

IN THE MATTER OF: )  
 )  
APPLICATION OF STEVENS OPERATING )  
CORPORATION FOR APPROVAL OF SALT ) CASE NO. 10199  
WATER DISPOSAL, CHAVES COUNTY, )  
NEW MEXICO, )  
 )  
 )

HUNNICUTT REPORTING  
1660 OLD PECOS TRAIL, SUITE F  
SANTA FE, NEW MEXICO 87501 (505) 982-9770

## I N D E X

January 10, 1991  
Examiner Hearing  
Case No. 10199

PAGE

APPEARANCES

3

## APPLICANT'S WITNESSES:

DONALD G. STEVENS

Direct Examination by Mr. Carr

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Examination by Examiner Catanach

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## APPLICANT'S EXHIBITS:

MRKD

ADMTD

1.

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

BEFORE: DAVID R. CATANACH, Hearing Examiner

FOR THE DIVISION: ROBERT G. STOVALL, ESQ.  
General Counsel  
Oil Conservation Commission  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

FOR THE APPLICANT: CAMPBELL & BLACK, P.A.  
Attorneys at Law  
BY: WILLIAM F. CARR, ESQ.  
110 North Guadalupe  
Suite 1  
Santa Fe, New Mexico 87501

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1 EXAMINER CATANACH: At this time, we'll call case 10199.

2 MR. STOVALL: Application of Stevens Operating  
3 Corporation for approval of salt water disposal, Chaves  
4 County, New Mexico.

5 EXAMINER CATANACH: Appearances in the case?

6 MR. CARR: May it please the examiner. My name is  
7 William F. Carr with the law firm Campbell & Black, P.A. of  
8 Santa Fe. I represent Stevens Operating Corporation. I would  
9 request the record reflect that my witness Donald G. Stevens  
10 has previously been sworn and remains under oath.

11 EXAMINER CATANACH: The record shall reflect that.

12 DONALD G. STEVENS

13 the Witness herein, having been previously sworn, was examined  
14 and testified as follows:

15 DIRECT EXAMINATION

16 BY MR. CARR:

17 Q. Will you state your name for the record, please.

18 A. Donald G. Stevens.

19 Q. Mr. Stevens, you are the operator of the proposed  
20 salt water disposal well which is the subject of this case?

21 A. That's correct. Stevens Operating Corporation is.

22 Q. Are you familiar with the application filed in this  
23 case and the proposed disposal well?

24 A. I am.

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

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1 EXAMINER CATANACH: They are.

2 Q. (By Mr. Carr:) Would you briefly state for Mr.  
3 Catanach what Stevens Operating Corporation seeks with this  
4 application?

5 (Applicant's Exhibit No. 1 was  
6 marked for identification.)

7 A. We propose to convert a currently shut in gas well  
8 called the Stevens Operating Corporation Number 1 Hanlad state  
9 located in the northeast quarter, southwest quarter Section  
10 16, Township 10 South, Range 27 East to an injection well to  
11 inject into the Fusselman formation the produced water from  
12 the Stevens Operating Corporation McBride states numbers 1, 2,  
13 and 3 wells located in Section 28, same township and range.

14 The page 3 of Exhibit 1, which is the Exhibit 1  
15 being the C-108 as required by the OCD, shows the schematic of  
16 the proposed injection well in that Hanlad state well. It  
17 shows that the surface casing and intermediate casing was  
18 circulated, shows the perforations in the currently shut in  
19 Pennsylvanian gas zones, shows the perforations in the  
20 Fusselman formation for injection of the produced salt water  
21 therein.

22 This is a little unusual in that we would like to  
23 keep the shutin gas well available for producing at a later  
24 date. We currently have a packer at 6795, and the  
25 perforations in the Pennsylvanian zone are above that. We

1 would propose putting in another packer above those  
2 perforations and in fact having two packers with the gas zone  
3 sealed off from the annulus and from the injection zone. The  
4 reason for that is, one, there is some gas in there. It's not  
5 very prolific, but it certainly has some value. There is no  
6 other well in the nearby area where we can inject water to a  
7 good aquifer in the area such as the Fusselman in this well.  
8 And at some time in the future, we would propose to produce  
9 the well. We feel this methodology would allow us to save  
10 that zone for further production at a further time.

11 Now the original idea we had was to produce that  
12 well up the annulus or through another string. However, the  
13 well makes enough water that it needs to have an annulus of  
14 its own. So we don't think we could make a dual out of it,  
15 which is the reason for setting it up at this time.

16 Q. Exhibit 1, the C-108, was prepared by you?

17 A. Yes.

18 Q. Was this C-108 provided to all leasehold operators  
19 within a half mile of this proposed disposal well?

20 A. Yes, it was.

21 Q. Was a copy also provided to the surface owner?

22 A. It was.

23 Q. And was it provided by certified mail?

24 A. It was.

25 Q. Who is the surface owner?

1           A.     It's Plains Producing or the Wintonburg estate.  
2     They own all the fee acres to the east, and they own the state  
3     lease on which this well is located.

4           Q.     What is the current status of this well?

5           A.     It is currently receiving under a C-103 approval  
6     from the Artesia office water, produced water, from the  
7     McBride wells on a testing basis to see if it will take it in  
8     the manner we would hope, and it is. It's taking all the  
9     water on a vacuum.

10          Q.     When we look at the well data sheet for the  
11     proposed disposal well, do you propose to fill the annular  
12     space with an inert fluid?

13          A.     We do and with a corrosion inhibitor.

14          Q.     And will there be a pressure gauge at the surface  
15     which will enable you to monitor the pressure in the annular  
16     space as required by the federal underground injection control  
17     program?

18          A.     Yes, and it will be monitored daily.

19          Q.     And in this well, are you proposing to use lined  
20     tubing? Or, again, do you request authority, as you did in  
21     the immediately preceding case, to use unlined tubing?

22          A.     In the immediately preceding case, we would like to  
23     use the unlined tubing and use a corrosion inhibitor on the  
24     same basis and the same reasoning as the previous case. We  
25     have to use corrosion inhibitor and scale inhibitor to quite a

1 large degree in our heater treaters to break the water out  
2 from the oil. The oil is very paraffinic and requires  
3 considerable treatment and heat to properly break the oil out.  
4 As a consequence, the scale goes up with the temperature. We  
5 therefore have a fair amount of corrosion inhibitor and scale  
6 inhibitor in the water going to this well. We will inject and  
7 currently are injecting additional corrosion inhibitor and  
8 scale inhibitor in order that the well may be protected  
9 without the lining as we had stated in our previous hearing.

10 MR. STOVALL: Mr. Carr, excuse me just a minute. The  
11 word you used was paraffinic? I'm not sure the reporter got  
12 that.

13 THE WITNESS: Sorry.

14 Q. (By Mr. Carr:) Do you believe the program for  
15 completing the well you have recommended will enable you to  
16 assure that you do not have unusual or unique problems with  
17 corrosion in the well?

18 A. Well, we believe so. And in fact as a cross-check,  
19 of course, we will have the corrosion coupons by which we will  
20 gauge how effective our corrosion inhibition program is and  
21 increase it or decrease it depending upon how those coupons  
22 come out. And as stated in the previous hearing, at such time  
23 that enough metal has been removed by corrosion from the  
24 coupons and obviously the tubing, we would propose to replace  
25 the tubing prior to a hole or a catastrophic failure which



1 might result from corrosion otherwise.

2           The concern we have, as in the same way as with  
3 lined tubing, you usually just inject until you get a hole.  
4 We would hope that this methodology would enable us to replace  
5 the tubing before we got such a hole, not necessarily that it  
6 will.

7           Q.     What type of stimulation program do you propose for  
8 the well?

9           A.     It has previously been stimulated with 2,500  
10 gallons of acid, 15 percent.

11          Q.     And you anticipate nothing more being needed at  
12 this time?

13          A.     Well, the only time we would would be if we  
14 experienced higher pressures which would indicate we have some  
15 plugging action. And the usual remedy is just additional  
16 stimulation with 15 percent acid.

17          Q.     Would you refer to page 5 of the C-108 which is a  
18 plat and review that for Mr. Catanach.

19          A.     This plat shows the area of review, a circle  
20 one-half mile in radius around the wellbore. No wells in the  
21 Devonian are within that area of review. There are two  
22 shallow wells producing out of the San Andres within the area  
23 of review. The one well just outside the area of review, we  
24 have checked. That's the original Honolulu well in the  
25 southeast southeast of Section 16. And that well was properly

1 plugged at the time with a cement plug just above the  
2 Fusselman formation.

3 Q. Now if we go to the schematic drawing that  
4 immediately follows this plat, which well is that?

5 A. That is the Mountain States, the Honolulu well as a  
6 matter of fact. Even though it's not within the area of  
7 review, we did include it here. And it shows a cement plug  
8 between 6700 and 6780.

9 Q. And this shows all the plugging details required by  
10 form C-108?

11 A. It does.

12 Q. At what rates do you have propose to inject in this  
13 well?

14 A. 1,000 barrels a day average, 2,880 barrels a day  
15 proposed maximum rate.

16 Q. And the system will be closed?

17 A. It will be closed with gas links on all tanks.

18 Q. Do you anticipate that the well will receive this  
19 volume under gravity, or do you anticipate having to put  
20 pressure on the well?

21 A. It is currently under gravity. The testing has  
22 worked out that there is no pressure required. Possibly some  
23 day there will be either through plugging or conceivably  
24 through fill up. And in that case, again, our current pump is  
25 750 pounds rated. We wouldn't mind having the .2 pounds per

1 foot of depth maximum. We wouldn't anticipate using that very  
2 much very often.

3 Q. But you believe that you could satisfactorily  
4 inject under that pressure and still keep the water in the  
5 injection interval?

6 A. Yes.

7 Q. Now, again, would you state what the source of the  
8 fluid is that you propose to inject in this well?

9 A. It's from the Fusselman formation in the McBride  
10 state wells in Section 28 some one and a half miles south.  
11 And that is out of the Fusselman.

12 Q. And so there would be no reason to anticipate any  
13 problems with the compatibility of the injected fluid with  
14 fluids in the formation?

15 A. Should be none.

16 Q. And in the C-108 on page 8 is a Water Analysis  
17 Report. Could you go to that and simply identify and review  
18 that briefly for Mr. Catanach.

19 A. Briefly, it shows that it is salt water. It  
20 doesn't freeze as one would expect. Relatively fresh salt  
21 water freezes. It froze quite a bit in December because the  
22 waterline is on top of the ground. And this analysis report  
23 does not go into the scaling or corrosion potential.

24 We have a report, quite a lengthy one, that states  
25 that the well, the water is subject to moderate scaling

1 potential when heated to 120 degrees. That's the temperature  
2 that we heat in our heater treaters necessary to break out the  
3 oil from the water. That also is about the bottom hole  
4 temperature of some 128 degrees in the McBride wells.  
5 Therefore, we feel that the scaling and corrosion potential is  
6 moderate, definitely is there, and should be treated for the  
7 tubing's sake and the injection well's sake.

8 Q. Are there any fresh water wells in the area?

9 A. There are none. There was one one mile east in the  
10 northeast, southeast quarter of Section 15 which was drilled  
11 to 98 feet by the rancher and showed, I think it was, 145  
12 parts per million chloride, relatively fresh water.

13 Q. This was in the Yates formation?

14 A. Yates formation. That well however has gone dry,  
15 and the rancher currently pumps water to it from some five  
16 miles away. There are no other water wells or fresh water in  
17 the area to our knowledge.

18 Q. No underground source of drinking water that you  
19 are aware of?

20 A. No. I would suspect there are some occasional  
21 wells like this one there, like that one in Section 15 in the  
22 shallow sands and formations occasionally. But none have been  
23 developed in the area.

24 Q. And the closest one is a mile to the east?

25 A. Yes.

1           Q.     Let's go to the 10th page of this C-108, the log  
2 sections, and I would ask you to review those for Mr.  
3 Catanach.

4           A.     Those logs are on the injection well. They  
5 demonstrate through the neutron density the tremendous  
6 porosity in this Dolomite formation. The permeability log,  
7 the Dual Laterolog, Micro-SFL on the right, shows the  
8 tremendous permeability and the tremendous water in the  
9 perforated interval from 6904 to 44. Again, this reservoir is  
10 a wonderful injection reservoir. It's an ocean of water down  
11 there that covers all of Chaves and Lea Counties, northern Lea  
12 certainly or southern Roosevelt. And we should have no  
13 problem injecting into it without undue pressures.

14          Q.     Are all logs on the subject well on file with the  
15 Oil Conservation Division?

16          A.     They are.

17          Q.     Mr. Stevens, you've examined the available  
18 engineering and geologic data on this area. And as a result  
19 of this examination, have you discovered any evidence of  
20 faulting or other hydrologic connections between the injection  
21 zone and any underground source of drinking water?

22          A.     We don't believe there could be. The only surface  
23 fault nearby is the Diablo Dike about three-quarters of a mile  
24 north. And that is believed sealed by the tertiary  
25 intrusives, which probably caused the dike in the first place.

1 And there's no connection between this injection zone at 6700  
2 feet and the surface waters that we know of or could conceive  
3 of.

4 (Applicant's Exhibit No. 2 was  
5 marked for identification.)

6 Q. Is Exhibit Number 2 an affidavit and attached  
7 letters confirming that notice of today's hearing has been  
8 provided in accordance with OCD rules?

9 A. Yes, it is.

10 Q. In your opinion, will granting this application be  
11 in the best interests of conservation, the prevention of  
12 waste, and the protection of correlative rights?

13 A. I do.

14 Q. Were Exhibits 1 and 2 prepared by you or compiled  
15 under your direction and supervision?

16 A. They were.

17 MR. CARR: At this time, Mr. Catanach, we would move the  
18 admission of Stevens Operating Corporation Exhibits 1 and 2.

19 EXAMINER CATANACH: Exhibits 1 and 2 will be admitted as  
20 evidence.

21 (Applicant's Exhibits Nos. 1 and 2  
22 were admitted into evidence.)

23 MR. CARR: That concludes my direct examination of Mr.  
24 Stevens.

25 EXAMINATION

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1 BY EXAMINER CATANACH:

2 Q. Mr. Stevens, was the proposed injection well  
3 originally drilled to test the Fusselman?

4 A. Yes, it was.

5 Q. Was it initially completed in the Fusselman?

6 A. No. It was originally completed in the  
7 Pennsylvanian. Fusselman wasn't tested because it was a  
8 seismic fiasco. It was 500 feet low to projections. So the  
9 logs indicate water, and the structural position indicate  
10 water. The Diablo field, the Fusselman field to the south,  
11 again, some 300 to 500 feet higher structurally, obviously is  
12 separated from this injection well by faulting or faults, one  
13 or more faults. We feel there could be no connection between  
14 this zone and the producing zone to the south in the Diablo  
15 Fusselman pool.

16 Q. This well was tested in the Fusselman?

17 A. Was not.

18 Q. These perforations, those are the proposed  
19 injection perforations?

20 A. Well, they're actually the current injection  
21 perforations which we received from the OCD Artesia to test  
22 and see if the zone would take the water as anticipated.

23 Q. I see. What was the well producing from the Penn  
24 when it was abandoned?

25 A. I think it was -- oh, it may have produced

1 something on the order of 300,000 a day. The calculated AFC  
2 at open flow was somewhere around a million, but the maximum  
3 it might have produced would, in our opinion, have been around  
4 300,000 cubic feet of gas per day with about six barrels of  
5 water, which was worrisome, made us feel that the reserves  
6 were going to be relatively low.

7 Q. Have you calculated the reserves?

8 A. No, we haven't. We feel it would be an exercise in  
9 futility with that water. The big question is we could make a  
10 volumetric calculation, but we feel it would be not worthwhile  
11 inasmuch as the water would presumably kill it within a  
12 relatively short time. But that again is conjecture.

13 Q. How long do you propose to utilize the well for  
14 injection?

15 A. We don't know. We'd like to use it as long as it  
16 is necessary to move the produced water in the Diablo  
17 Fusselman field. There is another well in the San Andres  
18 which this commission has approved for Hanson Oil Company  
19 which takes part of the producing water. But it's not enough.  
20 We're making more water than that well can handle, and that  
21 was the reason for using this well.

22 Q. Your current well configuration would allow you to  
23 come back later on and possibly produce the Penn reserves?

24 A. Yes, we believe that the Penn reserves can't be  
25 hurt by being shut in with the dual packer system. Currently



1 we only have one packer in below the Penn zone, but we would  
2 propose pulling that and putting the additional packer in  
3 subject to your order and approval.

4 Q. If in fact you do have a packer or tubing failure,  
5 the Penn zone would be subject to some water damage or --

6 A. It is possible. It certainly could take some  
7 water. I can't imagine that the damage would be that much.  
8 Those sands to our knowledge are not water-sensitive. But,  
9 yes, it could possibly suffer some damage, but not any  
10 long-term damage. It would probably just requiring more  
11 swabbing to bring the oil in.

12 Q. Mr. Stevens, how would you determine if you had a  
13 failure in your bottom packer?

14 A. We wouldn't be able to do that. And to our mind,  
15 that's another reason for using the corrosion coupon  
16 methodology to make sure that the tubing was changed before  
17 the metal was reduced to a point where a failure was likely by  
18 corrosion.

19 Of course, we'll be able to determine in setting  
20 the bottom packer initially if it's a good seat before setting  
21 the upper packer. But subsequent failure we would not be able  
22 to determine. I wouldn't anticipate much likelihood of its  
23 failure and that such failures would probably be in the upper  
24 packer or from the upper part of the hole.

25 Q. Do you know when the Honolulu well was plugged and

1 abandoned?

2 A. I think it was 1951, '50 or '51.

3 EXAMINER CATANACH: I believe that's all I have of the  
4 witness. The witness may be excused. Anything further in  
5 this case?

6 MR. CARR: Nothing further.

7 EXAMINER CATANACH: 10199 will be taken under advisement.

8 (The foregoing hearing was adjourned at the approximate  
9 hour of 10:50 a.m.)

10  
11  
12  
13  
14  
15  
16 I do hereby certify that the foregoing is  
17 a complete record of the proceedings in  
18 the Examiner hearing of Case No. 10199,  
19 heard by me on January 10, 1991.  
20 David P. Catanach, Examiner  
21 Oil Conservation Division  
22  
23  
24  
25

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

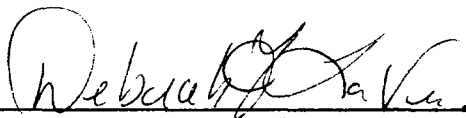
3 REPORTER'S CERTIFICATE

4  
5  
6 I, DEBORAH F. LAVINE, RPR, a Certified Court  
7 Reporter and Notary Public, DO HEREBY CERTIFY that I  
8 stenographically reported these proceedings before the Oil  
9 Conservation Division; and that the foregoing is a true,  
10 complete and accurate transcript of the proceedings of said  
11 hearing as appears from my stenographic notes so taken and  
12 transcribed under my personal supervision.

13 I FURTHER CERTIFY that I am not related to nor  
14 employed by any of the parties hereto and have no interest in  
15 the outcome hereof.

16 DATED at Santa Fe, New Mexico, this 11th of  
17 February, 1991.

18  
19  
20  
21  
22 My Commission Expires:  
23 August 6th, 1993

  
DEBORAH F. LAVINE, RPR  
Certified Court Reporter  
CCR No. 252, Notary Public

24  
25  
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DEBORAH F. LAVINE, CCR, RPR