

1 STATE OF NEW MEXICO  
2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
3 OIL CONSERVATION DIVISION  
4 STATE LAND OFFICE BUILDING  
5 SANTA FE, NEW MEXICO

6 23 August 1989

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Marathon Oil Company for CASE  
10 downhole commingling, Rio Arriba County, 9733  
11 New Mexico.

12 BEFORE: David R. Catanach, Examiner  
13  
14

15 TRANSCRIPT OF HEARING

16 A P P E A R A N C E S  
17

18 For the Division:

19  
20 For Marathon Oil  
21 Company:

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25

## I N D E X

## BRENT LOWERY

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1 MR. CATANACH: We'll call next  
2 Case 9733, application of Marathon Oil Company for downhole  
3 commingling, Rio Arriba County, New Mexico.

4 Are there appearances in this  
5 case?

6 MR. KELLAHIN: Mr. Examiner,  
7 I'm Tom Kellahin of the Santa Fe law firm of Kellahin,  
8 Kellahin & Aubrey, appearing in association with Mr. Larry  
9 Garcia of Marathon Oil Company.

10 We are here to present Case  
11 9733 and I have one witness to be sworn.

12 MR. CATANACH: Any other ap-  
13 pearances? Will the witness please stand and be sworn in?

14  
15 (Witness sworn.)

16  
17 BRENT LOWERY,  
18 being called as a witness and being duly sworn upon his  
19 oath, testified as follows, to-wit:

20  
21 DIRECT EXAMINATION

22 BY MR. KELLAHIN:

23 Q Mr. Lowery, for the record would you  
24 please state your name and occupation?

25 A My name is Brent Lowery and I'm a re-

1       servoir engineer with Marathon Oil Company in Midland.

2                   Q           Mr. Lowery, you in fact reside in Mid-  
3       land?

4                   A           Yes, sir, I do.

5                   Q           And have you on prior occasion testi-  
6       fied as a reservoir engineer before this Division?

7                   A           Not as a reservoir engineer; as a pro-  
8       duction engineer, yes, I have.

9                   Q           What have you studied with regards to  
10      this application to seek approval on your Jicarilla Apache  
11      Lease to downhole commingle some Dakota production with  
12      Mesaverde Production?

13                  A           We've looked at the production records  
14      and reserve estimates for each of the zones and find some  
15      disparity between what we're currently able to produce and  
16      what the Mesaverde, in particular, is capable of producing.

17                  Q           How long have you been studying that --  
18      that issue?

19                  A           Since about July of last year.

20                  Q           Based upon your studies do you now have  
21      recommendations for the Examiner on what to do with cer-  
22      tain of these wells?

23                  A           Yes, sir, I do.

24                               MR. KELLAHIN; We tender at  
25      this time Mr. Lowery as an expert petroleum engineer.

1 MR. CATANACH: He is so qual-  
2 ified?

3 Q Mr. Lowery, let's take your exhibit  
4 package and simply start with Exhibit Number One and show  
5 us how you have organized the wells that you're seeking ap-  
6 proval to downhole commingle the Mesaverde and the Dakota  
7 production.

8 A Okay, Exhibit One, the first five wells  
9 listed with their locations and perforated intervals are  
10 wells that are currently dually completed in the Dakota and  
11 Mesaverde.

12 The second set of six wells are current-  
13 ly single Dakota producers that we propose in the future  
14 possibly to recomplete in the Mesaverde and then downhole  
15 commingle Mesaverde and Dakota production.

16 Q Are you seeking approval in this one  
17 order to allow you to convert the dually completed wells to  
18 wells that are downhole commingled for production of Mesa-  
19 verde and Dakota, as well as a future procedure, then, that  
20 will allow you to commingle the Dakota when these other six  
21 wells are recompleted in the Mesaverde?

22 A Yes, we will.

23 Q When we turn to Exhibit Number Two what  
24 is shown on that exhibit?

25 A This is a list of the offset operators

1 of our Jicarilla Apache Lease.

2 Q All right, let's use Exhibit Number  
3 Three, then, and have you describe Exhibit Number Three for  
4 us.

5 A Exhibit Number Three is a -- is a map  
6 showing Marathon's leases and the surrounding leases for  
7 one section around Marathon's Jicarilla Apache Lease.

8 On the map there are several symbols  
9 over in the legend, if you'll look.

10 The wells that are encircled with a  
11 round circle are the current Mesaverde-Dakota dual comple-  
12 tions.

13 The wells with squares around them are  
14 the proposed recompletions that we would like to downhole  
15 commingle upon completion.

16 And the triangles surround wells that  
17 have had downhole commingling approved already. They are  
18 dual Mesaverde-Dakota producers, also.

19 And also on the map the proration units  
20 for Marathon's leases are shown in the cross hatched out-  
21 line in each of the sections.

22 Q What have you done to satisfy yourself  
23 that the downhole comingling of the Mesaverde and Dakota  
24 formation can be done without jeopardizing reserves or  
25 without violating correlative rights of any interest own-

1       ers?

2                   A           Well, in the requirements of Rule 303-C,  
3       I believe it is, we prepared applications and in the pro-  
4       cess of preparing those applications and gathering the ne-  
5       cessary information we measured the bottom hole pressure in  
6       the Dakota and measured a surface pressure and determined  
7       the fluid level on the Mesaverde side of the dual comple-  
8       tions, and come up with a reservoir pressure that way.

9                   The pressures are almost identical;  
10      they're within a few hundred pounds of each other, in the  
11      range of plus or minus 1100 pounds, and based on that, of  
12      course, we will have cross flow but the fluids -- water is  
13      not produced in any great quantities by either formation  
14      and the fluids are -- are compatible, hydrocarbon gas and  
15      condensate.

16                   Is the ownership common between the  
17      Dakota and the Mesaverde for each of the spacing units?

18                   A           It is.

19                   Q           I believe your plat shows us other wells  
20      by other operators for which the Division has approved com-  
21      mingling of Mesaverde and Dakota wells?

22                   A           Yes, sir.

23                   Q           And how are those shown?

24                   A           Those are shown with the diamond around  
25      them -- triangles, excuse me.

1                   Q           Did the Division express to you a reason  
2 why your applications for administrative approval could not  
3 be approved administratively?

4                   A           We submitted two applications, one for  
5 Jicarilla Apache 14-E, in which the Mesaverde completion  
6 never has produced in commercial quantities since the com-  
7 pletion was made, and also for Jicarilla Apache No. 13-E,  
8 and the reason that these were not approved administra-  
9 tively was because the Dakota is a nonmarginal zone in this  
10 field.

11                  Q           Have you selected one of the wells as  
12 an example or a type well for which to commingle production  
13 on a test basis to see whether or not there was a benefit  
14 to the working interest owners to have that production com-  
15 mingled?

16                  A           The Commission granted us permission for  
17 a 30-day downhole commingling test on the Jicarilla Apache  
18 NO. 14-E Well. This well, of course, has shown the most  
19 dramatic results from downhole commingling and shows what  
20 potential may exist in the other wellbores, although we  
21 wouldn't expect such dramatic results leasewide.

22                  Q           Let's turn to that information.

23                               MR. KELLAHIN: Mr. Catanach,  
24 it is shown by the yellow tab in your exhibit package.  
25 That will be the information, starting with Exhibit Five.



1           Q           Mr. Lowery, before we describe your con-  
2 clusions based upon Exhibit Number Five, show us what it  
3 is.

4           A           Okay. Exhibit Number Five is a decline  
5 curve plot of that commingling test with what we would  
6 expect the Dakota to produce had it been produced by it-  
7 self during the same period.

8                   The uppermost curve on the -- on the  
9 plot there is the total gas rate produced during the test  
10 for the commingled Dakota and Mesaverde zones.

11                   The straight line just underneath it is  
12 our projection of what the Dakota is capable of doing based  
13 on production history on that well.

14                   The next line down represents condensate  
15 production in barrels of condensate per day produced during  
16 this test. This would be commingled Dakota and Mesaverde  
17 condensate production.

18                   And the line at the very bottom of the  
19 plot is what the Dakota normally would produce in terms of  
20 barrels of condensate per day.

21           Q           Have you demonstrated to your satisfac-  
22 tion as an engineer that the gas in the Dakota will allow  
23 you to effectively and efficiently lift the liquids in the  
24 Mesaverde and thereby extend the producing life of the  
25 Mesaverde formation in this well?

1           A           Yes, we have. By looking at each well  
2 on the lease it is a dual Mesaverde-Dakota completion. In  
3 the process of shooting fluid levels on these Mesaverde  
4 completions we did detect a column, a fluid column, above  
5 the perforations and in the 14-E the perforations are plus  
6 or minus 5300 in the Mesaverde and we found a fluid level  
7 at approximately 1000 feet from surface, indicating approx-  
8 imately 4200 feet of fluid level above our perforations.

9                       Again, this well has not been capable of  
10 producing in commercial quantities since it was completed,  
11 although on our other wells we did detect condensate accum-  
12 ulations in the wellbores. Those -- those Mesaverde com-  
13 pletions do not produce condensate as a matter of natural  
14 production. Once in awhile we might get a barrel or two  
15 out of it, but by and large it produces dry gas.

16           Q           In looking at the information available  
17 from all 11 wells, do you see any of the requirements of  
18 the administrative approval order provisions in Rule 303  
19 that you're unable to fulfill or satisfy administratively  
20 other than the issue of the fact that you have a Dakota  
21 zone that is still commercial or a Mesaverde zone that has  
22 not yet been tested?

23           A           (Unclear) on a cash flow basis to pro-  
24 duce. At the present time these wells will still produce  
25 in economic and paying quantities although I'll show later

1 on decline curves, there, that these wells come on and pro-  
2 duce a month -- the whole month continually, that they load  
3 up and die and, in fact, they will be come uneconomic in  
4 the very near future.

5 Q Can we postpone the decision to down-  
6 hole commingling until some future point where both zones  
7 are uneconomic?

8 A The problem with waiting until the  
9 Dakota becomes uneconomic is that there we would lose our  
10 -- our mechanism to produce the fluids out of the Mesa-  
11 verde that are causing the loading and the decrease in pro-  
12 duction.

13 The Dakota produces a much drier gas,  
14 which is much lower -- or much higher GOR than the Mesa-  
15 verde, and if we wait until that gas supply is depleted and  
16 then at some time in the future artificially lift the Mesa-  
17 verde, that -- that technique would not be economical be-  
18 cause the Mesaverde reserves that are remaining wouldn't  
19 justify any great expenditure to produce them.

20 Q What other alternative means have you  
21 examined as an engineer to see if there was another choice,  
22 other than downhole commingling to capture these reserves?

23 A Most of these wells have 4-1/2 inch  
24 casing and that severely limits the options that are pos-  
25 sible at all.

1                   If we -- the one option there is would  
2 -- right now, would be to, you know, be able to produce  
3 both zones simultaneously and generate a return on our in-  
4 vestment, would be to run two strings of tubing.

5                   There's a couple of problems with that.  
6 One, the cost of the new tubing strings. We'd have to buy  
7 about 12,000 feet of tubing, small diameter tubing that's  
8 more expensive than the standard sizes. It would cost us  
9 about \$80,000 to buy the tubing and then install it.

10                  Also, physically in that area this gas  
11 does produce a small amount of CO<sub>2</sub>, enough to cause corro-  
12 sion damage to higher strength tubulars that would be re-  
13 quired to run to a depth of 7200 feet, which is where our  
14 Dakota perforations are.

15                  J-55 physically is not capable of being  
16 run that deep and especially not in the dual completion  
17 situation where you have packers and that sort of thing  
18 that would be required to isolate the zones.

19                  And also, for the amount of reserves  
20 we're talking about potentially recovering, I ran the econ-  
21 omics with the 100-million remaining in reserves, where in  
22 reality we're looking at more on the order of 50-million  
23 per well for the wells we're talking about. At current gas  
24 prices we'd never see a positive cash flow from that in-  
25 vestment.

1           Q           Does downhole commingling, then, repre-  
2 sent the best and most viable alternative for -- for ulti-  
3 mate recovery of production from both of the formations?

4           A           It's certainly the most viable one;  
5 probably the only choice now or at any time in the future.

6           Q           Have you attempted to quantify the addi-  
7 tional reserves that you might not otherwise recover if the  
8 Commission does not approve the downhole commingling?

9           A           Yes, I have. In the attachments marked  
10 Exhibit Five, the second and third sheets are a xeroxed  
11 copy of some information out of Dwight's. It's P/z and  
12 rate/cum data and there also is shown on there cumulative  
13 production.

14                       Using accepted techniques of P/z analy-  
15 sis on, in particular, the Jicarilla Apache No. 9-E, we  
16 show an ultimate recovery of about 205-million cubic feet  
17 of gas and I'd like to point out for our discussion here  
18 that in the last quarter, last half of 1987 Northwest  
19 Pipeline in- advertently reported to Marathon in the five  
20 dual completion wells, they inadvertently reported Dakota  
21 production as Mesaverde production. They got the meter  
22 numbers switched somehow, but the cumulative production on  
23 those wells as shown in these plots is different. It's  
24 lower, in particular on the No. 9-E, the cumulative pro-  
25 duction on that is about 154-million as opposed to the

1 almost 169-million shown on the plot.

2 The ultimate recovery based on the P/z  
3 analysis is about 205-million cubic feet. That well has  
4 produced about 154-million cubic feet, which leaves us  
5 about 50-million cubic feet remaining to be recovered.

6 The last --

7 Q Just so I'm clear on the 9-E Well, what  
8 portion of that gas production ultimately would not be  
9 recovered if the downhole commingling of the Dakota and the  
10 Mesaverde was not approved?

11 A Okay. If you'd like to look at the last  
12 page in that document, it's a decline curve showing the  
13 past -- past four months, we've gotten a settlement out of  
14 Northwest Pipeline. We're now able to move that gas and  
15 even with a marginal well we're able to produce that well  
16 for the entire month for each month we have a contract for  
17 the gas.

18 There's a line drawn through the last  
19 four months of production and up in the upper righthand  
20 corner there's a decline rate calculation, and the remain-  
21 ing reserves projected based on this decline is about 9-  
22 million cubic feet. So the amount of gas in jeopardy in  
23 this particular case is about -- it comes out to be about  
24 49-million cubic feet, 41-million cubic feet in jeopardy.

25 And a similar analysis was done for the

1 Jicarilla Apache No. 16-E.

2 Q That will be the next -- the next P/z  
3 plot after the 9-E is the 16-E?

4 A Right.

5 Q All right, and you've shown ultimate  
6 recovery on your decline of 120 --

7 A Right.

8 Q -- MMCF?

9 A And the cumulative production on this  
10 well is actually 64,600,000 as opposed to the 95-million  
11 shown by Dwight's.

12 Q Okay, and on your decline curve for the  
13 16-E, what do you show for the remaining recoverable?

14 A We show about a million cubic feet re-  
15 maining recoverable.

16 Q So that puts at risk some 63-million?

17 A Right, that's correct.

18 Q In the event downhole commingling is not  
19 approved.

20 A That's correct.

21 Q In your opinion is the information de-  
22 rived from analysis of Well 16-E and the 9-E Well, is that  
23 going to be typical or characteristic of the other wells  
24 that you're seeking downhole commingling approval for?

25 A Yes, it is. It's characteristic of

1 those and also characteristic of the offsets that have had  
2 downhole commingling approved for them.

3 Q How would you propose the Division  
4 Examiner set up a percentage for allocating production be-  
5 tween the Dakota and the Mesaverde?

6 A This was -- has been done in what's  
7 marked Exhibit Four. Those are the five applications for  
8 our five existing wells and the percentage lists were  
9 determined based on previous Mesaverde and Dakota produc-  
10 tion.

11 Q From that well?

12 A From -- from each of the individual  
13 wells.

14 Q And we're talking about the five that  
15 are already dualled wells.

16 A Right.

17 Q So you've taken --

18 A These were based on the two completions  
19 in each of those wells, so each -- each split is unique to  
20 each wellbore.

21 Q How would you propose a method for allo-  
22 cating production for the other six wells for which you  
23 have not tested or completed in the Mesaverde?

24 A I would propose that we be allowed to  
25 complete and test the Mesaverde and see what kind of pro-



1       duction we'd be able to get from that and then determine  
2       our split at that point.

3                       But, you know, if -- if we had to have  
4       the percentage split before that information was avail-  
5       able, I would -- I would recommend we take an average of  
6       the five wells that are completed and use that split.

7               Q           There is no unusual expense or diffi-  
8       culty for Marathon as the operator to individually test the  
9       Mesaverde formation before you commingle it with the ex-  
10      isting Dakota production?

11              A           During the process of completion we  
12      would do that, anyway, so that poses no hardship.

13              Q           Was the information shown in Exhibits  
14      One through Five either prepared by you directly or com-  
15      piled under your direction and supervision, or represent  
16      documents available from the files of Marathon or the Oil  
17      Conservation Division?

18              A           Yes, they are.

19              Q           And to the best of your knowledge is the  
20      information shown true and accurate?

21              A           Yes, sir, it is.

22                               MR. KELLAHIN:   We move the  
23      introduction of Exhibits One through Five.

24                               MR. CATANACH:   Exhibits One  
25      through Five will be admitted as evidence.

1 MR. KELLAHIN: That concludes  
2 our examination of Mr. Lowery.

3  
4 CROSS EXAMINATION

5 BY MR. CATANACH:

6 Q Mr. Lowery, do each of these separate  
7 applications have all the required information needed to  
8 process these --

9 A Yes, sir, they do, with the exception  
10 of, I believe, the last three. I don't believe we got a  
11 map attached, but Exhibit Three should suffice for that.

12 Q Is Marathon the only working interest  
13 owner on the Jicarilla Apache Lease?

14 A Yes, sir, we are.

15 Q Do you know which of these wells is  
16 currently nonmarginal in the Dakota formation?

17 A All five --

18 Q All five of them are?

19 A -- of them are nonmarginal in the  
20 Dakota.

21 Q Have you got production -- some produc-  
22 tion tests on that?

23 A Yes, sir, there's a decline curve for  
24 each completion attached to each of the applications.

25 Q Are all of these five wells considered

1 marginal in the Mesaverde?

2 A With the exception of No. 8-E. No. 8-E  
3 is also nonmarginal in the Mesaverde.

4 We do have evidence that, you know, by  
5 means of the fluid level surveys, that we do -- are getting  
6 an accumulation of fluid in that wellbore, as well. While  
7 the production now is nonmarginal, we anticipate sometime  
8 in the near future that it will become marginal.

9 Q You've got fluid accumulation in all  
10 five of your wellbores?

11 A Yes, sir, we do.

12 Q All right. Both these are prorated gas  
13 pools. Do you know what the status of the -- well, what I  
14 want is do you know if there is any under or over  
15 production in any of these zones currently?

16 A Currently the Dakota is overproduced.

17 Q Which wells?

18 A In all five, I believe. I'm not sure,  
19 with the exception of No. 9-E what -- how much overproduced  
20 they are, but I know No. 9-E would produce about 3 days a  
21 month because it's right at the 12 times overproduced  
22 limit.

23 Our problem there, of course, is with,  
24 you know, take or pay problems with Northwest and they had  
25 it shut in for quite some time and we just haven't been

1 able to generate a great deal of allowable and now that  
2 we're able to produce, they reach their overproduced status  
3 pretty quickly.

4 Q What's going to happen if -- if you have  
5 to shut the well in? It's downhole commingled and you have  
6 to shut the well in due to overproduction? Is that going  
7 to cause any loss of reserves?

8 A That's not going to cause any loss of  
9 reserves. It will just, you know, one pool's going to  
10 limit the production from the other but ultimately it will  
11 -- at some period in the future that over -- overproduction  
12 status in the -- should -- it should come into balance  
13 where they'll be both overproduced in the same amount or  
14 underproduced, or whatever the case may be in the future.

15 That -- I'd like to mention that that  
16 shouldn't cause any loss of reserves. It will just be an  
17 inconvenience for Marathon to schedule production from  
18 those wells.

19 Q The six other wells that are -- that are  
20 not currently dually completed, those are all Dakota pro-  
21 ducers, are they not?

22 A Yes, sir, they are.

23 Q Are those, all of those nonmarginal in  
24 the Dakota?

25 A I'm not for certain about all of them

1 but I'm pretty sure that they are all nonmarginal.

2 I would have to check.

3 Q Is the fluid accumulation problem some-  
4 thing that gets worse over time as you produce these wells,  
5 as the pressure depletes?

6 A That's right. As the pressure depletes  
7 and you get less rate through that annular -- annular com-  
8 pletion, you lose the ability to -- well, your ability to  
9 move liquids up that annulus decreases.

10 Q The six proposed Mesaverde completions,  
11 do you anticipate that you'll have that problem right off,  
12 right when you complete it?

13 A To some extent we should. You know, for  
14 instance, the 14-E has had that problem from the very start  
15 and the other -- the others, with the exception of Number  
16 8-E, have also had -- had varying degrees of liquid  
17 loading, you know, ever since they were completed.

18 If you look back on the production  
19 curves you can see that cycle. When they come on they fall  
20 off pretty quick and then they'll be shut in for a period  
21 and come back at a higher rate and then again log off.

22 Q Uh-huh.

23 A The problem that we have out here is the  
24 Mesaverde is shallower so it has to be produce up the  
25 casing/tubing annulus, which has a cross sectional area

1 that's several times greater than if it were allowed to  
2 produce up the tubing. There's just not enough gas velo-  
3 city to move the -- move the liquids, and the Mesaverde  
4 does make quite a bit of liquid.

5 Q You did a calculation that you'd lose,  
6 you might lose some reserves in the 9-E and 16-E. Did you  
7 do that on all the other wells, or just those two?

8 A Just those two but a similar situation  
9 would apply to the rest of them.

10 Q Now, how would you propose to allocate  
11 production when you open up the Mesaverde in those six  
12 additional wells?

13 A We would make a production test upon  
14 completion in the Mesaverde and probably produce it by it-  
15 self for, hopefully, a period of several months, and deter-  
16 mine how it's going to perform and then base the production  
17 split on that test on the Mesaverde with production history  
18 from the Dakota and come up with an allocation that way.

19 Q So you would test that for a period of  
20 time before you actually commingled?

21 A Right.

22 Q Your allocation formulas in your five  
23 existing dually completed wells, is that based on produc-  
24 tion history?

25 A Right, it is, with the exception of the

1 14-E.

2 Q Which is based on -- which is based on  
3 what?

4 A If I could have just a minute to look at  
5 the application?

6 The allocation for the No. 14-E was  
7 based on that 30-day commingling test.

8 Q That -- was that the well that the Mesa-  
9 verde was not produced at all?

10 A That's correct. And that 30-day test is  
11 the only real information that we had, or data we had, to  
12 base our production split.

13 Q So the only increase that you got in  
14 that test, you just allocated to the Mesaverde.

15 A That's correct.

16 Q What about the condensate produced from  
17 those two zones, would it be in the same proportion as the  
18 gas?

19 A No, it wouldn't.

20 Q Is there a --

21 A That's one item we didn't address in the  
22 application and it's an oversight on our part.

23 Q So we don't have any information on what  
24 to allocate the liquids?

25 A Well, based on the test, it looks like

1 90 percent of the condensate, roughly, should be attri-  
2 buted to the Mesaverde and the remaining 10 percent to the  
3 Dakota.

4 Q That's on the 14.

5 A Right.

6 Q Should that apply in all the other  
7 wells?

8 A In the other wells it should be similar  
9 to -- to what the Dakota produces, but there again, we have  
10 no condensate production on the Mesaverde completion, so we  
11 have nothing to compare it with, because the Mesaverde  
12 won't unload the condensate, which is the cause of our  
13 problems.

14 Q Go over that again for me. 90 percent  
15 to the Mesaverde for the liquids and 10 percent to the  
16 Dakota.

17 MR. CATANACH: I think that's  
18 all I have of the witness.

19 MR. KELLAHIN: Mr. Examiner,  
20 we have as an Exhibit Six the notification to the offset  
21 operators. While the certified mailings were sent to all  
22 of them, I have come over here without the last two cards,  
23 so I'd like to give you a copy of Exhibit Six and then to-  
24 morrow bring over the completed returns. I have not  
25 brought with me the last two cards which we've received



1 back, so I need to give you the cards for Southern Union  
2 Exploration and Meridian Oil, Inc., which we've received,  
3 and I simply neglected to bring with me.

4 MR. CATANACH: Okay. We'll  
5 admit Exhibit Number Six in that case.

6 Is there anything further in  
7 Case 9733?

8 MR. KELLAHIN: No, sir.

9 MR. CATANACH: It will be  
10 taken under advisement.

11  
12 (Hearing concluded.)  
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## C E R T I F I C A T E

I, SALLY W. BOYD, C. S. R. DO HEREBY  
CERTIFY that the foregoing Transcript of Hearing before the  
Oil Conservation Division (Commission) was reported by me;  
that the said transcript is a full, true and correct record  
of the hearing, prepared by me to the best of my ability.

Sally W. Boyd CSR

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 9733,  
heard by me on August 23 1988.

David R. Catanzaro, Examiner  
Oil Conservation Division