

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO

17 August 1988

EXAMINER HEARING

IN THE MATTER OF:

Application of BHP Petroleum Company, CASE
Inc. for non-standard proration units 9461
and an unorthodox gas well location,
Chaves County, New Mexico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division: Robert G. Stovall
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I N D E X

WILLIAM J. MORRIS

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E X H I B I T S

Applicant Exhibit One, Plat 4

Applicant Exhibit Two, Plat 6

Applicant Exhibit Three, Structural Map 7

Applicant Exhibit Four, Certificate of Mailing 11

1 MR. CATANACH: Call Case 9461.
2 MR. STOVALL: Application of
3 BHP Petroleum Company, Inc., for a nonstandard proration
4 unit and an unorthodox gas well location, Chaves County,
5 New Mexico.

6 MR. CATANACH: Are there ap-
7 pearances in this case?

8 MR. KELLAHIN: Mr. Examiner,
9 I'm Tom Kellahin of the Santa Fe law firm of Kellahin, Kel-
10 lahin & Aubrey, appearing on behalf of the applicant and I
11 have one witness to be sworn.

12 MR. CATANACH: Any other ap-
13 pearances?

14 Will the witness please stand
15 and be sworn in?

16
17 (Witness sworn.)

18
19 WILLIAM J. MORRIS,
20 being called as a witness and being duly sworn upon his
21 oath, testified as follows, to-wit:

22
23 DIRECT EXAMINATION

24 BY MR. KELLAHIN:

25 Q Mr. Morris, for the record would you

1 please state your name and occupation?

2 A My name is William J. Morris. I'm a
3 petroleum geologist for BHP Petroleum Company.

4 Q Mr. Morris, on previous occasions you've
5 testified as a petroleum geologist before the New Mexico
6 Oil Conservation Division?

7 A Yes.

8 Q And you've prepared and made an evalua-
9 tion of the subject matter for this application?

10 A Yes, I have.

11 MR. KELLAHIN: Mr. Examiner,
12 at this time we tender Mr. Morris as an expert petroleum
13 geologist.

14 MR. CATANACH: He is so quali-
15 fied.

16 Q Mr. Morris, let's take a moment and let
17 me direct your attention to what is marked as Exhibit Num-
18 ber One. Would you identify for us, first of all, the sec-
19 tion that is the subject matter of this application?

20 A Section 5, located in Township 11 South,
21 27 East.

22 Q And this is referred to as the Erwin
23 (sic) Ranch prospect in Chaves County, New Mexico?

24 A That's right.

25 Q What is the primary formation that you

1 intend to test with the drilling of this well in Section 5?

2 A Our primary objective is the Lower
3 Paleozoic Montoya formation.

4 Q The Montoya would be an oil producing
5 formation?

6 A Right, it is an oil zone.

7 Q And is there special pool rules for the
8 Montoya formation or is this on statewide spacing rules?

9 A This falls on statewide rules.

10 Q When we look at Exhibit Number One, Mr.
11 Morris, within Section 5 are we dealing with a full size
12 section?

13 A No, we're not. These are half sections
14 that have resulted from the land grid survey that is em-
15 ployed in the State of New Mexico.

16 Q When we look at the south half of that
17 section, then, we're dealing with 320 acres plus the odd
18 size lots along the northern boundary?

19 A That's right.

20 Q And when we look at the spacing unit for
21 the 40-acre oil spacing, in fact how many acres are we
22 dealing with?

23 A 47.06 acres.

24 Q Okay. The well location is spotted
25 there and what distance is it from the south and east lines

1 of the section?

2 A It is from -- 1650 feet from each line.

3 Q And will that be a standard oil well
4 location under statewide rules?

5 A Yes.

6 Q Let's turn now, sir, to Exhibit Number
7 Two. This is in fact the same display --

8 A Yes.

9 Q -- as the previous exhibit?

10 A Yes, it is.

11 Q When you look at the potential for an
12 oil -- for a gas well spacing, is that what you've intended
13 to portray with the red outline?

14 A Right. The red outline is the proration
15 unit we're asking for to be dedicated to gas.

16 Q And how many acres would be included
17 within the section, then, for that gas spacing unit?

18 A There would be approximately 348 acres.

19 Q Are there special pool rules for any of
20 the deep gas producing formations below the top of the
21 Wolfcamp in this immediate area?

22 A Yes. The statewide rules --

23 Q Would apply?

24 A -- would apply to this case.

25 Q So there are no special pool rules for

1 any --

2 A Oh, no. No.

3 Q -- of these gas pools.

4 A Right, this is -- would be a wildcat
5 well.

6 Q Using the statewide gas spacing, then,
7 would this well for gas spacing below the top of the Wolf-
8 camp be at a standard gas well location?

9 A No. Statewide rules require it to be
10 1980 from the east line in this case and we are 330 feet
11 short of that requirement.

12 Q And in this instance you're moving to-
13 wards acreage that your company also controls?

14 A That's right.

15 Q Monsanto now is BHP Petroleum, isn't it?

16 A Correct.

17 Q Let's turn, sir, now to Exhibit Number
18 Three and have you identify that exhibit.

19 A Okay, this is a structure map on top of
20 the Lower Paleozoic Montoya formation. We have five seis-
21 mic lines across this to help define the structural feat-
22 ure.

23 The yellow color is the acreage that BHP
24 has under lease from the state and the arrow points to the
25 proposed location.

1 Q Does this represent your work product?

2 A Yes, it does.

3 Q Do we have any subsurface control for
4 this area in terms of wellbore information, logs, that type
5 of information?

6 A There are a number of wells on this map.
7 The closest one to the proposed location is in Section 31
8 just to the northeast.

9 Q In mapping the structure, this is a map
10 of the structure for the potential oil production out of
11 the Montoya formation?

12 A That is correct.

13 Q Have you attempted to map or interpret
14 what we might see in the deeper gas formation?

15 A The gas would be a little bit shallower.
16 It's in the Pennsylvanian section.

17 Q Oh, I'm sorry. All right.

18 A And I have not made a map on that to
19 this date.

20 Q In looking at the 320-acre gas spacing
21 units that would lie above the Montoya formation, can we
22 infer or interpret from this structural interpretation any-
23 thing about the gas formations?

24 A No, I don't believe so.

25 Q The primary objective, then, is the oil

1 in the Montoya?

2 A That's correct.

3 Q Explain to us what has caused you to
4 pick this as the location within Section 5 that is the op-
5 timum location by which to penetrate and test the Montoya
6 formation.

7 A Okay. Typically the Montoya formation
8 in this area produces on structure. It's a very strong
9 water drive type reservoir. If you use the Chisum Field as
10 an example, which lies to the southeast it is a two well
11 producing field and it has several wells, dry holes that
12 are water-bearing just off of the structure. So they're
13 small structures. We feel like we need to be on the high-
14 est point of the feature. The proposed location is our in-
15 terpretation of where the highest location is at.

16 Q Within your structural interpretation
17 for the Montoya formation do we have a standard oil well
18 location that would also be standard gas well spacing loca-
19 tion?

20 A It's my feeling that we'd be too close
21 to the fault to be -- to be at a standard gas location to
22 properly test the Montoya formation.

23 Q Describe for us what you find in identi-
24 fying the fault that runs through Section 5. Is that a
25 fault to such a degree that you're separating physically

1 potential production from the west side of the section from
2 the east side?

3 A As far as the Montoya formation --

4 Q Yes, sir.

5 A -- that's what we're -- yes, that's why
6 we're drilling at the proposed location.

7 Q When we look at potential gas production
8 can we infer or interpret from this structural display that
9 we would be physically separating out the spacing unit?

10 A No. Typically in this area the faulting
11 which cuts the lower Paleozoic sections usually dies out
12 into the Penn, Pennsylvanian section, so they don't always
13 go through that part of the formation.

14 Q Identify for us those lines of seismic
15 runs that are closest to the proposed well location.

16 A Okay, we have a line 4, which is an
17 east/west line that runs through the midsections of Sec-
18 tions 3, 4, 5 and 6, and we have lines 2 and 5, which are
19 north/south lines that run through Section 5 as well.

20 Q Do you have an opinion, Mr. Morris, as
21 to whether or not approval of this application would afford
22 to BHP Petroleum Company the opportunity to avoid the drill-
23 ling of an unnecessary well?

24 A Yes, it certainly would.

25 Q And in your opinion would it promote

1 conservation, protect correlative rights and avoid or pre-
2 vent the waste of hydrocarbons?

3 A Yes. Yes, it would.

4 MR. KELLAHIN: That concludes
5 my examination of Mr. Morris, Mr. Catanach.

6 We would move the introduction
7 of his Exhibits One through Three.

8 Exhibit Four is our Certifi-
9 cate of Mailings to other interest owners in the immediate
10 area.

11 We would ask also at this time
12 that Exhibit Four be admitted.

13 MR. CATANACH: Exhibits One
14 through Four will be admitted as evidence.

15 MR. KELLAHIN: That concludes
16 our presentation.

17 MR. CATANACH: Exhibit A to
18 Number Four is the list of the operators you sent notifica-
19 tion to?

20 MR. KELLAHIN: Yes, sir, and
21 what we did is on July 28th, as well as July 25th, we sent
22 them not only a copy of this cover letter which is attached
23 but they had a copy of the actual application.

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CROSS EXAMINATION

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BY MR. CATANACH:

Q Mr. Morris, you're requesting that for the 40-acre proration unit that you get the northwest-southeast and Lot 2.

A North -- right, that is right. Yes. It's shown on Exhibit One in the red outline what the proration unit would be.

Q How many acres does Lot 2 consist of?

A 7.06 acres.

Q 7.06.

A Right. That's shown in green.

Q How deep would you encounter the Montoya formation?

A It should be about 6300 feet.

Q You said there were some other Montoya wells in this area?

A There are two wells in Section 13, which is about 5 miles to the southeast that produce from the Lower Paleozoic section. They're in Units I and J, and they're oil wells. This is the Chisum Field.

Q You say that structure has a lot to do with the productive capabilities of these wells?

A Yeah, these wells only produce on structure, usually at the highest point. Typically these struc-

1 tures are not totally filled with oil so that there is an
2 oil/water -- there's a lot of water on the flankish (sic)
3 portions so that you need to be on the very highest points
4 to have your safest location.

5 Q There isn't any other Pennsylvanian
6 production in this area?

7 A The closest field that I'm aware of is
8 the Foor Ranch Penn Field and it's about 10 to 15 miles to
9 the north, maybe slightly northwest, and it is a gas zone.
10 It's probably 10 to 20 wells, something like that.

11 Q Now you're basing your location on your
12 seismic data, is that right?

13 A That's correct.

14 Q That's the only control you have.

15 A Exactly.

16 Q And your seismic shows that you'd be --

17 A The highest point would be approximately
18 at shotpoint 110 on line 4 and that's the approximate loca-
19 tion of the well. We're a little bit off of that but that
20 would put us even at a more unorthodox location for oil.

21 MR. CATANACH: I don't have
22 any more questions of the witness. He may be excused,
23 Is there anything further in
24 Case 9461?

25 MR. KELLAHIN: No, sir.

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MR. CATANACH: The case will
be taken under advisement.

(Hearing concluded.)

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C E R T I F I C A T E

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

Sally W. Boyd CSR

I do hereby certify that the foregoing is a complete record of the proceedings in the Examiner hearing of Case No. 9461 heard by me on August 17 1988.
David R. Citarach, Examiner
Oil Conservation Division