

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BLDG.
SANTA FE, NEW MEXICO

18 February 1987

EXAMINER HEARING

IN THE MATTER OF:

Application of BTA Oil Producers to contract the horizontal limits of the West Osudo-Wolfcamp Pool and the concomitant creation of a new gas pool with special pool rules, Lea County, New Mexico. CASE 9078

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Commission: Jeff Taylor
Legal Counsel for the Division
Oil Conservation Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

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MR. CATANACH: Call next Case Number 9078.

MR. TAYLOR: Application of BTA Oil Producers to contract the horizontal limits of the West Osudo-Wolfcamp Pool and the concomitant creation of a new gas pool with special pool rules, Lea County, New Mexico.

MR. CATANACH: At the request of the applicant this case will be continued to the Examiner Hearing scheduled for March 4, 1987.

(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 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 this portion 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. 9078, heard by me on February 18, 1987.
David R. Caton, Examiner
Oil Conservation Division



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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

- CASE 9078
- CASE 9846
- CASE 9847
- CASE 9812
- CASE 9813
- CASE 9850

EXAMINER HEARING

TRANSCRIPT OF PROCEEDINGS

CONTINUED AND DISMISSED CASES

BEFORE: MICHAEL E. STOGNER, EXAMINER

STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO

December 27, 1989

ORIGINAL

CUMBRE COURT REPORTING
(505) 984-2244

1 HEARING EXAMINER: This hearing will come
2 to order. I'm Michael E. Stogner, appointed Examiner
3 for today's docket. Note today's date, December 27,
4 1989.

5 What I'll do first is call all the
6 continued and dismissed cases. So, we'll start by
7 calling Case No. 9078, which is in the matter of case
8 number 9078 being reopened pursuant to the provisions
9 of Division Order Nos. R-8450.

10 This case will be continued to the
11 Examiner's hearing scheduled for January 10, 1990.

12 * * * * *

13 HEARING EXAMINER: Call next case, No.
14 9846, which is the application of Yates Petroleum
15 Corporation for compulsory pooling, Eddy County, New
16 Mexico.

17 At the Applicant's request, this case will
18 be continued to the Examiner's hearing scheduled for
19 January 10, 1990.

20 * * * * *

21 HEARING EXAMINER: Call next case, No.
22 9847, which is the application of Yates Petroleum
23 Corporation for an unorthodoxed oil well location, Lea
24 County, New Mexico.

25 At the Applicant's request, this case will

1 be dismissed.

2 * * * * *

3 HEARING EXAMINER: Over to the next page,
4 I'll call next case, No. 9812, which is the
5 application of Meridian Oil, Incorporated, on behalf
6 of El Paso Natural Gas Company, for an unorthodox coal
7 gas well location, Rio Arriba County, New Mexico.

8 At the Applicant's request, this case is
9 dismissed.

10 * * * * *

11 HEARING EXAMINER: Call next case, No.
12 9813, which is the application of Meridian Oil
13 Incorporated, on behalf of El Paso Natural Gas
14 Company, for an unorthodox coal gas well location, Rio
15 Arriba County, New Mexico.

16 At the Applicant's request, this case is
17 also continued to the Examiner's hearing scheduled for
18 January 10, 1990.

19 * * * * *

20 HEARING EXAMINER: Well, we're on the last
21 page, on page 6, Case No. 9850, which is in the matter
22 of the hearing called by the Oil Conservation Division
23 on its own motion for an order extending certain
24 existing pools in Rio Arriba and San Juan Counties,
25 New Mexico.

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This case is also continued to the
Examiner's hearing scheduled for January 10, 1990.

* * * * *

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

6
7 4 March, 1987

8 EXAMINER HEARING

9 IN THE MATTER OF:

10 Application of BTA Oil Producers to contract the horizontal limits of the West Osudo-Wolfcamp Pool and the con-
11 comitant creation of a new gas pool with special pool rules, Lea County,
12 New Mexico. CASE 9078

13 BEFORE: Michael E. Stogner, Examiner

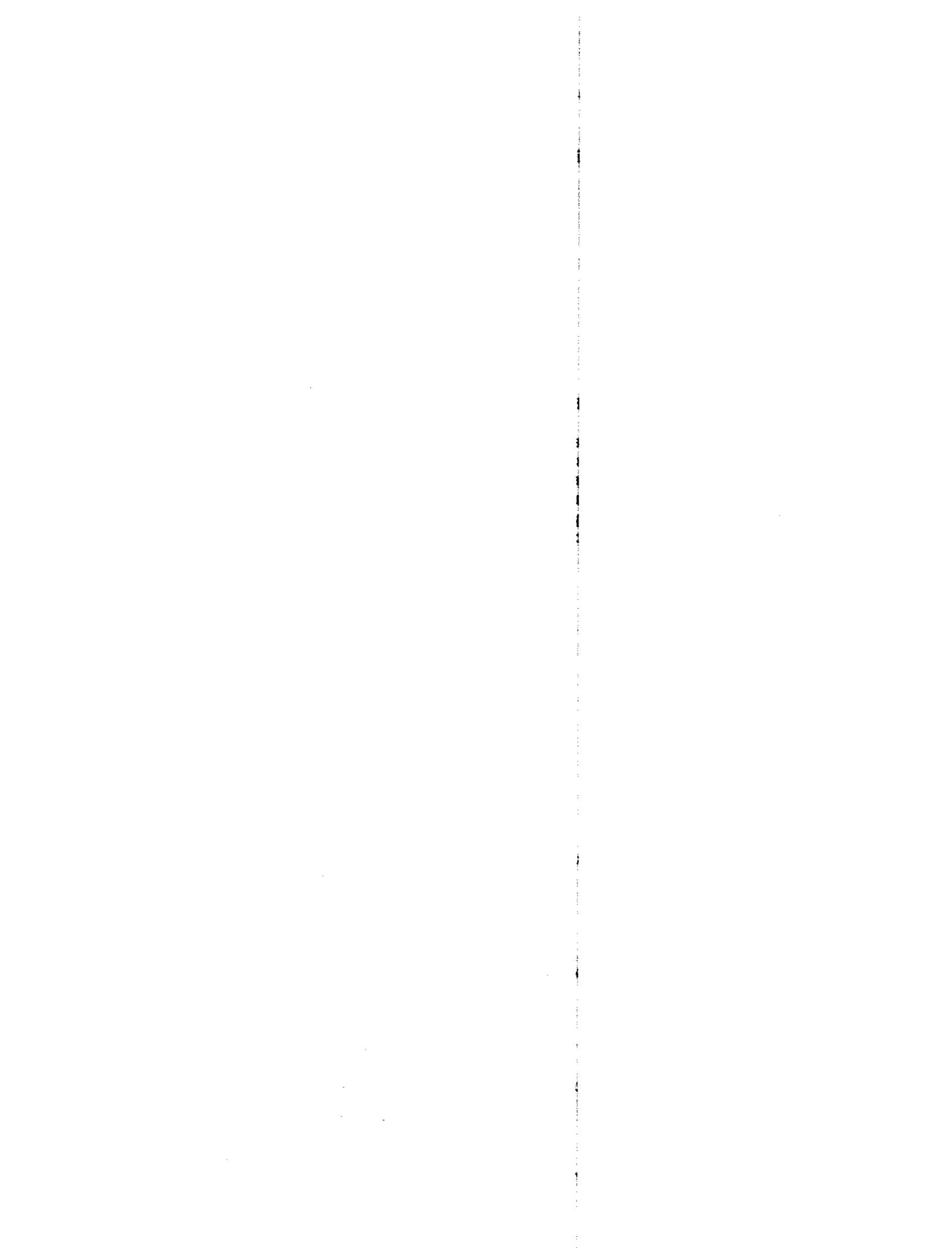
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15 TRANSCRIPT OF HEARING

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

18
19 For the Commission: Jeff Taylor
20 Legal Counsel for the Division
21 Oil Conservation Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

22 For BTA Oil Producers: W. Thomas Kellahin
23 Attorney at Law
KELLAHIN, KELLAHIN, & AUBREY
24 P. O. Box 2265
Santa Fe, New Mexico 87501

25 For Amoco Production: William F. Carr
Attorney at Law
CAMPBELL & BLACK P.A.
P. O. Box 2208
Santa Fe, New Mexico 87501



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MR. STOGNER: Call next Case
Number 9078.

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MR. TAYLOR: The application of
BTA Oil Producers to contract the horizontal limits of the
West Osudo-Wolfcamp Pool and the concomitant creation of a
new gas pool with special pool rules, Lea County, New Mexico.

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9

MR. STOGNER: Call for -- call
for appearances.

10

11

12

MR. KELLAHIN: Mr. Examiner,
I'm Tom Kellahin of Santa Fe, New Mexico, appearing on be-
half of the applicant.

13

14

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16

I understand from Mr. Carr this
morning that he has some concerns and potential objections
in our case. I would estimate it will take us about an hour
to present this case.

17

18

19

If you'd like us to wait and
take a shorter case, we'd be happy to do so, but I believe
some of the issues involved in this case may be disputed.

20

21

MR. STOGNER: Mr. Carr, who do
you represent?

22

23

MR. CARR: I represent Amoco
Production Company.

24

25

I also represent Ronald J.
Byers, a mineral interest owner under the east half of the

1 east half of Section 23, which includes half the acreage
2 which is the subject of Mr. Kellahin's application.

3 MR. STOGNER: Do you have any
4 witnesses?

5 MR. CARR: No, I do not.

6 MR. STOGNER: Let's go off the
7 record for a second, Sally.

8

9 (Thereupon a discussion was had off the record.)

10

11 MR. STOGNER: We'll take a lit-
12 tle, short recess and call this case back later on the
13 docket.

14

15 (Thereupon a recess was taken.)

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MR. STOGNER: This hearing will
come to order.

We'll come back and continue
with Case Number 9078. I believe we called for appearances
and Mr. Kellahin had entered an appearance and Mr. Bill Carr
had entered an appearance.

Have we sworn the witness yet?

MR. KELLAHIN: No, sir. I have
one witness to present on behalf of my client.

MR. STOGNER: And, Mr. Carr, do
you have any witnesses?

MR. CARR: I will not call a
witness.

MR. STOGNER: Okay, will the
witness please stand at this time to be sworn.

(Witness sworn.)

MR. STOGNER: Mr. Kellahin.

MR. KELLAHIN: Thank you, Mr.
Examiner.

Mr. Examiner, I want to intro-
duce at this time what we have marked as BTA's Exhibit Num-
ber Thirteen. This is a package of notices to the various

1 parties that were interested in the application. I'll sub-
2 mit that to you as a separate exhibit, Mr. Examiner.

3 The case was originally filed
4 for hearing on February 18th, 1987, and at the time that ap-
5 plication was filed, and the first page of Exhibit Thirteen
6 is in fact the application, if you'll turn to the attachment
7 to the application on the third page, you will find that
8 when we file the application we sent notices to the opera-
9 tors in the pool and within a half mile of the pool that we
10 though might be affected by what we were doing.

11 Thereafter, just prior to the
12 February 18th hearing, on February 13th I received a phone
13 call from Mr. Ron Byers who is a mineral owner underneath
14 the east half of the northeast corner of 23, and Mr. Byers'
15 interest is held by BTA as the operator.

16 Mr. Byers, as an interest
17 owner, was concerned about the change in designation of this
18 area as a gas pool.

19 Under the notice rules we nor-
20 mally do not notify the mineral owners under our own tracts
21 of a spacing case, but because of Mr. Byers' call to me, we
22 then went forward with a supplemental notice, continued our
23 case, and sent notice to Mr. Byers and to all the other peo-
24 ple that are indicated in the package of exhibits, as well
25 as those operators that we had previously notified, advising

1 them that the case was now continued to the March 4th hear-
2 ing, to give all those parties additional time and an oppor-
3 tunity to come forward.

4 I understand that some of those
5 individuals wrote letters to the Commission.

6 Of those that we've notified, I
7 believe Mr. Byers, through Mr. Carr, is the only party
8 that's appeared at today's hearing.

9 With that explanation of the
10 notices, then, I would propose to submit to you Mr. Steve
11 Salmon, who is our reservoir engineer, petroleum engineer,
12 to discuss with you the technical reasons that we believe
13 support our application.

14 MR. CARR: I have only one com-
15 ment in response. I'm also appearing on behalf of Amoco
16 Production Company and Mr. Byers does own interest under the
17 property as defined by Mr. Kellahin. He also has interest
18 in the property underlying the Heller Well, which is the
19 east offset to the subject well and a well operated by Amo-
20 co.

21
22 STEVE SALMON,
23 being called as a witness and being duly sworn upon his
24 oath, testified as follows, to-wit:

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DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Mr. Salmon, let's begin, -- if that's acceptable, Mr. Stogner?

MR. STOGNER: Please.

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

A Yes. My name is Steve Salmon. I'm currently employed by BTA Oil Producers as the Manager of Exploitation and Reservoir Engineering.

Q Mr. Salmon, have you previously testified before the Oil Conservation Division as a petroleum engineer?

A Yes, I have.

Q And pursuant to your employment by BTA Oil Producers, have you made a study of the facts available to you surrounding this application?

A Yes.

Q And pursuant to that study have you prepared certain exhibits or caused those exhibits to be prepared under your supervision and direction?

A Yes, I have.

MR. KELLAHIN: We tender at this time Mr. Salmon as an expert petroleum engineer.

1 MR. STOGNER: Mr. Salmon is so
2 qualified.

3 Q Let me direct your attention first of
4 all, if you please, to Exhibit Number One and let you
5 identify Exhibit One for us and help locate us as to where
6 the property is that is the subject of this application.

7 A Yes. Exhibit One is an insert from the
8 Midland Map Company Producing Zone Map. This map is on a
9 scale of one inch equals six miles. It is prepared to
10 locate the Byers in relation to the regional geology.

11 The approximate area of the Osudo West
12 Wolfcamp and the Lea Southeast Wolfcamp Field is colored in
13 blue, which is the small blue area just to the right of
14 center of the map.

15 These fields are located approximately
16 17 miles northwest of Eunice and 19 miles southwest of
17 Hobbs.

18 The fields are located in a transition
19 area between the Northwest Shelf to the west and the Central
20 Basin Platform to the east. The approximate dividing line
21 is shown on this map between the geological areas is that
22 dashed line just to the west of the blue area.

23 Q Let's turn to a plat that specifically
24 shows the area that I have before me, Exhibit Number Two,
25 Mr. Salmon, which, before you describe that exhibit, would

1 you simply identify it for us?

2 A Yes. This is an exhibit showing the
3 Wolfcamp production data, the wells that have tested the
4 Wolfcamp in the area, and a color code for the various
5 leases, or the various fields in the area.

6 Q Before we describe the content of the ex-
7 hibit, would you locate for the Examiner the well that is
8 the subject of the case?

9 A Yes. This is the BTA Byers 8605 JV-P
10 Byers Well No. 1. It's indicated by the double circle
11 colored in red close to the center of the map. It's located
12 in the northeast quarter of Section 23, Township 20 South,
13 Range 35 East.

14 Q Based upon your studies as an engineer,
15 Mr. Salmon, what are you recommending to the Examiner with
16 regards to this application?

17 A Our application is to get a field dis-
18 covery for our well, is -- what we are wanting to do is to
19 get a gas well classification for the BTA well. We initi-
20 ally filed this well to be completed in the Lea Southeast
21 Wolfcamp Gas Pool. This filing was rejected by the Conser-
22 vation Division and -- however, we still think that this is
23 a proper filing for the well. If this is not a proper fil-
24 ing, we still have a gas well. We will attempt to prove to-
25 day that the -- it is separated from the Amoco Heller No. 1

1 and that these two wells should be in separate fields.

2 Q Let's identify for the Examiner the pools
3 in the area, the Wolfcamp pools in the area that are spaced
4 upon 160-acre spacing.

5 A Okay, at the top of the map there is a
6 well colored orange. The orange color indicates this is in
7 the Lea Wolfcamp Field.

8 This well is classified as a gas well.
9 It actually has 320-acre spacing.

10 At the south end of the map, or at the
11 bottom, there are two wells colored in green. These two
12 wells are in the Lea Wolfcamp Southeast Field. This is a
13 gas field on 160-acre spacing.

14 Q When we look at Section 24, which is the
15 section adjoining your well, and look at the Amoco Heller
16 Well, Mr. Salmon, that well has been designated and classi-
17 fied in what pool?

18 A It is in the Osudo-Wolfcamp West Field,
19 which is an oil field on 40-acre spacing.

20 Q Because of the proximity of your well to
21 the Amoco well, the District Office has recommended that
22 your well be classified as an oil well?

23 A Yes.

24 Q And in the -- in the West Osudo Field.

25 A Yes.

1 Q When we look at the well to the west of
2 the BTA well, there's an Amoco well, the Amoco Bass Com No.
3 1 Well?

4 A Yes. What is the status of that well?

5 A It is a P & A'd producer. It did produce
6 in the Osudo Wolfcamp West Field.

7 Q If the Examiner approved 160-acre gas
8 spacing for your well, what acreage would you dedicate to
9 the well?

10 A It would be the northeast quarter section
11 of Section 23.

12 Q Can you summarize for us, Mr. Salmon,
13 your opinion as to whether or not the BTA well in 23 is sep-
14 arate from the Amoco Heller oil well in Section 24?

15 A Yes, I think it is separate from the Amo-
16 co Heller oil well.

17 Q If the Examiner decides not to designate
18 a new gas pool and assign your well a discovery allowable,
19 how would you recommend to the Examiner ~~that he handle~~ the
20 BTA well in 23 in terms of its spacing?

21 A An alternate to giving us a discovery
22 well would be to approve our original filing, which was to
23 put the well in the Lea Wolfcamp Southeast Field.

24 Q Identify for us, and I don't think you
25 have to go through the specific details of it, identify for

1 us the type of information that's available to the Examiner
2 on Exhibit Number Two.

3 A The type of information on the Wolfcamp
4 producing wells is general completion data information in an
5 A, B, C, D, E nomenclature.

6 Opposite the A for each well is the per-
7 forated interval.

8 Opposite the B is the field that the well
9 is completed in.

10 Opposite the C is the initial potential
11 for the well.

12 Opposite D is the September of 1986 mon-
13 thly rate.

14 And opposite E is the cumulative produc-
15 tion through September of 1986.

16 Two wells that have not produced in the
17 Wolfcamp but have tested the Wolfcamp have the test data
18 shown. One of these wells is the Amoco Best Com No. 2, lo-
19 cated in the southeast quarter section of Section 23.

20 This well was perforated in the Wolfcamp.
21 The last fifteen hours it swabbed 7-1/2 barrels of oil, 12
22 barrels of water with a slight show of gas, and was plugged
23 back to the Bone Spring. It's currently a plugged well.

24 The other well that tested the Wolfcamp
25 that has not produced is the Lea Southeast -- or the Petro

1
2 Lewis Southeast Lea Unit Well No. 3 in the northeast quarter
3 of Section 26.

4 This well drill stem tested gas too small
5 to measure, reversed six barrels of oil.

6 There are quite a few gas wells shown on
7 here that are not producing from the Wolfcamp. These wells
8 are producing mainly from the Osudo Morrow.

9 Q When we look at the Southeast Lea Wolf-
10 camp, the one where Petro Lewis has their wells in 26 and 25

11 --

12 A Yes.

13 Q -- summarize for us or characterize the
14 kind of gas pool we have in that area in terms of its
15 gas/oil ratio, the kinds of characteristics youre discover-
16 ing in that type of gas pool.

17 A Okay, the Lea Southeast -- Southeast Lea
18 Unit Well No. 1 is an excellent well in terms of recovery.
19 It has made 3005-million cubic feet of gas plus 357,000 bar-
20 rels of condensate.

21 It had an excellent initial potential,
22 15-million cubic feet per day with a GOR of 4000 cubic feet
23 per barrel of oil.

24 The adjacent well over in Section --

25 Q I'm sorry, I missed the number. The
gas/oil ratio in that pool is about 4000-to-1?

1 A Yes. The American Trading Company -- or
2 these were originally drilled by American Trading but the
3 Southeast Lea Unit Well No. 2, just to the east of this well
4 is a tight well looking at the logs. It's calculated abso-
5 lute open flow was 1.1-million cubic feet per day with a
6 14,500 cubic foot per barrel of oil ratio.

7 It has been on production a long time but
8 it has only recovered 285-million cubic feet and 25,000
9 barrels of condensate.

10 Q If we look at the gas pool in the north,
11 the Lea Wolfcamp Pool, where TXO has their well, is that al-
12 so a gas pool that has a low gas/oil ratio?

13 A Yes. This is a gas pool and on its
14 potential it had a GOR of 8,571 cubic foot per barrel of
15 oil.

16 Q Let's turn to Exhibit Number Three now,
17 Mr. Salmon, and have you identify that exhibit for us.

18 A Exhibit Number Three is a structure map.
19 The scale is one inch equals 2000 feet, which is the same as
20 the previous map; covers the same area as the previous map.
21 It is contoured on the Third Bone Springs Sand, which is a
22 correlation marker above the Wolfcamp that we feel is a con-
23 sistent correlation marker in the area.

24 * The map shows that the structure in the
25 area is an east to west dipping anticline. We do have a

1 small bump or a small ridge in the south end of the map
2 around the Petro Lewis Southeast Lea Unit Well No. 1.

3 The trapping mechanism will be strati-
4 graphic rather than structural.

5 Q Do you have an opinion as to what the
6 drive mechanism is for the reservoir?

7 A It is essentially gas expansion. I think
8 that the Amoco Bass does show that you have some water
9 encroachment, but the main drive mechanism would be gas
10 expansion.

11 Q Would you identify for us the kinds of
12 factors that you would utilize as a petroleum engineer to
13 satisfy yourself that you are dealing with either a gas or
14 an oil reservoir?

15 A Well, you look at the GOR. If it's got a
16 high GOR, obviously you have a gas well. If it has a low
17 GOR, obviously you have an oil well. In between these two
18 extremes you can run pvt tests on your wells and determine
19 the state of the hydrocarbon in the formation.

20 Q Does the gravity of the liquids produced
21 give you any indication or help in deciding whether or not
22 you're dealing with a gas or an oil reservoir?

23 A Yes, a low gravity would generally go
24 with oil wells, 40 gravity and below; 50 gravity and above,
25 you're generally dealing with either a volatile oil or a gas

1 condensate reservoir.

2 Q What are the types of liquid gravity ran-
3 ges that you're discovering in the gas pools immediately ad-
4 jacent to your wells?

5 A The gravities are generally above 50
6 gravity.

7 Q When you have a well that produces in a
8 gas/oil ratio such as you're seeing in this area, you've in-
9 dicated to us that an engineer will cause pvt data to be de-
10 veloped and fluid studies to be made of the reservoir.

11 A Yes.

12 Q What is the purpose of doing that, Mr.
13 Salmon?

14 A The purpose of that is to determine what
15 type of reservoir you're dealing with, which helps determine
16 your spacing; it helps determine how hard you're going to
17 pull the well, and you run it for your knowledge to help you
18 more efficiently deplete the field.

19 Q Have you caused such studies to be made
20 of the BTA well?

21 A Yes, we have.

22 Q Before we look at that information, Mr.
23 Salmon, can you give us what your opinion is with regards to
24 whether or not this is a gas or an oil pool surrounding this
25 well?

1 A Well, I don't think it takes an opinion.
2 The data shows that at reservoir conditions the hydrocarbons
3 are in the gaseous phase.

4 Q All right. Let's turn to that informa-
5 tion and have you identify for us Exhibit Number Four.

6 A Yes. Exhibit Number Four is the report
7 by Tefteller, who collected the samples for a recombined pvt
8 study. It shows the shut-in bottom hole pressures. It
9 shows their recommendations on GOR's for the pvt study. It
10 shows a 4-point test and the stabilization prior to collect-
11 ing samples.

12 The first sheet on this is strictly a
13 cover sheet from Tefteller.

14 The second sheet starts showing the 4-
15 point pressure data. On the extreme right part of the
16 second sheet, the one labeled page 1 of 8 up at the top,
17 shows that the bottom hole pressure at 11,434 feet is 4,526
18 pounds on the shut-in pressure. This is a 13-day shut-in.

19 The pages labeled 1, 2, and 3 of 8 in the
20 upper righthand corner record te 4-point test and a 3-day
21 stabilization period prior to collecting the sample for the
22 reservoir fluid work.

23 I would like to point out that during the
24 4-point test the lowest pressure recorded is on page 2 of 8.
25 It's while the well was producing at about 3-million cubic

1 feet per day. The lowest bottom hole pressure that we en-
2 countered is 4,230 pounds.

3 This is approximately a 300-pound draw-
4 down at 3-million cubic feet per day, which indicates an ex-
5 cellent deliverability for the well.

6 At the bottom of the page, labeled 4 of
7 8, Tefteller recommends that for the recombination work that
8 7,183 standard cubic feet per barrel be used for the recom-
9 bined sample. This ratio represents the cumulative gas/oil
10 ratio for the most stable part of the test, which is the
11 last 24 hours.

12 The next sheet of this shows the gradient
13 shut-in pressure survey prior to the test. Again the shut-
14 in pressure is up in the upper lefthand corner. The shut-in
15 pressure is 4,526 pounds.

16 Just to the right of the pressure are the
17 pressure gradients. These range from .122 to .192, which
18 would be consistent with a gas condensate type of fluid in
19 the tubing.

20 The next page is a flowing pressure and
21 flowing gradient test. These gradients, gradients which
22 range from .161 to .180, are again consistent with a
23 gas/condensate gradient.

24 The next two sheets show the log log plot
25 for the 4-point test and the multipoint forms of gas wells

1 filled out by Tefteller. The calculated absolute open flow
2 was 21-million cubic feet per day.

3 Q With the data collected did -- by Teftel-
4 ler, what then does an engineer do to satisfy himself that
5 at reservoir conditions he is dealing with a gas reservoir?

6 A Well, Tefteller delivered the samples to
7 CORE Lab, who ran a pvt analysis on the hydrocarbons.

8 Q Is that pvt analysis shown as Exhibit
9 Number Five?

10 A Yes, it is.

11 Q All right, let me direct your attention
12 to Exhibit Number Five and have you discuss and describe its
13 contents.

14 A Okay. The heart of this report is on
15 page 3 of 5. That's really the fifth sheet. The previous
16 sheets are the data and assumptions that we used in the col-
17 lection or in the analysis.

18 This is a tabulation of pressure versus
19 relative volume. It shows that on the top third of the
20 pressure which they reported, they've shown that at 4,539
21 pounds the dew point of the hydrocarbon fluid is achieved.
22 This means that above the 4,539 pounds the hydrocarbons
23 would exist as 100 percent gas.

24 When you reach 4,539 pounds you begin to
25 get some condensate turning to liquid and as the pressures

1 decrease, you get more condensate.

2 Q Based upon the studies by CORE Lab, then,
3 the magic point for this particular reservoir, using the
4 specific reservoir data, is that a dew point exists at 4539
5 pounds --

6 A Yes.

7 Q -- psig.

8 A Yes.

9 Q And above that point, then, if we find
10 reservoir pressure above that point, the hydrocarbons in the
11 reservoir are in a gas stage.

12 A Yes.

13 Q All right.

14 The current pressure in the BTA Byers,
15 according to our shut-in pressure, is 4,526. This is just
16 slightly below the dew point. We are at the point to where
17 some condensate will begin to be turning to liquid. The or-
18 iginal reservoir pressure, as we'll see when we get to the
19 pressures, was higher than this and at the initial reservoir
20 conditions you were 100 percent gas.

21 If you'll turn over two more pages to the
22 graph that's labeled page 5 of 5, this is a graph of the
23 retrograde liquid volume as a percent of hydrocarbon pore
24 space on the vertical scale going from zero percent to 100
25 percent versus pressure on the horizontal scale.

1 Again, if you're above 4,539 pounds, you
2 have no liquid. At the point at which 4,539 pounds is
3 reached, you start getting some liquid. From there, as the
4 graph going up shows, the condensate as a liquid does in-
5 crease in the reservoir up to a maximum of 22 percent of the
6 hydrocarbon pore space.

7 At that point, when you reach a pressure
8 a little below 2000 pounds, some of the condensate will
9 start going back into the gaseous phase. This is a typical
10 graph on a retrograde gas/condensate reservoir.

11 Q Do you have an opinion as to whether a
12 retrograde condensate reservoir such as this ought to have
13 applied to it the state gas pool rules?

14 A Yes, I think it should.

15 Q Do you have a recommendation with regards
16 to the spacing to be established for the pool?

17 A I think that our well can drain 160 acres
18 and with the field to the south being 160-acre spacing, I
19 recommend that we use this spacing.

20 There is a tight well in the southeast
21 quarter of our Section 23. I might have trouble showing the
22 Commission that we could drain the southeast quarter or that
23 that area is commercially productive of hydrocarbons.

24 Q So rather than going to a 320-acre gas
25 spacing it appears to you at this point that 160-acre spac-

1 ing is appropriate.

2 A Yes, I would think it would be.

3 Q All right. Let's turn to an analysis of
4 the relationship between the BTA Byers Well and the offset-
5 ting Amoco Heller Well, which I understand your opinion is
6 that that well ought to be left on 40-acre oil spacing.

7 A Yes.

8 Q All right, let's turn to that analysis
9 and let me have you use for that discussion Exhibit Number
10 Six, which is cross section A-A'.

11 A Exhibit Number Six is a west to east, as
12 you go from left to right on the cross section, cross sec-
13 tion.

14 The leftmost well is the Amoco Bass Com
15 No. 1. The center well is the BTA Byers No. 1, and the
16 rightmost well is the Amoco Heller No. 1.

17 On this cross section, as well as on the
18 next cross section that we'll show, the well names and com-
19 pletion data are shown below the log. The drill stem tests
20 are shown beside the log to the right. The perforations are
21 shown by the rectangles with circles in them in the center
22 tract and the subsea depths of the top and bottom perf on
23 the initial completion is shown out to the right of the log.

24 The neutron porosity where we have the
25 neutron curve, porosity greater than 5 percent is colored in

1 green. On the next cross section we will have some sonic
2 logs and on that the sonic porosity greater than 5 percent
3 is colored in green.

4 The top correlation line shown on the
5 cross section is the Third Bone Spring Sand. This is the
6 point that we mapped on because it is a nice, consistent,
7 correlative interval from well to well.

8 The middle line is the top of the Wolf-
9 camp lime or carbonate, and the bottom line is the base of
10 the Wolfcamp lime or carbonate. The productive interval is
11 between the top and base of the Wolfcamp lime, usually to-
12 wards the top of the interval.

13 Q I know you're going to get to more de-
14 tails about the differences between the Heller Well and the
15 BTA Byers Well in terms of your opinion that one is in a gas
16 reservoir and the other is in an oil reservoir, but now
17 might be a helpful time to explain to the Examiner, using
18 this exhibit, what are some of the reasons that have caused
19 you to conclude that the two are in different types of re-
20 servoirs?

21 A The GOR of the Amoco Heller initially was
22 2459 cubic feet per barrel of oil.

23 The GOR for the Amoco Byers was 6,284 --
24 no -- yeah, I've got that mislabeled. I notice that should
25 be cubic feet per barrel of oil instead of MCF per day.

1 The GOR of the BTA well was 7,212 cubic
2 foot per barrel of oil as noted on the potential test; on
3 the stabilization it was 17,083.

4 The Amoco Heller well is up-structure
5 from both of the other two wells and it has an initial GOR
6 of less than half of what they are, and a -- this shouldn't
7 happen if these wells are in communication.

8 We will look at a performance curve in a
9 little bit and the Amoco Heller has a typical limited reser-
10 voir oil decline curve.

11 Q While we're using this exhibit, let's al-
12 so discuss the well to the west of the Byers No. 1 Well, the
13 Amoco Best Com 1 Well, to have you describe for us whether
14 or not that Best Well has depleted the production in the
15 Wolfcamp to such an extent that some portion or all of that
16 40-acre tract ought to be excluded from being assigned a
17 portion of the allowable from the BTA Byers Well.

18 A No, I don't think it has. This well was
19 perforated -- well, first of all, it has excellent porosity
20 and permeability development; had a good deliverability;
21 porosities up in the range of 20 percent. It has a nice,
22 solid block of porosity. It looks like an excellent well.
23 They perforated from the base of the porosity up almost to
24 the top of the porosity initially as shown by the perfora-
25 tions on the left side of the middle tract. These are

1 labeled 4-1-83.

2 The well did start making water fairly
3 soon after its completion and the performance became very
4 erratic. They did try two plugback attempts as shown by the
5 perforations on the left side of the inside tract and ones
6 sown to the left of the log. These were not successful.

7 Q Mr. Salmon, please discuss Exhibit Seven.

8 A Exhibit Seven is a production graph on
9 this well. As you can see, the -- this is a 3-cycle 5-year
10 graph. The barrels of oil per month, barrels of water per
11 month, and MCF per month are shown on the lefthand scale
12 from 100 to 100,000 barrels or MCF per month.

13 The GOR is shown on the righthand side of
14 the scale from 10 to 10,000 cubic feet per barrel of oil.

15 The well came in initially with an excel-
16 lent rate. The oil rate was between 4-and-5000 barrels of
17 oil per month for the first three months.

18 The gas was over 20-million cubic feet
19 per month with one month being up around 90-million cubic
20 feet.

21 The GOR kind of jumped around there. One
22 month it dropped down, but it was generally 3500 cubic foot
23 per barrel of oil in place.

24 It started out real high; it did drop
25 down to 4500.

1 In January the well started making a lot
2 of water. In January it reported over 12,000, January of
3 1984, it reported 12,000 barrels of water per month. As you
4 can see, from then on the performance became very erratic
5 and the oil and gas production both dropped off drastically.

6 I think that this well watered out and
7 had some channeling problems and they just couldn't get the
8 water shut off.

9 Q In your opinion did the Best Well deplete
10 the Wolfcamp reservoir?

11 A No, and I think we'll have to look at the
12 BTA Well before we can get to the reasons as to why I think
13 that.

14 The center well on our cross section,
15 going back to it, is the BTA 8605 JV-P Byers No. 1. This
16 well also had excellent porosity development as shown by the
17 amount of green colored in. It wasn't quite as high as on
18 the Amoco well, but it's excellent porosity.

19 However, there are major differences be-
20 tween the porosity on the two wells.

21 The porosity on the Amoco well, and this
22 is the Best Com when I'm saying the Amoco well, occurred 25
23 feet below the top of the Wolfcamp Lime, while the porosity
24 in the Byers occurred 90 feet down into the Wolfcamp Lime,
25 so there's a big difference in where the porosity occurred

1 in the interval.

2 Also, in the Byers you have a 90 feet --
3 no, you have about, roughly, 60 feet of porosity develop-
4 ment. You don't see any real tight intervals. It looks
5 like it's all one zone.

6 The porosity in the BTA well occurs over
7 122-foot gross interval. It does have tight streaks separ-
8 ating it into various porosity zones, so you can see that
9 there, even though they both are good, they do have, do show
10 that between the wells it's a very heterogeneous reservoir.

11 The two lower perforated intervals in the
12 BTA well that are shown in the center tract, the perfora-
13 tions with the arrows marked through them, were perforated,
14 both zones swabbed water, and the well was plugged back to
15 the top perforations shown from 11,430 to 11, 440 feet.

16 In looking at where the water is in the
17 Byers Well, the BTA well, it has to be somewhere between the
18 top set of perfs and the middle set. Looking at how this
19 ties in with the Amoco Best Com, the top perf in the middle
20 set is the minus subsea of 7785. The subsea of the base of
21 the porosity on the Amoco well is -7785.

22 So on that basis, on our way you could
23 say that the potential's there for the rest of that to have
24 hydrocarbons in it.

25 If you take the more pessimistic outlook

1 and say that the water is right at the base of the top set
2 of perms, that would be a subsea of -7749.

3 If you take that subsea over to the Amoco
4 well you would still have 33 feet of porosity above that in-
5 terval, and I think on this basis you can say that the Amoco
6 well's problems were probably largely due to a channeling of
7 water from the bottom and that they have not adequately dep-
8 leted the reservoir in that area.

9 I might point out the Amoco well made its
10 initial potential natural; the BTA well producing first,
11 then acidized with 200 gallons.

12 Okay, that's all I have on those two
13 wells right now.

14 Q Let's see, we're looking at exhibit --
15 the information on the --

16 A Exhibit Six.

17 Q -- Exhibit Six?

18 A Right. The third well on this cross sec-
19 tion is the Amoco Heller No. 1. This well was perforated
20 over a gross interval from 11,326 to 11,436; however, the
21 only porosity over 5 percent on the neutron curve is over
22 the interval from 11,414 to 11,422 feet. The porosity is
23 less than 10 percent and it's only an 8-foot interval.

24 The extreme deterioration in porosity
25 from the other two wells is obvious just from the appearance

1 of the cross section.

2 The Amoco Heller Well was fraced with
3 12,500 gallons, which I think confirms that initially it was
4 probably tight. It did potential for 379 barrels of oil, 5
5 barrels of load water, and a GOR to 2,459 cubic feet per
6 barrel of oil, and in looking at the cross section it's ob-
7 vious most of the perforations are above any perforations in
8 the Amoco Best Com or in the BTA Byers No. 1.

9 Q In your opinion is the Amoco Heller Well
10 producing in the same reservoir as the other two wells on
11 the cross section?

12 A No.

13 Q Let's turn to Exhibit Number Eight, which
14 I think is the production information on the Heller Well.

15 A Yes. This is a production graph on the
16 Amoco Heller No. 1. The oil and gas scales and the symbols
17 used are the same as on the previous graph. It's again on
18 3-cycle 5-year paper. The GOR scale again is on the right-
19 hand side of the graph. The scale is different in that it
20 goes from 1000 cubic feet per barrel of oil at the bottom to
21 1-million cubic feet per barrel of oil at the top.

22 The oil, which is shown by the solid
23 curve on this cross section, is on a very steep decline.

24 The gas, which is shown by the x's is de-
25 clining but not as steeply.

1 The initial GOR, which is shown by the
2 broken line, started at less than 3000 cubic foot per barrel
3 of oil, at about 2600 to 2800 cubic feet per barrel of oil.
4 It has climbed rapidly and it is currently over 8000 cubic
5 feet per barrel of oil.

6 Now this well during this period was
7 flowing. It has been put on pump recently. I talked with
8 Steve White, an engineer in Amoco's Hobbs Office. He said
9 it was currently making 30 to 40 barrels of oil per day and
10 approximately 250 MCF per day on pump.

11 Q How would you characterize the perfor-
12 mance --

13 A That's in the first part of February.

14 Q How would you characterize the performance
15 of this well?

16 A Well, it's a typical limited reservoir
17 oil well, probably volatile oil since its oil gravity is up
18 over 50 gravity.

19 The pressure on the BTA Byers, and we'll
20 look at the pressures later, showed very little depletion or
21 difference between it and the Amoco Best Com No. 1. It
22 would be hard to rationalize the BTA Byers with a high
23 deliverability and high pressure being in communication with
24 a limited reservoir oil well.

25 Q Let's turn now, Mr. Salmon, to a consid-

1 eration of the relationship of the BTA Byers Well to the
2 Petro Lewis wells in the Southeast Lea Wolfcamp Gas Pool,
3 and as an aid to that presentation, let me direct your at-
4 tention to Exhibit Nine, which is the B-B' cross section.

5 A Yes. Cross Section B-B' is a north to
6 south trending cross section. On the lefthand side it
7 starts on the north, about two miles north of the BTA well,
8 on the TXO Jordan No. 2-B. A trace of the cross section is
9 shown on the map on the inset.

10 It then proceeds to the south through the
11 BTA Byers Well; then to the south offset of this well, the
12 Amoco Best Com No. 2; then to the south offset of that well
13 to the Southeast Lea Unit No. 3; then to the south well from
14 that, the Southeast Lea Unit Well No. 1. All these wells
15 appear to -- the producers appear to be completed in the
16 same carbonate bank.

17 The leftmost well on this cross section,
18 as I said, is the TXO Production Corporation Jordan B Well
19 No. 2. This well is completed as a gas well. It poten-
20 tialled for 2.4-million cubic feet per day; GOR of 6875 cubic
21 feet per barrel of condensate.

22 As shown by the lack of green color, it
23 again is a tight well; does have a few feet colored black
24 there in the perforations from 11,440-to-50 feet.

25 Just to the right of that well is the BTA

1 Byers No. 1, which we looked at on the previous cross sec-
2 tion and again the extreme heterogeneity of the reservoir is
3 shown by the differences in the porosity development.

4 The third well, or the middle well going
5 to the right, is the Amoco Best Well No. 2. This is the
6 south offset to the BTA Byers.

7 Again there's a total lack of neutron
8 porosity over 5 percent. Right around 11,400 feet the den-
9 sity does get up over that and cross plotting those wells,
10 those two curves would probably result in a porosity of
11 about 7 percent over 4 to 5 feet.

12 It was perforated, as shown on the center
13 track. It was acidized with 6,500 gallons and it swabbed
14 noncommercial oil and water.

15 Again the extreme heterogeneity of the
16 reservoir is shown by the differences in the porosity devel-
17 opment between the two wells.

18 The next well going to the right is the
19 Petro Lewis Southeast Lea Unit Well No. 3.

20 This well has a remnant of the porosity
21 development. It has about six feet of porosity over 5 per-
22 cent and the well was drill stem tested, flowed gas to sur-
23 face too small to measure and it did reverse out 6 barrels
24 of oil.

25 The pressures on this test, the initial

1 shut-in, 3,992; the final shut-in, 5,289, does indicate that
2 the pressures in this tight test aren't adequately built up.

3 The last well on the right is the Petro
4 Lewis Southeast Lea Unit Well No. 1. This is the best pro-
5 ducer in the area from the Wolfcamp. As I said, it made 2
6 BCF, 357 barrels of condensate, and as shown by the amount
7 of green shown on the sonic log, we would expect it to be a
8 good well.

9 It was perforated initially from 11,400
10 to 500 and the perms below there from 11,4 -- no, the ini-
11 tial perms were 11, 400 to 470. The perforations from
12 11,470 to 11,500 feet were added in 1974.

13 Q Do you have a production graph of the
14 performance of the Petro Lewis well --

15 A Yes.

16 Q -- that you've been discussing? Is that
17 Exhibit Number Ten?

18 A Yes, that's Exhibit Number Ten. Now this
19 graph is on 3-cycle 20-year semilog paper. The GOR is indi-
20 cated by the blue curve and the scale is shown on the left
21 side of the graph, going from 1 to 1000 MCF per barrel.

22 The monthly gas production is indicated
23 by the red curve and this scale is on the righthand side.

24 As you can see, the well for the first
25 six months had an excellent deliverability, up in the range

1 of 70-million cubic feet and higher.

2 It then declined rapidly to a little bit
3 over 10-million cubic feet per month where the decline flat-
4 tened out; been on production since 1968 and it's been an
5 excellent well.

6 The GOR for this well has bounced around
7 quite a bit. It's ranged from 4000 cubic foot per barrel to
8 generally less than 10,000 cubic feet per barrel.

9 In 1980 through 1983 the GOR appeared to
10 be gradually creeping up and since that time the production
11 has been very erratic.

12 This well also was initially completed
13 natural.

14 The one producing well that we don't have
15 on our cross sections is the well immediately to the right
16 of this well, the Petro Lewis Southeast Lea Unit Well No. 2.
17 This well appears to be tight on the logs. It was fraced
18 with 21,000 gallons, and it did flow on test 384 MCF per
19 day. I think the potential, if I remember, was .1 -- calcu-
20 lated open flow with 1.1-million cubic feet per day.

21 It also has produced since 1968 but its
22 cumulative is only 285-million cubic feet plus 25,000 bar-
23 rels of condensate.

24 Q Have you made a study of the pressure
25 data available for the Wolfcamp wells in this area?

1 A Yes.

2 Q And have you presented that study in
3 forms of a tabulation and a -- of the data, and a graph of
4 that data?

5 A Yes. Exhibit Eleven is the graph of the
6 data with the pressure on the lefthand side of the graph in
7 thousands of psi and the date being on the horizontal scale.

8 Exhibit Twelve is this same data presen-
9 ted in a table format.

10 Q What's the reason that you have made a
11 study of the pressure data, Mr. Salmon?

12 A This is to try to determine the pressure
13 relationship between the BTA well and the other gas pro-
14 ducers in the area and the Amoco Heller.

15 Q And what have you concluded about the
16 pressure relationship among those wells?

17 A Well, it appears that the Amoco Byers, or
18 the Amoco Best Com No. 1, very possibly had some pressure
19 depletion from the Southeast Lea Unit well. Pressure on the
20 BTA well is close to the pressure that the Best Com No. 1
21 had. I did get a pressure from Mr. Zinsmeister with Amoco
22 on the Heller. When he gave it to me he told me it was a
23 single dip-in point, that it wasn't built up, and I think
24 that the data shows that it is not a built-up pressure and
25 is inadequate for making any conclusion as to -- just on the

1 pressure data -- whether it's in the same field as we are.

2 Q That's only insofar as the Heller Well
3 goes.

4 A As the Heller, yes.

5 Q All right. Using the pressure informa-
6 tion available to you, what have you concluded about the re-
7 lationship of the Best Com Well and the BTA well versus the
8 Wolfcamp wells to the south? In the Southeast Lea?

9 A I think that both of the Amoco Best Com
10 and the BTA Byers do show pressure depletion from that, from
11 the production to the south.

12 The TXO Well two miles to the north also
13 could be showing some pressure depletion from that produc-
14 tion.

15 Going over the --

16 Q Does it change your opinion with regards
17 to the pressure depletion in the northeast quarter of 23
18 that Amoco drilled the Best Com No. 2 Well in the southeast
19 of the southeast of 23?

20 A No, as I said, this is a very heterogen-
21 eous reservoir. It could very easily be trending in a
22 north/south direction over a fairly thin streak and could
23 bend around between those two wells, or between the Best Com
24 No. 2 and the Southeast Lea Unit Well No. 3.

25 You can't prove this geologically but I

1 think the pressure data indicates it's a definite possibil-
2 ity.

3 Q What have you concluded with regards to
4 the pressure depletion in the area insofar as that informa-
5 tion is useful to reach a conclusion about spacing patterns?

6 A I think that the pressure is transmitted
7 very well over an area where the porosity carries.

8 Going over the pressure data in detail,
9 the first pressures we have available are 1968 on the South-
10 east Lea Unit Well No. 1. This well was DST'd twice. The
11 pressures on one DST at 11,430 feet were 6,502 pounds.

12 On the second DST the pressures were
13 6,616 pounds.

14 Now, closely behind that, in June of
15 1968, the Southeast Lea Unit Well No. 2 was drill stem tes-
16 ted. The initial shut-in on that was 6,791 pounds.

17 The final shut-in was 5,336, indicating
18 an insufficient build-up on the test or depletion during the
19 test.

20 But these tests established an initial
21 reservoir pressure for the Wolfcamp carbonate to be between
22 6,500 and 6,800 pounds, in that range.

23 The Southeast Lea Unit Well No. 3 is the
24 next pressures available. It was DST'd in 1982. Again I
25 think the pressures are not adequately built-up in a tight

1 well, and are very little help in determining anything, but
2 the pressures on the initial shut-in were 3,992 and on the
3 final shut-in were 5,389.

4 Following this the Amoco Best Com No. 1
5 was drilled in 1983. In April of 1983 they had a 12-day
6 shut-in where the pressure was 4,717 pounds. The following
7 month they had a 3-day shut-in of 4,654 pounds.

8 Looking at the excellent porosity on the
9 well, the good permeability, I think in 12 days that well
10 would probably build-up and that would be a good pressure
11 for the area at that time.

12 The Amoco Heller was drilled in 1985.
13 Its pressure was 4,140 pounds. As I mentioned before, it's
14 a one point dip in pressure. The Amoco personnel that I
15 talked to, Mr. Zinsmeister, didn't think it was built-up,
16 since the well took such a big frac to turn it into a pro-
17 ducer, and I think just from that data alone you can think
18 that it may not be built-up.

19 The later pressure on the TXO Jordan B
20 No. 2 and the BTA Byers No. 1, that are higher than this
21 pressure, confirms that the pressure in that well probably
22 wasn't built-up.

23 The TXO Well, which is two miles north of
24 the BTA Byers, had a 63-hour shut-in pressure of 4,683
25 pounds. I got this data out of the Commission files. The

1 pressure was flat for the last 48 hours of the shut-in and I
2 think that that indicates it's a good pressure.

3 On the BTA Byers the DST pressure was
4 4,531 pounds. The test chart was flat. They had a 13-day
5 shut-in of 4,526 pounds. I think those are good pressures.

6 Now there are two possible interpreta-
7 tions from this data.

8 One interpretation would be, and I think
9 that it's the most probably correct, is that the the South-
10 east Lea Unit Well No. 1 and 2 have depleted the area for --
11 around the Amoco Best No. 1, the Byers No. 1, prior to their
12 completion and maybe even as far north as the TXO Jordan No.
13 2-B.

14 The other interpretation would be that
15 the original pressure around the Amoco Best Com No. 1 is
16 1,785 pounds -- at least 1,785 pounds lower than the initial
17 pressure in the Lea Southeast Unit well, and if that is the
18 interpretation, then the Amoco Best No. 1, the TXO Jordan B
19 No. 2, and the BTA Byers are seeing close to virgin reser-
20 voir pressure.

21 Since good pressure data is not available
22 on the Heller, the pressure is of no help in determining the
23 status of that well.

24 Q Let me have you summarize, Mr. Salmon,
25 your opinions on the various issues and then have you iden-

1 tify some of the factors that you've utilized to support
2 those opinions.

3 Starting off, first of all, with your
4 study to determine whether or not you have an opinion that
5 the Byers No. 1 Well is a gas well producing from a gas res-
6 ervoir.

7 A The Byers No. 1 in my opinion it's defi-
8 nitely a gas well producing from a retrograde gas condensate
9 reservoir.

10 Q Do you base that opinion in part upon
11 your analysis of the information received from CORE Lab, the
12 pvt study --

13 A Yes.

14 Q -- and the fluid information?

15 A Yes.

16 Q Is that a typical study that is done by
17 individuals in your profession and relied upon by you as en-
18 gineers --

19 A Yes, it is.

20 Q -- and is it typically used to determine
21 that the hydrocarbons in reservoir conditions are either gas
22 or oil?

23 A Yes, it is.

24 Q With regards to the opinion that you've
25 expressed that the Amoco Heller Well to the east of your lo-

1 cation is an oil well and is separated from the BTA gas well
2 in Section 23, summarize for us the factors that make up or
3 include that opinion?

4 A The factors there are the, of course, the
5 initial GOR on the potential, the initial producing GOR,
6 which I think placed this well as an oil well up structure
7 two wells that appear to be gas wells.

8 The second factor is the decline curve on
9 the well which is typical for a limited reservoir oil well.
10 You generally don't have oil wells in the same reservoir up
11 structure of gas wells.

12 Q Let me ask you your opinion with regards
13 to the spacing pattern and the efficiency of dedicating the
14 northeast quarter of Section 23 to the BTA well.

15 A ~~Well~~ Well, a gas well with excellent permea-
16 bility as evidenced by the deliverability of the BTA Byers
17 Well, as evidenced by a drill stem test that we have where
18 the pressure just broke flat, which indicates an excellent
19 permeability, the well can drain 160 acres. If the reser-
20 voir extends 320 acres I think it could drain that and I
21 think that the New Mexico Conservation Commission pretty
22 well accepts that a well can drain -- a gas well can drain
23 320 acres.

24 Q Would a 160-acre gas spacing be consistent
25 with the other Wolfcamp gas spacing in the area?

1 A It would be consistent with the Lea
2 Southeast Wolfcamp. To the north you do have a field with
3 320-acre spacing.

4 Q Do you have an opinion as to whether or
5 not the spacing was less than 160 you as an operator would
6 be forced to drill an unnecessary well?

7 A We would eventually be forced to drill
8 additional wells to protect and hold our acreage and keep
9 other operators from picking up the leases after the primary
10 terms and drilling the leases, yes.

11 Q In your opinion is that expense of addi-
12 tional wells necessary in this reservoir?

13 A No, I think the well that we have will
14 drain the reservoir.

15 Q Additional wells in the northeast quar-
16 ter, in your opinion at this time based upon available in-
17 formation, would not produce reserves that would otherwise
18 be produced by the -- not otherwise be produced by the Byers
19 Well No. 1?

20 A No.

21 Q You concluded for us earlier that the
22 Best Com No. 1 Well did not have an impact, or a significant
23 impact, on the ability of the west half of the northeast
24 quarter to contribute productive acreage to the Byers Well.

25 A Right.

1 Q And ^{that} ~~that~~ opinion was based on the fact
2 that that well watered out before it was pressure depleted?

3 A Right.

4 Q And the fact it watered out was attribu-
5 table to the low perforations that Amoco placed in that
6 well?

7 A Yes.

8 Q And those low perforations led, then, to
9 the water channeling and the drowning out of the production.

10 A Yes.

11 Q As opposed to having the west half of
12 that quarter section being depleted of reserves.

13 A Right.

14 Q Do you have an opinion, Mr. Salmon, as to
15 whether the -- Mr. Salmon, for this particular reservoir do
16 you have an opinion as to whether it is rate sensitive? In
17 other words, must the producing rates of the wells in this
18 gas reservoir be controlled in some fashion in order to max-
19 imize the ultimate recovery?

20 A No, I don't think so. The small drawdown
21 in pressure in the BTA Well, I think indicates it's not rate
22 sensitive. You wouldn't expect it to be rate sensitive, no.

23 Q In your opinion, Mr. Salmon, will ap-
24 proval of this application, the establishment of 160-acre
25 gas pool under statewide rules for 160-acre gas well be the

1 optimum method to handle the production and spacing for this
2 reservoir?

3 A Yes, I think it will.

4 MR. KELLAHIN: That concludes
5 my examination of Mr. Salmon, Mr. Stogner, and we would move
6 the introduction of his Exhibits One through Twelve.

7 MR. CARR: No objection.

8 MR. STOGNER: No objection?
9 Exhibits One through -- what did you say?

10 MR. KELLAHIN: Twelve.

11 MR. STOGNER: Exhibits One
12 through Twelve will be admitted into evidence.

13 Mr. Carr, your witness.

14

15 CROSS EXAMINATION

16 BY MR. CARR:

17 Q Mr. Salmon, if I understand BTA's appli-
18 cation, what you're seeking is either the contraction of the
19 West Osudo Wolfcamp Pool, deleting the northeast quarter of
20 23 and making that a separate new gas pool, or extending the
21 Southeast Lea Wolfcamp Pool up to and including the north-
22 east quarter of Section 23.

23 A Yes.

24 Q And in either event you would have a 160-
25 acre unit dedicated to a gas well.

1 A Yes.

2 Q If either of those are approved by the
3 Division, BTA will be able to produce substantially greater
4 quantities of oil and gas from that well than under present
5 rules, is that not true?

6 A Yes.

7 Q And you'll be able to also hold the ac-
8 reage without drilling additional wells.

9 A We will hold the full northeast quarter.
10 We would, I think, lose the southeast quarter after the pri-
11 mary term of the leases --

12 Q But you would hold the entire northeast
13 quarter without additional drilling there.

14 A Right.

15 Q If the rules stay as they are, there would
16 be -- you would need to drill additional wells on 40 to hold
17 that acreage.

18 A Yes, past the primary term.

19 Q Now if I understand your testimony, we
20 don't have a dispute here today that the gas/oil ratio for
21 the BTA well in the northeast of Section 23 is such that it
22 would be classified an oil well if we adjusted the gas/oil
23 ratio.

24 A I don't think we -- there is a set cutoff
25 in the New Mexico rules, but --

1 Q Is that --

2 A -- I think it is low enough to where, in
3 a lot of cases, it would be classified as an oil pool, yes.

4 Q It has a gas/oil ratio below or less than
5 100,000 cubic feet of gas per barrel of oil, does it not?

6 A Yes.

7 Q So then if that is the cutoff, it would
8 be classified as an oil well.

9 A Yes, if that's the cutoff.

10 Q Okay. So looking at the gas/oil ratio
11 you don't feel you have an accurate reading on this particu-
12 lar well, is that correct?

13 A If that's the only piece of data you
14 looked at, correct.

15 Q And you've concluded that one of the
16 things that signalled that you might look at the situation
17 in the reservoir was the gravity of the oil.

18 A Yes.

19 Q And the gravity of the oil was somewhere
20 in the neighborhood of, what, 50 degrees?

21 A Yes, it was up -- the gravity -- it's
22 above 50. It's in the 53 to 55 gravity range.

23 Q And that would indicate to you that you
24 might have a volatile reservoir situation?

25 A Yes, it could indicate a possible vola-

1 tile oil type reservoir or it could indicate a retrograde
2 gas condensate reservoir, either one.

3 Q And when you get over 40 that -- degrees,
4 that's what that sort of tells you?

5 A Oh, you have oilfields, you know, that 40
6 to 45 degrees are generally oil fields. When you get up
7 over 50, then you start getting into the volatile oil and
8 the retrograde gas condensate.

9 Q And the gravity of the oil in the Heller
10 Well, the Amoco well, is also over 50, is it not?

11 A Yes.

12 Q Now, if we declare this a gas well, would
13 this be a proration gas well? Or do you know? I don't.

14 A I don't know right offhand. I don't
15 think it would be.

16 Q All right, do you have any idea what --
17 at what rates this well would be permitted to produce the
18 hydrocarbons under it?

19 A As far as the Conservation Division
20 rules, I don't think that there is a limit.

21 As far as practical rules on deliverabil-
22 ity -- delivering gas into the pipeline, these days I think
23 it would probably be in the 3-to-6-million cubic feet a day
24 range.

25 Q And that is in excess of what it could

1 now as an oil well.

2 A Maximum. Yes, as an oil well it would
3 have 2000 times 365 barrels of oil and 730 MCF a day.

4 Q Okay, and if you -- if this is classified
5 as a gas well, how much of the oil will you be able to pro-
6 duce?

7 A We'd be able -- you mean over the life of
8 the well or --

9 Q No, I mean daily. Will you be able to
10 produce more than a 365 barrel depth bracket allowable?

11 A It's conceivable that if you produce --
12 yes, it's conceivable that you could.

13 Q So that is the real benefit that BTA
14 would derive, is it not?

15 A Yes. BTA would derive a benefit from a
16 higher producing rate.

17 Q Now, to establish that you had a retro-
18 grade condensate reservoir, you ran a pvt test.

19 A Yes.

20 Q And from that you were able to conclude
21 that at a reservoir pressure, that the hydrocarbons were in
22 a gaseous state, is that correct?

23 A Yes.

24 Q Were you able to make a similar computa-
25 tion for the reservoir under the Amoco well?

1 A No.

2 Q You don't have pressure data that --

3 A You mean under the Amoco Byers or the
4 Heller --

5 Q I'm sorry, the Heller Well.

6 A Under the Heller Well, no.

7 Q You don't have really sufficient pressure
8 data to do a lot with the Heller Well, isn't that fair to
9 say?

10 A Well, we don't have sufficient pressure
11 data and you can't at this time go back to the initial pro-
12 ducing conditions for the well. You -- at this point you
13 can't get that.

14 Q So that's something we don't know about
15 that well.

16 A Right.

17 Q Now if we take a look at -- I'll work
18 backward through these, your Exhibit Number Nine, which is
19 the cross section, the north/south cross section, one of
20 your proposals, I understand, is to extend the Southeast Lea
21 Wolfcamp Pool to the north, is that correct? Is that not
22 right?

23 A That is one of the options that would be
24 acceptable to us, yes.

25 Q And to that you would have take in the

1 Petro Lewis well that was incapable of commercial produc-
2 tion, is that not right? It lies between the existing
3 Southeast Lea and the BTA Byers No. 1?

4 A The No. 3 Well did DST gas. It's cur-
5 rently a Morrow producer. It's possible that with large
6 stimulation it could be turned into a producer.

7 Q In the Wolfcamp?

8 A The No. 2 Well, yes.

9 Q And that's the well that's the second
10 well from the right on your cross section that has just a
11 very small portion of the log shaded in green.

12 A Right.

13 Q And that's what you called, I think, a
14 remnant of porosity.

15 A Yes.

16 Q If you look at this whole cross section,
17 I believe it was your testimony that they're all in the same
18 carbonate reservoir.

19 A Carbonate bank, yes.

20 Q Do you think they're all in the same
21 pool?

22 A I think with the probable exception of
23 the Heller, yes.

24 I think that the area right immediately
25 around the Southeast Lea Unit No. 3 is probably so tight

1 that you probably won't see any depletion of that area.

2 Q So what you're seeking is a possible ex-
3 tension of this pool to the north and you have a well that
4 was wet in it and well that had only a remnant of porosity
5 in it.

6 A Well was wet, which well is that?

7 Q Isn't that the Amoco well immediately
8 north, the Best Com No. 2?

9 A The Best Com No. 2 was tight. It did
10 swab oil and water at low rates.

11 Q It was never able to -- made into a com-
12 mercial producer, was it?

13 A This is correct.

14 Q And as to the Petro Lewis Well immediate-
15 ly south of that, was it ever a commercial producer?

16 A The No. 3 Well?

17 Q Yes, sir.

18 A It's a commercial producer in the Morrow.

19 Q But not in the Wolfcamp.

20 A Not in the Wolfcamp.

21 Q And never in the Wolfcamp.

22 A Never in the Wolfcamp.

23 Q And you're proposing --

24 A It (not clearly understood.)

25 Q And you're proposing to extend the South-

1 east Lea to include the acreage on which both of those wells
2 are located.

3 A Yes.

4 Q Now, if we look at the Petro Lewis No. 3,
5 you believe this is in the same reservoir as the BTA Byers
6 No. 1.

7 A The No. 3?

8 Q Yes, sir.

9 A The porosity -- well, you're in the same
10 carbonate bank. At that location, no, I don't -- that well
11 is a tight well. It could respond to stimulation and end up
12 making a well.

13 Q And if it did, it's your opinion that
14 that would be in the same pool?

15 A If it did, yes, I think it would probably
16 be in the same pool.

17 Q If we look at your cross section that's
18 Exhibit Number Six and we look at the Heller No. 1 it also
19 has a very small section shaded in green. Isn't it possible
20 that what we have there is also just a remnant of porosity?

21 A I think it is a remnant of porosity, yes.

22 Q Okay, so if we go from your Byers Well
23 south to the Petro Lewis No. 3, the remnant of porosity in
24 your opinion would be in the same pool but if we go to the
25 Amoco Heller to the east it is not.

1 A Yes.

2 Q Now if we look at these zones on the
3 cross section, Six, there is a small shaded area on the Amo-
4 co Heller Well. That shaded area is the producing interval,
5 is it not, in that well?

6 A The entire perforated interval is the
7 producing interval.

8 Q All right, and --

9 A It was fraced with 12 -- hold it, are you
10 talking about which well?

11 Q I'm sorry, I'm talking about the Heller
12 Well, the one on the right.

13 A Okay, yes, it's perforated over approxi-
14 mately a 100-foot interval.

15 Q Okay, now the green shaded area on this
16 log section shows what?

17 A The green section shows porosity.

18 Q Porosity, so is it fair to assume that
19 that is where the production is coming from in the Heller
20 Well?

21 A It could be, yes. It most -- the well
22 was fraced with 12,500 gallons. When you frac a well you
23 can break into zones that don't show up on the log --

24 Q So there may be vertical communication.

25 A -- so there may be vertical communica-

1 tion. The porosity zone that you see there is probably the
2 most likely zone.

3 Q And that zone would correlate with part
4 of the producing interval in the BTA Byers Well, would it
5 not?

6 A Yes, it would.

7 MR. CARR: I have nothing fur-
8 ther.

9 MR. STOGNER: Mr. Kellahin, any
10 redirect?

11 MR. KELLAHIN: No, sir.

12

13 CROSS EXAMINATION

14 BY MR. STOGNER:

15 Q Mr. Salmon, as far as the Heller Well
16 goes, do you know what the gravity of oil coming out of that
17 well is?

18 A It's between 53 and 55; gravity of that
19 well is about the same as it is in our well. They're both
20 in the 53 to 55 range; depending on where you catch your
21 sample you'll get a range in there somewhere.

22 MR. STOGNER: I have no further
23 questions of this witness.

24 Are there any other questions
25 of Mr. Salmon?

1 MR. KELLAHIN: No, sir.

2 MR. STOGNER: He may be ex-
3 cused.

4 Do you all have any closing
5 statements?

6 MR. CARR: Very brief.

7 MR. STOGNER: Mr. Carr.

8 MR. CARR: May it please the
9 Examiner, BTA is before you today having drilled a well in
10 the West Osudo Wolfcamp Pool classified as an oil well.
11 It's a very good well and they're interested in producing it
12 at higher rates than permitted under existing rules, so they
13 seek to do one of two things, either create a new pool for
14 this well because it's a good well, or extend the Southeast
15 Lea Wolfcamp Pool to include it.

16 I submit to you that, first of
17 all, in regard to extension of the Southeast Lea Wolfcamp,
18 this was not included within the call of the case. It would
19 require readvertisement.

20 That aside, it is asking you to
21 extend a pool over an area in which there are two noncommer-
22 cial wells and I don't believe anything in the record would
23 justify doing that from an engineering point of view.

24 If either of the alternatives
25 sought by BTA are granted, we will have a gas well. The gas

1 well will be nonprorated and their purpose will be -- their
2 purposes will have been achieved in that they'll be able to
3 produce at a higher rate and they won't have to do the drill-
4 ling that would be required to develop the oil pool.

5 Amoco is here today, as is Mr.
6 Byers, in opposition to this application. We believe that
7 the evidence shows that these are the same reservoir. We
8 may have a smaller portion of it but the data BTA has pre-
9 sented I think is woefully inadequate in certain respects.

10 First of all, they talk about
11 the well that Petro Lewis operates to the south that has a
12 small porosity shelf and they'll stand here before you and
13 claim that this would be in the same reservoir and that the
14 reservoir does extend to the south.

15 They admit that the zones cor-
16 relate between their Byers Well and the Amoco Heller Well to
17 the east.

18 They talk about having and have
19 presented pvt information that they have prepared which
20 would tend to show, perhaps, a retrograde condensate condi-
21 tion in the reservoir. They were directed or pointed this
22 way because of the gravity of the oil in their Byers Well,
23 and yet if we look at it, the gravity of the oil in the
24 Amoco Well would certainly indicate that the oil is the same
25 and there's no pvt information on that. Simply showing what

1 they have in their well, it seems to me, and breaking it and
2 calling it a separate pool, is an inadequate presentation
3 and if you accept their argument, we submit that you'll be
4 authorizing drainage which will have two sets of rules in
5 the same reservoir, and we therefore request that the appli-
6 cation be denied.

7 MR. STOGNER: Thank you, Mr.
8 Carr.

9 Mr. Kellahin?

10 MR. KELLAHIN: Mr. Examiner,
11 it's undisputed that Mr. Salmon has used the best available
12 information, using standard engineering practices, to tell
13 you under reservoir conditions what type of well he has.

14 It is undisputed that that tes-
15 timony shows that this is a gas reservoir and that the BTA
16 well produces from a gas reservoir.

17 What Amoco wants to do with
18 their acreage is certainly up to them. If they want to be
19 in our pool, that's fine; if they don't, why, that's fine
20 with us. If they want to stay on forties, that's all right,
21 too. If they want to stay on 160's, the gas -- that's fine
22 with us, too.

23 They have not provided you any
24 information to demonstrate what ought to be done with the
25 Heller Well. It is undisputed that Mr. Salmon has told you

1 that in his opinion, and it's the only opinion you have be-
2 fore you, that that is in a separate reservoir. You're stuck
3 with a gas well and you've got to be able to do with it, one
4 of the logical things to do is simply extend the closest gas
5 pool that you have.

6 I mean you can do that. The
7 District Office can simply extend it and it's done. It does
8 not matter that there are wells in the area that don't pro-
9 duce commercial Wolfcamp; the testimony is that it was pres-
10 sure depleted from Wolfcamp gas wells. It shows in the evi-
11 dence that this is a gas well.

12 You cannot ignore the informa-
13 tion Mr. Salmon has given you but it does not preclude you
14 from a number of options.

15 The option is that you can
16 space this on 160 acres and let Amoco come in with their own
17 presentation to demonstrate with their own pvt study what
18 they well is or is not. If Mr. Carr wants to argue it's an
19 oil well, let him bring in his proof, but don't believe him
20 standing here without an expert to tell you that we ought
21 not to have a gas well when in fact we have a gas well. He
22 can't deny it, it's there, and no amount of verbiage is
23 going to change that into an oil well.

24 What is your obligation, and
25 that is to space on what is appropriate for the reservoir.

1 Don't make us drill additional wells when one well will do.

2 The fact that we can produce at
3 a higher rate, the undisputed testimony is it does no damage
4 and there's certainly no testimony at all before you that
5 there's been any drainage. The first time I ever heard that
6 idea is when Mr. Carr gave it to you. There's no evidence
7 of drainage here; no proof of it at all. If he's concerned
8 about drainage, where is his proof?

9 The only thing you can do with
10 what you've given us is to treat this as a gas well. Your
11 options are to extend the existing gas pool or to create a
12 new one for us. We don't want to infringe upon Amoco. We
13 don't think they're in the same reservoir for us, and that's
14 our expert's opinion. If they believe otherwise, let them
15 come demonstrate it to you.

16 We don't want to draw their
17 well into our pool. We don't see any reason for it. They
18 can produce at whatever rates they can next door; that's
19 fine with us, but let us have what we think is appropriate
20 in this case and please grant the application.

21 MR. STOGNER: Thank you. Is
22 there anything further in this case?

23 MR. CARR: Mr. Stogner, there
24 are several letters that I'm asking just be included in the
25 record of the case from Mr. Byers, Mr. Nixon, and others.

1 MR. STOGNER: I have received
2 several correspondence to be read into the record today. I
3 will not read them; however, I will allude to them and they
4 will be made part of the record.

5 One Alton C. White, Junior, in
6 Austin, Texas objects.

7 James W. Nixon, M.D., and a
8 James W. Nixon, Junior, M.D., both object, San Antonio,
9 Texas.

10 A Mr. (unclear) Johnson of Aus-
11 tin, Texas, a letter of exception, and Adolph A. Karmel,
12 that's K-A-R-M-E-L, Junior, of Austin, Texas, also sends an
13 objection. Evidently they are interest owners within the
14 acreage discussed today.

15 They will be made part of the
16 record.

17 If there's nothing further in
18 Case Number 9078, I do have one instruction for both attor-
19 neys today. Would you both submit me a rough draft order
20 within the next ten days?

21 At that time I'll keep the re-
22 cord open for the receipt of just those particular items.

23 That will conclude this case
24 and I'm going to take a thirty minute break.

25

(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 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 this portion 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. _____ heard by me on _____ 19__.

_____, Examiner
Oil Conservation Division

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 22 November 1988

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 In the matter of Case No. 9078 being CASE
10 reopened pursuant to the provisions 9078
11 of Division Order No. R-8450, which
12 created the Southwest Osudo-Wolfcamp
13 pool in Lea County, New Mexico.

14 BEFORE: Michael E. Stogner, Examiner

15
16
17 TRANSCRIPT OF HEARING

18
19 A P P E A R A N C E S

20 For the Division: Robert G. Stovall
21 Attorney at Law
22 Legal Counsel to the Division
State Land Office Bldg.
Santa Fe, New Mexico

23 For BTA Oil Producers: W. Thomas Kellahin
24 Attorney at Law
KELLAHIN, KELLAHIN & AUBREY
25 P. O. Box 2265
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I N D E X

STEVE SALMON

Direct Examination by Mr. Kellahin 4

E X H I B I T S

BTA Exhibit One, Plat	5
BTA Exhibit Two, Map	6
BTA Exhibit Three, Structural Map	8
BTA Exhibit Four, Cross Section	8
BTA Exhibit Five, Production Graph	10
BTA Exhibit Six, Production Graph	11
BTA Exhibit Seven, Daily Tests	12

1 MR. STOGNER: Call next Case
2 Number 9058.

3 MR. STOVALL: In the matter of
4 Case Number 9078 being reopened pursuant to the provisions
5 of Division Order No. R-8450, which created the southwest
6 Osudo Wolfcamp Pool in Lea County, New Mexico, upon the
7 application of BTA Oil Producers.

8 MR. STOGNER: Call for appear-
9 ances.

10 MR. KELLAHIN: Mr. Examiner,
11 I'm Tom Kellahin of the Santa Fe law firm of Kellahin,
12 Kellahin & Aubrey. I'm appearing today on behalf of BTA
13 Oil Producers. They were the original applicant in the
14 case that was heard by the Division back on March 4th,
15 1987, before you, Mr. Stogner.

16 My witness then is the same
17 witness I have today, a petroleum engineer. His name is
18 Steve Salmon.

19 MR. STOGNER: Are there any
20 other appearances in this matter?

21 There being none, will the
22 witness please stand?

23

24

(Witness sworn.)

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STEVE SALMON,

being called as a witness and being duly sworn upon his oath, testified as follows, to-wit:

DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Mr. Salmon, would you please state your name and occupation?

A Yes. My name is Steve Salmon. I'm currently employed by BTA Oil Producers in Midland, Texas, as Manager of Development and Reservoir Engineering.

Q Mr. Salmon, you testified as a reservoir engineer on behalf of your company before Examiner Stogner on March 4th, 1987, in the original case that established the West Osudo Wolfcamp Pool?

A Yes, I did.

Q And have you continued your studies of the production and information available from this pool?

A Yes, I have.

Q And pursuant to that study have you additional recommendations and conclusions and opinions for Mr. Stogner today?

A Yes, I do. At the previous hearing I testified that BTA 8605 JD-Byers No. 1 was completed in a retrograde gas condensate reservoir. Based on that testi-

1 mony, BTA was given a temporary new gas pool designation
2 with 320-acre spacing.

3 Q Is it still your opinion today that that
4 pool ought to continue on 320-acre spacing as a retrograde
5 condensate gas reservoir?

6 A Yes. I think it should continue that.
7 It may be possible the Commission would want to make this
8 temporary, since the reservoir at this time is in a state
9 of flux with water encroachment into the well.

10 MR. KELLAHIN: At this time,
11 Mr. Examiner, we tender Mr. Salmon as an expert reservoir
12 engineer.

13 MR. STOGNER: Mr. Salmon is so
14 qualified.

15 Q Mr. Salmon, would you refer to what is
16 marked as Exhibit Number One and let's refresh the Exam-
17 iner's recollection about the original fact situation
18 involved in this application.

19 A Yes. Exhibit One is the same Exhibit
20 One that was presented in the previous hearing. It's an
21 insert from the Midland Map Company producing zone map on
22 a 1 inch equals 6 mile scale, strictly to locate the South-
23 west Osudo Wolfcamp Gas Pool in relation to the regional
24 area.

25 The location of this field is colored in

1 and the small blue area just to the right of center of the
2 map, located approximately 17 miles northwest of Eunice,
3 New Mexico, and approximately 19 miles southwest of Hobbs.

4 This pool is in the transition area
5 between the Northwest Shelf to the west and the Central
6 Basin Platform to the east, with the approximate dividing
7 line between these two provinces shown by the heavy dashed
8 line just west of the pool.

9 Q Let's turn now, sir, to Exhibit Number
10 Two and discuss specifically the area that's included
11 within the current West Osudo Wolfcamp Pool.

12 A Okay. This is a Wolfcamp production --

13 Q I'm sorry, I said west. I meant the
14 southwest.

15 A Yes.

16 Q The subject pool.

17 A Yes, okay. This is a Wolfcamp produc-
18 tion and test data map. The area included in the pool at
19 this time is the west half of Section 23, 20 South, 35
20 East, which is outlined in red.

21 Q The only current producer in the pool is
22 your BTA Byers Well in the east half of the east half of
23 that section?

24 A Right and it is designated by the red
25 dot.

1 Q As we move farther east in the Section
2 24, in what pool is the Amoco Heller Well?

3 A It is designated by the blue to be in
4 the Osudo Wolfcamp West Field, which is an oil field.

5 Q Part of the original discussion for a
6 decision by the Examiner in March of '87 was whether or not
7 the Byers Well was in fact in a separate reservoir from the
8 Heller Well.

9 Does that continue to be your opinion
10 based upon subsequent information generated since the last
11 hearing?

12 A Yes.

13 Q Describe for Mr. Stogner what the cur-
14 rent status of production is for the Byers Well.

15 A The Byers Well, the production shown on
16 this map is for July of 1988. We will have some up-dates on
17 different exhibits for this specific well later on, but in
18 July it made 8.8-million cubic feet and 2,510 barrels of
19 condensate.

20 Q When we look to the west of the Byers
21 Well we find the Amoco Best Well and that well was watered
22 out, plugged and abandoned at the time of the hearing back
23 in March of '87.

24 A That's correct.

25 Q All right, sir. Let's turn now to the

1 structure map which is Exhibit Number Three. Would you
2 again refresh our memory about what the structural situ-
3 ation is in the reservoir?

4 A Yes. This structure map covers the same
5 area as the previous map. It is contoured on the Third
6 Bone Spring sand. The contour interval is 100 feet and the
7 structure is on an east to west dipping anticline. You do
8 have a slight reversal on the south part of the map around
9 the Lea Southeast Unit Well No. 1, and based on the list
10 and the nature of the logs in the area, I feel that the
11 trapping mechanism in this area is strictly stratigraphic.

12 Q There have been no subsequent wells
13 drilled in this pool?

14 A No.

15 Q All right. Let's turn now to the cross
16 section, Mr. Salmon, and this will be Exhibit Number Four.

17 A Yes. This is a cross section going from
18 west to east from the Amoco Best Gas Com No. 1 on the left,
19 through the BTA Byers No. 1 in the center, to the Amoco
20 Heller to the right or on the east side of the cross sec-
21 tion.

22 The well names and data for the wells is
23 shown at the bottom of the log. The drill stem tests are
24 -- we only have one on this cross section shown to the
25 right of the log on the BTA Byers No. 1. The perforations

1 are shown by the rectangle in the center track of the log.
2 The porosity greater than 5 percent on the neutron log is
3 colored in green on the log. The correlation line shown on
4 this cross section, the top line is the Third Bone Spring
5 sand. We felt like this was a good correlation marker
6 through the area to draw a structure map on and that is
7 what we drew our structure map on.

8 The next line coming down is the top of
9 the Wolfcamp Lime, which is the top of the lime bank that
10 produces from the Wolfcamp. And then the bottom line is
11 the base of the Wolfcamp lime.

12 The production in this Wolfcamp lime
13 bank is between the top of the lime and the base of the
14 lime.

15 Q I realize you have subsequent exhibits
16 that detail specifically the production information from
17 your Byers Well, but this might be a useful display to
18 explain to Mr. Stogner why you believe the reservoir is in
19 a state of flux and how you as the operator propose to
20 modify the production by altering the perforations in the
21 wellbore to continue to produce the reservoir.

22 A Yes. Subsequent exhibits will show that
23 the water production on the BTA Byers No. 1 is increasing
24 drastically; that the well is watering out. The well has
25 recently been put on a beam pump to pump the water off. As

1 you can see on the log on the Byers, there is some poro-
2 sity above the current perfs. When the existing perfs
3 water out, we will be attempting a plug back to the upper
4 pay.

5 Q That is similar to the manner in which
6 the Amoco Best Well to the west of your location was oper-
7 ated, was it not, Mr. Salmon?

8 A Yes. The Amoco Well initially perfor-
9 ated with the perfs shown on the righthand side of the
10 center track on the Amoco Best Well. These are labeled
11 4-1-83. Now they essentially perforated the whole pro-
12 sity interval in their well at one time.

13 This well watered out from those perfs;
14 in August of '84 it was recompleted with the perfs shown to
15 the left of those and they attempted another recompletion
16 in May of '85 when those perfs watered out, but it was
17 pretty much unsuccessful.

18 Q Let me direct your attention to Exhibit
19 Number Five and have you discuss for us the production in-
20 formation as plotted for the Amoco Best Well.

21 A Yes, sir. Exhibit Five is the produc-
22 tion graph on the Amoco Best Well. The scale for oil,
23 barrels of oil per month, barrels of water per month, and
24 MCF per month is on the left side of the graph.

25 The scale for GOR is shown on the right

1 side of the graph, and the vertical scale is a 3-cycle log
2 scale, the horizontal being a 5-year linear scale.

3 When the well initially came on produc-
4 tion it had a very good producing rate; an oil rate of 4500
5 to 5000 barrels of oil per month. The gas rate was up over
6 20-million cubic feet per month. It had a very good rate
7 initially.

8 The well then did start making water and
9 the water production is shown by the circles with the dots
10 in them. Once it started making water the production
11 characteristics for the well became very erratic.

12 In August of '84 when they tried the
13 recompletion, just looking at the graph it looks like it
14 didn't do a whole lot of good, but the well did continue
15 production through the middle of '85.

16 Q Let me direct your attention to Exhibit
17 Number Six, now, Mr. Salmon, and have you show us the plot
18 of production information from the Byers No. 1 Well.

19 A Okay. The scales on this graph are all
20 shown on the left side of the graph. The oil production is
21 shown by the dots connected with a solid line. The gas
22 production is shown by the unconnected X's. The initial
23 rate for this well was up around 40-million cubic feet per
24 month. It had a very good condensate rate of over 6000
25 barrels per month.

1 The gas and condensate both had a
2 drastic decline since that time. Since the water produc-
3 tion started up in the first part of 1987, again the water
4 production is shown by the circles with the dots in them.

5 The water production increased drasti-
6 cally, peaking at up close to 20,000 barrels of water per
7 month. The GOR during this time, up until November of '87,
8 the GOR being shown by the dots connected with a broken
9 line, the GOR was pretty constant up until November of '87,
10 between 6-to-7000 cubic foot per barrel of oil.

11 In November we installed a compressor.
12 Gas was used in the compressor and this does not show up in
13 the sales and production. Indeed, this gas being used in
14 the compressor, the GOR did start down at that time.

15 I made an estimate to -- of the gas used
16 in the compressor, assuming that December would have had
17 6,900 cubic foot per barrel of oil, which is in the range
18 of what it had been running. This showed that we were
19 using about 3100 cubic foot per month in the compressor.

20 The unconnected triangles are the GOR
21 plugging this gas back into the calculation. They do still
22 show some slight GOR decline but not near what we had seen
23 before.

24 Q I direct your attention to Exhibit
25 Number Seven, Mr. Salmon, and have you identify and de-

1 scribe that information.

2 A Okay. As I stated previously, the BTA
3 Byers No. 1 started loading up with water. It got to the
4 point where it would not produce consistently.

5 In September of '88, or excuse me, in
6 November the 2nd of 1988 we did put it on a beam pump to
7 lift the water off and since that time the well's been
8 producing into a 20-pound Phillips line with a beam pump
9 pumping the water off.

10 We have approximately two weeks worth of
11 data. The production seems to have somewhat stabilized
12 though it appears to still be dropping and our GORs since
13 that time are still below what they were initially. I feel
14 that this is probably due to the water production coming
15 through the reservoir and possibly picking up some conden-
16 sate and carrying it into the well. This may be some con-
17 densate that may have settled out of the gas.

18 It's also possible you could have a very
19 thin layer of condensate laying on top of the water, but
20 whatever, I feel that the lower GOR here is strictly due to
21 the water bringing in some condensate.

22 Q Based upon your continued studies of
23 this reservoir, Mr. Salmon, what are your conclusions and
24 recommendations to Mr. Stogner?

25 A We still have a pretty good pressure in

1 the reservoir. The initial pressure was a little over 4500
2 pounds.

3 On September the 22nd the well had died
4 and had been dead for several days, and we went out and
5 took a pressure on it. The pressure was still 3,450
6 pounds, so we still feel that we have an appreciable re-
7 servoir pressure. I think the amount of production shows
8 this.

9 Since the production right now is in a
10 state of flux, it has not exhibited the GOR increase that
11 would have, I think, been expected for a retrograde conden-
12 sate mainly due to the water influx. The way it's declin-
13 ing, the life in the current zone would appear to be less
14 than a year and at the time that it's uneconomical, we will
15 plug back. We think we do have a chance to have a good gas
16 well at that time and I would like -- I would recommend
17 that the current rules be continued.

18 Q Based upon your additional studies of
19 the reservoir, do you see any indication of communication
20 between the Byers Well in your reservoir and the Amoco
21 Heller Well in the reservoir to the east of you?

22 A No, I don't. The Amoco Heller Well
23 continues to be a marginal well productionwise. It's cur-
24 rently making 55 barrels of oil and 3004 MCF per month.
25 The last few months it's reported no water. The most water

1 it's reported in the past year has been just a few barrels
2 of water per day. I see no communication between our well
3 and the Heller Well.

4 Q Do you have a recommendation to the
5 Examiner as to what the proper rate of withdrawal from the
6 reservoir ought to be?

7 A At this point that question I don't
8 think can be answered. The water production encroachment
9 has essentially limited the production from our well. We
10 have no evidence (unclear) water would make under a higher
11 gas production. At the current time the production is
12 pretty limited and we're not going to be producing high
13 volumes of gas (not clearly understood.)

14 Q Your current production is shown on
15 Exhibit Number Seven with the gas, the water and the con-
16 densate production?

17 A Yes.

18 Q Is this producing rate the result of
19 reservoir limitation or limitations of your beam pump?

20 A The beam pump is pumping at capacity.
21 We have -- we're pumping water up the tubing; some gas and
22 condensate is coming up the tubing; it's also flowing gas
23 and condensate out the annulus. So we are producing at the
24 maximum rate that we can.

25 Q Do you have a recommendation to the Exa-

1 miner as to what additional period of time you would ex-
2 tend the temporary rules for this reservoir?

3 A Based on the graph on the BTA Byers, and
4 current test data indicates the previous declines are still
5 valid, it looks like the well would reach an economic limit
6 from the current zone some time in the next year. At that
7 time we would plug the well back and attempt a recomple-
8 tion. So I would recommend that we extend the current
9 rules for a period of a year.

10 MR. KELLAHIN: Mr. Examiner,
11 that concludes our presentation of Mr. Salmon's testimony.
12 We move the introduction of his Exhibits One through Seven.

13 MR. STOGNER: Exhibits One
14 through Seven will be admitted into evidence at this time.

15 I have no further questions of
16 this witness.

17 Are there any other questions?
18 Are there any questions of Mr. Salmon?

19 He may be excused. Mr. Kella-
20 hin, would you provide me with a rough draft order?

21 MR. KELLAHIN: Be happy to.

22 MR. STOGNER: Is there any-
23 thing further in Case Number 9078?

24 The case will be taken under
25 advisement.

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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. 9078 (Reopened) heard by me on 22 Nov. 19 88.
Michael E. Slagman, Examiner
Oil Conservation Division

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

EXAMINER HEARING

IN THE MATTER OF: Case 9078

In the matter of Case 9078 being
Reopened pursuant to the provisions
Of Division Order Nos. R-;8450 and
R-8450-A, both concerning the Southwest
Osudo-Wolfcamp Gas Pool in Lea County,
New Mexico.

TRANSCRIPT OF PROCEEDINGS

BEFORE DAVID R. CATANACH, EXAMINER

STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO
January 10, 1990

ORIGINAL

A P P E A R A N C E S

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FOR THE OIL CONSERVATION DIVISION:

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I N D E X

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1 MR. CATANACH: Call the hearing back to order
2 and call Case 9078.

3 MR. STOVALL: In the matter of Case 9078
4 being reopened pursuant to the provisions of Division
5 Order Nos. R-8450 and R-8450-A, both concerning the
6 Southwest Osudo-Wolfcamp Gas Pool in Lea County, New
7 Mexico.

8 MR. CATANACH: Appearances in this case?

9 MR. KELLAHIN: Mr. Examiner, I'm Tom Kellahin
10 of the Santa Fe law firm of Kellahin, Kellahin & Aubrey
11 appearing on behalf of the BTA Oil Producers. I have
12 one witness to be sworn.

13 MR. CATANACH: Will the witness be sworn.

14 STEVE SALMON,
15 the witness herein, after having been first duly sworn
16 upon his oath, was examined and testified as follows.

17 MR. KELLAHIN: Mr. Examiner, we have five
18 exhibits to discuss with you this morning. I've also
19 given you a copy of the two prior orders that apply to
20 this particular reservoir.

21 By way of introduction, Mr. Examiner, this
22 witness I'm about to present, Mr. Salmon, is a
23 reservoir engineer that testified at both of the two
24 prior hearings, and he's here to testify again.

25 We're dealing with a retrograde gas

1 condensate gas reservoir. This is the west
2 Osudo-Wolfcamp Pool. The pool is a one-well reservoir,
3 and it was initially brought before Examiner Stogner
4 back in March of 1987.

5 There was opposition to the creation of the
6 pool at that time because there was concern by AMOCO,
7 who had the offsetting Wolfcamp well to the east of us,
8 as to whether or not our reservoir was in communication
9 with theirs.

10 It was determined, based upon the evidence,
11 back in 87 that they were in fact separate. Division
12 created a separate pool and asked us to come back then
13 in 1988 to discuss specifically what ought to be the
14 producing rate for the reservoir.

15 There was a question in 87 and again in 88 as
16 to what would be the appropriate producing rate in
17 order to not waste the gas and, correspondingly,
18 recover the maximum amount of oil in the reservoir.

19 At the second hearing of this case in 1988,
20 there was no further opposition to what we had proposed
21 to do. At that point it had become conclusive to all
22 the technical people that this in fact was a one-well
23 reservoir pool.

24 The purpose of our testimony today is to ask
25 you to make the rules that we are using for this

1 reservoir permanent. The rules provide the opportunity
2 to produce this as a gas reservoir with corresponding
3 liquids.

4 This reservoir is unique in that it does not
5 fit conveniently into the conventional thinking about
6 whether this is a gas or an oil reservoir. It simply
7 represents properties of each. And therein lies the
8 unique character of the retrograde gas condensate
9 reservoir.

10 Mr. Salmon has carefully reviewed the
11 information available. And it will be his testimony
12 that for the best interests of all the interest owners,
13 including royalty and working interest owners, that it
14 serves no useful purpose to set up a procedure whereby
15 the pool well gets reclassified as an oil well and,
16 subsequently, a gas well and flipping back and forth.
17 The interests will be the same.

18 And for the economy of processing and
19 administering the well, Mr. Salmon will conclude for
20 you that the current producing rates of the well are
21 such that we should continue with the gas well
22 classification and allow him to operate as he has done
23 for the last two years.

24 With that introduction, Mr. Catanach, I'd
25 like to present Mr. Salmon.

EXAMINATION

1
2 BY MR. KELLAHIN:

3 Q. Mr. Salmon, for the record, sir, would you,
4 please, state your name and occupation.

5 A. Yes. My name is Steve Salmon. I'm currently
6 employed by BTA Oil Producers as their Chief Reservoir
7 Engineer.

8 Q. Mr. Salmon, have you previously testified
9 before the Oil Conservation Division, particularly in
10 the two prior cases that involve the west
11 Osudo-Wolfcamp Pool?

12 A. Yes, I have.

13 Q. Have you made yourself aware of and are you
14 continually familiar with the facts surrounding this
15 reservoir and the well that produces from this
16 reservoir?

17 A. Yes.

18 MR. KELLAHIN: Mr. Examiner, we tender Mr.
19 Salmon as an expert reservoir engineer.

20 MR. CATANACH: He is so qualified.

21 Q. (BY MR. KELLAHIN) So that Mr. Catanach will
22 have the opportunity to understand some of the
23 background of this case, Mr. Salmon, let me direct your
24 attention, sir, to what is marked as Exhibit No. 1 and
25 have you orient Mr. Catanach as to where the particular

1 Wolfcamp field is located.

2 A. Yes. Exhibit 1 is an insert from the Midland
3 Map Company Producing Zone Map. This map is on a 1
4 inch equals 6 mile scale. The southwest Osudo-Wolfcamp
5 gas field is located at as indicated by the small blue
6 area just to the right of center of the map. The field
7 is located about 17 miles northwest of Eunice and
8 approximately 19 miles southwest of Hobbs.

9 Q. I misspoke a while ago. I referred to this
10 as the west Osudo. This is, in fact, the southwest
11 Osudo.

12 A. Yes.

13 Q. Where would we find the west Osudo-Wolfcamp
14 field?

15 A. The west Osudo field will be shown on the
16 next exhibit. But the producing well from the west
17 Osudo-Wolfcamp field is just to the east of our well.

18 Q. And that's the AMOCO Heller well?

19 A. Right.

20 Q. Let's turn, sir, to Exhibit No. 2. Would you
21 identify that display for us?

22 A. Yes. This is a Wolfcamp production and test
23 data map. The legend on this map is shown down in the
24 lower left-hand corner where we show the symbols for
25 oil wells, gas wells, and so forth.

1 The scale on the map is 1 inch equals 2,000
2 feet. And we have omitted any wells that have not
3 penetrated the Wolfcamp. The various Wolfcamp fields
4 are color-coded by the code just to the bottom of the
5 map.

6 The red is the Osudo-Wolfcamp southwest
7 well. This is the BTA Byers Well No. 1. It's the well
8 completed in the field that's the subject of this
9 hearing.

10 Q. Currently what is the acreage assigned to the
11 Byers well in Section 23?

12 A. The east half of Section 23 is currently
13 assigned to the Byers well. This 320 acres is made up
14 from two separate leases. One of the leases covers the
15 east half of the east half of the section. The other
16 lease covers the west half of the east half of the
17 section.

18 Q. As a result of Division Order R-8450 entered
19 in May of 1987, what acreage was dedicated to the Byers
20 well in 23?

21 A. The east half of Section 23 was dedicated to
22 the well.

23 Q. Summarize for the Examiner, Mr. Salmon, the
24 basic facts, as you recall them, with regards to the
25 justification of the creation of the southwest Osudo

1 Wolfcamp field in Section 23.

2 A. Okay. At the time of the last hearing, the
3 AMOCO Best No. 1, which is located just to the west of
4 our well, had been plugged. This was a well that had
5 been completed, watered out quickly. It made about
6 27,000 barrels of oil and 181 million cubic feet.

7 At that hearing we felt like our well may --
8 in fact, probably had been in communication with that
9 well. However, the AMOCO Heller well, which was the
10 only producer in that field at the time, we felt like
11 we were not in communication with that well.

12 That well at the time was at a very low
13 rate. It was less than 60 barrels per month, makes
14 very little water, the gas rate was low, indicating
15 that the area was fairly well depleted pressure-wise.

16 When we completed the Byers No. 1, it came in
17 close to original reservoir pressure. We felt like
18 and, I think that we convinced the Examiner at that
19 time, that the AMOCO Heller and our Byers No. 1 were in
20 separate reservoirs.

21 Q. Let's take a look at Exhibit No. 3, which is
22 the structure map. Is this the same exhibit that was
23 used at the original hearing --

24 A. Yes.

25 Q. -- to establish the new pool?

1 A. It's the same exhibit. The only change made
2 is we changed the date to today's date. Essentially,
3 this map is contoured on the Third Bone Spring Sand.
4 And contour interval is 100 feet. It shows that the
5 area is an anticline, dipping to the west.

6 There is a slight amount of reversal just in
7 the south part of Section 26, but this is very minor in
8 a localized area.

9 The trapping mechanism for the Byers -- or
10 for this field is strictly stratigraphic. I don't feel
11 there's any structural component to it at all.

12 Q. Let's go to the cross-section, Mr. Salmon,
13 which is marked as Exhibit No. 4. Okay. This is an
14 east -- or west to east cross-section going from the
15 west on the left side to the east on the right. A
16 trace of it is shown by the map inset on the lower
17 right corner.

18 It goes from the AMOCO Best No. 1 through the
19 BTA Byers No. 1 to the AMOCO Heller No. 1.

20 Q. Let's focus specifically on the information
21 available from the log to show you what are the likely
22 producing intervals within the Wolfcamp.

23 A. The porosity greater than 5 percent is
24 colored in green on the logs. Essentially, the more
25 green, the better the porosity and, correspondingly,

1 the better the production.

2 Q. The vertical limits for this pool are
3 identified by using this log and finding the top of the
4 Wolfcamp line and then the base of the Wolfcamp line?

5 A. This is true. The two lower contour lines
6 are the top of the Wolfcamp and the base of the
7 Wolfcamp. And the production interval is between these
8 two points.

9 The line that's labeled the Third Bone
10 Springs Sand was the contour point that we used for our
11 structure map. It's a consistent point in the area.
12 It's easily -- you can easily correlate it between
13 wells.

14 We tried to correlate on the top of the base
15 of the Wolfcamp line. This is very inconsistent, and
16 we would not have had a very good structure map.

17 Q. At the time of the original hearing, what was
18 the producing status of the well?

19 A. Of which one?

20 Q. Of the Byers No. 1 Well.

21 A. The Byers No. 1 --

22 Q. -- had been completed in what portion of the
23 Wolfcamp?

24 A. Oh, okay. We tested two zones prior to
25 getting to the producing portion. Shown in the center

1 tract are the perforations on the well by the
2 rectangles with circles in them.

3 The lower two zones that have the arrows
4 through them, we tested water from those zones,
5 indicating that we do have a water contact in the
6 reservoir.

7 The actual perforated interval that is
8 produced -- was producing then; it is producing now --
9 is from 11,428 to 11,440 feet.

10 Q. At the time of the original hearing, Mr.
11 Salmon, had you obtained fluid samples from the well at
12 some point and had those fluid samples analyzed by the
13 PVT analysis?

14 A. Yes, we did.

15 Q. From what portion of the well or from that
16 formation was that sample taken?

17 A. It was taken from these perforations, 11,428
18 to 440.

19 Q. What were the the results of the PVT
20 analysis?

21 A. The results of the PVT analysis were that
22 this reservoir conditions the fluids condensate and gas
23 well and the gaseous phase.

24 MR. KELLAHIN: Mr. Examiner, that PVT
25 analysis is in as one of the exhibits in the original

1 transcript of hearing. It's Exhibit No. 4. Here's a
2 copy of the transcript and the exhibits in that prior
3 case.

4 THE WITNESS: I think Exhibits 4 and 5 make
5 up the analysis and the tests.

6 Q. (BY MR. KELLAHIN) At the hearing in 1988,
7 you were asked to come back on behalf of your company
8 and satisfy the Examiner as to what, in your opinion,
9 would be the appropriate producing rates for the pool
10 that the Division found to be a gas pool.

11 A. Yes. The tests on the reservoir fluids did
12 indicate it to be a retrograde condensate reservoir,
13 which means as you deplete the pressure, the condensate
14 will come out of suspension in the gas.

15 And there was concern if you produced it too
16 rapidly, you would leave a lot of your oil otherwise
17 recoverable, that you would leave it in the reservoir.

18 Q. At that time what was your anticipated plan
19 of operating the well in terms of completing the
20 production out of the existing perforations and then
21 recompletion into other Wolfcamp zones?

22 A. We felt like we would produce the current
23 perms until they deplete. In 1988 we, based on the
24 performance at that time, we thought that would happen
25 relatively quickly.

1 The production flattened out, and we are
2 still producing from that zone. We have two intervals
3 that we will plug back to in the future. They're shown
4 on the log on the cross-section.

5 The best looking interval is the one from the
6 11,404 to 420 feet. We had good shows when we drilled
7 this. It shows to have good porosity. We ran a drill
8 stem test on it.

9 It flowed 3 million cubic feet per day at
10 2,150 pounds on the drill stem test. I think this will
11 make a very good producing zone.

12 Another zone that will probably be tested is
13 from 11,322 to 11,352 feet. The porosity colored in on
14 that portion is the density porosity. It's probably
15 greatly affected by the washout. That zone may not be
16 too good.

17 Q. Have you tabulated for us what has been the
18 production from the well, Mr. Salmon?

19 A. The next exhibit is a production graph on the
20 well.

21 Q. The Exhibit No. 5, I believe. Let's a take a
22 moment and have you identify for the Examiner the
23 various color codes on the graph.

24 A. Okay. The black curve is the monthly oil
25 production. The green broken curve is the gas-oil

1 ratio. The scales for both of these curves are on the
2 left side of the graph.

3 The red broken curve is the monthly gas
4 production. And the blue dashed curve is the monthly
5 water production scales for -- these are shown on the
6 right side.

7 This is a Similog scale with time on the
8 horizontal scale and the other parameters on the
9 vertical scales.

10 Q. Help us read the display, Mr. Salmon, by
11 going back to approximately March of 87, which was the
12 time of the initial hearing that has created this pool
13 and give us the various rates using the gas-oil ratio,
14 the oil production, and the water and the gas.

15 A. Okay. When the well first came on
16 production, it had a very good deliverability. The gas
17 rate is shown by the red curve -- was just over 50,000
18 MCF per month at the peak there.

19 The peak of the oil was just over 9,000
20 barrels of oil per month. The gas-oil ratio at that
21 time varied somewhat, but it was between 6 and 7,000
22 cubic feet per barrel.

23 The water production at that time was very
24 low, though the water production did increase rapidly.
25 And by the middle of 1988, it was up to 18 to 19,000

1 barrels per month.

2 Q. Take us to the point in time that we had the
3 second hearing, which was in November of 88, and give
4 us the rates.

5 A. Okay. Through 1988 the production declined
6 very rapidly for the gas and the oil. Apparently due
7 to the high water production, the water was overrunning
8 in the oil and gas.

9 We put the well on pump. Apparently we got
10 the water pumped off. At the time of the last hearing,
11 the production was decreasing rapidly. This is why we
12 thought that the well would be depleted in this zone
13 relatively quickly.

14 Just about the time of the hearing, the
15 production flattened off, and since then the oil
16 production has been between 1,000 to 1,150 barrels per
17 month.

18 The gas bottomed down at about 3,000 MCF per
19 month and has rebounded back up to about 4,000 barrels
20 per month. With the production --

21 Q. You said barrels. You mean MCF?

22 A. MCF per month, yes.

23 Q. If you go back to November of 88, what was
24 your gas rate on a monthly basis?

25 A. The gas rate in November was about 3,300 to

1 3,400 MCF per month.

2 Q. And your oil rate in November of 88 was what
3 on a monthly basis?

4 A. The oil rate was, in October, it actually
5 bottomed at about 800 barrels of oil per month and was
6 about 1,000 barrels per month in November.

7 Q. In 87 at the first hearing, your gas-oil
8 ratio was between 6 and 7,000 --

9 A. Right.

10 Q. -- cubic feet of gas per barrel of oil?

11 A. Right.

12 Q. What was your gas-oil ratio in November of 88
13 at the second hearing?

14 A. The gas-oil ratio in November had fallen down
15 to about 3,300 MCF per barrel.

16 Q. As a result of that hearing, gas spacing and
17 gas rules continued to apply to the reservoir?

18 A. Yes.

19 Q. And you continued to dedicate 320 to the
20 well?

21 A. Yes.

22 Q. What are the current gas -- what is the
23 current gas-oil ratio for the well?

24 A. The current gas-oil ratio is about
25 approximately 3,600 cubic foot per barrel.

1 Q. What is your recommendation and opinion, Mr.
2 Salmon, as to what rules should apply for the
3 production from this reservoir?

4 A. I recommend that we continue the gas rules
5 for this well.

6 Q. Why, sir?

7 A. If we -- at such time as we plug back to the
8 next zone, I feel that we will have a gas well at that
9 time. The drill stem test indicates the well in that
10 interval capable of making it greater than 3 million
11 cubic feet per day.

12 If we changed the rules at this point to oil
13 rules, then we change them to gas rules, when we change
14 it to oil rules, the spacing will drop between 40 acres
15 and 80 acres, we'll lose the west half of our lease,
16 the westernmost.

17 Q. West half of your spacing unit?

18 A. Right, the west half of the spacing unit.
19 And that lease will no longer share in the production,
20 and the royalty owners will no longer share in the
21 production of that lease if it's changed to oil.

22 Q. And --

23 A. And when we change it back to gas, we won't
24 have 320 acres to dedicate to the well.

25 Q. In terms of the method by which you are

1 operating the well, is it going to make a difference to
2 the operation of the well as to whether this is a gas
3 reservoir, an oil reservoir, a retrograde gas
4 condensate reservoir, or an associated reservoir?

5 A. The current operations from existing zones
6 will not be affected regardless of the classification
7 of the reservoir. We're pumping as much oil as we can
8 get out of it.

9 If it was changed to an oil reservoir, we
10 would continue pumping it to recover all of the oil and
11 gas that we can economically recover. The problem will
12 come after we recomplete the well.

13 There will also be a problem with -- I think
14 it would make inequities in how the production is
15 shared if we were cut back to an oil well at this
16 point.

17 Q. What is your opinion as to whether or not
18 there is need for additional wells in order to fully
19 develop the producible reserves in the reservoir?

20 A. I feel that the existing well will recover
21 the reserves that can be recovered from this
22 reservoir.

23 As I said, the trapping mechanism was
24 stratigraphic. It's a limited reservoir. I feel that
25 the existing well will recover the recoverable reserves

1 from the reservoir.

2 Q. If the Division should change the gas rules
3 in the reservoir to oil rules after this hearing and
4 space it on 40 acres, in your opinion, would that
5 encourage the drilling of additional wells?

6 A. No. We would still -- we have no plans to
7 drill because we feel that the existing well is
8 recovering the reserves. We would continue to own the
9 easternmost lease, the east 160 acres in the section.

10 We would lose the west half of our proration
11 unit, but we wouldn't drill a well over there, and I
12 don't think anybody else would come in and drill a well
13 there.

14 Q. In your opinion, are there sufficient
15 remaining recoverable reserves in the spacing units
16 that would offset your well if it was spaced on 40
17 acres to justify the drilling of additional wells?

18 A. No. The acreage that we don't have is
19 down-structure at a legal location. You have the AMOCO
20 Best well that has already watered out.

21 It would take an unorthodox location to get
22 any oil and gas at all. And I don't think you would
23 make a good enough well even with an unorthodox
24 location to justify a well.

25 Q. Let's look at the structure map, which is

1 Exhibit No. 3. Using that structure map, give us your
2 opinion of the limits of the reservoir.

3 A. On the structure map you can't determine the
4 limits. I think the limits are based strictly on
5 stratigraphy.

6 Q. No. I meant to use this as a display by
7 which you could describe your opinion of the limits.

8 A. You do have a well on the south part of the
9 section that tested the Wolfcamp.

10 The AMOCO Best Com. No. 2 is located in the
11 southeastern portion of the reservoir. This well
12 perforated the Wolfcamp and tested noncommercial. Oil
13 and gas showed.

14 The AMOCO Watkins, which is in the west half
15 of Section 23, does not have the lime bank developed
16 well. It would not make a producer.

17 We are not in communication with the AMOCO
18 Heller No. 1, so the limits would be somewhere between
19 our well and that well.

20 Going to the north, there's very little
21 control, but from the completion to September of 1988,
22 we lost over 1,000 pounds of reservoir pressure. I
23 don't think it extends very far to the north either.

24 Q. Have you, as a reservoir engineer, made any
25 calculations to satisfy yourself that the current well

1 is draining at least 40 acres?

2 A. I have made some poor volume calculations.
3 With the performance of the reservoir at this point, I
4 feel that they're not real accurate.

5 But I think that we -- based on those, I come
6 up with that we have drained somewhere in the
7 neighborhood of 45 to 50 acres at this point from the
8 current zone. And we are continuing to produce, so
9 that number will increase.

10 Q. Are you able to satisfy yourself that you can
11 come up with a reliable drainage number that will show
12 you the ultimate acreage to be drained by the well?

13 A. No. With the current performance of the
14 well, I would say just about anything can happen. It
15 appears to be stable at this point. The oil production
16 is pretty much flat. You can't make an extrapolation
17 of that.

18 The gas is actually increasing slightly. The
19 water production appears to be fairly flat. It could
20 continue stable like this for a long time, or it could
21 change for the better or the worst in a few months.

22 Q. What is happening in the reservoir to
23 influence the data by which you make the drainage
24 calculations?

25 A. I think what we have is that the major

1 portion of the hydrocarbon reservoir is a gas
2 condensate reservoir. That's the part of the reservoir
3 we were originally completed in. That's the part of
4 the reservoir we'll be in when we recomplete.

5 In producing from that interval, apparently
6 we were depleting the pressure. This has caused a
7 thin -- apparently we have a thin oil layer on top of
8 the water.

9 This has caused the water and oil to encroach
10 into the wellbore and actually come up. And we feel
11 like right now we're probably producing from all three
12 portions of the reservoir, the gas condensate, the oil,
13 and the water zone.

14 Q. Notwithstanding the water influx that
15 influences the data base by which you make your
16 drainage calculation, you've satisfied yourself that
17 even the oil zone itself is one that is draining more
18 than 40 acres?

19 A. The calculations come out that we have
20 drained more than 40 acres of oil, yes.

21 Q. So if this reverts to 40-acre oil spacing, we
22 have acreage beyond that spacing unit that's
23 contributing oil to the well?

24 A. Yes.

25 Q. Why couldn't you have simply -- if the

1 Examiner wants to choose the single criteria for
2 establishing rules to be the gas-oil ratio in the
3 reservoir, would you recommend that he do that?

4 A. No.

5 Q. Why not?

6 A. I think it would cause inequities between the
7 royalty owners. If we go to 40-acre spacing or if we
8 go to 80-acre spacing, the royalty owner on our
9 easternmost lease is the only one that will share in
10 the production.

11 I think that with us pooling the water
12 up-structure, it's pushing oil and gas ahead of it. I
13 think that we are recovering reserves from both the
14 leases.

15 Q. Could you change the gas-oil ratio by simply
16 going up and completing into the upper portion of the
17 Wolfcamp, increasing your gas production and,
18 therefore, changing the gas-oil ratio?

19 A. Yes, we could. To do that we would probably
20 need to set a bridge plug on this zone and shut it off
21 to complete in the other zone or it wouldn't flow like
22 a normal gas well.

23 Q. Is there some risk to your remaining oil
24 recovery if you do that, Mr. Salmon?

25 A. Yes. If we plug off the current zone, we

1 produce the upper zone. We would come back to this
2 zone, I think there's a very good chance we wouldn't
3 get the hydrocarbons that we're getting now.

4 Q. Would the continuation of gas rules for this
5 reservoir cause the gas energy to be prematurely
6 withdrawn from the reservoir thereby leaving greater
7 quantities of oil or condensate left unrecoverable in
8 the reservoir?

9 A. Repeat that.

10 Q. Yes, sir. Gas rules give you the opportunity
11 to produce more gas out of the reservoir.

12 A. Yes, they do.

13 Q. Does the well have the physical capacity to
14 produce --

15 A. No. Right now we are producing what we can
16 with the maximum rate that we can get out of the well.
17 The well is pumped off. This is the most that we can
18 produce from it.

19 If we were to plug back, I think that we
20 would be bypassing the oil that we're getting now.

21 Q. Mr. Stogner's concern at the last hearing was
22 that the gas rules would give you an opportunity to
23 prematurely withdraw too much gas from the reservoir
24 and cause the condensate and liquids to remain
25 unproduced in the reservoir.

1 A. Right. That was one of the concerns
2 expressed. I think it was a valid concern. At this
3 point, with current performance of the well, it's
4 really not an applicable concern.

5 Q. So, in your opinion, you see no reason to
6 change this to oil spacing or to create some kind of
7 procedure where this is administered by associated gas
8 pools?

9 A. No.

10 Q. Will the change in -- will the continuation
11 of gas well spacing rules to the well change your
12 method of operation?

13 A. No.

14 Q. In your opinion, will it be the method by
15 which the interest owners, royalty override, and
16 working interest owners receive the greatest benefit
17 from the reservoir?

18 A. Yes.

19 Q. In your opinion, will the continuation of the
20 current rules and making those rules permanent be in
21 the best interests of conservation and the prevention
22 of waste?

23 A. Yes.

24 MR. KELLAHIN: That concludes my
25 examination.

1 We would move the introduction of his
2 Exhibits 1 through 5.

3 (Thereupon, Exhibits 1 through
4 5 were offered into evidence.)

5 MR. CATANACH: Exhibits 1 through 5 will be
6 admitted as evidence.

7 (Thereupon, Exhibits 1 through
8 5 were admitted into evidence.)

9 EXAMINATION

10 BY MR. CATANACH:

11 Q. Mr. Salmon, when you plug back eventually and
12 recomplete in the upper zone, and assuming this is
13 still a gas pool, won't you have the same problem? You
14 won't have a limit on the rate of gas withdrawal and
15 you may again be faced with leaving oil in the
16 reservoir?

17 A. I think that is a valid concern at that
18 point. We are going to operate in a method to try to
19 get the maximum number of reserves out of it.

20 I think our method of operation is somewhat
21 shown by this zone in that the well on initial
22 completion had a rate of 3 million cubic feet per day
23 with the flowing tube of pressure of over 2,000 pounds,
24 which means we could have produced at a higher rate.

25 At no point did we produce at what I feel

1 like is an excessive rate at that time. When we plug
2 back to try to get the maximum number of hydrocarbons
3 out, we will not produce it at an excessive rate.

4 Q. From what you've calculated, your drainage
5 area when you recomplete will not change; is that your
6 opinion? It will still be draining at a little over 40
7 acres?

8 A. I think one of the reasons that our drainage
9 area is so small at this point is due to the water
10 influx. The well porosity-wise, permeability-wise is
11 capable of draining a bigger area.

12 We're producing at this point over 300
13 barrels of water per day. It's got excellent porosity;
14 it has excellent permeability. From that standpoint we
15 have the capability to drain 320 acres.

16 I personally don't feel that the reservoir
17 covers 320 acres based on the initial pressure drops
18 that we have obtained.

19 So when we recomplete in the gas shown, if we
20 squeeze this zone and are successful in shutting off
21 the water production, I think it will drain a big area,
22 yes.

23 Q. How much of the east half of Section 23 do
24 you feel contains reservoir?

25 A. It goes at least to the AMOCO Best Com. No.

1 1. That well I feel like actually watered out
2 prematurely, and it goes some distance past there. I
3 have no control of saying how far past there.

4 But when they originally completed that well,
5 they had a thick porosity interval. They perforated
6 the whole interval rather than just perforating part of
7 it.

8 The well came in flowing real well. It had
9 a -- it flowed natural 3 million cubic feet per day and
10 545 barrels of condensate in 26 hours. Then it watered
11 out.

12 They then attempted to squeeze those perms
13 and perforate just in the top. They made two attempts
14 to squeeze off their water. And neither attempt was
15 very successful.

16 Had that well been completed differently, I
17 think that it could have probably produced the bulk of
18 the reserves in the reservoir.

19 So it goes at least, I would say, halfway
20 across that lease and maybe all the way across it.

21 Q. So you'd say approximately 75 percent of that
22 east half may be productive?

23 A. I would say 75 percent of the north -- of the
24 northern half of it. As I said, when you get down into
25 the southern half of the section, you do lose your

1 reservoir before you get out of it.

2 At the original hearing, we suggested
3 160-acre spacing because that's what we felt like was
4 productive -- was the northeast quarter of the
5 section. That would have been unorthodox, and that's
6 why we have the 320-acre spacing.

7 Q. I'm sorry. What would have been unorthodox?

8 A. If they had given us gas rules with 160-acre
9 spacing. The south half of the section, I don't feel
10 like it's contributing very much to the production.

11 I feel like it's mainly the northeast quarter
12 and maybe the north part of the south half.

13 As I said, this reservoir, I think, is
14 relatively limited in areal extent. From completion
15 through September of 1988, we had 1,000 pound drawdown
16 in the pressure.

17 But I do think that both halves -- both of
18 our leases are contributing to the production of the
19 well. And I think to be equitable, both of them should
20 share in the production. The only way that they can
21 share is if we continue the gas rules.

22 Q. Does BTA's interest in the well change from
23 40-acre well to a 320-acre well?

24 A. There may be a minor change, but there's no
25 appreciable change.

1 Q. It's not significant?

2 A. No. We have 100 percent of the working
3 interest in both of the leases.

4 Q. Mr. Salmon, when did you estimate that you'll
5 be able to recomplete the well?

6 A. Looking at the graph, I don't feel that there
7 is a way to predict that. The production is
8 essentially flat at this point. As long as it remains
9 flat, we feel like we're getting a higher percentage of
10 the oil out than we would if we recompleted.

11 So we -- as long as it remains flat, we plan
12 to produce it. The gas is actually creeping up
13 slightly.

14 Q. And the pools that surround this particular
15 pool, are those oil or gas?

16 A. The closest pool, which is the Osudo Wolfcamp
17 west field, is an oil pool. The two wells to the
18 south, the Lea Wolfcamp southeast wells, are gas
19 wells. The field to the north, the Lea Wolfcamp field,
20 is a gas pool.

21 I did talk to the operator about a year ago,
22 and he was considering trying to get it changed to an
23 oil pool to get higher priority on his gas. I don't
24 know if he ever did that or not. I haven't checked
25 that.

1 Q. Again, it's your opinion this will be the
2 only well drilled in this particular field?

3 A. Yes, I think it is.

4 Q. And you believe this well can drain the
5 entire --

6 A. Yes, I think that it can drain the entire
7 reservoir.

8 MR. CATANACH: That's all the questions I
9 have of the witness.

10 FURTHER EXAMINATION

11 BY MR. KELLAHIN:

12 Q. Mr. Salmon, let me visit with you on two
13 topics that Mr. Catanach discussed with you. One, he
14 was concerned as to whether or not in the gas reservoir
15 we needed some special rule to limit the gas-oil ratio
16 notwithstanding the gas rule.

17 The question is once you recomplete into the
18 Wolfcamp and get gas, that will give you the
19 possibility of increasing your gas production up to a
20 point where you might leave condensate and oil in the
21 reservoir?

22 A. I have to say that would be a possibility.
23 In the retrograde gas condensate reservoir, at best
24 you're going to, you know, produce at some point. When
25 you hit the dew point, the condensate will start

1 dropping out. So as you complete the reservoir, that's
2 going to happen.

3 With a very high permeability reservoir, like
4 we have here, and a limited reservoir, I don't think
5 that's going to be a big problem. We haven't
6 experienced big pressure drawdowns around the well.

7 And at any reasonable producing rate that I
8 think we'll produce it at, I don't think that's going
9 to be a problem.

10 Q. The question Mr. Catanach didn't ask you on
11 that topic was whether or not, in your opinion, we need
12 to adopt a special gas-oil ratio limitation in order to
13 control that possibility?

14 A. No. I don't think that a special gas-oil
15 ratio limitation is needed. I don't think gas-oil
16 limitation would be practical.

17 Q. The only limitation that could be adopted
18 that would be practical would be to put some maximum
19 rate on the withdrawal rate.

20 And when we recomplete, we will see how the
21 pressure draws down when we produce it and as long as
22 possible, maintain the reservoir above the dew point.

23 Q. Using just good prudent operation
24 techniques --

25 A. Yes.

1 Q. -- you don't see any way that you could now
2 guess as to what those rules ought to be in order to
3 preclude the least efficient operation?

4 A. Right. Until you recomplete the well, you
5 see what the pressure drawdown is in that zone, there's
6 no way to determine the rate.

7 Q. Your original calculations before Examiner
8 Stogner back in 87 showed drainage in excess of 160
9 acres. And your original request then was for 160-acre
10 reservoir?

11 A. Right. Our original request was for 160
12 acres. The reason we made that was we knew that coming
13 into the hearing we would have a difficult time showing
14 all 320 acres of our leases productive with -- at least
15 that will contribute to this well because of the AMOCO
16 Best Com. No. 2 in the southeast quarter of the
17 section.

18 So to avoid that as a problem, we asked for
19 160 acres. As far as the operation, as far as how the
20 lease will share in the production, it really makes no
21 difference whether it's 160- or 320-acre spacing.

22 Q. That's my next question. The original
23 Examiner order denied your request for 160-acre spacing
24 and simply implied the state-wide Wolfcamp gas rules of
25 320 to the reservoir?

1 A. Right.

2 Q. But you would have no objection should this
3 Examiner now determine that we now have sufficient
4 evidence to say that it ought to be in the northeast
5 quarter of the section?

6 A. No. I would have no problem with that. It
7 will make no difference in our operations. It will
8 make no difference in how the production is split out.

9 Q. Do you see if the gas spacing is changed from
10 320 to 160 that that will cause a well to be drilled in
11 the southeast quarter of Section 23?

12 A. No. If that happens, I think that we will
13 still hold all of our leases. And we don't plan on
14 drilling a well.

15 Q. Would that create the opportunity for a well
16 to be drilled in the southeast quarter that would
17 simply utilize your information, drill to the very top,
18 or at least perforate only in the very top of the
19 Wolfcamp gas, and extract the gas then that you
20 subsequently hoped to obtain with your recompletion?

21 A. It would allow wells to be drilled there,
22 yes, if we wanted to drill one.

23 Q. Or does it create the opportunity under your
24 lease arrangement for a third party to do it?

25 A. I don't think so, no.

1 Q. You wouldn't lose the leasehold interest in
2 the southeast quarter if spacing is reduced to 160?

3 A. No.

4 Q. So changing the spacing is not going to
5 encourage the drilling of additional wells?

6 A. No.

7 Q. In your opinion, that would be unnecessary
8 anyway?

9 A. Right.

10 MR. KELLAHIN: Nothing further.

11 MR. STOVALL: One follow-up of where you're
12 going, Mr. Kellahin.

13 EXAMINATION

14 BY MR. STOVALL:

15 Q. I don't know if you answered it or not or I
16 didn't hear it. You've shown two rectangles, 260-acre
17 rectangles on your Exhibit 2?

18 A. Right.

19 Q. Those are the two separate leases that are
20 involved?

21 A. Right.

22 Q. And so not only your working interests, but
23 the royalty interests would remain proportionally the
24 same on 160 or 320?

25 A. No. The royalty interests under those two

1 leases are different.

2 Q. But the proportion of the interests
3 participating in the well would be the same because
4 it's still 50-50; is that correct?

5 A. I think it's approximately the same. It may
6 not be exact, but it's approximately the same, yes.
7 There are no big differences.

8 Q. But there wouldn't be a royalty owner
9 excluded from the production if you went to a northeast
10 quarter proration unit?

11 A. Right. If we went to a northeast quarter
12 proration unit, right. They would share the same,
13 which they are on the 320-acre spacing.

14 MR. CATANACH: Is that it? That's all the
15 questions I have. There being nothing further in Case
16 9813, it will be taken under advisement. And this
17 hearing is adjourned.

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1 CERTIFICATE OF REPORTER

2

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

5

6 I, Debbie Vestal, Certified Shorthand
 7 Reporter and Notary Public, HEREBY CERTIFY that the
 8 foregoing transcript of proceedings before the Examiner
 9 of the Oil Conservation Division was reported by me;
 10 that I caused my notes to be transcribed under my
 11 personal supervision; and that the foregoing is a true
 12 and accurate record of the proceedings.

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

17 WITNESS MY HAND AND SEAL February 10, 1990.

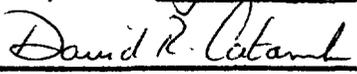
18

19 
 20 _____
 Debbie Vestal
 CSR No. 400

21

22

23 I do hereby certify that the foregoing is
 24 a complete record of the proceedings in
 the Examiner hearing of Case No. 9078,
 heard by me on January 10 1990.

25 
 _____, Examiner
 Oil Conservation Division

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BLDG.
SANTA FE, NEW MEXICO

4 March, 1987

EXAMINER HEARING

IN THE MATTER OF:

Application of BTA Oil Producers to contract the horizontal limits of the West Osudo-Wolfcamp Pool and the concomitant creation of a new gas pool with special pool rules, Lea County, New Mexico. CASE 9078

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

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E X H I B I T S

4

BTA Exhibit One, Map 10

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BTA Exhibit Two, Map 11

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BTA Exhibit Three, Structure Map 16

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BTA Exhibit Nine, Cross Section B-B' 33

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16

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1
2 MR. STOGNER: Call next Case
3 Number 9078.

4 MR. TAYLOR: The application of
5 BTA Oil Producers to contract the horizontal limits of the
6 West Osudo-Wolfcamp Pool and the concomitant creation of a
7 new gas pool with special pool rules, Lea County, New Mexico.

8 MR. STOGNER: Call for -- call
9 for appearances.

10 MR. KELLAHIN: Mr. Examiner,
11 I'm Tom Kellahin of Santa Fe, New Mexico, appearing on be-
12 half of the applicant.

13 I understand from Mr. Carr this
14 morning that he has some concerns and potential objections
15 in our case. I would estimate it will take us about an hour
16 to present this case.

17 If you'd like us to wait and
18 take a shorter case, we'd be happy to do so, but I believe
19 some of the issues involved in this case may be disputed.

20 MR. STOGNER: Mr. Carr, who do
21 you represent?

22 MR. CARR: I represent Amoco
23 Production Company.

24 I also represent Ronald J.
25 Byers, a mineral interest owner under the east half of the

1 east half of Section 23, which includes half the acreage
2 which is the subject of Mr. Kellahin's application.

3 MR. STOGNER: Do you have any
4 witnesses?

5 MR. CARR: No, I do not.

6 MR. STOGNER: Let's go off the
7 record for a second, Sally.

8
9 (Thereupon a discussion was had off the record.)

10
11 MR. STOGNER: We'll take a lit-
12 tle, short recess and call this case back later on the
13 docket.

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15 (Thereupon a recess was taken.)

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1 parties that were interested in the application. I'll sub-
2 mit that to you as a separate exhibit, Mr. Examiner.

3 The case was originally filed
4 for hearing on February 18th, 1987, and at the time that ap-
5 plication was filed, and the first page of Exhibit Thirteen
6 is in fact the application, if you'll turn to the attachment
7 to the application on the third page, you will find that
8 when we file the application we sent notices to the opera-
9 tors in the pool and within a half mile of the pool that we
10 though might be affected by what we were doing.

11 Thereafter, just prior to the
12 February 18th hearing, on February 13th I received a phone
13 call from Mr. Ron Byers who is a mineral owner underneath
14 the east half of the northeast corner of 23, and Mr. Byers'
15 interest is held by BTA as the operator.

16 Mr. Byers, as an interest
17 owner, was concerned about the change in designation of this
18 area as a gas pool.

19 Under the notice rules we nor-
20 mally do not notify the mineral owners under our own tracts
21 of a spacing case, but because of Mr. Byers' call to me, we
22 then went forward with a supplemental notice, continued our
23 case, and sent notice to Mr. Byers and to all the other peo-
24 ple that are indicated in the package of exhibits, as well
25 as those operators that we had previously notified, advising

1
2 MR. STOGNER: This hearing will
3 come to order.

4 We'll come back and continue
5 with Case Number 9078. I believe we called for appearances
6 and Mr. Kellahin had entered an appearance and Mr. Bill Carr
7 had entered an appearance.

8 Have we sworn the witness yet?

9 MR. KELLAHIN: No, sir. I have
10 one witness to present on behalf of my client.

11 MR. STOGNER: And, Mr. Carr, do
12 you have any witnesses?

13 MR. CARR: I will not call a
14 witness.

15 MR. STOGNER: Okay, will the
16 witness please stand at this time to be sworn.

17
18 (Witness sworn.)

19
20 MR. STOGNER: Mr. Kellahin.

21 MR. KELLAHIN: Thank you, Mr.
22 Examiner.

23 Mr. Examiner, I want to intro-
24 duce at this time what we have marked as BTA's Exhibit Num-
25 ber Thirteen. This is a package of notices to the various

1 them that the case was now continued to the March 4th hear-
2 ing, to give all those parties additional time and an oppor-
3 tunity to come forward.

4 I understand that some of those
5 individuals wrote letters to the Commission.

6 Of those that we've notified, I
7 believe Mr. Byers, through Mr. Carr, is the only party
8 that's appeared at today's hearing.

9 With that explanation of the
10 notices, then, I would propose to submit to you Mr. Steve
11 Salmon, who is our reservoir engineer, petroleum engineer,
12 to discuss with you the technical reasons that we believe
13 support our application.

14 MR. CARR: I have only one com-
15 ment in response. I'm also appearing on behalf of Amoco
16 Production Company and Mr. Byers does own interest under the
17 property as defined by Mr. Kellahin. He also has interest
18 in the property underlying the Heller Well, which is the
19 east offset to the subject well and a well operated by Amo-
20 co.

21
22 STEVE SALMON,
23 being called as a witness and being duly sworn upon his
24 oath, testified as follows, to-wit:
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DIRECT EXAMINATION

BY MR. KELLAHIN:

Q Mr. Salmon, let's begin, -- if that's acceptable, Mr. Stogner?

MR. STOGNER: Please.

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

A Yes. My name is Steve Salmon. I'm currently employed by BTA Oil Producers as the Manager of Exploitation and Reservoir Engineering.

Q Mr. Salmon, have you previously testified before the Oil Conservation Division as a petroleum engineer?

A Yes, I have.

Q And pursuant to your employment by BTA Oil Producers, have you made a study of the facts available to you surrounding this application?

A Yes.

Q And pursuant to that study have you prepared certain exhibits or caused those exhibits to be prepared under your supervision and direction?

A Yes, I have.

MR. KELLAHIN: We tender at this time Mr. Salmon as an expert petroleum engineer.

1 MR. STOGNER: Mr. Salmon is so
2 qualified.

3 Q Let me direct your attention first of
4 all, if you please, to Exhibit Number One and let you
5 identify Exhibit One for us and help locate us as to where
6 the property is that is the subject of this application.

7 A Yes. Exhibit One is an insert from the
8 Midland Map Company Producing Zone Map. This map is on a
9 scale of one inch equals six miles. It is prepared to
10 locate the Byers in relation to the regional geology.

11 The approximate area of the Gsudo West
12 Wolfcamp and the Lea Southeast Wolfcamp Field is colored in
13 blue, which is the small blue area just to the right of
14 center of the map.

15 These fields are located approximately
16 17 miles northwest of Eunice and 19 miles southwest of
17 Hobbs.

18 The fields are located in a transition
19 area between the Northwest Shelf to the west and the Central
20 Basin Platform to the east. The approximate dividing line
21 is shown on this map between the geological areas is that
22 dashed line just to the west of the blue area.

23 Q Let's turn to a plat that specifically
24 shows the area that I have before me, Exhibit Number Two,
25 Mr. Salmon, which, before you describe that exhibit, would

1 you simply identify it for us?

2 A Yes. This is an exhibit showing the
3 Wolfcamp production data, the wells that have tested the
4 Wolfcamp in the area, and a color code for the various
5 leases, or the various fields in the area.

6 Q Before we describe the content of the ex-
7 hibit, would you locate for the Examiner the well that is
8 the subject of the case?

9 A Yes. This is the BTA Byers 8605 JV-P
10 Byers Well No. 1. It's indicated by the double circle
11 colored in red close to the center of the map. It's located
12 in the northeast quarter of Section 23, Township 20 South,
13 Range 35 East.

14 Q Based upon your studies as an engineer,
15 Mr. Salmon, what are you recommending to the Examiner with
16 regards to this application?

17 A Our application is to get a field dis-
18 covery for our well, is -- what we are wanting to do is to
19 get a gas well classification for the BTA well. We initi-
20 ally filed this well to be completed in the Lea Southeast
21 Wolfcamp Gas Pool. This filing was rejected by the Conser-
22 vation Division and -- however, we still think that this is
23 a proper filing for the well. If this is not a proper fil-
24 ing, we still have a gas well. We will attempt to prove to-
25 day that the -- it is separated from the Amoco Heller No. 1

1 and that these two wells should be in separate fields.

2 Q Let's identify for the Examiner the pools
3 in the area, the Wolfcamp pools in the area that are spaced
4 upon 160-acre spacing.

5 A Okay, at the top of the map there is a
6 well colored orange. The orange color indicates this is in
7 the Lea Wolfcamp Field.

8 This well is classified as a gas well.
9 It actually has 320-acre spacing.

10 At the south end of the map, or at the
11 bottom, there are two wells colored in green. These two
12 wells are in the Lea Wolfcamp Southeast Field. This is a
13 gas field on 160-acre spacing.

14 Q When we look at Section 24, which is the
15 section adjoining your well, and look at the Amoco Heller
16 Well, Mr. Salmon, that well has been designated and classi-
17 fied in what pool?

18 A It is in the Osudo-Wolfcamp West Field,
19 which is an oil field on 40-acre spacing.

20 Q Because of the proximity of your well to
21 the Amoco well, the District Office has recommended that
22 your well be classified as an oil well?

23 A Yes.

24 Q And in the -- in the West Osudo Field.

25 A Yes.

1 Q When we look at the well to the west of
2 the BTA well, there's an Amoco well, the Amoco Bass Com No.
3 1 Well?

4 A Yes. What is the status of that well?

5 A It is a P & A'd producer. It did produce
6 in the Osudo Wolfcamp West Field.

7 Q If the Examiner approved 160-acre gas
8 spacing for your well, what acreage would you dedicate to
9 the well?

10 A It would be the northeast quarter section
11 of Section 23.

12 Q Can you summarize for us, Mr. Salmon,
13 your opinion as to whether or not the BTA well in 23 is sep-
14 arate from the Amoco Heller oil well in Section 24?

15 A Yes, I think it is separate from the Amoco
16 Heller oil well.

17 Q If the Examiner decides not to designate
18 a new gas pool and assign your well a discovery allowable,
19 how would you recommend to the Examiner that he handle the
20 BTA well in 23 in terms of its spacing?

21 A An alternate to giving us a discovery
22 well would be to approve our original filing, which was to
23 put the well in the Lea Wolfcamp Southeast Field.

24 Q Identify for us, and I don't think you
25 have to go through the specific details of it, identify for

1 us the type of information that's available to the Examiner
2 on Exhibit Number Two.

3 A The type of information on the Wolfcamp
4 producing wells is general completion data information in an
5 A, B, C, D, E nomenclature.

6 Opposite the A for each well is the per-
7 forated interval.

8 Opposite the B is the field that the well
9 is completed in.

10 Opposite the C is the initial potential
11 for the well.

12 Opposite D is the September of 1986 mon-
13 thly rate.

14 And opposite E is the cumulative produc-
15 tion through September of 1986.

16 Two wells that have not produced in the
17 Wolfcamp but have tested the Wolfcamp have the test data
18 shown. One of these wells is the Amoco Best Com No. 2, lo-
19 cated in the southeast quarter section of Section 23.

20 This well was perforated in the Wolfcamp.
21 The last fifteen hours it swabbed 7-1/2 barrels of oil, 12
22 barrels of water with a slight show of gas, and was plugged
23 back to the Bone Spring. It's currently a plugged well.

24 The other well that tested the Wolfcamp
25 that has not produced is the Lea Southeast -- or the Petro

1

2 Lewis Southeast Lea Unit Well No. 3 in the northeast quarter
3 of Section 26.

4 This well drill stem tested gas too small
5 to measure, reversed six barrels of oil.

6 There are quite a few gas wells shown on
7 here that are not producing from the Wolfcamp. These wells
8 are producing mainly from the Osudo Morrow.

9 Q When we look at the Southeast Lea Wolf-
10 camp, the one where Petro Lewis has their wells in 26 and 25
11 --

12 A Yes.

13 Q -- summarize for us or characterize the
14 kind of gas pool we have in that area in terms of its
15 gas/oil ratio, the kinds of characteristics youre discover-
16 ing in that type of gas pool.

17 A Okay, the Lea Southeast -- Southeast Lea
18 Unit Well No. 1 is an excellent well in terms of recovery.
19 It has made 3005-million cubic feet of gas plus 357,000 bar-
20 rels of condensate.

21 It had an excellent initial potential,
22 15-million cubic feet per day with a GOR of 4000 cubic feet
23 per barrel of oil.

24 The adjacent well over in Section --

25 Q I'm sorry, I missed the number. The
gas/oil ratio in that pool is about 4000-to-1?

1 A Yes. The American Trading Company -- or
2 these were originally drilled by American Trading but the
3 Southeast Lea Unit Well No. 2, just to the east of this well
4 is a tight well looking at the logs. It's calculated abso-
5 lute open flow was 1.1-million cubic feet per day with a
6 14,500 cubic foot per barrel of oil ratio.

7 It has been on production a long time but
8 it has only recovered 285-million cubic feet and 25,000
9 barrels of condensate.

10 Q If we look at the gas pool in the north,
11 the Lea Wolfcamp Pool, where TXO has their well, is that al-
12 so a gas pool that has a low gas/oil ratio?

13 A Yes. This is a gas pool and on its
14 potential it had a GOR of 8,571 cubic foot per barrel of
15 oil.

16 Q Let's turn to Exhibit Number Three now,
17 Mr. Salmon, and have you identify that exhibit for us.

18 A Exhibit Number Three is a structure map.
19 The scale is one inch equals 2000 feet, which is the same as
20 the previous map; covers the same area as the previous map.
21 It is contoured on the Third Bone Springs Sand, which is a
22 correlation marker above the Wolfcamp that we feel is a con-
23 sistent correlation marker in the area.

24 The map shows that the structure in the
25 area is an east to west dipping anticline. We do have a

1 small bump or a small ridge in the south end of the map
2 around the Petro Lewis Southeast Lea Unit Well No. 1.

3 The trapping mechanism will be strati-
4 graphic rather than structural.

5 Q Do you have an opinion as to what the
6 drive mechanism is for the reservoir?

7 A It is essentially gas expansion. I think
8 that the Amoco Bass does show that you have some water
9 encroachment, but the main drive mechanism would be gas
10 expansion.

11 Q Would you identify for us the kinds of
12 factors that you would utilize as a petroleum engineer to
13 satisfy yourself that you are dealing with either a gas or
14 an oil reservoir?

15 A Well, you look at the GOR. If it's got a
16 high GOR, obviously you have a gas well. If it has a low
17 GOR, obviously you have an oil well. In between these two
18 extremes you can run pvt tests on your wells and determine
19 the state of the hydrocarbon in the formation.

20 Q Does the gravity of the liquids produced
21 give you any indication or help in deciding whether or not
22 you're dealing with a gas or an oil reservoir?

23 A Yes, a low gravity would generally go
24 with oil wells, 40 gravity and below; 50 gravity and above,
25 you're generally dealing with either a volatile oil or a gas

1 condensate reservoir.

2 Q What are the types of liquid gravity ran-
3 ges that you're discovering in the gas pools immediately ad-
4 jacent to your wells?

5 A The gravities are generally above 50
6 gravity.

7 Q When you have a well that produces in a
8 gas/oil ratio such as you're seeing in this area, you've in-
9 dicated to us that an engineer will cause pvt data to be de-
10 veloped and fluid studies to be made of the reservoir.

11 A Yes.

12 Q What is the purpose of doing that, Mr.
13 Salmon?

14 A The purpose of that is to determine what
15 type of reservoir you're dealing with, which helps determine
16 your spacing; it helps determine how hard you're going to
17 pull the well, and you run it for your knowledge to help you
18 more efficiently deplete the field.

19 Q Have you caused such studies to be made
20 of the BTA well?

21 A Yes, we have.

22 Q Before we look at that information, Mr.
23 Salmon, can you give us what your opinion is with regards to
24 whether or not this is a gas or an oil pool surrounding this
25 well?

1 A Well, I don't think it takes an opinion.
2 The data shows that at reservoir conditions the hydrocarbons
3 are in the gaseous phase.

4 Q All right. Let's turn to that informa-
5 tion and have you identify for us Exhibit Number Four.

6 A Yes. Exhibit Number Four is the report
7 by Tefteller, who collected the samples for a recombined pvt
8 study. It shows the shut-in bottom hole pressures. It
9 shows their recommendations on GOR's for the pvt study. It
10 shows a 4-point test and the stabilization prior to collect-
11 ing samples.

12 The first sheet on this is strictly a
13 cover sheet from Tefteller.

14 The second sheet starts showing the 4-
15 point pressure data. On the extreme right part of the
16 second sheet, the one labeled page 1 of 8 up at the top,
17 shows that the bottom hole pressure at 11,434 feet is 4,526
18 pounds on the shut-in pressure. This is a 13-day shut-in.

19 The pages labeled 1, 2, and 3 of 8 in the
20 upper righthand corner record te 4-point test and a 3-day
21 stabilization period prior to collecting the sample for the
22 reservoir fluid work.

23 I would like to point out that during the
24 4-point test the lowest pressure recorded is on page 2 of 8.
25 It's while the well was producing at about 3-million cubic

1 feet per day. The lowest bottom hole pressure that we en-
2 countered is 4,230 pounds.

3 This is approximately a 300-pound draw-
4 down at 3-million cubic feet per day, which indicates an ex-
5 cellent deliverability for the well.

6 At the bottom of the page, labeled 4 of
7 8, Tefteller recommends that for the recombination work that
8 7,183 standard cubic feet per barrel be used for the recom-
9 bined sample. This ratio represents the cumulative gas/oil
10 ratio for the most stable part of the test, which is the
11 last 24 hours.

12 The next sheet of this shows the gradient
13 shut-in pressure survey prior to the test. Again the shut-
14 in pressure is up in the upper lefthand corner. The shut-in
15 pressure is 4,526 pounds.

16 Just to the right of the pressure are the
17 pressure gradients. These range from .122 to .192, which
18 would be consistent with a gas condensate type of fluid in
19 the tubing.

20 The next page is a flowing pressure and
21 flowing gradient test. These gradients, gradients which
22 range from .161 to .180, are again consistent with a
23 gas/condensate gradient.

24 The next two sheets show the log log plot
25 for the 4-point test and the multipoint forms of gas wells

1 filled out by Tefteller. The calculated absolute open flow
2 was 21-million cubic feet per day.

3 Q With the data collected did -- by Teftel-
4 ler, what then does an engineer do to satisfy himself that
5 at reservoir conditions he is dealing with a gas reservoir?

6 A Well, Tefteller delivered the samples to
7 CORE Lab, who ran a pvt analysis on the hydrocarbons.

8 Q Is that pvt analysis shown as Exhibit
9 Number Five?

10 A Yes, it is.

11 Q All right, let me direct your attention
12 to Exhibit Number Five and have you discuss and describe its
13 contents.

14 A Okay. The heart of this report is on
15 page 3 of 5. That's really the fifth sheet. The previous
16 sheets are the data and assumptions that we used in the col-
17 lection or in the analysis.

18 This is a tabulation of pressure versus
19 relative volume. It shows that on the top third of the
20 pressure which they reported, they've shown that at 4,539
21 pounds the dew point of the hydrocarbon fluid is achieved.
22 This means that above the 4,539 pounds the hydrocarbons
23 would exist as 100 percent gas.

24 When you reach 4,539 pounds you begin to
25 get some condensate turning to liquid and as the pressures

1 decrease, you get more condensate.

2 Q Based upon the studies by CORE Lab, then,
3 the magic point for this particular reservoir, using the
4 specific reservoir data, is that a dew point exists at 4539
5 pounds --

6 A Yes.

7 Q -- psig.

8 A Yes.

9 Q And above that point, then, if we find
10 reservoir pressure above that point, the hydrocarbons in the
11 reservoir are in a gas stage.

12 A Yes.

13 Q All right.

14 The current pressure in the BTA Byers,
15 according to our shut-in pressure, is 4,526. This is just
16 slightly below the dew point. We are at the point to where
17 some condensate will begin to be turning to liquid. The or-
18 iginal reservoir presssure, as we'll see when we get to the
19 pressures, was higher than this and at the initial reservoir
20 conditions you were 100 percent gas.

21 If you'll turn over two more pages to the
22 graph that's labeled page 5 of 5, this is a graph of the
23 retrograde liquid volume as a percent of hydrocarbon pore
24 space on the vertical scale going from zero percent to 100
25 percent versus pressure on the horizontal scale.

1 Again, if you're above 4,539 pounds, you
2 have no liquid. At the point at which 4,539 pounds is
3 reached, you start getting some liquid. From there, as the
4 graph going up shows, the condensate as a liquid does in-
5 crease in the reservoir up to a maximum of 22 percent of the
6 hydrocarbon pore space.

7 At that point, when you reach a pressure
8 a little below 2000 pounds, some of the condensate will
9 start going back into the gaseous phase. This is a typical
10 graph on a retrograde gas/condensate reservoir.

11 Q Do you have an opinion as to whether a
12 retrograde condensate reservoir such as this ought to have
13 applied to it the state gas pool rules?

14 A Yes, I think it should.

15 Q Do you have a recommendation with regards
16 to the spacing to be established for the pool?

17 A I think that our well can drain 160 acres
18 and with the field to the south being 160-acre spacing, I
19 recommend that we use this spacing.

20 There is a tight well in the southeast
21 quarter of our Section 23. I might have trouble showing the
22 Commission that we could drain the southeast quarter or that
23 that area is commercially productive of hydrocarbons.

24 Q So rather than going to a 320-acre gas
25 spacing it appears to you at this point that 160-acre spac-

1 ing is appropriate.

2 A Yes, I would think it would be.

3 Q All right. Let's turn to an analysis of
4 the relationship between the BTA Byers Well and the offset-
5 ting Amoco Heller Well, which I understand your opinion is
6 that that well ought to be left on 40-acre oil spacing.

7 A Yes.

8 Q All right, let's turn to that analysis
9 and let me have you use for that discussion Exhibit Number
10 Six, which is cross section A-A'.

11 A Exhibit Number Six is a west to east, as
12 you go from left to right on the cross section, cross sec-
13 tion.

14 The leftmost well is the Amoco Bass Com
15 No. 1. The center well is the BTA Byers No. 1, and the
16 rightmost well is the Amoco Heller No. 1.

17 On this cross section, as well as on the
18 next cross section that we'll show, the well names and com-
19 pletion data are shown below the log. The drill stem tests
20 are shown beside the log to the right. The perforations are
21 shown by the rectangles with circles in them in the center
22 tract and the subsea depths of the top and bottom perf on
23 the initial completion is shown out to the right of the log.

24 The neutron porosity where we have the
25 neutron curve, porosity greater than 5 percent is colored in

1 green. On the next cross section we will have some sonic
2 logs and on that the sonic porosity greater than 5 percent
3 is colored in green.

4 The top correlation line shown on the
5 cross section is the Third Bone Spring Sand. This is the
6 point that we mapped on because it is a nice, consistent,
7 correlative interval from well to well.

8 The middle line is the top of the Wolf-
9 camp lime or carbonate, and the bottom line is the base of
10 the Wolfcamp lime or carbonate. The productive interval is
11 between the top and base of the Wolfcamp lime, usually to-
12 wards the top of the interval.

13 Q I know you're going to get to more de-
14 tails about the differences between the Heller Well and the
15 BTA Byers Well in terms of your opinion that one is in a gas
16 reservoir and the other is in an oil reservoir, but now
17 might be a helpful time to explain to the Examiner, using
18 this exhibit, what are some of the reasons that have caused
19 you to conclude that the two are in different types of re-
20 servoirs?

21 A The GOR of the Amoco Heller initially was
22 2459 cubic feet per barrel of oil.

23 The GOR for the Amoco Byers was 6,284 --
24 no -- yeah, I've got that mislabeled. I notice that should
25 be cubic feet per barrel of oil instead of MCF per day.

1 The GOR of the BTA well was 7,212 cubic
2 foot per barrel of oil as noted on the potential test; on
3 the stabilization it was 17,083.

4 The Amoco Heller well is up-structure
5 from both of the other two wells and it has an initial GOR
6 of less than half of what they are, and a -- this shouldn't
7 happen if these wells are in communication.

8 We will look at a performance curve in a
9 little bit and the Amoco Heller has a typical limited reser-
10 voir oil decline curve.

11 Q While we're using this exhibit, let's al-
12 so discuss the well to the west of the Byers No. 1 Well, the
13 Amoco Best Com 1 Well, to have you describe for us whether
14 or not that Best Well has depleted the production in the
15 Wolfcamp to such an extent that some portion or all of that
16 40-acre tract ought to be excluded from being assigned a
17 portion of the allowable from the BTA Byers Well.

18 A No, I don't think it has. This well was
19 perforated -- well, first of all, it has excellent porosity
20 and permeability development; had a good deliverability;
21 porosities up in the range of 20 percent. It has a nice,
22 solid block of porosity. It looks like an excellent well.
23 They perforated from the base of the porosity up almost to
24 the top of the porosity initially as shown by the perfora-
25 tions on the left side of the middle tract. These are

1 labeled 4-1-83.

2 The well did start making water fairly
3 soon after its completion and the performance became very
4 erratic. They did try two plugback attempts as shown by the
5 perforations on the left side of the inside tract and ones
6 sown to the left of the log. These were not successful.

7 Q Mr. Salmon, please discuss Exhibit Seven.

8 A Exhibit Seven is a production graph on
9 this well. As you can see, the -- this is a 3-cycle 5-year
10 graph. The barrels of oil per month, barrels of water per
11 month, and MCF per month are shown on the lefthand scale
12 from 100 to 100,000 barrels or MCF per month.

13 The GOR is shown on the righthand side of
14 the scale from 10 to 10,000 cubic feet per barrel of oil.

15 The well came in initially with an excel-
16 lent rate. The oil rate was between 4-and-5000 barrels of
17 oil per month for the first three months.

18 The gas was over 20-million cubic feet
19 per month with one month being up around 90-million cubic
20 feet.

21 The GOR kind of jumped around there. One
22 month it dropped down, but it was generally 3500 cubic foot
23 per barrel of oil in place.

24 It started out real high; it did drop
25 down to 4500.

1 In January the well started making a lot
2 of water. In January it reported over 12,000, January of
3 1984, it reported 12,000 barrels of water per month. As you
4 can see, from then on the performance became very erratic
5 and the oil and gas production both dropped off drastically.

6 I think that this well watered out and
7 had some channeling problems and they just couldn't get the
8 water shut off.

9 Q In your opinion did the Best Well deplete
10 the Wolfcamp reservoir?

11 A No, and I think we'll have to look at the
12 BTA Well before we can get to the reasons as to why I think
13 that.

14 The center well on our cross section,
15 going back to it, is the BTA 8605 JV-P Byers No. 1. This
16 well also had excellent porosity development as shown by the
17 amount of green colored in. It wasn't quite as high as on
18 the Amoco well, but it's excellent porosity.

19 However, there are major differences be-
20 tween the porosity on the two wells.

21 The porosity on the Amoco well, and this
22 is the Best Com when I'm saying the Amoco well, occurred 25
23 feet below the top of the Wolfcamp Lime, while the porosity
24 in the Byers occurred 90 feet down into the Wolfcamp Lime,
25 so there's a big difference in where the porosity occurred

1 in the interval.

2 Also, in the Byers you have a 90 feet --
3 no, you have about, roughly, 60 feet of porosity develop-
4 ment. You don't see any real tight intervals. It looks
5 like it's all one zone.

6 The porosity in the BTA well occurs over
7 122-foot gross interval. It does have tight streaks separ-
8 ating it into various porosity zones, so you can see that
9 there, even though they both are good, they do have, do show
10 that between the wells it's a very heterogeneous reservoir.

11 The two lower perforated intervals in the
12 BTA well that are shown in the center tract, the perfora-
13 tions with the arrows marked through them, were perforated,
14 both zones swabbed water, and the well was plugged back to
15 the top perforations shown from 11,430 to 11, 440 feet.

16 In looking at where the water is in the
17 Byers Well, the BTA well, it has to be somewhere between the
18 top set of perfs and the middle set. Looking at how this
19 ties in with the Amoco Best Com, the top perf in the middle
20 set is the minus subsea of 7785. The subsea of the base of
21 the porosity on the Amoco well is -7785.

22 So on that basis, on our way you could
23 say that the potential's there for the rest of that to have
24 hydrocarbons in it.

25 If you take the more pessimistic outlook

1 and say that the water is right at the base of the top set
2 of perms, that would be a subsea of -7749.

3 If you take that subsea over to the Amoco
4 well you would still have 33 feet of porosity above that in-
5 terval, and I think on this basis you can say that the Amoco
6 well's problems were probably largely due to a channeling of
7 water from the bottom and that they have not adequately dep-
8 leted the reservoir in that area.

9 I might point out the Amoco well made its
10 initial potential natural; the BTA well producing first,
11 then acidized with 200 gallons.

12 Okay, that's all I have on those two
13 wells right now.

14 Q Let's see, we're looking at exhibit --
15 the information on the --

16 A Exhibit Six.

17 Q -- Exhibit Six?

18 A Right. The third well on this cross sec-
19 tion is the Amoco Heller No. 1. This well was perforated
20 over a gross interval from 11,326 to 11,436; however, the
21 only porosity over 5 percent on the neutron curve is over
22 the interval from 11,414 to 11,422 feet. The porosity is
23 less than 10 percent and it's only an 8-foot interval.

24 The extreme deterioration in porosity
25 from the other two wells is obvious just from the appearance

1 of the cross section.

2 The Amoco Heller Well was fraced with
3 12,500 gallons, which I think confirms that initially it was
4 probably tight. It did potential for 379 barrels of oil, 5
5 barrels of load water, and a GOR to 2,459 cubic feet per
6 barrel of oil, and in looking at the cross section it's ob-
7 vious most of the perforations are above any perforations in
8 the Amoco Best Com or in the BTA Byers No. 1.

9 Q In your opinion is the Amoco Heller Well
10 producing in the same reservoir as the other two wells on
11 the cross section?

12 A No.

13 Q Let's turn to Exhibit Number Eight, which
14 I think is the production information on the Heller Well.

15 A Yes. This is a production graph on the
16 Amoco Heller No. 1. The oil and gas scales and the symbols
17 used are the same as on the previous graph. It's again on
18 3-cycle 5-year paper. The GOR scale again is on the right-
19 hand side of the graph. The scale is different in that it
20 goes from 1000 cubic feet per barrel of oil at the bottom to
21 1-million cubic feet per barrel of oil at the top.

22 The oil, which is shown by the solid
23 curve on this cross section, is on a very steep decline.

24 The gas, which is shown by the x's is de-
25 clining but not as steeply.

1 eration of the relationship of the BTA Byers Well to the
2 Petro Lewis wells in the Southeast Lea Wolfcamp Gas Pool,
3 and as an aid to that presentation, let me direct your at-
4 tention to Exhibit Nine, which is the B-B' cross section.

5 A Yes. Cross Section B-B' is a north to
6 south trending cross section. On the lefthand side it
7 starts on the north, about two miles north of the BTA well,
8 on the TXO Jordan No. 2-B. A trace of the cross section is
9 shown on the map on the inset.

10 It then proceeds to the south through the
11 BTA Byers Well; then to the south offset of this well, the
12 Amoco Best Com No. 2; then to the south offset of that well
13 to the Southeast Lea Unit No. 3; then to the south well from
14 that, the Southeast Lea Unit Well No. 1. All these wells
15 appear to -- the producers appear to be completed in the
16 same carbonate bank.

17 The leftmost well on this cross section,
18 as I said, is the TXO Production Corporation Jordan B Well
19 No. 2. This well is completed as a gas well. It poten-
20 tialled for 2.4-million cubic feet per day; GOR of 6875 cubic
21 feet per barrel of condensate.

22 As shown by the lack of green color, it
23 again is a tight well; does have a few feet colored black
24 there in the perforations from 11,440-to-50 feet.

25 Just to the right of that well is the BTA

1 Byers No. 1, which we looked at on the previous cross sec-
2 tion and again the extreme heterogeneity of the reservoir is
3 shown by the differences in the porosity development.

4 The third well, or the middle well going
5 to the right, is the Amoco Best Well No. 2. This is the
6 south offset to the BTA Byers.

7 Again there's a total lack of neutron
8 porosity over 5 percent. Right around 11,400 feet the den-
9 sity does get up over that and cross plotting those wells,
10 those two curves would probably result in a porosity of
11 about 7 percent over 4 to 5 feet.

12 It was perforated, as shown on the center
13 track. It was acidized with 6,500 gallons and it swabbed
14 noncommercial oil and water.

15 Again the extreme heterogeneity of the
16 reservoir is shown by the differences in the porosity devel-
17 opment between the two wells.

18 The next well going to the right is the
19 Petro Lewis Southeast Lea Unit Well No. 3.

20 This well has a remnant of the porosity
21 development. It has about six feet of porosity over 5 per-
22 cent and the well was drill stem tested, flowed gas to sur-
23 face too small to measure and it did reverse out 6 barrels
24 of oil.

25 The pressures on this test, the initial

1 shut-in, 3,992; the final shut-in, 5,289, does indicate that
2 the pressures in this tight test aren't adequately built up.

3 The last well on the right is the Petro
4 Lewis Southeast Lea Unit Well No. 1. This is the best pro-
5 ducer in the area from the Wolfcamp. As I said, it made 2
6 BCF, 357 barrels of condensate, and as shown by the amount
7 of green shown on the sonic log, we would expect it to be a
8 good well.

9 It was perforated initially from 11,400
10 to 500 and the perms below there from 11,4 -- no, the ini-
11 tial perms were 11, 400 to 470. The perforations from
12 11,470 to 11,500 feet were added in 1974.

13 Q Do you have a production graph of the
14 performance of the Petro Lewis well --

15 A Yes.

16 Q -- that you've been discussing? Is that
17 Exhibit Number Ten?

18 A Yes, that's Exhibit Number Ten. Now this
19 graph is on 3-cycle 20-year semilog paper. The GOR is indi-
20 cated by the blue curve and the scale is shown on the left
21 side of the graph, going from 1 to 1000 MCF per barrel.

22 The monthly gas production is indicated
23 by the red curve and this scale is on the righthand side.

24 As you can see, the well for the first
25 six months had an excellent deliverability, up in the range

1 of 70-million cubic feet and higher.

2 It then declined rapidly to a little bit
3 over 10-million cubic feet per month where the decline flat-
4 tened out; been on production since 1968 and it's been an
5 excellent well.

6 The GOR for this well has bounced around
7 quite a bit. It's ranged from 4000 cubic foot per barrel to
8 generally less than 10,000 cubic feet per barrel.

9 In 1980 through 1983 the GOR appeared to
10 be gradually creeping up and since that time the production
11 has been very erratic.

12 This well also was initially completed
13 natural.

14 The one producing well that we don't have
15 on our cross sections is the well immediately to the right
16 of this well, the Petro Lewis Southeast Lea Unit Well No. 2.
17 This well appears to be tight on the logs. It was fraced
18 with 21,000 gallons, and it did flow on test 384 MCF per
19 day. I think the potential, if I remember, was .1 -- calcu-
20 lated open flow with 1.1-million cubic feet per day.

21 It also has produced since 1968 but its
22 cumulative is only 285-million cubic feet plus 25,000 bar-
23 rels of condensate.

24 Q Have you made a study of the pressure
25 data available for the Wolfcamp wells in this area?

1 A Yes.

2 Q And have you presented that study in
3 forms of a tabulation and a -- of the data, and a graph of
4 that data?

5 A Yes. Exhibit Eleven is the graph of the
6 data with the pressure on the lefthand side of the graph in
7 thousands of psi and the date being on the horizontal scale.

8 Exhibit Twelve is this same data presen-
9 ted in a table format.

10 Q What's the reason that you have made a
11 study of the pressure data, Mr. Salmon?

12 A This is to try to determine the pressure
13 relationship between the BTA well and the other gas pro-
14 ducers in the area and the Amoco Heller.

15 Q And what have you concluded about the
16 pressure relationship among those wells?

17 A Well, it appears that the Amoco Byers, or
18 the Amoco Best Com No. 1, very possibly had some pressure
19 depletion from the Southeast Lea Unit well. Pressure on the
20 STA well is close to the pressure that the Best Com No. 1
21 had. I did get a pressure from Mr. Zinsmeister with Amoco
22 on the Heller. When he gave it to me he told me it was a
23 single dip-in point, that it wasn't built up, and I think
24 that the data shows that it is not a built-up pressure and
25 is inadequate for making any conclusion as to -- just on the

1 pressure data -- whether it's in the same field as we are.

2 Q That's only insofar as the Heller Well
3 goes.

4 A As the Heller, yes.

5 Q All right. Using the pressure informa-
6 tion available to you, what have you concluded about the re-
7 lationship of the Best Com Well and the BTA well versus the
8 Wolfcamp wells to the south? In the Southeast Lea?

9 A I think that both of the Amoco Best Com
10 and the BTA Byers do show pressure depletion from that, from
11 the production to the south.

12 The TXO Well two miles to the north also
13 could be showing some pressure depletion from that produc-
14 tion.

15 Going over the --

16 Q Does it change your opinion with regards
17 to the pressure depletion in the northeast quarter of 23
18 that Amoco drilled the Best Com No. 2 Well in the southeast
19 of the southeast of 23?

20 A No, as I said, this is a very heterogen-
21 eous reservoir. It could very easily be trending in a
22 north/south direction over a fairly thin streak and could
23 bend around between those two wells, or between the Best Com
24 No. 2 and the Southeast Lea Unit Well No. 3.

25 You can't prove this geologically but I

1 think the pressure data indicates it's a definite possibil-
2 ity.

3 Q What have you concluded with regards to
4 the pressure depletion in the area insofar as that informa-
5 tion is useful to reach a conclusion about spacing patterns?

6 A I think that the pressure is transmitted
7 very well over an area where the porosity carries.

8 Going over the pressure data in detail,
9 the first pressures we have available are 1968 on the South-
10 east Lea Unit Well No. 1. This well was DST'd twice. The
11 pressures on one DST at 11,430 feet were 6,502 pounds.

12 On the second DST the pressures were
13 6,616 pounds.

14 Now, closely behind that, in June of
15 1968, the Southeast Lea Unit Well No. 2 was drill stem tes-
16 ted. The initial shut-in on that was 6,791 pounds.

17 The final shut-in was 5,336, indicating
18 an insufficient build-up on the test or depletion during the
19 test.

20 But these tests established an initial
21 reservoir pressure for the Wolfcamp carbonate to be between
22 6,500 and 6,800 pounds, in that range.

23 The Southeast Lea Unit Well No. 3 is the
24 next pressures available. It was DST'd in 1982. Again I
25 think the pressures are not adequately built-up in a tight

1 well, and are very little help in determining anything, but
2 the pressures on the initial shut-in were 3,992 and on the
3 final shut-in were 5,389.

4 Following this the Amoco Best Com No. 1
5 was drilled in 1983. In April of 1983 they had a 12-day
6 shut-in where the pressure was 4,717 pounds. The following
7 month they had a 3-day shut-in of 4,654 pounds.

8 Looking at the excellent porosity on the
9 well, the good permeability, I think in 12 days that well
10 would probably build-up and that would be a good pressure
11 for the area at that time.

12 The Amoco Heller was drilled in 1985.
13 Its pressure was 4,140 pounds. As I mentioned before, it's
14 a one point dip in pressure. The Amoco personnel that I
15 talked to, Mr. Zinsmeister, didn't think it was built-up,
16 since the well took such a big frac to turn it into a pro-
17 ducer, and I think just from that data alone you can think
18 that it may not be built-up.

19 The later pressure on the TXO Jordan B
20 No. 2 and the BTA Byers No. 1, that are higher than this
21 pressure, confirms that the pressure in that well probably
22 wasn't built-up.

23 The TXO Well, which is two miles north of
24 the BTA Byers, had a 63-hour shut-in pressure of 4,683
25 pounds. I got this data out of the Commission files. The

1 pressure was flat for the last 48 hours of the shut-in and I
2 think that that indicates it's a good pressure.

3 On the BTA Byers the DST pressure was
4 4,531 pounds. The test chart was flat. They had a 13-day
5 shut-in of 4,526 pounds. I think those are good pressures.

6 Now there are two possible interpreta-
7 tions from this data.

8 One interpretation would be, and I think
9 that it's the most probably correct, is that the the South-
10 east Lea Unit Well No. 1 and 2 have depleted the area for --
11 around the Amoco Best No. 1, the Byers No. 1, prior to their
12 completion and maybe even as far north as the TXC Jordan No.
13 2-B.

14 The other interpretation would be that
15 the original pressure around the Amoco Best Com No. 1 is
16 1,785 pounds -- at least 1,785 pounds lower than the initial
17 pressure in the Lea Southeast Unit well, and if that is the
18 interpretation, then the Amoco Best No. 1, the TXC Jordan B
19 No. 2, and the BTA Byers are seeing close to virgin reser-
20 voir pressure.

21 Since good pressure data is not available
22 on the Heller, the pressure is of no help in determining the
23 status of that well.

24 Q Let me have you summarize, Mr. Salmon,
25 your opinions on the various issues and then have you iden-

1 tify some of the factors that you've utilized to support
2 those opinions.

3 Starting off, first of all, with your
4 study to determine whether or not you have an opinion that
5 the Byers No. 1 Well is a gas well producing from a gas res-
6 ervoir.

7 A The Byers No. 1 in my opinion it's defi-
8 nitely a gas well producing from a retrograde gas condensate
9 reservoir.

10 Q Do you base that opinion in part upon
11 your analysis of the information received from CORE Lab, the
12 pvt study --

13 A Yes.

14 Q -- and the fluid information?

15 A Yes.

16 Q Is that a typical study that is done by
17 individuals in your profession and relied upon by you as en-
18 gineers --

19 A Yes, it is.

20 Q -- and is it typically used to determine
21 that the hydrocarbons in reservoir conditions are either gas
22 or oil?

23 A Yes, it is.

24 Q With regards to the opinion that you've
25 expressed that the Amoco Heller Well to the east of your lo-

1 cation is an oil well and is separated from the BTA gas well
2 in Section 23, summarize for us the factors that make up or
3 include that opinion?

4 A The factors there are the, of course, the
5 initial GOR on the potential, the initial producing GOR,
6 which I think placed this well as an oil well up structure
7 two wells that appear to be gas wells.

8 The second factor is the decline curve on
9 the well which is typical for a limited reservoir oil well.
10 You generally don't have oil wells in the same reservoir up
11 structure of gas wells.

12 Q Let me ask you your opinion with regards
13 to the spacing pattern and the efficiency of dedicating the
14 northeast quarter of Section 23 to the BTA well.

15 A Well, a gas well with excellent permea-
16 bility as evidenced by the deliverability of the BTA Byers
17 Well, as evidenced by a drill stem test that we have where
18 the pressure just broke flat, which indicates an excellent
19 permeability, the well can drain 160 acres. If the reser-
20 voir extends 320 acres I think it could drain that and I
21 think that the New Mexico Conservation Commission pretty
22 well accepts that a well can drain -- a gas well can drain
23 320 acres.

24 Q Would a 160-acre gas spacing be consistent
25 with the other Wolfcamp gas spacing in the area?

1 A It would be consistent with the Lea
2 Southeast Wolfcamp. To the north you do have a field with
3 320-acre spacing.

4 Q Do you have an opinion as to whether or
5 not the spacing was less than 160 you as an operator would
6 be forced to drill an unnecessary well?

7 A We would eventually be forced to drill
8 additional wells to protect and hold our acreage and keep
9 other operators from picking up the leases after the primary
10 terms and drilling the leases, yes.

11 Q In your opinion is that expense of addi-
12 tional wells necessary in this reservoir?

13 A No, I think the well that we have will
14 drain the reservoir.

15 Q Additional wells in the northeast quar-
16 ter, in your opinion at this time based upon available in-
17 formation, would not produce reserves that would otherwise
18 be produced by the -- not otherwise be produced by the Byers
19 Well No. 1?

20 A No.

21 Q You concluded for us earlier that the
22 Best Com No. 1 Well did not have an impact, or a significant
23 impact, on the ability of the west half of the northeast
24 quarter to contribute productive acreage to the Byers Well.

25 A Right.

1 Q And htat opinion was based on the fact
2 that that well watered out before it was pressure depleted?

3 A Right.

4 Q And the fact it watered out was attribu-
5 table to the low perforations that Amoco placed in that
6 well?

7 A Yes.

8 Q And those low perforations led, then, to
9 the water channeling and the drowning out of the production.

10 A Yes.

11 Q As opposed to having the west half of
12 that quarter section being depleted of reserves.

13 A Right.

14 Q Do you have an opinion, Mr. Salmon, as to
15 whether the -- Mr. Salmon, for this particular reservoir do
16 you have an opinion as to whether it is rate sensitive? In
17 other words, must the producing rates of the wells in this
18 gas reservoir be controlled in some fashion in order to max-
19 imize the ultimate recovery?

20 A No, I don't think so. The small drawdown
21 in pressure in the BTA Well, I think indicates it's not rate
22 sensitive. You wouldn't expect it to be rate sensitive, no.

23 Q In your opinion, Mr. Salmon, will ap-
24 proval of this application, the establishment of 160-acre
25 gas pool under statewide rules for 160-acre gas well be the

1 optimum method to handle the production and spacing for this
2 reservoir?

3 A Yes, I think it will.

4 MR. KELLAHIN: That concludes
5 my examination of Mr. Salmon, Mr. Stogner, and we would move
6 the introduction of his Exhibits One through Twelve.

7 MR. CARR: No objection.

8 MR. STOGNER: No objection?
9 Exhibits One through -- what did you say?

10 MR. KELLAHIN: Twelve.

11 MR. STOGNER: Exhibits One
12 through Twelve will be admitted into evidence.

13 Mr. Carr, your witness.

14
15 CROSS EXAMINATION

16 BY MR. CARR:

17 Q Mr. Salmon, if I understand BTA's appli-
18 cation, what you're seeking is either the contraction of the
19 West Osudo Wolfcamp Pool, deleting the northeast quarter of
20 23 and making that a separate new gas pool, or extending the
21 Southeast Lea Wolfcamp Pool up to and including the north-
22 east quarter of Section 23.

23 A Yes.

24 Q And in either event you would have a 160-
25 acre unit dedicated to a gas well.

1 A Yes.

2 Q If either of those are approved by the
3 Division, BTA will be able to produce substantially greater
4 quantities of oil and gas from that well than under present
5 rules, is that not true?

6 A Yes.

7 Q And you'll be able to also hold the ac-
8 reage without drilling additional wells.

9 A We will hold the full northeast quarter.
10 We would, I think, lose the southeast quarter after the pri-
11 mary term of the leases --

12 Q But you would hold the entire northeast
13 quarter without additional drilling there.

14 A Right.

15 Q If the rules stay as they are, there would
16 be -- you would need to drill additional wells on 40 to hold
17 that acreage.

18 A Yes, past the primary term.

19 Q Now if I understand your testimony, we
20 don't have a dispute here today that the gas/oil ratio for
21 the BTA well in the northeast of Section 23 is such that it
22 would be classified an oil well if we adjusted the gas/oil
23 ratio.

24 A I don't think we -- there is a set cutoff
25 in the New Mexico rules, but --

1 Q Is that --

2 A -- I think it is low enough to where, in
3 a lot of cases, it would be classified as an oil pool, yes.

4 Q It has a gas/oil ratio below or less than
5 100,000 cubic feet of gas per barrel of oil, does it not?

6 A Yes.

7 Q So then if that is the cutoff, it would
8 be classified as an oil well.

9 A Yes, if that's the cutoff.

10 Q Okay. So looking at the gas/oil ratio
11 you don't feel you have an accurate reading on this particu-
12 lar well, is that correct?

13 A If that's the only piece of data you
14 looked at, correct.

15 Q And you've concluded that one of the
16 things that signalled that you might look at the situation
17 in the reservoir was the gravity of the oil.

18 A Yes.

19 Q And the gravity of the oil was somewhere
20 in the neighborhood of, what, 50 degrees?

21 A Yes, it was up -- the gravity -- it's
22 above 50. It's in the 53 to 55 gravity range.

23 Q And that would indicate to you that you
24 might have a volatile reservoir situation?

25 A Yes, it could indicate a possible vola-

1 tile oil type reservoir or it could indicate a retrograde
2 gas condensate reservoir, either one.

3 Q And when you get over 40 that -- degrees,
4 that's what that sort of tells you?

5 A Oh, you have oilfields, you know, that 40
6 to 45 degrees are generally oil fields. When you get up
7 over 50, then you start getting into the volatile oil and
8 the retrograde gas condensate.

9 Q And the gravity of the oil in the Heller
10 Well, the Amoco well, is also over 50, is it not?

11 A Yes.

12 Q Now, if we declare this a gas well, would
13 this be a proration gas well? Or do you know? I don't.

14 A I don't know right offhand. I don't
15 think it would be.

16 Q All right, do you have any idea what --
17 at what rates this well would be permitted to produce the
18 hydrocarbons under it?

19 A As far as the Conservation Division
20 rules, I don't think that there is a limit.

21 As far as practical rules on deliverabil-
22 ity -- delivering gas into the pipeline, these days I think
23 it would probably be in the 3-to-6-million cubic feet a day
24 range.

25 Q And that is in excess of what it could

1 now as an oil well.

2 A Maximum. Yes, as an oil well it would
3 have 2000 times 365 barrels of oil and 730 MCF a day.

4 Q Okay, and if you -- if this is classified
5 as a gas well, how much of the oil will you be able to pro-
6 duce?

7 A We'd be able -- you mean over the life of
8 the well or --

9 Q No, I mean daily. Will you be able to
10 produce more than a 365 barrel depth bracket allowable?

11 A It's conceivable that if you produce --
12 yes, it's conceivable that you could.

13 Q So that is the real benefit that BTA
14 would derive, is it not?

15 A Yes. BTA would derive a benefit from a
16 higher producing rate.

17 Q Now, to establish that you had a retro-
18 grade condensate reservoir, you ran a pvt test.

19 A Yes.

20 Q And from that you were able to conclude
21 that at a reservoir pressure, that the hydrocarbons were in
22 a gaseous state, is that correct?

23 A Yes.

24 Q Were you able to make a similar computa-
25 tion for the reservoir under the Amoco well?

- 1 A No.
- 2 Q You don't have pressure data that --
- 3 A You mean under the Amoco Byers or the
4 Heller --
- 5 Q I'm sorry, the Heller Well.
- 6 A Under the Heller Well, no.
- 7 Q You don't have really sufficient pressure
8 data to do a lot with the Heller Well, isn't that fair to
9 say?
- 10 A Well, we don't have sufficient pressure
11 data and you can't at this time go back to the initial pro-
12 ducing conditions for the well. You -- at this point you
13 can't get that.
- 14 Q So that's something we don't know about
15 that well.
- 16 A Right.
- 17 Q Now if we take a look at -- I'll work
18 backward through these, your Exhibit Number Nine, which is
19 the cross section, the north/south cross section, one of
20 your proposals, I understand, is to extend the Southeast Lea
21 Wolfcamp Pool to the north, is that correct? Is that not
22 right?
- 23 A That is one of the options that would be
24 acceptable to us, yes.
- 25 Q And to that you would have take in the

1 Petro Lewis well that was incapable of commercial produc-
2 tion, is that not right? It lies between the existing
3 Southeast Lea and the BTA Byers No. 1?

4 A The No. 3 Well did DST gas. It's cur-
5 rently a Morrow producer. It's possible that with large
6 stimulation it could be turned into a producer.

7 Q In the Wolfcamp?

8 A The No. 2 Well, yes.

9 Q And that's the well that's the second
10 well from the right on your cross section that has just a
11 very small portion of the log shaded in green.

12 A Right.

13 Q And that's what you called, I think, a
14 remnant of porosity.

15 A Yes.

16 Q If you look at this whole cross section,
17 I believe it was your testimony that they're all in the same
18 carbonate reservoir.

19 A Carbonate bank, yes.

20 Q Do you think they're all in the same
21 pool?

22 A I think with the probable exception of
23 the Heller, yes.

24 I think that the area right immediately
25 around the Southeast Lea Unit No. 3 is probably so tight

1 that you probably won't see any depletion of that area.

2 Q So what you're seeking is a possible ex-
3 tension of this pool to the north and you have a well that
4 was wet in it and well that had only a remnant of porosity
5 in it.

6 A Well was wet, which well is that?

7 Q Isn't that the Amoco well immediately
8 north, the Best Com No. 2?

9 A The Best Com No. 2 was tight. It did
10 swab oil and water at low rates.

11 Q It was never able to -- made into a com-
12 mercial producer, was it?

13 A This is correct.

14 Q And as to the Petro Lewis Well immediate-
15 ly south of that, was it ever a commercial producer?

16 A The No. 3 Well?

17 Q Yes, sir.

18 A It's a commercial producer in the Morrow.

19 Q But not in the Wolfcamp.

20 A Not in the Wolfcamp.

21 Q And never in the Wolfcamp.

22 A Never in the Wolfcamp.

23 Q And you're proposing --

24 A It (not clearly understood.)

25 Q And you're proposing to extend the South-

1 east Lea to include the acreage on which both of those wells
2 are located.

3 A Yes.

4 Q Now, if we look at the Petro Lewis No. 3,
5 you believe this is in the same reservoir as the BTA Byers
6 No. 1.

7 A The No. 3?

8 Q Yes, sir.

9 A The porosity -- well, you're in the same
10 carbonate bank. At that location, no, I don't -- that well
11 is a tight well. It could respond to stimulation and end up
12 making a well.

13 Q And if it did, it's your opinion that
14 that would be in the same pool?

15 A If it did, yes, I think it would probably
16 be in the same pool.

17 Q If we look at your cross section that's
18 Exhibit Number Six and we look at the Heller No. 1 it also
19 has a very small section shaded in green. Isn't it possible
20 that what we have there is also just a remnant of porosity?

21 A I think it is a remnant of porosity, yes.

22 Q Okay, so if we go from your Byers Well
23 south to the Petro Lewis No. 3, the remnant of porosity in
24 your opinion would be in the same pool but if we go to the
25 Amoco Heller to the east it is not.

1 A Yes.

2 Q Now if we look at these zones on the
3 cross section, Six, there is a small shaded area on the Amo-
4 co Heller Well. That shaded area is the producing interval,
5 is it not, in that well?

6 A The entire perforated interval is the
7 producing interval.

8 Q All right, and --

9 A It was fraced with 12 -- hold it, are you
10 talking about which well?

11 Q I'm sorry, I'm talking about the Heller
12 Well, the one on the right.

13 A Okay, yes, it's perforated over approxi-
14 mately a 100-foot interval.

15 Q Okay, now the green shaded area on this
16 log section shows what?

17 A The green section shows porosity.

18 Q Porosity, so is it fair to assume that
19 that is where the production is coming from in the Heller
20 Well?

21 A It could be, yes. It most -- the well
22 was fraced with 12,500 gallons. When you frac a well you
23 can break into zones that don't show up on the log --

24 Q So there may be vertical communication.

25 A -- so there may be vertical communica-

1 tion. The porosity zone that you see there is probably the
2 most likely zone.

3 Q And that zone would correlate with part
4 of the producing interval in the BTA Byers Well, would it
5 not?

6 A Yes, it would.

7 MR. CARR: I have nothing fur-
8 ther.

9 MR. STOGNER: Mr. Kellahin, any
10 redirect?

11 MR. KELLAHIN: No, sir.

12

13

CROSS EXAMINATION

14 BY MR. STOGNER:

15 Q Mr. Salmon, as far as the Heller Well
16 goes, do you know what the gravity of oil coming out of that
17 well is?

18 A It's between 53 and 55; gravity of that
19 well is about the same as it is in our well. They're both
20 in the 53 to 55 range; depending on where you catch your
21 sample you'll get a range in there somewhere.

22 MR. STOGNER: I have no further
23 questions of this witness.

24 Are there any other questions
25 of Mr. Salmon?

1 MR. KELLAHIN: No, sir.

2 MR. STOGNER: He may be ex-
3 cused.

4 Do you all have any closing
5 statements?

6 MR. CARR: Very brief.

7 MR. STOGNER: Mr. Carr.

8 MR. CARR: May it please the
9 Examiner, BTA is before you today having drilled a well in
10 the West Osudo Wolfcamp Pool classified as an oil well.
11 It's a very good well and they're interested in producing it
12 at higher rates than permitted under existing rules, so they
13 seek to do one of two things, either create a new pool for
14 this well because it's a good well, or extend the Southeast
15 Lea Wolfcamp Pool to include it.

16 I submit to you that, first of
17 all, in regard to extension of the Southeast Lea Wolfcamp,
18 this was not included within the call of the case. It would
19 require readvertisement.

20 That aside, it is asking you to
21 extend a pool over an area in which there are two noncommer-
22 cial wells and I don't believe anything in the record would
23 justify doing that from an engineering point of view.

24 If either of the alternatives
25 sought by BTA are granted, we will have a gas well. The gas

1 well will be nonprorated and their purpose will be -- their
2 purposes will have been achieved in that they'll be able to
3 produce at a higher rate and they won't have to do the drill-
4 ling that would be required to develop the oil pool.

5 Amoco is here today, as is Mr.
6 Byers, in opposition to this application. We believe that
7 the evidence shows that these are the same reservoir. We
8 may have a smaller portion of it but the data BTA has pre-
9 sented I think is woefully inadequate in certain respects.

10 First of all, they talk about
11 the well that Petro Lewis operates to the south that has a
12 small porosity shelf and they'll stand here before you and
13 claim that this would be in the same reservoir and that the
14 reservoir does extend to the south.

15 They admit that the zones cor-
16 relate between their Byers Well and the Amoco Heller Well to
17 the east.

18 They talk about having and have
19 presented pvt information that they have prepared which
20 would tend to show, perhaps, a retrograde condensate condi-
21 tion in the reservoir. They were directed or pointed this
22 way because of the gravity of the oil in their Byers Well,
23 and yet if we look at it, the gravity of the oil in the
24 Amoco Well would certainly indicate that the oil is the same
25 and there's no pvt information on that. Simply showing what

1 they have in their well, it seems to me, and breaking it and
2 calling it a separate pool, is an inadequate presentation
3 and if you accept their argument, we submit that you'll be
4 authorizing drainage which will have two sets of rules in
5 the same reservoir, and we therefore request that the appli-
6 cation be denied.

7 MR. STOGNER: Thank you, Mr.
8 Carr.

9 Mr. Kellahin?

10 MR. KELLAHIN: Mr. Examiner,
11 it's undisputed that Mr. Salmon has used the best available
12 information, using standard engineering practices, to tell
13 you under reservoir conditions what type of well he has.

14 It is undisputed that that tes-
15 timony shows that this is a gas reservoir and that the BTA
16 well produces from a gas reservoir.

17 What Amoco wants to do with
18 their acreage is certainly up to them. If they want to be
19 in our pool, that's fine; if they don't, why, that's fine
20 with us. If they want to stay on forties, that's all right,
21 too. If they want to stay on 160's, the gas -- that's fine
22 with us, too.

23 They have not provided you any
24 information to demonstrate what ought to be done with the
25 Heller Well. It is undisputed that Mr. Salmon has told you

1 that in his opinion, and it's the only opinion you have be-
2 fore you, that that is in a separate reservoir. You're stuck
3 with a gas well and you've got to be able to do with it, one
4 of the logical things to do is simply extend the closest gas
5 pool that you have.

6 I mean you can do that. The
7 District Office can simply extend it and it's done. It does
8 not matter that there are wells in the area that don't pro-
9 duce commercial Wolfcamp; the testimony is that it was pres-
10 sure depleted from Wolfcamp gas wells. It shows in the evi-
11 dence that this is a gas well.

12 You cannot ignore the informa-
13 tion Mr. Salmon has given you but it does not preclude you
14 from a number of options.

15 The option is that you can
16 space this on 160 acres and let Amoco come in with their own
17 presentation to demonstrate with their own pvt study what
18 they well is or is not. If Mr. Carr wants to argue it's an
19 oil well, let him bring in his proof, but don't believe him
20 standing here without an expert to tell you that we ought
21 not to have a gas well when in fact we have a gas well. He
22 can't deny it, it's there, and no amount of verbiage is
23 going to change that into an oil well.

24 What is your obligation, and
25 that is to space on what is appropriate for the reservoir.

1 Don't make us drill additional wells when one well will do.

2 The fact that we can produce at
3 a higher rate, the undisputed testimony is it does no damage
4 and there's certainly no testimony at all before you that
5 there's been any drainage. The first time I ever heard that
6 idea is when Mr. Carr gave it to you. There's no evidence
7 of drainage here; no proof of it at all. If he's concerned
8 about drainage, where is his proof?

9 The only thing you can do with
10 what you've given us is to treat this as a gas well. Your
11 options are to extend the existing gas pool or to create a
12 new one for us. We don't want to infringe upon Amoco. We
13 don't think they're in the same reservoir for us, and that's
14 our expert's opinion. If they believe otherwise, let them
15 come demonstrate it to you.

16 We don't want to draw their
17 well into our pool. We don't see any reason for it. They
18 can produce at whatever rates they can next door; that's
19 fine with us, but let us have what we think is appropriate
20 in this case and please grant the application.

21 MR. STOGNER: Thank you. Is
22 there anything further in this case?

23 MR. CARR: Mr. Stogner, there
24 are several letters that I'm asking just be included in the
25 record of the case from Mr. Byers, Mr. Nixon, and others.

1 MR. STOGNER: I have received
2 several correspondence to be read into the record today. I
3 will not read them; however, I will allude to them and they
4 will be made part of the record.

5 One Alton C. White, Junior, in
6 Austin, Texas objects.

7 James W. Nixon, M.D., and a
8 James W. Nixon, Junior, M.D., both object, San Antonio,
9 Texas.

10 A Mr. (unclear) Johnson of Aus-
11 tin, Texas, a letter of exception, and Adolph A. Karmel,
12 that's K-A-R-M-E-L, Junior, of Austin, Texas, also sends an
13 objection. Evidently they are interest owners within the
14 acreage discussed today.

15 They will be made part of the
16 record.

17 If there's nothing further in
18 Case Number 9078, I do have one instruction for both attor-
19 neys today. Would you both submit me a rough draft order
20 within the next ten days?

21 At that time I'll keep the re-
22 cord open for the receipt of just those particular items.

23 That will conclude this case
24 and I'm going to take a thirty minute break.

25

(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 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 this portion 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. _____ heard by me on _____ 19____.

_____, Examiner
Oil Conservation Division