACH:

24 Q. Ms. Brelih, looking at Exhibit Number 3 am I
25 correct in understanding that some of those wells are not

1 in the Monument-Tubb Pool?

2 A. No, sir, all of those wells are Monument-Tubb
3 Pool wells.

4 Q. Okay. The wells you mentioned, the one in the
5 northeast of 14, and -- hang on a second --

6 A. And the west half of 15.

7 Q. Right. What did you say about those wells?

8 A. They are Monument-Tubb Pool wells also; they're
9 just outside the official boundaries. And the one in
10 Section 14 is Texaco's and the four in Section 15 are
11 Conoco's.

12 Q. Outside the official boundaries?

13 A. Yes.

14 Q. They're not in the Monument Tubb Pool?

15 A. Not officially, no. For some reason, there's
16 that little window left in Section 15. I'm not familiar
17 with the history of which pieces were added when, but
18 they're within a mile, so they fall under the same rules.

19 Q. Are those recent completions?

20 A. No, sir, nothing in this pool is a very recent
21 completion. Most of them were done in the late Sixties,
22 early Seventies.

23 Q. That is weird. Do you know why Conoco's initial
24 Application for 6000 to 1 was denied?

25 A. Yes, sir. At the time it was thought to be

1 excessive. I think those were the words of the Commission.

2 But again, that was five years after they had
3 just found the pool, so they didn't really know.

4 Q. Do you have any estimates on what the remaining
5 life of the pool or reserves remaining in the pool are?

6 A. No, sir. I would say that we're extending them.
7 We've embarked on a successful workover program in this
8 pool and are putting more contemporary completions on these
9 wells and getting some very good results, but I've not
10 estimated the life.

11 Q. What evidence do you -- Or what data have you
12 looked at to show you there's not a gas cap in this pool?

13 A. Well, again, if you look at both the structure
14 map and the production plot, again on the structure map you
15 don't see the orange dots for those wells with GORs over
16 20,000, consistently at the high points of the structure.
17 Nor do you see the green or blue dots for the lower GORs
18 consistently in the troughs.

19 If it were, for instance, a gas cap, you would
20 consistently see the orange coming down to the green on the
21 edges there.

22 Also, with the GOR being so consistent, a
23 solution gas drive reservoir that is below the bubble point
24 will behave that way where your GOR will build very rapidly
25 to a critical gas saturation and stay there, and I believe

1 that's what we're seeing, and log analysis shows that too.

2 Q. Okay. You mentioned that your -- Is it some of
3 your newer wells, you're not getting -- Are these wells
4 flowing?

5 A. Yes, they are.

6 Q. And you're not being able to produce enough gas
7 to lift the fluid?

8 A. We're right on the borderline, pinched back to
9 888 MCF.

10 Q. About how many wells is this affecting currently?

11 A. Right now three.

12 Q. Three wells. Are all the wells in the pool -- Or
13 how many wells are flowing in the pool, approximately?

14 A. Just a minute.

15 Q. Just one?

16 A. No, no, I'm sorry, wait just a minute, I can
17 answer that question.

18 Q. Just approximately.

19 A. Eight -- Ten.

20 Q. Okay. Are they recompletions or new drills or --

21 A. Some of them are. Some of them are old -- I have
22 three recompletions that are flowing, and there are five or
23 six old ones that are flowing.

24 Q. Will the increase in GOR just delay having to put
25 a pump on these wells?

1 A. I don't know.

2 Q. You don't feel like the oil recovery from this
3 pool is going to be adversely affected by increasing the
4 GOR?

5 A. No, sir, I don't think it will affect it at all.
6 This pool seems to want to produce at a 20,000 to 30,000
7 GOR.

8 EXAMINER CATANACH: I don't have any further
9 questions.

10 MR. CARR: Mr. Catanach, I have all of the
11 letters and return receipts we've sent that I'd be happy to
12 leave with you, if you want them. I do have an affidavit
13 that identifies that these have --

14 EXAMINER CATANACH: Do we need those, return
15 receipts? I guess we can keep them in the file, Mr. Carr.

16 MR. CARR: So I'll tender these to you.

17 And that concludes our presentation in this case.

18 EXAMINER CATANACH: Okay. There being nothing
19 further in Case 10,968, [sic] it will be taken under
20 advisement.

21 MR. CARR: Thank you, Mr. Catanach.

22 (Thereupon, these proceedings were concluded at

23 12:25 p.m.)

24 * * * I do hereby certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 10968.
25 heard by me on May 26 1994.
David L. Catanach, Examiner

Oil Conservation Division

CUMBRE COURT REPORTING
(505) 984-2244


1 CERTIFICATE OF REPORTER

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

6 I, Steven T. Brenner, Certified Court Reporter
7 and Notary Public, HEREBY CERTIFY that the foregoing
8 transcript of proceedings before the Oil Conservation
9 Division was reported by me; that I transcribed my notes;
10 and that the foregoing is a true and accurate record of the
11 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 June 16, 1994.

17
18 
19 STEVEN T. BRENNER
CCR No. 7

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