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I N D E X

PATRICK TOWER

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PATRICK GAUME

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1

2

MR. QUINTANA: Call next Case

3

8659.

4

MR. TAYLOR: Application of

5

Santa Fe Energy Company for salt water disposal, Lea Coun-

6

ty, New Mexico.

7

MR. BRUCE: Mr. Examiner, my

8

name is Jim Bruce from the Hinkle Law Firm in Santa Fe, and

9

I have two witnesses to be sworn.

10

MR. QUINTANA: Are there fur-

11

ther appearances in Case 8659?

12

If not, would you have your

13

witnesses please stand and be sworn in at this time?

14

15

(Witnesses sworn.)

16

17

MR. QUINTANA: You may proceed.

18

19

PATRICK TOWER,

20

being called as a witness and being duly sworn upon his

21

oath, testified as follows, to-wit:

22

23

DIRECT EXAMINATION

24

BY MR. BRUCE:

25

Q

Would you please state your name, ad-

1 dress, occupation, and employer?

2 A My name is Patrick Tower. I'm a Senior  
3 Landman with Santa Fe Energy Company in Midland, Texas.

4 Q Have you previously testified before the  
5 OCD as a landman and had your credentials accepted as a mat-  
6 ter of record?

7 A Yes, I have.

8 Q Are you familiar with Case 8659 and the  
9 land matters involved in this case?

10 A Yes, I am.

11 MR. BRUCE: Mr. Examiner, is  
12 the witness considered qualified?

13 MR. QUINTANA: Yes, he is. You  
14 may proceed.

15 Q Mr. Tower, would you briefly state what  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 Santa Fe Energy Company seeks by this application?

2 A Santa Fe Energy Company seeks authority  
3 to convert its Santa Fe Pacific Railroad No. 15 Well to a  
4 salt water disposal well and to use the well to dispose of  
5 produced salt water into the San Andres formation at approx-  
6 imate depth of 5000 feet.

7 The Santa Fe Pacific Railroad Well No. 15  
8 is located in Unit B of Section 34, Township 9 South, Range  
9 37 East, in Lea County, New Mexico.

10 This well is currently an uneconomical  
11 producer being pumped less than one day per month.

12 The Santa Fe Pacific Railroad No. 15 Well  
13 will replace the Santa Fe Pacific Railroad No. 6 Well, which  
14 was a salt water disposal well used by Santa Fe and which  
15 was plugged and abandoned March 13th, 1985, due to casing  
16 and tubing problems.

17 The Well No. 6 was located in Unit D of  
18 Section 33, Township 9 South, Range 37 East, which is ap-  
19 proximately 1-1/2 miles to the west of the Well No. 15.

20 Well No. 6 was approved as a disposal  
21 well by OCD Order No. R-5073.

22 Q Thank you. Would you please refer to Ex-  
23 hibit Number One and briefly describe it?

24 A Exhibit Number One is a land plat of the  
25 subject area showing the proposed disposal well and also

1 showing a 1/2 mile radius around the well. Both the produc-  
2 ing and nonproducing wells are shown in the area.

3                   There is production within one mile of the  
4 Santa Fe Pacific Railroad No. 15 Well, primarily to the  
5 northwest and southwest.

6                   Santa Fe Energy Company owns and operates  
7 all wells within the area of review. The only offset lease  
8 owner within a half mile, besides Santa Fe Energy Company,  
9 is ARCO.

10                  Q            Are there any other salt water disposal  
11 wells near Well No. 15?

12                  A            Yes, there are. There's two; one being  
13 the Cox USN No. 2 Well in Unit H of Section 27 of the same  
14 township and range, and the Coastal Oil and Gas Santa Fe No.  
15 2 Well in Unit F of Section 33, also same township and  
16 range.

17                  Q            Have ARCO and the surface owner been no-  
18 tified of this application and in that respect I refer you  
19 to Exhibits Two, Three, and Four.

20                  A            Yes, they have. Exhibit Two is a letter  
21 to Michael Harton, who is the surface owner, and Exhibit  
22 Three is a letter to ARCO Oil and Gas Company, who is the  
23 offset lease owner, and both of these, with these exhibits  
24 are attached the certified return receipts evidencing their  
25 notice.

1                   Exhibit Four consists of copies of the  
2 notice published in the Hobbs Daily News.

3                   Q           In your opinion will the granting of this  
4 application be in the interest of conservation, the  
5 prevention of waste, and the protection of correlative  
6 rights?

7                   A           Yes, it will.

8                   Q           And were Exhibits One through Four  
9 prepared or compiled by you from records kept by the  
10 District Office of Santa Fe Energy Company?

11                  A           Yes, they were.

12                                   MR. BRUCE:   Mr. Examiner, I  
13 move the admission of Exhibits One through Four.

14                                   MR. QUINTANA:   Exhibits One  
15 through Four will be entered as evidence.

16                                   MR. BRUCE:   I have no further  
17 questions of this witness.

18

19                                   CROSS EXAMINATION

20 BY MR. QUINTANA:

21                   Q           Correct me if I'm wrong, Mr. Tower, but  
22 the reason this case is here before us today is because  
23 there's production within a 2-mile radius of the injection  
24 well?

25                   A           Yes, sir.

1 Q And you stated that wells within a mile  
2 -- within a half mile and a mile of this proposed disposal  
3 well are producers of Santa Fe Energy?

4 A Let me see.

5 Q Let me clarify that for you. Those two  
6 circles there, which is a 1/2-mile circle, the inner circle?

7 A The outer circle.

8 Q The outer circle is a 1/2-mile circle on  
9 Exhibit One?

10 A Yes, sir.

11 Q What's the inner circle?

12 MR. GAUME: My name is Pat  
13 Gaume. I'll be testifying in a minute.

14 MR. QUINTANA: Okay.

15 MR. GAUME: That map was pre-  
16 pared by me. The inner circle simply highlights Well No.  
17 15.

18 MR. QUINTANA: Okay.

19 MR. GAUME: The outer circle --

20 MR. QUINTANA: Is the 1/2-mile  
21 --

22 MR. GAUME: -- is the 1/2-mile  
23 radius.

24 MR. QUINTANA: Okay, fine.

25 Thank you, that clarifies it.



1 engineer, all in West Texas and New Mexico.

2 I'm a Registered Professional Engineer in  
3 Texas.

4 Q Are you familiar with Case 8659 and the  
5 engineering matters involved in this case?

6 A Yes, I am.

7 Q And do your duties at Santa Fe Energy  
8 Company encompass responsibility for salt water disposal  
9 wells?

10 A Yes.

11 MR. BRUCE: Mr. Examiner, is  
12 the witness considered qualified?

13 MR. QUINTANA: How many direct  
14 -- approximately how many direct years of petroleum engi-  
15 neering experience do you have, actual petroleum engineering  
16 experience?

17 A Eight and a half of the nine years.

18 MR. QUINTANA: He is considered  
19 an expert petroleum engineer.

20 You may proceed.

21 Q Would you please refer to Exhibits Five  
22 and Six, describe them, and detail the history, current sta-  
23 tus, and proposed completion of Well No. 15 and the reasons  
24 you seek this application?

25 A May I stand? Exhibit Number Five is the

1 well data sheet, legal sized sheet that you see before you,  
2 and Exhibit Six is a structure map which we have on the  
3 wall.

4                   Particularly I'd like to direct your at-  
5 tention on the well data sheet to the lefthand side the  
6 fluid level shot and pumped in tests that were run on 3-9 of  
7 '85 and 3-20 of '85, toward the bottom of the information  
8 there.

9                   This structure map is a structure map of  
10 the top of the San Andres B zone of the West Sawyer Field.  
11 it encompasses four leases that we operate.

12                   The first is the SFPRR lease in Sections  
13 27, 28, 33, and 34. It originally has 23 wells of which No.  
14 6 is now plugged and abandoned.

15                   The Rich Unit is a single well lease in  
16 unit -- what is that -- well, anyway, the south -- southwest  
17 quarter of Section 34.

18                   Then we also have a two-well lease in Fe-  
19 deral 27; two-well lease Federal 22, in Sections 27 and 22,  
20 respectively.

21                   Our lease holdings are marked in yellow.

22                   Our application is made for economic  
23 reasons. When we were -- when we -- it was to our economic  
24 advantage to operate a disposal well, the SFPRR No. 6, as  
25 compared with trucking costs, and because of our increased

1 plugging -- water disposal cost, we've had to cut production  
2 on the Rich Unit No. 1 to just a couple -- to about four  
3 days a month, and it's been to our economic disadvantage and  
4 we've had to cut the production on the SFPR No. 15 to about  
5 one day a month, or less, because under a water hauling sit-  
6 uation they are both uneconomic to produce.

7           Also on all of our wells our operating  
8 expenses are up and because of that our wells reach economic  
9 limit sooner and as wells get P&Aed at economic limit, our  
10 ultimate reserves on each well are reduced and our ultimate  
11 recovery would therefore be reduced without a replacement  
12 salt water disposal well.

13           Therefore our field, we feel that our  
14 field oil reserves will be conservatively produced as a re-  
15 sult of this salt water disposal well.

16           This structure map does show the top of  
17 our San Andres B Zone, which we describe as a marker to  
18 simply show the top of our productive interval.

19           And we have observed a trend here. We  
20 show and believe that we have generally a permeability  
21 pinchout up dip to the northwest. We have a fairly well de-  
22 fined oil/water contact to the southeast.

23           The SFPR No. 6 was high to the northwest  
24 in the area of pinchout and required about 1800 to 2000  
25 pounds pressure to dispose of water over its entire life.

1 Of course this is a 5000 (not understood.)

2 The SFPR No. 15 is low to the southeast  
3 and the oil/water contact and has a high apparent permeabil-  
4 ity.

5 The SFPR No. 15 was selected as a re-  
6 placement salt water disposal well for eight reasons.

7 The first reason, it has the highest to-  
8 tal fluid production of all of our SFPR wells.

9 Second reason, its oil cut over its en-  
10 tire life has been five to ten percent, meaning its water  
11 cut has been 90 to 95 percent.

12 As our shot (not understood) indicates we  
13 have a low bottom hole pressure. I calculated it to be  
14 about 790 pounds and when we ran our pump-in test, we found  
15 that that test indicates that the well could take fluid on  
16 low pump-in pressure, especially as compared to the SFPR No.  
17 6.

18 Fifth reason, all the wells within a half  
19 mile are Santa Fe Energy operated. The results of the pump-  
20 in --

21 Sixth reason, the results of the pump-in  
22 test indicates an expensive workover to either deepen the  
23 well to other porous intervals or have to perforate addi-  
24 tional could be avoided due to its high ability to accept  
25 fluid or produce fluid in existing perforations.

1                   Second to the last point, if the field  
2 was ever converted to waterflood, it does fit into some pos-  
3 sible patterns.

4                   Finally, by converting this well to salt  
5 water disposal, the salt water disposal system is relieved  
6 of its heaviest water producer. Where the SFPRR No. 6 had  
7 to handle an average of about 440 barrels of water a day,  
8 this well would have 440 minus 170, or about 270 barrels of  
9 water a day to handle, at least in the near term.

10                   MR. QUINTANA: I'd like to make  
11 a brief statement, Mr. -- is it Gaume?

12                   A            Yes.

13                   MR. QUINTANA: The basic things  
14 that I'm concerned with in permitting a salt water disposal  
15 well through the State of New Mexico is -- in this case is  
16 to determine that you will not adversely affect production  
17 offsetting the well, even though it's your own production,  
18 and two is to make sure -- to insure that you -- the mechan-  
19 ical integrity and the operating practices of the injection  
20 well do not affect fresh water sources. And those are my  
21 two basic concerns, so if you would address those, I would  
22 appreciate it.

23                   A            I will, yes, sir.

24                   MR. QUINTANA: You may proceed.

25                   Q            Mr. Gaume, what will the injection pres-

1 sure and the anticipated injection volume be?

2 A About 1000 pounds and 270 to 300 barrels  
3 a day.

4 Q And you seek authority for the maximum of  
5 1000 pounds, although you do not know if that will be neces-  
6 sary at this time, is that correct?

7 A Yes. At the present time I'm asking for  
8 1000 pounds. Our pump-in tests indicate that that's all  
9 that will be required.

10 Q What is the source of the fluids to be  
11 disposed of?

12 A It's local San Andres water and will be  
13 disposed back into the San Andres formation.

14 Q Therefore you anticipate no compatibility  
15 problems.

16 A None.

17 Q Will you please briefly describe the cur-  
18 rent status of other wells in the area of review and in con-  
19 nection with that will you look at, and describe, Exhibit  
20 Seven-A through Seven-F?

21 A Seven-A through Seven-F are well sketches  
22 of -- of several wells either within the half mile radius or  
23 very near to the half mile radius of the SFPRR No. 15. They  
24 are all owned and operated by Santa Fe Energy Company and in  
25 a general statement, this whole field was drilled 1972-73

1 with identical casing, casing plans, programs, et cetera,  
2 and all these wells are about twelve to thirteen years old  
3 and of high integrity right now.

4 Q Is there any fresh water formation in  
5 this area?

6 A Yes. And you'll notice all of this cas-  
7 ing -- all of these wells have 8-5/8ths inch casing past 400  
8 feet with cement to surface.

9 Q Are there any fresh water wells within a  
10 mile of the proposed salt water disposal well?

11 A Yes. There's a well in Unit C of Section  
12 34. We just located this well. We find that it's a wind-  
13 mill about 150 feet away from our ODC-1 in the Rich Unit.

14 Q Are there any geological faults connect-  
15 ing the fresh water formation with the disposal zone?

16 A No, none that we're aware of.

17 Q In your opinion will the granting of this  
18 application be in the interest of conservation, the  
19 prevention of waste, and the protection of correlative  
20 rights?

21 A Yes.

22 Q And were Exhibits Five through Seven  
23 prepared or compiled by you or under your direction?

24 A Yes.

25 MR. BRUCE: Mr. Examiner, I

1 move the admission of Exhibits Five through Seven.

2 MR. QUINTANA: Exhibits Five  
3 through Seven will be admitted in evidence.

4 MR. BRUCE: I have no further  
5 questions of this witness.

6 MR. QUINTANA: Mr. Gaume, I  
7 have several questions for you.

8 A Yes, sir.

9

10 CROSS EXAMINATION

11 BY MR. QUINTANA:

12 Q Let me start out with the fresh water  
13 well that you just pointed out to me.

14 Do you have a sample of that --

15 A I was --

16 Q Do you have a water analysis of that  
17 water well?

18 A No, sir, I'll be happy to submit one to  
19 you as soon as possible.

20 Q I would appreciate if you would do that,  
21 and to explain the reason for that, it serves two purposes.  
22 One is if there is pollution in that fresh water source at  
23 this time we know it's not you, it's already there.

24 Two, if it happens later then we know  
25 it's most likely coming from, possibly from you.

1                   It's a base sample for us to use for your  
2 protection.

3                   The second question I had is could you  
4 explain to me in detail the mechanical details of the pro-  
5 posed completion of the salt water disposal well?

6                   A            What we would be doing is we would be  
7 utilizing our existing casing, existing perforations. We  
8 would go in with -- with an injection packer and set it --  
9 if I can find my notes there -- we would set it some dis-  
10 tance above the perforations, probably on the order of about  
11 60 feet, and we would inject through plastic-coated tubing.

12                  Q            What type of packer do you plan to use?

13                  A            Just an oil field standard; probably use  
14 a Baker or a Guiberson injection packer.

15                  Q            2-3/8ths inch tubing?

16                  A            Yes.

17                  Q            Do you feel that the well has been ade-  
18 quately cemented around the casing to protect --

19                  A            Yes, I do.

20                  Q            All the fresh water zones have been  
21 covered?

22                  A            Yes, I do.

23                  Q            Any offsetting injection zones that --  
24 you're injecting into any offsetting zones and those are  
25 covered, which I don't think you are.

1           A           No, sir, we are not, but -- but we have  
2 every reason to believe high integrity of this well and the  
3 offsetting wells.

4           Q           The injection disposal zone would be 4960  
5 to 4990, is that correct?

6           A           No, the injection zone would be -- well,  
7 yes, when you -- when you take the 15 foot -- well, we have  
8 a Kelly bushing of only 11 feet. I show my perforations at  
9 4985 to 5020.

10          Q           And that's what you would like to have  
11 approved as the official disposal zone?

12          A           That's -- yes, sir, perhaps the entire  
13 interval or, you know, zone of the San Andres B Zone, if  
14 that's -- but that would be fine. That 35 foot interval is  
15 what we would inject into, yes, sir.

16          Q           There are no P&A wells within a half mile  
17 radius.

18          A           No, sir.

19          Q           Other than the well --

20          A           Well, that -- event he SFPRR No. 6 is a  
21 mile and a half away.

22          Q           Okay.

23          A           If you'll look up toward the northeast  
24 you'll see that there was one that is outside the half mile  
25 radius.

1           Q           Is it your professional opinion that you  
2 will not adversely affect production offsetting this dis-  
3 posal well?

4           A           That is my professional opinion.

5           Q           Do you happen also to have a sample of  
6 the San Andres water?

7           A           Yes, I do. Would you like me to submit  
8 it?

9           Q           Yes, I would.

10          A           The sample is from our SFPRR No. 4. It  
11 was run in July of 1984. This was run by Halliburton.

12          Q           And that sample would be indicative of  
13 both the disposal zone and water that you produce, which is  
14 the same?

15          A           Yes, sir, it would.

16                           MR. BRUCE: Mr. Examiner, if I  
17 may say one thing. The fresh water well is in Unit L, not  
18 Unit C, of Section 34.

19                           MR. QUINTANA: Exhibit Eight  
20 will be admitted as evidence at this time.

21                           I have no further questions of  
22 the witness.

23                           Are there further questions of  
24 the witness from anybody else?

25                           MR. TAYLOR: Mr. Gaume, is it

1 your professional opinion that your procedures here would  
2 protect fresh water resources?

3 A Yes.

4 MR. TAYLOR: Okay, that's all I  
5 have.

6 MR. QUINTANA: I have one final  
7 statement to make to you, Mr. Gaume.

8 You requested 1000 pounds pres-  
9 sure, surface injection pressure. It's the OCD's policy to  
10 grant .2 psi per foot. In the event that you would request  
11 a higher pressure we would require you to run a step rate  
12 test and we'll examine the step rate test and determine the  
13 injection pressure from that.

14 A That's -- that's correct.

15 MR. QUINTANA: All right. If  
16 there are no further questions of the witness, he may be ex-  
17 cused, and Case 8659 will be taken under advisement.

18

19 (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 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 true and correct copy of the transcript of the hearing held before the Examiner on July 31, 1985. 8659  
Gilbert P. Puntina Examiner  
Oil Conservation Division