

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

20 May 1987

EXAMINER HEARING

IN THE MATTER OF:

Application of Damson Oil Corporation CASE
for the extension of the proposed West 9138
Lusk-Delaware Pool and an exception
to General Rule 505, Lea County, New
Mexico.

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

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OIL CONSERVATION DIVISION

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I N D E X

STATEMENT BY MR. BRUCE 4

BRENT LOWERY

Direct Examination by Mr. Bruce 5

Cross Examination by Mr. Stogner 34

E X H I B I T S

Damson Exhibit One, Plat 7

Damson Exhibit Two, Schematic 8

Damson Exhibit Three, Cross Section 17

Damson Exhibit Four, Cross Section 19

Damson Exhibit Five, Cross Section 20

Damson Exhibit Six, Structure Map 21

Damson Exhibit Seven, Phi-H Map 22

1

2

I N D E X CONT'D

3

4

5	Damson Exhibit Eight, Log	24
6	Damson Exhibit Nine, Tabulations	25
7	Damson Exhibit Ten, Water Analyses	28
8	Damson Exhibit Eleven, Decline Curve	8
9	Damson Exhibit Twelve, Decline Curve	30
10	Damson Exhibit Thirteen, C-102	32
11	Damson Exhibit Fourteen, Amended Forms	51

12

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MR. STOGNER: Call next Case Number 9138.

MR. TAYLOR: The application of Damson Oil Corporation for the extension of the proposed West Lusk-Delaware Pool and an exception to General Rule 505, Lea County, New Mexico.

MR. STOGNER: Call for appearances.

MR. BRUCE: Mr. Examiner, my name is Jim Bruce from the Hinkle Law Firm in Santa Fe, representing Damson Oil Corporation and I have one witness to be sworn.

MR. STOGNER: Are there any other appearances? There being none will the witness please stand and be sworn?

(Witness sworn.)

MR. BRUCE: Before we begin, Mr. Examiner, I would state that this case arises because the applicant had a 25 year old well that was producing 20 or 30 barrels of oil a day and suddenly began producing over 300 barrels a day, which, of course, isn't usual, and that's what precipitated this whole matter.

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BRENT LOWERY,

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

DIRECT EXAMINATION

BY MR. BRUCE:

Q Mr. Lowery, would you please state your full name and city of residence?

A My name is Brent Lowery and I live in Midland, Texas.

Q And what is your occupation and who is your employer?

A I am currently on rotational assignment as a production technician for Damson Oil Corporation in Midland.

Q And have you previously testified before the New Mexico OCD?

A No, I have not.

Q Would you please briefly state your educational and work background?

A I received a BS in petroleum engineering from Texas Tech University in August of 1984.

Upon graduation from Texas Tech University I went to work for Damson as a production engineer.

1 I've worked a variety of areas in West Texas and southeas-
2 tern New Mexico.

3 I have recommended and designed recomple-
4 tion, recompletions, evaluated reservoir performance and po-
5 tential, and have participated in evaluation of several
6 waterflood projects.

7 I am also a member of the Society of Pet-
8 roleum Engineers.

9 Q And are you familiar with Damson's appli-
10 cation in Case Number 9138 and the engineering matters in-
11 volved in that case?

12 A Yes, I am.

13 MR. BRUCE: Mr. Examiner, is
14 the witness considered qualified?

15 MR. STOGNER: Mr. Lowery is so
16 qualified.

17 Q Briefly, Mr. Lowery, what does Damson
18 seek by its application?

19 A Damson Oil Corporation is requesting an
20 extension of the proposed West Lusk-Delaware Pool to include
21 Unit H in Section 29, Township 19 South, Range 32 East, Lea
22 County, New Mexico, and also for exception to statewide Rule
23 505.

24 In addition, Damson is requesting relief
25 from the usual shut-in requirements of the Oil Conservation

1 Division in the event of possible overproduction.

2 Q Would you please now refer to Exhibit
3 Number One and describe that briefly for the Examiner?

4 A Exhibit One is a 0-sectionn land map cen-
5 tered around Section 29, T 19 South, R 32 East, Lea County,
6 New Mexico.

7 The area of Section 29 highlighted in
8 yellow represents acreage that Damson currently has under
9 lease below a depth of 4500 feet.

10 The red, yellow, and blue markers repre-
11 sent active Delaware producers in the area.

12 The dark yellow marker located in Unit H
13 of Section 29 represents Damson Oil Corportion's Southern
14 California Federal No. 1 Well.

15 The red marker located in Unit D of Sec-
16 tion 32 represents Texaco, Incorporated's State of New Mex-
17 ico "CR" No. 1 Well.

18 The blue marker located in Unit D of Sec-
19 tion 33 represents Amoco Production Company's Plains Unit
20 Federal No. 7 Well.

21 Q Did you notify offset operators of Dam-
22 son's application?

23 A Yes, I did.

24 Q And who did you notify?

25 A Based on the best information we had

1 available, I notified Amoco Production Company at their
2 Hobbs office; Mobil Producing Texas and New Mexico, Incor-
3 porated, at their Hobbs office; Phillips Petroleum Company
4 at their Odessa office; Texaco, Incorporated, at their Hobbs
5 office; and Yates Petroleum Corporation in Artesia.

6 Q Would you please now refer to Exhibit
7 Number Two and also Exhibit Number Eleven and describe
8 what's on those exhibits?

9 A Exhibit Two is a wellbore schematic of
10 Damson's Southern California Federal No. 1 as it currently
11 exists.

12 Instead of describing all features of the
13 sketch at this time, I will refer back to Exhibit Two at the
14 appropriate time during discussion of the well's history.

15 Also at this time I'd like to describe
16 Exhibit Eleven, which is a decline curve for Damson's South-
17 ern California Federal No. 1. It is submitted at this time
18 to help understand their chronology of events to be de-
19 scribed.

20 Q Would you please go into the history of
21 Damson's well?

22 A Okay. El Paso Natural Gas drilled the
23 Southern California Federal No. 1 in the summer of 1962 to a
24 total depth of 12,830 feet and completed it as a dual Strawn
25 and Morrow producer.

1 As noted on Exhibit Two, the following
2 casing program was used:

3 13-3/8ths inch 54.5 pound J-55 surface
4 casing was set at 826 feet with 950 sacks of cement.

5 9-5/8ths inch 40 pound N-80 intermediate
6 casing was set at 3947 and cemented in place with a total of
7 2,725 sacks of cement. This should give adequate protection
8 to all fresh water zones.

9 A split string production casing design
10 consisting of 5-1/2 inch 17 pound P-110 pipe from 8,048 feet
11 to 12,841 feet, and 5-1/2 inch 17 pound N-80 pipe from zero
12 to 8,048 feet were cemented in place with 850 sacks.

13 A temperature survey indicated the top of
14 cement to be at 10,380 feet from surface.

15 After Morrow and Strawn perforations were
16 place, two Brown Oil Tool hydraulic packers and two strings
17 of 2-1/16th integral joint tubing were run.

18 The long string packer isolating the Mor-
19 row perforations was set at 12,396 feet.

20 The short string dual packer was set at
21 11,337 feet to isolate Strawn perforations from the tubing
22 and casing annulus.

23 This equipment remained in place until
24 August, 1982, when Dorchester Enhanced Recovery began opera-
25 tions to convert the well to artificial lift. At that time

1 the Morrow completion was temporarily abandoned by means of
2 a Baker "FW" type equalizing check valve and tubing stop set
3 in the long string tubing at 11,337 feet after having mud
4 pumped in it.

5 The long string was then jet-cut and
6 pulled. An unsuccessful attempt was made to unset the
7 hydraulic packer at 11,337, and it was left in the hole.

8 After an acid treatment the sucker rod
9 pumping system was installed and the well placed on
10 production.

11 After a casing leak occurred on September
12 29th, 1986, operations were initiated to protect the Strawn
13 completion and repair the leak, which was located at 4631 to
14 4646. As noted on Exhibit Two, this interval was squeezed
15 with 485 sacks on October 5th, 1986, with the top of cement
16 estimated to be at 2450 feet, which is 1900 -- excuse me,
17 which 1497 feet up inside the 9-5/8ths intermediate casing.

18 The squeeze was drilled out and a bridge
19 plug protecting the Strawn was removed. A packer was run
20 and set above the hydraulic packer at 11,337 feet.

21 The tubing was swabbed and no fluid entry
22 was obtained. Apparently the Brown packer had become
23 plugged. Several unsuccessful attempts were made to
24 circulate fill off of the packer and regain communication
25 through it with the Strawn.

1 After several attempts were made to re-
2 lease the packer it was deemed necessary to cut over and
3 fish it to recover production and also to get a cast to --
4 and also to set a cast iron bridge plug over the Morrow to
5 abandon it.

6 After the Morrow tubing stub with the
7 plug in it was jarred loose, casing pressure built up at
8 1000 psig and began flowing mud and gas, presumably from the
9 Morrow. No show of oil had been realized at this time. Af-
10 ter the packer was cut over it could not be pulled.

11 Estimated expenditures at this time had
12 exceeded the AFE amount verbally authorized by Damson's
13 partners. Instead of continuing with fishing operations, it
14 was decided to place the well back on production until a
15 supplemental AFE could be prepared, circulated, and signed
16 by all joint interest partners.

17 After the decision was made, preparations
18 to put the well on production were begun.

19 Tubing was run and the well was swabbed
20 to clean up drilling mud that was being recovered. Problems
21 caused by paraffin, drilling mud, and keeping the well under
22 control, required an additional 7-days work before produc-
23 tion resumed. A supplemental AFE was prepared to cover over-
24 expenditures already incurred, plus additional funds to com-
25 plete fishing operations and abandonment of the Morrow.

1 Several days after production was resumed
2 on October 29th, the well began to flow and pump 200 barrels
3 of oil plus 35 barrels of water and 170 MCF of gas per day.

4 November production totaled 5,833 barrels
5 of oil, which an average rate of 194 barrels per day.

6 During December 9,871 barrels were pro-
7 duced, averaging 318 barrels per day. Production for the
8 first 12 days of January, 1987, averaged 274 barrels per
9 day. 5,135 barrels of oil were produced in January, bring-
10 ing total oil production from November 1st, 1986, to February
11 1st, 1987, to 20,839 barrels.

12 Production prior ot September 28th, 1986,
13 was 32 barrels of oil per day with 50 to 60 psig casing
14 pressure.

15 Oil, gas, and water samples were taken
16 from several wells in the area for comparison with histori-
17 cal data. Oil and gas samples do not correlate with either
18 Strawn or Morrow data and water samples correlated very well
19 with known Delaware producers. Knowing that the Strawn and
20 Morrow were both open and that oil, gas, and water samples
21 indicated that production was coming from another source, it
22 was decided to attempt to pinpoint the source of production
23 while the well was still capable of flowing.

24 On January 12th, 1987, operations were
25 begun to determine the source of production. A packer with

1 an on/off tool was run and set at 11,247 feet. The well
2 flowed 131 barrels of oil and 29 barrels of water up the an-
3 nulus in 12 hours after the packer was set. The tubing was
4 swabbed and started flowing, also. An attempt to isolate
5 the Strawn and Morrow by setting a blanking plug in the
6 packer failed, so the packer had to be pulled.

7 Problems with getting the packer out of
8 the hole necessitated the use of an overshot. A tight spot
9 in the casing at 4613 had to be reamed to allow passage of
10 the overshot and fishing to be completed.

11 On January 24th, 1987, a reconditioned
12 packer and retrievable bridge plug was then run. The bridge
13 plug was set and tested at 11,141 feet, which on that date
14 effectively isolated the Strawn and Morrow. As noted on
15 Exhibit 2, the casing was tested and a hole was located
16 between 7958 and 8085. That packer failed and a third
17 packer was run and set at 5501 feet.

18 At this point no flow up the tubing or
19 annulus had occurred since the bridge plug had been set at
20 11,141. Setting the packer at 5501 feet was done to
21 determine if the hole at plus or minus 8000 was the source
22 of production. The fact that this hole appeared after the
23 squeeze at 4631 was completed suggested it as a source of
24 production.

25 As the tubing was swabbed, annular pres-

1 sure built up and annular flow began. At the same time the
2 tubing swabbed dry and went on vacuum. The tubing was then
3 lowered and the packer reset at 7805. Annular flow
4 continued. Noise and temperature logs were run in an
5 attempt to pinpoint the source but by the time they were
6 run, the well had loaded up and very little flow was
7 occurring. Nothing definitive was suggested by either log.

8 In addition to the well not flowing, tool
9 problems were experienced which resulted in an unusable
10 temperature log presentation. Schlumberger agreed to run
11 the next temperature log at no charge because of the
12 problems experienced.

13
14 Since fluid was entering the casing at
15 some point above 5501, the second bridge plug was set at
16 7156. A second hole was located between 4615 and 4677. The
17 packer was removed and production equipment was run.
18 Production was 108 barrels of oil plus 62 barrels of load
19 water the first 12 hours after pumping resumed.

20 Production for February 10th was 393
21 barrels of oil per day plus 122 barrels of water plus 220
22 MCF of gas.

23 After this work was completed the Bureau
24 of Land Management was consulted to find out what would be
25 required to bring this well into compliance to their

1 satisfaction with Federal operating regulations. In addi-
2 tion, the presentation was given to NMOCD personnel in
3 Hobbs. At that time Damson was advised by the NMOCD to
4 amend C-115's to reflect Delaware production from the South-
5 ern California Federal No. 1 back to January the 24th of
6 1987.

7 AT this point we felt comfortable that
8 production was coming from the Delaware as opposed to the
9 Bone Springs, but we did not know what specific Delaware
10 zone was producing. Log analysis showed a number of possi-
11 bilities.

12 Because of the poor mechanical condition
13 of our wellbore, in addition to not knowing at that time the
14 exact source of production, it was requested that Damson not
15 be required to squeeze the hole at 4615 to 4577. After a
16 discussion with Pete Chester of the BLM in Roswell, the fol-
17 lowing requirements to abandon the Strawn and Morrow and
18 plug back the Delaware were made. The abandonment of the
19 Strawn and Morrow would have to be done in one of two ways.

20 One method required that the dual packer
21 stuck at 11,337 feet be recovered and a cast iron bridge
22 plug be set between the Strawn and Morrow completions, with
23 a second bridge plug set above the Strawn and capped with 50
24 feet of cement.

25 The second alternative was to set a re-

1 tainer 50 feet above the dual packer and squeeze both zones
2 together.

3 To complete plugback operations the hole
4 between 7958 and 8085 would have to be squeezed. After
5 these requirements were met, then production of Delaware
6 from the casing leak between 4615 and 4677 would be allowed
7 with no additional cementing work.

8 A meeting of all partners in the well was
9 held at Damson's office in Midland to discuss what plan of
10 action would be appropriate. The main point of concern was
11 the poor mechanical condition of the production casing. As
12 noted on Exhibit Two, two additional leaks occurred after
13 the initial hole was cemented. Also, as I've already men-
14 tioned, the the tight spot in the casing at 4613 had to be
15 reamed to allow passage of an overshot.

16 In the process of trying to pinpoint the
17 source of production in January, great difficulty was exper-
18 ienced in trying to get the tools to set. To avoid a great
19 risk of losing the wellbore by fishing the dual packer, a
20 decision was made to give up plans of possibly re-entering
21 the Strawn at a later time and permanently abandoning the
22 Strawn and Morrow by squeezing both zones with the dual pac-
23 ker in place.

24 It was decided to attempt to run a second
25 noise and temperature log and definitively locate the pro-

1 ducing zone. The logging tools worked properly and and re-
2 sults of this temperature survey will be presented as Exhi-
3 bit Eight later in the testimony.

4 As noted on Exhibit Two, on April 29th,
5 1987, a retainer was set at 11,292 feet and a running
6 squeeze to 4500 psig was obtained on the Strawn and Morrow
7 completions.

8 A second retainer was set at 7812 and the
9 hole between 798 -- 7958 and 8085 was cemented with 150
10 sacks.

11 Calculated top of the cement outside the
12 casing is 7585 and the new plugback TD is 7746.

13 Production tubing has not been run below
14 4632 since the cement was placed, so integrity of the well-
15 bore below this point is not known. Both cementing proce-
16 dures were witnessed by BLM personnel.

17 Q Would you please now refer to the cross
18 sections marked as Exhibits Three, Four, and Five, and dis-
19 cuss what they show with respect to the producing zone?

20 A Exhibit Three is a structural cross sec-
21 tion A-A' that includes from left to right wells located in
22 Unit F and D in Section 33, Units I and H in Section 29, and
23 Unit M in Section 21.

24 This cross section runs from south to
25 north as shown on the index map. A subsea datum of -800

1 feet was used.

2 The color scheme used to identify feat-
3 ures on this exhibit are as follow:

4 Green represents productive sands.

5 Yellow represents nonproductive sands.

6 Brown represents nonproductive shaly
7 sands.

8 And white represents porosity below 4
9 percent.

10 The purpose of Exhibit Three is to iden-
11 tify the north/south horizontal limits of the present Lusk
12 Delaware Field.

13 In 1969 Amoco Production Company drilled
14 the Plains Unit No. 9 as a shallow Delaware test and recom-
15 pleted their Plains Unit No. 7, which was formerly a Lusk
16 Strawn producer. Both commercial -- both were commercial
17 producers and the new field was designated as the Lusk Dela-
18 ware Field.

19 As noted on Exhibit Three, the interval
20 for 4828 to 4836 was perforated in the Plains Unit No. 9 and
21 produced about 25,000 barrels of oil before being abandoned.
22 This zone corresponds to the non-productive interval from
23 4840 to 4860 that was tested in the Plains Unit No. 7.

24 Moving from south to north this zone is
25 productive in the Plains Unit No. 9, nonproductive in the

1 Plains Unit No. 7 and disappears almost entirely before it
2 gets to Damson's Southern California Federal No. 4, No. 1,
3 and the Plains Unit 4 Well.

4 Most production for the Lusk Delaware
5 Field has originated in an interval from 4712 to 4732 in the
6 Plains Unit No. 7. Again following the cross section from
7 south to north beginning with the Plains No. 9, the zone is
8 a nonproductive shaly sand, a very good productive sand
9 which has produced in excess of 197,000 barrels of oil in
10 the Plains Unit No. 7, grades into a shaly sand in Damson's
11 Southern California Federal No. 4, Southern California No.
12 1, and Plains Unit No. 4 Well.

13 Exhibit Four is a structural cross sec-
14 tion B-B' that includes from left to right wells located in
15 Unit A of Section 31, Unit D and Unit A of Section 32, Unit
16 D of Section 33, Unit N and Unit J of Section 48. This
17 cross section runs from west to east, as indicated on the
18 index map. The datum of 900 -- of 800 -- minus 800 subsea
19 was used and the same color scheme used in Exhibit Three is
20 used here, as well.

21 The purpose of Exhibit 4 is to identify
22 the east/west horizontal limits of the Lusk Delaware Field.

23 Texaco's State of New Mexico "DH" No. 1,
24 located in Unit A of Section 32 and Amoco's Plains Unit No.
25 10, located in the Unit N of Section 28, were both drilled

1 as extensions of the Lusk Delaware Pool. Both wells were
2 noneconomic producers which were abandoned.

3 Amoco perforated the Plains Unit No. 10
4 from 4719 to 4729, which is the same zone that was produc-
5 tive in the Plains Unit No. 7, even though it appears as a
6 shaly sand. Production history verifies this. Cumulative
7 production for that completion was 2,884 barrels of oil.

8 Texaco perforated two zones from 4760 to
9 4780 and 4804 to 4816. Both appear as nonproductive shaly
10 sands. Cumulative production for that completion is 583
11 barrels of oil.

12 It is readily apparent that the only pro-
13 ductive Lusk Delaware zone in this east/west cross section
14 is the 4712 to 4732 zone in the Plains Unit No. 7.

15 Exhibit Five is a structural cross sec-
16 tion C-C' that included from left to right wells located in
17 Unit I of Section 31, Unit D of Section 32, Unit K and Unit
18 H of Section 29, and Unit E of Section 28.

19 This cross section runs from southwest to
20 northeast as shown on the index map. A datum of -800 feet
21 subsea was used and the same color scheme used in Exhibits
22 Three and Four is used here, also.

23 The purpose of Exhibit Five is to show
24 that the zones from 6416 to 6422, which was recently com-
25 pleted in Texaco's State of New Mexico CR No. 1 Well, is not

1 only present but much better developed and potentially pro-
2 ductive in Damson's Southern California Federal No. 1.

3 Moving from left to right across the sec-
4 tion, development of the West Lusk Delaware Pool can be
5 traced.

6 On the Middleton Federal "B" No. 2 a net
7 thickness of 3 feet and porosity of 15 percent was calcu-
8 lated.

9 Moving to the Texaco State "CR" Well,
10 which is the discovery well for this reservoir, net thick-
11 ness is increased to 8 feet and porosity calculated to be
12 about 14 percent.

13 Initial potential for this zone was 172
14 barrels of oil, 196 MCF of gas per day, from perforations at
15 6416 to 6422.

16 As we continue to move northeastward, the
17 Damson Southern California Federal No. 1 zone development
18 continues. In the Southern California Federal No. 3 net
19 thickness is 16 feet and porosity calculates to be 17.9 per-
20 cent.

21 In Damon's Southern California Federal
22 No. 1 the West Lusk Delaware pay is 16 feet thick with about
23 17 percent porosity.

24 Exhibit Six is a structure map based on
25 the top of the West Lusk Delaware zone. The four digit num-

1 ber representing the subsea elevation top is listed below
2 each well location used to construct the map.

3 Colored markers represent active Delaware
4 wells in the area.

5 The blue marker located in Unit D of Sec-
6 tion 33 represents Amoco's Plains Unit No. 7, although it is
7 not completed in the West Lusk Delaware zone.

8 The red marker located in Unit D of Sec-
9 tion 32 represents Texaco's State "CR" No. 1 Well, which
10 again is the discovery well for this pool.

11 The yellow marker located in Unit H of
12 Section 29 is Damson's Southern California Federal No. 1,
13 which contend is in fact producing from the West Lusk Dela-
14 ware zone.

15 Exhibit Six is designed to show that no
16 structural change exists that would cause Damson's well to
17 be nonproductive relative to the Texaco well. Over a dis-
18 tance of roughly 1.3 miles the subsea elevation between the
19 Damson well and the Texaco well changes by only 18 feet with
20 the Damson well being 18 feet low in structure to the Texaco
21 well.

22 Q Would you please now refer to Exhibit
23 Seven and discuss the net porosity in this area?

24 A Okay. Exhibit Seven is a Phi-H map of
25 the West Lusk Delaware pay. Numbers located adjacent to the

1 various well locations represent a porosity times thickness
2 value as calculated from sonic porosity logs.

3 As in the previous exhibit, the yellow
4 marker located in Unit H of Section 29 represents Damson's
5 Southern California Federal No. 1.

6 The red marker located in Unit D of Sec-
7 tion 32 represents the Texaco State "CR" No. 1.

8 And the blue marker located in Unit D of
9 Section 33 represents Amoco's Plains Unit No. 7.

10 The blue marker was plotted for reference
11 only and has no bearing on the conclusion to be demonstrated
12 by this exhibit.

13 Exhibit Seven is designed to demonstrate
14 the distribution of net porosity thickness in Section -- in
15 Sections 29 and 32. It also shows that Damson's Southern
16 California Federal No. 1 has roughly 2-1/2 times as much net
17 porosity thickness as Texaco's State "CR" No. 1. In addi-
18 tion, the gross interval thickness in Damson's well is 16
19 feet and in Texaco's well it is only 8 feet.

20 Based on zone thickness along the Damson
21 well could be expected to have two times the productivity of
22 the Texaco well.

23 Q Would you please now move on to the tem-
24 perature log marked as Exhibit Eight?

25

1 A Exhibit Eight is a temperature log run on
2 the Damson Oil Corporation Southern California Federal No. 1
3 by Schlumberger on April 7, 1987.

4 The log was run from surface to 7080
5 feet. Since it was logged through tubing which was set at
6 plus or minus 4336, a portion of the log from surface to
7 4400 feet was not included.

8 The heavy solid lines represents a normal
9 temperature gradient in this well. This gradient was calcu-
10 lated using a temperature reading at 4400 feet and a second
11 at 7050 feet.

12 The resulting calculated gradient is .82
13 degrees Fahrenheit per 100 feet.

14 The interpretation made by myself and
15 concurred with by Schlumberger is that fluid is channeling
16 up behind pipe from a point in the vicinity of 6450 feet
17 from surface, referring to that portion of the log, this can
18 be readily observed.

19 As can be seen by correlation of the gam-
20 ma ray tract with an open hole log, the West Lusk Delaware
21 zone is located in the vicinity where the anomaly appears.
22 The temperature scale on the log increases from left from
23 right. Since the anomaly originating at 6450 falls to the
24 right of what is considered to be the normal gradient line,
25 the heating effect is represented. This hearing effect is

1 most probably caused by warmer fluid entering the casing-
2 formation annulus at that point and channeling upwards.
3 This channel can be traced up to about 5,250 feet where the
4 anomaly dissipates.

5 Q Please move on to Exhibit Number Nine and
6 discuss its contents.

7 A Exhibit Nine is the tabulated results of
8 oil and gas analyses run by Bell Petroleum Labs on oil and
9 gas samples taken from Amoco's Plains Unit Federal No. 7,
10 producing from the Lusk Delaware Pool; Texaco's State of New
11 Mexico "CR" No. 1, which is producing from the proposed West
12 Lusk Delaware Pool; and Damson's Southern California Federal
13 No. 1, which is treated as an unknown.

14 Inspection of gas analyses tabulated on
15 Pages 6, 7, and 8 of Exhibit Nine reveals a close correla-
16 tion between the percent in methane measured in the Texaco
17 State "CR" No. 1 sample and Damson's Southern California
18 Federal No. 1 sample; however, a difference of about 2 per-
19 cent is noted between both samples as compared with Amoco's
20 Plains Unit No. 7 gas sample.

21 The chromatographic analyses of the hep-
22 tanes plus fractions of the oil samples, in addition to de-
23 termination of API gravity and molecular weights of the hep-
24 tanes plus fraction, a positive determination of the origin
25 of Southern California Federal No. 1 production can be made.

1 Page 2 and 3 of Exhibit Nine provide a
2 description of methods and equipment used in the analyses.

3 The Southern California Federal No. 1 oil
4 sample had a gravity of 41.5 degrees API at 60 degrees Fah-
5 renheit. This was almost identical to the State -- the Tex-
6 aco State "CR" No. 1 sample, which was measured to be 41.3
7 degrees API at 60 degrees Fahrenheit.

8 The API gravity of Amoco's Plains Unit
9 No. 7 sample was measured to be 38.2 degrees API.

10 Since API gravity generally increases
11 with formation depth, oil produced from the shallower zone
12 completed in the Plains Unit No. 7 would be expected to have
13 a lower gravity than oil produced from the deeper Delaware
14 zone completed in the Texaco well.

15 Based on API gravity alone, production
16 from the Southern California Federal No. 1 appears to origi-
17 nate from the same zone as the Texaco State "CR" No. 1.

18 The second point of comparison is the
19 measured molecular weights of the heptanes plus oil frac-
20 tion.

21 The heptanes and heavier fractions have a
22 much higher boiling point than normally experienced atmo-
23 spheric temperatures. As a result sampling techniques and
24 handling do not affect or alter their composition, which al-
25 lows accurate analytical results.

1 spell that?

2 A F-A-R-N-E-S-A-N-E.

3 MR. STOGNER: Okay, continue.

4 A And pristane.

5 MR. STOGNER: Spell that.

6 A P-R-I-S-T-A-N-E.

7 MR. STOGNER: Okay.

8 A And phytane is P-H-Y-T-A-N-E.

9 MR. STOGNER: Okay, now what
10 was the carbons again on each one?

11 A The farnesane is a C14 isomer. The pris-
12 tane is a C17 isomer, and phytane is a C18 isomer.

13 MR. STOGNER: Okay. Thank you.

14 A Okay. Results of these analyse are tabu-
15 lated for comparison on page four of Exhibit Nine.

16 The ratios, as just described, are con-
17 sidered to be very indicative of the origin of crude oil.
18 Hydrocarbons formed under different conditions would have
19 different ratios.

20 In the case of the particular Delaware
21 samples being compared in Exhibit Nine, the ratio of pris-
22 tane to normal C17 provides a strong point of positive cor-
23 relation between the State "CR" No. 1 sample and Southern
24 California Federal No. 1 sample. It also provides a
25 distinction between those two samples and a sample collected

1 from Amoco's Plains Unit No. 7.

2 In summary, all three analytical techni-
3 ques show positive correlation between Texaco's State "CR"
4 No. 1 samples and Damson's Southern California Federal No. 1
5 samples. At the same time all three techniques provide dif-
6 ferentiation of those two samples from the Plains Unit No. 7
7 samples.

8 Q Please move on to the water analysis mar-
9 ked as Exhibit Number Ten.

10 A Exhibit Ten is a copy of water analyses
11 performed by Martin Water Lab on Damson's Southern Califor-
12 nia Federal No. 1, Texaco's State of New Mexico "CR" No. 1,
13 and Amoco's Plains Unit Federal No. 7.

14 This exhibit is presented to provide a
15 complete produced fluid sample analysis. No real distinc-
16 tions can be made between West Lusk Delaware and Lusk Dela-
17 ware zones using this information.

18 Q Please move on to Exhibit Number Eleven,
19 which has already been partially discussed and discuss
20 briefly the change in production rates.

21 A Okay. Exhibit Eleven is a decline curve
22 of our Damson Southern California Federal No. 1. It's to be
23 noted in the production reflected in October, this is the
24 area in which the casing leak initially appeared and the
25 work on fishing the packer above the Strawn and Morrow was

1 done.

2 MR. STOGNER: Okay, I'm having
3 a hard time locating Exhibit Eleven.

4 A It was presented --

5 MR. STOGNER: Okay. Start over
6 again on Exhibit Eleven.

7 A Okay. Exhibit Eleven is a decline curve
8 on the Damson Southern California Federal No. 1.

9 The production prior to September 28th
10 was typical Strawn production. That's known Strawn
11 production. The area of no production in October of 1986 is
12 the time the initial casing leak appeared and the work was
13 done and they put the well back on production.

14 The work done to try to locate the source
15 of production was done in late January of 1987, which
16 corresponds with the gaps in production there, and --

17 Q What has been the approximate increase in
18 production due to the casing problem?

19 A Production of this well prior to the cas-
20 ing leak was approximately 30 barrels of oil per day. Sub-
21 sequent to the casing leak has been initially in excess of
22 300 barrels of oil per day.

23 Q Okay. Would you please move on to Exhi-
24 bit Number Twelve and describe what it shows?

25 A Exhibit Twelve is a decline curve of

1 of Amoco's Plains Unit No. 7 Well. An average daily produc-
2 tion rate was calculated by dividing monthly production
3 figures reported to the Commission by the number of days in
4 the corresponding month.

5 This was done to provide a curve with
6 units consistent with Exhibit Eleven, which has already been
7 described.

8 Upon comparisons of Exhibits Eleven and
9 Twelve it is apparent -- it is apparent that the capacity of
10 Damson's Southern California Federal No. 1 Well is much
11 greater than that of Amoco's Plains Unit No. 7 Well when it
12 was initially completed.

13 The Amoco well's producing zone has a
14 gross thickness of 32 feet and porosity of about 21 percent
15 as compared with 16 feet of gross pay and 17 percent poros-
16 ity in the Damson well.

17 Damson's well has demonstrated a deliver-
18 ability of two to three times that of the Amoco well.

19 Based on the reservoir performance it is
20 obvious that the two wells are producing from different
21 zones.

22 Q Mr. Lowery, before we move on to Exhibit
23 Number Thirteen, when the well was producing from the Strawn
24 formation what was the spacing for that well?

25 A Well, the well had 160 acres assigned to

1 it.

2 Q Under the local pool rules?

3 A Yeah, under special pool rules.

4 Q Would you please now describe Exhibit
5 Thirteen for the Examiner?

6 A Exhibit Thirteen is a Form C-102 that has
7 been prepared to rededicate only 40 acres to the Southern
8 California Federal No. 1 Well and it will be submitted to the
9 proper offices upon our return to Midland from this hearing.

10 Q Is the ownership in the northeast quarter
11 of Section 29 common?

12 A Yes, it is.

13 Q And who is the lessor of that area?

14 A Damson.

15 Q I mean is the Federal government the les-
16 sor there?

17 A Yes, it's a Federal lease.

18 Q Mr. Lowery, would you please discuss Dam-
19 son's request that any possible overproduction of the well
20 be made up at a reduced production rate rather than by a
21 complete shut-in of the well?

22 A In reference to Damson's request for re-
23 lief from possible complete shut-in of the well due to pos-
24 sible overproduction, referring to Exhibit Eleven, we would
25 point out that our well is currently producing at a rate of

1 approximately 200 barrels per day; however, the allowable
2 for the proposed West Lusk Delaware is 142 barrels per day
3 and the Lusk Delaware allowable is 80 barrels per day.

4 In late March I met with personnel of the
5 Hobbs OCD office to discuss possible overproduction from the
6 well. Jerry Sexton suggested that our production records be
7 amended back to January the 24th of 1987 to reflect Delaware
8 production.

9 Amended C-115's were prepared and submit-
10 ted; however, because of the poor condition of this well as
11 shown by our casing leak and othe problems, Damson requests
12 that it not be required to completely shut-in the well. In-
13 stead Damson requests that it be allowed to produce the well
14 at a reduced rate of 100 barrels per day until any overpro-
15 duction is made up.

16 We feel this is necessary to prevent to-
17 tal loss of the wellbore due to downhole mechanical prob-
18 lems. We would note that Texaco's State "CR" No. 1 wellbore
19 experienced casing problems during their recent recompletion
20 and it resulted in loss of access to the wellbore below the
21 Delaware.

22 Q Were Exhibits One through Thirteen pre-
23 pared by you or obtained from Damson's business records?

24 A Yes, they were.

25 Q And in your opinion will the granting of

1 this application be in the interest of conservation, the
2 prevention of waste, and the protection of correlative
3 rights?

4 A Yes, it will.

5 MR. BRUCE: We'd move the in-
6 troduction of Damson's Exhibits One through Thirteen.

7 MR. STOGNER: Exhibits One
8 through Thirteen will be admitted into evidence.

9 MR. BRUCE: And I have no fur-
10 ther questions of the witness at this time.

11 MR. STOGNER: Let's take a five
12 minute recess.

13

14 (Thereupon a recess was taken.)

15

16 MR. STOGNER: We'll continue
17 Case Number 9138.

18 Mr. Bruce, do you have any fur-
19 ther questions?

20 MR. BRUCE: No, sir.

21

22 CROSS EXAMINATION

23 BY MR. STOGNER:

24 Q Mr. Lowery, let's refer to your Exhibit
25 Eight, which is the log, the temperature log.

1 Okay, I'm looking at the depth of about
2 6450. Now, if I look to the temperature line to the -- on
3 the lefthand side of the line bar, now that indicates where
4 the flow is coming in?

5 A Yes, sir. The dotted line to the right
6 of the heavy, solid line, where it departs from that solid
7 curve, would indicate the point where fluid -- about the
8 point where fluid is entering.

9 Q So we're looking at the righthand side.

10 A Yes, sir.

11 Q Okay, I've got the solid line, which is
12 going up --

13 A The solid line represents the -- what
14 would be the normal gradient.

15 Q Okay, when I look at the lefthand side at
16 about 6470 there tends to be a norm -- I guess that's the
17 cable speed.

18 A Right, that's the cable speed curve, the
19 movement to the right.

20 Q All right, would that indicate -- let's
21 look at the temperature, the dotted temperature surevy line
22 on the lefthand side and that doesn't seem to be moving. Is
23 there any indication of why, or can you tell me why that
24 temperature line didn't move?

25 A That temperature line on the left track

1 of the log is a very small scale temperature log where each
2 chart division represents approximately -- represents 10 de-
3 grees of temperature change for each chart division.

4 The righthand track, each chart division
5 on that side represents 1/2 of one degree temperature change
6 so the temperature change is very slight and would not show
7 up on the -- the small scale temperature curve.

8 Q Okay, if I follow on the lefthand side,
9 the solid line, it seems to cross over at about 6650. Is
10 there indication there or does that tell me anything? Be-
11 tween 6650 and 6700?

12 A That's a very small anomaly that could be
13 attributed to possibly a number of things but I don't feel
14 there's any significance in this discussion.

15 Q Okay, but up there at 6450 where the line
16 obviously does cross over and makes a hotter temperature, I
17 guess it would be, all the way up on this scale, does indi-
18 cate a flow at that point.

19 A That is correct.

20 Q And referring back to Exhibit Two, behind
21 the casing, the 5-1/2 inch casing, the top of the cement at
22 7585, and then you have another squeeze job with the bottom
23 of the cement behind the casing there at 4615, is that cor-
24 rect?

25 A The bottom of the squeeze rigorously

1 would be considered 4646 feet, because that's the bottom
2 limit of the test. The hole is somewhere between 4631 feet
3 and 4646 feet and we do not know in that 15-foot interval
4 what the precise point of the hole is.

5 So in our case we considered it to be the
6 bottom of the interval.

7 Q Okay, I was reading the wrong one in
8 there.

9 So you essentially have fluid filling up
10 from 7585 up until the hole in the casing at 4615.

11 A Right, there is no -- not believed to be
12 any cement in that area.

13 Q Is there any tubing in this hole present-
14 ly?

15 A Yes, sir, the tubing is currently set at
16 about 4633 feet.

17 Q Is there a packer in there, too?

18 A No, there is not. It's a conventional
19 sucker rod pumpng system that's installed.

20 Q Is this a temporary completion or will
21 you come back and recomplete this in a more permanent manner
22 and will you go down there and perforate the casing at 7585?

23 A Currently we do not have any plans to do
24 that. After a discussion with the BLM we've done all that
25 they will require us to do as far as a recompletion is con-

1 cerned.

2 We've obtained permission from them to
3 produce the well as is from the casing leak between 4615 and
4 4677.

5 Q When we say casing leak, what kind of
6 profile do we see in that casing? Do we see holes? Do we
7 see --

8 A In all probability --

9 Q -- what?

10 A -- this isn't known for certain, but in
11 all probability the casing has been corroded from the out-
12 side in by salty Delaware formation fluids, water. The Del-
13 aware formation has a very high salt content and is prone to
14 cause corrosion if it cannot be treated and in this case
15 there's no way to put chemical behind the 5-1/2 casing in
16 the casing formation annulus, so this Delaware water has
17 been allowed to corrode the casing most probably for the
18 life of the well, which is approximately 25 years.

19 Q Now is this salt water from that upper
20 zone? Is it still flowing into the casing?

21 A We have not established that a zone up
22 the hole is flowing salt water at all; just from the resid-
23 ual water left when it was drilled and percolation over the
24 years, the formation water probably isn't flowing but has
25 accumulated in the wellbore, you know, over a period of time

1 but we are getting produced water most probably from the
2 zone we suspect is producing the oil, as well, and we have
3 noted a similar water/oil ratio in our produced fluid as
4 Texaco has in their well.

5 Q Let's talk about the Amoco 7 Plains Unit,
6 or Plains Unit Well No. 7. The perforated interval is at
7 4840, 4860, is that correct?

8 A In the -- that was a nonproductive com-
9 pletion. The productive completion is from 4712 to 4732 in
10 the Amoco Plains Unit No. 7.

11 The zone you mentioned was perforated,
12 acidized, and was swabbed dry.

13 Q Okay.

14 A And then later squeezed.

15 Q Now the production intervals in the Amoco
16 well, it does not correlate to your well, is that correct?

17 A By the time it -- it stratigraphically
18 pinches out, grades into a shaly sand, which we contend is
19 nonproductive in our well by the time it reaches that area,
20 and we base this on the results of the completions of other
21 Delaware wells in the immediate area, namely the Amoco
22 Plains Unit No. 10, which was specifically shot in the same
23 zone that correlates to the productive interval in the Amoco
24 Plains No. 7 and turned out to be nonproductive, or noneco-
25 nomically productive.

1 Q From 6450 to 4640 from the logs and from
2 the data that you know, is there any possible thief zones
3 for this oil to creep into, that you know of?

4 A We don't believe upon analysis of the
5 logs, normal Delaware zones have to be fracture treated
6 before they become productive and we do not believe that any
7 zone exists that would be a thief zone between those two
8 intervals.

9 Q What is the drive mechanism for the --
10 that West Lusk Delaware producing sand?

11 A The drive mechanism appears to be a
12 solution gas drive type reservoir. There is no reason to
13 believe that there is a water influx of any kind and there
14 doesn't appear to be a gas cap initially present.

15 Q Now, from the time that the fluid is
16 entering into behind the casing and the time that it makes
17 its way up to the perforations in the casing, we'll call
18 those holes perfs at this time, that's quite a hydrostatic
19 head, about 2000 feet, isn't it?

20 A Yeah, that's correct.

21 Q Do you -- do you see this any problem
22 presently or in the future to overcome this 2000 --

23 A At present it doesn't present a problem.
24 It's possible that it might present a problem later in the
25 life of the well when the reservoir pressure declines to

1 such that not enough gas can be produced to aerate the col-
2 umn, fluid column behind the pipe and carry out any produced
3 fluids.

4 Q What kind of gas production are you
5 seeing up at the surface?

6 A The GOR is running approximately 500-to-1
7 and it's held constant throughout this period of production,
8 since the Delaware started producing through the casing
9 leak.

10 Q Okay, let's refer now to Exhibit Number
11 One. The yellow shows Damson's acreage, is that correct?

12 A That is correct.

13 Q Okay. Do you know the horizontal extent
14 of the present Lusk Delaware Pool?

15 A Yes, sir. It appears that the horizontal
16 extent would be limited to the northwest quarter of Section
17 33 and in the case of the Amoco Plains Unit No. 7 zone, the
18 limits of that would in all probability be that Unit D in
19 Section 33.

20 There are three -- three plugged Lusk
21 Delaware wells offsetting the Amoco Plains Unit No. 7 that
22 would help verify this.

23 Q But do you know the legal limits of the
24 Lusk Delaware Pool at this time?

25 A Not as prescribed by the Commission, no,

1 I don't.

2 Q For the record, the boundaries of the
3 Lusk Delaware Pool will take in the northwest quarter of
4 Section 33, the southwest quarter of 28, the northeast quar-
5 ter of Section 32. You're roughly about a quarter of a mile
6 away from the pool boundaries of the Lusk Pool and the pro-
7 posed boundary, I believe, for the proposed West -- the pro-
8 posed boundary for the proposed pool in the West Lusk Dela-
9 ware Pool, I believe takes in the northwest quarter. Is
10 that correct? Is that your understanding?

11 A That's my understanding.

12 Q For the record, that is scheduled to be
13 heard June 17th.

14 Looking at our records it is advertised,
15 or will be advertised, and shown that it's classified as an
16 oil pool for Brushy Canyon production.

17 Q Could you elaborate where the Brushy
18 Canyon falls within the Delaware Pool?

19 A My geologic experience is limited and I
20 could not define the exact location of the beginning of the
21 Brushy Canyon but I do know it is the lowest of the three
22 canyon members of the Delaware Mountain Group.

23 Q Okay, how about the Amoco production? Do
24 you know if that's within the -- within this Brushy Canyon
25 or is it considered another canyon production?

1 A I believe it's considered as one of the
2 upper members of the canyon group, Delaware Mountain Group.

3 I do not believe it's part of the Brushy
4 Canyon.

5 Q But you don't know its vertical extent as
6 far as the Lusk Delaware Pool goes at this time?

7 A No, I don't.

8 Q And I'm assuming that the proposed pool
9 will be developed on 40-acre spacing, is that correct?

10 A Yes, sir.

11 Q As is the Lusk Delaware presently, is
12 being developed on 40, is that correct?

13 Okay, you're asking that this pool be ex-
14 tended, the proposed pool be extended to include your well.
15 Do you foresee what acreage it would entail to make this
16 (unclear) over to your well?

17 A I would -- I would assume it would have
18 to include all of Section 29 in addition to the quarter sec-
19 tion already described.

20 Q Okay, let's look at Section 29 on Exhibit
21 One. Down in the southeast quarter there shows to be a
22 Southern California Well No. 4. Do you know what production
23 that is?

24 A That currently is a Strawn well that Dam-
25 son is currently producing.

1 Q Okay. Let's look at the -- let's look up
2 in the northwest quarter, I show two wells; one to be plug-
3 ged and abandoned and that shows to be the Watson Bowman
4 Well No. 1, TD at 2746, so, obviously, that never penetrated
5 this area, correct?

6 A That's correct.

7 Q Okay, now how about the El Paso
8 Production Well No. 2 up in the northwest northwest?

9 A That was originally drilled as a Strawn
10 producer and was plugged and abandoned, I believe, about
11 1971.

12 Q Do you know if the Delaware was ever
13 tested in that well?

14 A No, it was not.

15 Q Now let's go down to the east side of the
16 southwest quarter and there's two wells shown in there.
17 Let's look at the one that's marked El Paso Well No. 3.
18 What do you know about that one?

19 A That well also was drilled as a Strawn
20 producer and has been plugged and abandoned at some point.
21 I don't have the exact date.

22 Q Do you know if that was ever tested in
23 the Delaware?

24 A That was not ever tested in the Delaware.

25

1 Q Okay. How about the Bowman one?

2 A The Bowman Federal was a Yates discovery
3 which did not penetrate the Delaware.

4 Q Do you have the drilling records on this
5 well, on the subject well that we're talking about today?

6 A I have them at the office but I do not
7 have them here with me.

8 Q When you looked through there, I assume
9 you dug them out and looked through it --

10 A Yes, sir.

11 Q -- did you see any kind of a drilling
12 break or anything of an abnormality when it went through
13 this particular area?

14 A The only -- our -- our records on this
15 well are very incomplete and the only records that we have
16 of any drilling that was done have been reported on the BLM
17 forms and the New Mexico Oil Conservation Division forms.
18 That's the extent of our -- our records on drilling of this
19 well.

20 Q Okay.

21 A One -- there were a couple of drill stem
22 tests in the Delaware when that well was drilled. No zones
23 were ever actually tested.

24 Q So they might have perforated the Dela-
25 ware up in the upper portions to do this test?

1 A No, they have not. They have not tested
2 the Delaware. A drill stem test was done when the well was
3 originally drilled.

4 Q Oh, okay.

5 A On the way to the Strawn.

6 Q So in the subject well the Strawn and the
7 Morrow production have been P&A'd.

8 A Yes, sir, they have.

9 Q Okay. Was it -- was it Damson's intent
10 to plug off the Strawn production at this time?

11 A Considering the fragile nature of our
12 wellbore, considerable risk was involved to -- to plug the
13 Morrow and temporarily abandon the Strawn in accordance with
14 regulations and to avoid that considerable risk of fishing
15 the packer that's located at 11,337 and replacing it with a
16 bridge plug, you know, after having set a cast iron bridge
17 plug between the Morrow and Strawn as would be required, we
18 felt that we would have lost the entire wellbore anyway, and
19 also the condition of the wellbore certainly isn't going to
20 improve with age and by the time we deplete the Delaware
21 zone, we felt that there wouldn't be enough integrity to re-
22 enter the Strawn and again produce it, and it was an econom-
23 ical producer at the time the casing leak occurred, and sub-
24 sequent to us abandoning it.

25 Q Was it your intent to test the Delaware

1 coming up later on in this well's life?

2 A No, it wasn't. This was an accident.

3 Q Was it an undesirable accident?

4 A I'm sure we would have looked at it after
5 knowing Texaco shot a Delaware zone offsetting us but we
6 didn't.

7 Q Okay. Let's refer now -- or let's to
8 your request to -- for an exemption to the General Rule 505.
9 Let's be more specific on that. What kind of an exemption
10 do you want again?

11 A It's my understanding of Rule 505 that
12 the allowable is based on the top perforation in the well-
13 bore.

14 Q Which would be in your case what?

15 A In our case this would be the casing
16 leak, which occurred not by our direct work but by accident.

17 Q Which would be up about 46 --

18 A The top of it would be at 4615.

19 Q Okay, in this case referring to Rule 505,
20 the depth pool range zero to 5000 feet, is that correct?

21 A That's correct.

22 Q That would have put you at 80 barrels a
23 day?

24 A That's correct.

25 Q Okay, and what do you propose the depth

1 bracket allowable be here?

2 A Since our -- we contend that our produ-
3 cing zone is in the vicinity of 6450 feet, we request that
4 the depth bracket allowable assigned to this well be in the
5 6-to-7000 foot range, which I believe is 142 barrels per
6 day.

7 Q All right. Is this the only exception to
8 Rule 505 what you're seeking?

9 A I believe that's correct.

10 Q I believe you said that the well is mak-
11 ing 300 barrels of oil roughly, is that right?

12 A It has in the past. It's declined some-
13 what and now its capacity would be more on the order of 200
14 to 220 barrels per day.

15 Q Okay, so you're proposing to pinch down
16 the production?

17 A That is correct.

18 Q From 200 to make this 142 barrel limit?

19 A That's correct, and in the event of over-
20 production, we also request that we be allowed to produce
21 the well at a reduced rate of 100 barrels of day, which is
22 below the allowable, to accrue enough allowable to make up
23 our overproduction.

24 Q Okay.

25 A As opposed to --

1 Q Run that -- run that portion by me again.

2 A Okay. We propose to produce our well at
3 a rate of 100 barrels per day to attribute the 42 barrels
4 per day of excess allowable to -- to apply towards our make-
5 up of overproduction.

6 Q Do you know how much you're overproduced
7 at this time?

8 A Not precisely. Also entering into that
9 problem is the point at which we will be required to report
10 our production as Delaware. At the direction of the Hobbs
11 OCD office, Jerry Sexton specifically -- he required or
12 suggested that we amend our C-115s back to January the 24th,
13 which corresponds to the time that we set our bridge plug
14 over the Strawn and definitely ruled it out as a source of
15 production.

16 Q Okay, so the C-115s from January 24th
17 will reflect Delaware.

18 A That is correct.

19 Q And anything before that would have been
20 -- would be considered Strawn or Morrow.

21 A That is correct. Relative to the Strawn
22 we did early, early when this event happened, we did ask for
23 and got an increased Strawn allowable, so prior to January
24 we were not overproduced relative to the Strawn allowable
25 that we were assigned.

1 I guess the point is that we did not know
2 where our production was coming from prior to January the
3 24th, and after that point we knew it wasn't coming from the
4 Strawn.

5 Q Did Jerry Sexton in our Hobbs District
6 office, is he -- did he verbally tell you this January 24th
7 date or do -- or did he write a letter or anything?

8 A He verbally told us when we made our
9 presentation of the facts we had at the time and I then
10 called him on the telephone the next day and again verified
11 this. When we talked with him, he did not specifically say
12 January the 24th, but he did say back to when the bridge
13 plug was set above the Strawn, which is January the 24th.

14 But this is verbally confirmed with him
15 on two different occasions.

16 Q Have you -- have you done that change?

17 A Yes, sir, we have, and I have copies of
18 the amended C-115s that we sent in last week to reflect the
19 Delaware production.

20 Q Do you have some copies you can give me?

21 A Yes, sir, I do. Also at this point I'd
22 like to mention in reference to amended C-115s, when this
23 problem started there was a problem with how our production
24 was split up between the two Strawn wells on the lease.
25 They both were produced at a common battery and through

1 several errors the wrong amount of production was assigned
2 to the Southern California Federal No. 1 relative to the
3 Strawn and amended C-115s to make those corrections were
4 submitted previous to this second set of amendments to re-
5 flect Delaware production from the Southern California Fed-
6 eral No. 1.

7 Q So what you have here is an amended --
8 amendment to an amendment.

9 A Correct.

10 Q Okay. But this amendment deals particu-
11 larly with from the Strawn to the Delaware.

12 A Correct.

13 Q Okay.

14 MR. BRUCE: Mr. Examiner, I have
15 marked the amended forms Exhibit Fourteen and request their
16 admission.

17 MR. STOGNER: I don't really
18 think that's necessary but since you already marked it, Ex-
19 hibit Fourteen will be admitted into evidence.

20 At this time we'll also take
21 note that these are a part of the Division records.

22 Q You show 8 production days, so that would
23 be 24.

24 A That is correct.

25 Q Great. Okay. If your exception to Rule

1 505 was not granted, what would -- what kind of -- what
2 would happen?

3 A We feel like that if this exception is
4 not granted other West Lusk Delaware operators would have an
5 unfair advantage in producing fluids from their wellbore at
6 the higher allowable where we would only be able to produce
7 our 80 barrels a day. This, I feel like, would be a viola-
8 tion of our correlative rights.

9 Q What would happen if you were ordered or
10 requested to perforate down at 6500 feet? What kind of a
11 hardship or would there be a hardship --

12 A We feel like being required to perforate
13 the zone at 6500 feet could possibly cause additional casing
14 damage that might -- that might allow the casing to fall
15 over to one side of the hole. We don't know exactly what
16 the condition is but we would -- we'd feel like the poten-
17 tial damage this could cause would not -- not better our
18 situation, that possibly cause us additional hardship.

19 We have a top allowable well as it cur-
20 rently exists, and we would like to leave it that way until
21 we -- production declines to some point where we would have
22 to -- to perforate that zone to possibly increase our pro-
23 duction back up to the top allowable.

24 Q What would happen if your request to ex-
25 tend the West Lusk Delaware Pool, let's say everything else

1 was granted but your request to extend the proposed pool,
2 and that was denied, how would that affect this well?

3 A Again, going back to the allowables in
4 the respective pools, would you mean to have our well put in
5 a different pool than the Lusk West -- the West Lusk or the
6 Lusk Delaware?

7 Q Yeah.

8 A Okay. If this were, if our well were not
9 placed in the West Lusk Delaware Pool, I feel like that our
10 correlative rights would still be violated since we are in
11 fact producing from the same zone that makes up the West
12 Lusk Delaaware Field.

13 Q How would your correlative rights be vio-
14 lated? Would you elaborate a little bit more?

15 A Well, offset operators would be allowed
16 to produce 142 barrels per day from the same zone that we
17 would only be able to produce 80 barrels a day, you know,
18 based on the depth bracket allowable.

19 But if that exception to Rule 505 was
20 granted and we did get the depth bracket allowable assigned
21 at the depth that our zone is, that would have no adverse
22 affect on us.

23 Q Okay.

24 A What would cause the adverse affect would
25 be us getting an allowable lesser than that of the West Lusk

1 Delaware Pool.

2 MR. STOGNER: I have no further
3 questions of this witness.

4 Are there any further questions
5 of Mr. Lowery?

6 If not, he may be excused.

7 Do you have anything further in
8 this case, Mr. Bruce?

9 MR. BRUCE: Nothing further.

10 MR. STOGNER: If not, this case
11 will be taken under advisement.

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13 (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 prepared by me to the best of my ability.

Sally W. Boyd CSR

I do hereby certify that the foregoing is a correct record of the proceedings in the Oil Conservation Hearing of Case No. 9138, heard by me on 20 May 1987.

Michael P. Singer, Examiner
Oil Conservation Division