

#### **Amoco Production Company**

Denver Region 1670 Broadway P.O. Box 800 Denver, Colorado 80201 303-830-4040



#### Via Federal Express

February 9, 1989

William J. Lemay Division Director Oil Conservation Division PO Box 2088 Santa Fe, New Mexico 87504

File: NWA-283-986.511

Application of Benson-Montin-Greer for Amendment of Order R-6469 to rescind approval of certain non-standard spacing units Rio Arriba County, New Mexico Comments for the Record, Case 9525\_\_\_\_\_

Amoco Production Company submits the following comments for the record in Case 9525. Amoco is an interest owner in lands adjacent to Sections 23 and 24, T24N-R1W included in the subject application and does not object to the approval of the subject application.

However, we received a copy of exhibits prepared by Benson-Montin-Greer for Case 9525 the night before the hearing. Since we were made aware of this testimony at such a late date and had relied upon the call of the hearing in formulating our position not to object to the application, we were precluded from presenting testimony at the hearing which may be contradictory to the applicants. We believe it would be inappropriate for the examiner to render a decision or make a finding-of-fact based upon testimony which was beyond the scope of the call of the hearing.

Sincerely,

J.W. Hawkins

JWH/ae

#### MONTGOMERY & ANDREWS

OF COUNSEL William R. Federici

J. O. Seth (1883-1963) A. K. Montgomery (1903-1987) Frank Andrews (1914-1981)

Seth D. Montgomery Victor R. Ortega Jeffrey R. Brannen John B. Pound Gary R. Kilpatric Thomas W. Olson William C. Madison Walter J. Melendres Bruce Herr Robert P. Worcester John B. Draper Nancy Anderson King Janet McL. McKay Joseph E. Earnest W. Perry Pearce Sarah M. Singleton Stephen S. Hamilton Bradford V. Coryell Michael H. Harbour Mack F. With Katherine W. Hall Robert J. Mroz Richard L. Puglisi Galen M. Buller

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PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

February 9, 1989

(HAND-DELIVERED)

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FEB 1 0 1989

OIL CONSERVATION DIVISION

David Catanach, Hearing Examiner Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

> Application of Benson-Montin-Greer Case No. 9525

Dear Mr. Catanach:

Enclosed please find comments submitted by Mobil Producing Texas-New Mexico Inc. in response to the information submitted by the applicant at the hearing of this matter on February 1, 1989.

These comments are submitted in order to make it clear that although Mobil has no objection to the purpose of the application filed by Benson-Montin-Greer in this matter, it objects to findings being entered in this matter which are not properly a part of this case.

In the event that you have any questions about these materials, please do not hesitate to contact me or Mr. Mark Mr. Craig is the Petroleum Engineer with Mobil in their Denver office who is responsible for this matter. Mr. Craig's direct telephone number is (303) 688-5429.

David Catanach, Hearing Examiner February 9, 1989
Page 2

Thank you for your consideration of these materials.

Sincerely,

W. Perry Pearce

WPP:mp/201
cc (w/enclosure):
 William F. Carr, Esquire
 Craig Eggerman (w/o enclosure)
 Mark Craig "
 Jeff Maisch "

To: Examiner, Oil Conservation Commission Of The New Mexico

Department Of Energy and Minerals

Subject: Statement of Mobil Oil Corporation in Oil Conservation

Commission Case #9525

Mobil Oil Corporation does not protest the establishment of regular 640 acre proration units in Sections 23 & 24 of Township 24N, Range 1W. However, we feel that a vast majority of the Benson-Montin-Greer Drilling Corp. Exhibit #1 (Sections E through T), presented by Mr. Greer, are extraneous and misleading to the case at hand.

Specifically, we feel it would be inappropriate to the intent of this case for a "finding of fact" to be made as to the following points Mr. Greer seeks in support for the application (B-M-G Exhibit #1, Section B):

- 1) "That drainage across, (into) the unit's south boundary area has occurred in the past."
- 2) "That drainage is now occurring across (away from) the unit over its south boundary; and that a high degree of potential exists for future drainage of significant amounts."

We see the basic reason for the establishment of these regularly shaped proration units as avoiding the case where Mobil drills a well and the Canada Ojitos Unit drills a direct northern offset and both parties end up with low capacity wells (as shown in B-M-G Exhibit #1, Section D).

Please take note that Mr. Greer presented no exhibits in support of termination of the five other nonstandard proration units contained within the application.

Mr Greer seems intent, however, on establishing that the wells to the south of the Canada Ojitos Unit are receiving pressure support from this unit. It is this conclusion with which we have problems. We feel we have an obligation to present a short data summary in contradiction of Mr. Greer's theories.

1) Mr. Greer stated that he expects the A-14 injector to provide "piston-like displacement" of oil to the south of the Canada Ojitos Unit (see also: B-M-G Exhibit #1, Section G, Yellow Pages, Paragraph 3).

If this were true, then the gas-oil ratios of the Amoco State CC #1 should be significantly higher than those in the next well to the south, the Nassau Resources Wishing Well #7. Gas should break through to the State CC #1 prior to the Wishing Well #7. Please refer to the attached map and plots of oil, gas, and gas-oil ratios for these two wells.

#### STATE CC #1

Jan 1-19, 1989: Average Production = 293 BOPD & 246 MCFPD Jan 1-19, 1989: Average GOR = 840 SCF/STB.

#### WISHING WELL\_#7

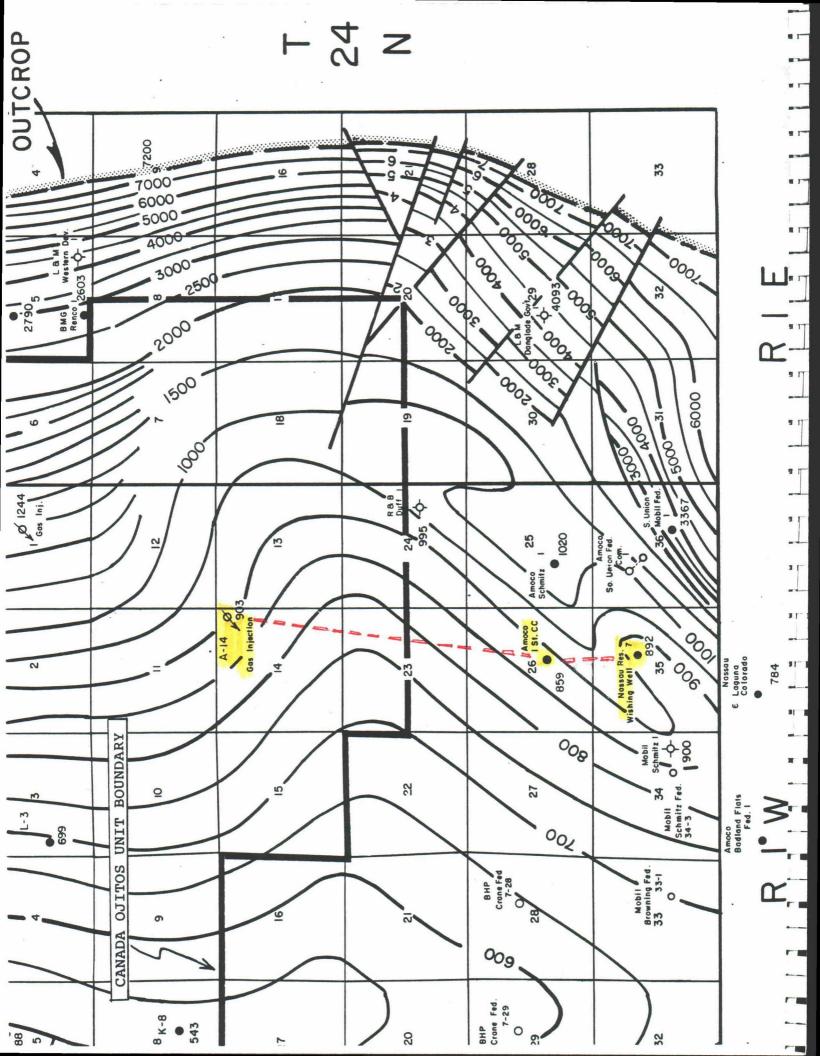
Jan 2-16, 1989: Average Production = 127 BOPD & 745 MCFPD Jan 2-16, 1989: Average GOR = 5866 SCF/STB

As you can see, the gas-oil ratio for the Wishing Well #7 is currently seven times higher than that for the State CC #1. This is exactly the opposite of what would be expected if Mr. Greer were correct (there is little chance the gas from the A-14 gas injection well is "going around" the State CC #1 and being produced in the Wishing Well #7; these two wells have been shown to be in pressure communication with each other).

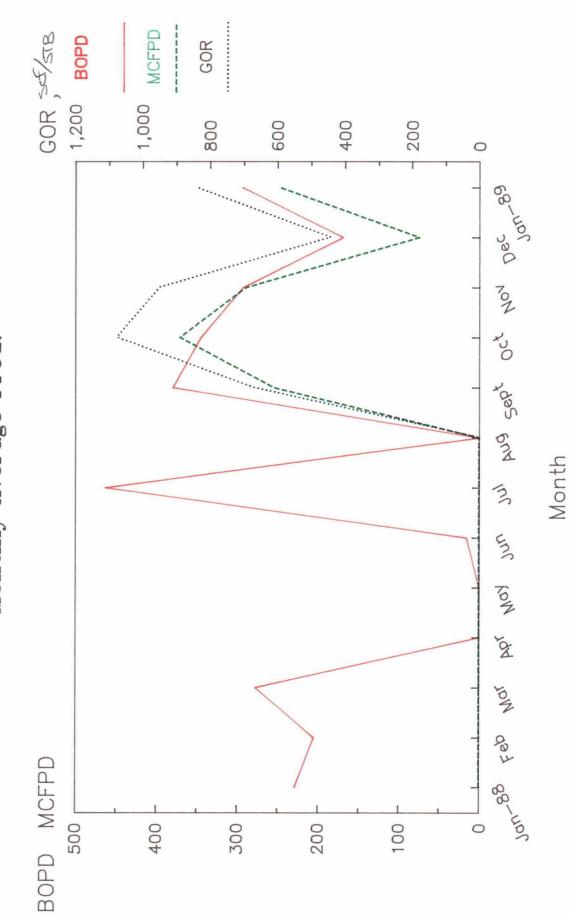
- 2) Mr. Greer's analogy to Craft & Hawkins' description of "attic oil" production by downdip gas injection (B-M-G Exhibit #1, Section G, Grey Pages) is meaningless as he later states that no such analogy exists. Recovery of "attic oil" requires that a gravity stable gas cap be formed, oil and gas would be vertically separated, with gas pushing the oil downward. Instead, Mr. Greer states that: "gas drive here will operate initially with a "piston" action forcing oil ahead of it until gas break-through occurs."
- 3) The last bottom-hole pressure build-up test in the State CC #1, run 9-10-88, showed a decrease in pressure in the last 12 hours of the 108 hour test. This indicates a lack of general pressure support in the area of communication with this well. A plot and copy of the build-up test data is attached.
- 4) The State CC #1 is experiencing pressure decline indicating a lack of pressure support.

The initial calculated pressure ( $P^*$ ) in the State CC #1 on 2-15-88 was 1520 psi corrected to a datum of 370' subsea. The maximum pressure measured in this well on 9-10-88 was 1244 psi at datum, after the well had produced only 24,362 barrels of oil.

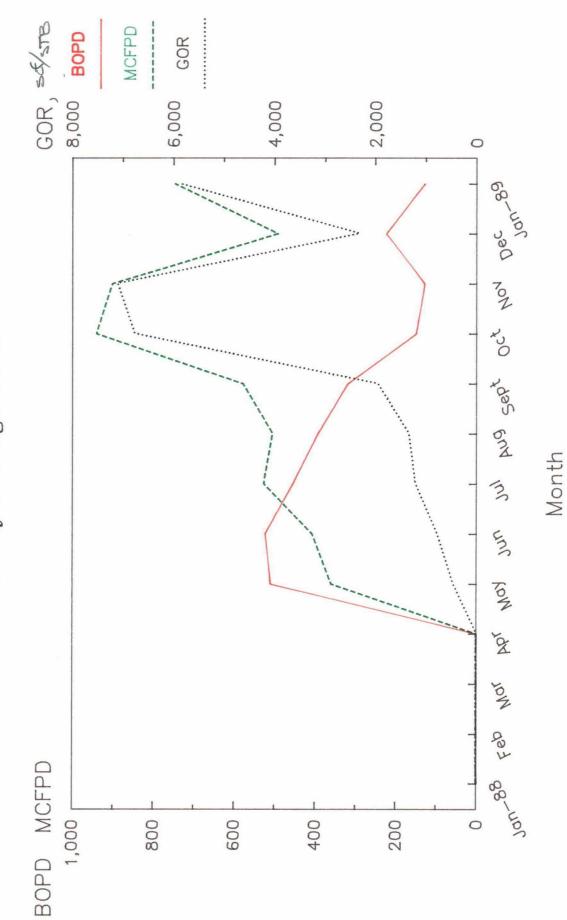
In conclusion, we agree with the basic intent of this case: to prevent waste by establishing regular 640 acre proration units in Sections 23 & 24 of Township 24N, Range 1W. However, we do feel that Mr. Greer is including data into the record which is irrelevant and not supported by the available data.

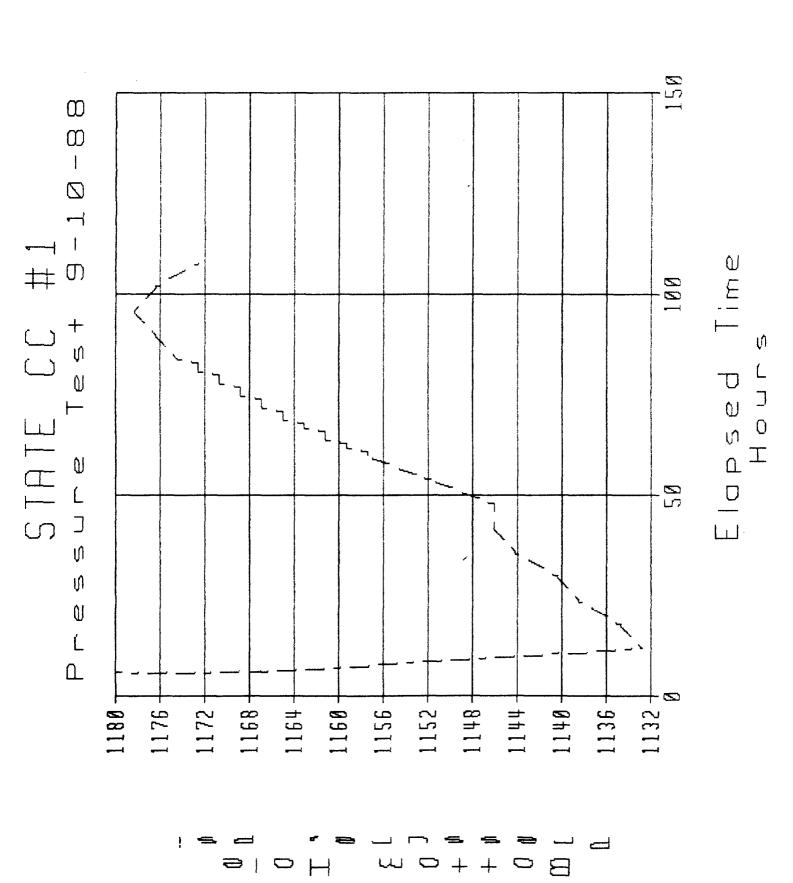


STATE CC #1 Monthly Average Prod.



WISHING WELL #7 Monthly Average Prod.





#### PRESSURE BUILDUP TEST - STATE CC #1

COMPANY NAME.... B&R SERVICE CO.

GUAGE TYPE..... KPG GUAGE NUMBER.... 68319 TICKET NUMBER... 701 BHP RECORDED AT. 6709' G.L.

Elap	sed
Uan	

Hours	Pressure	Date	Comment
0 6 12 18 24 30	1400.23 1166.92 1132.78 1134.67 1138.47 1140.36	9-10-88	Well Equalizing Well Equalizing Pressure Stabilizes
36 42	1144.16 1146.05		
48 54	1146.05 1151.75		
60 61	1157.44 1157.44		
62 63	1159.33 1159.33		
64 65	1161.23 1161.23		
66 67	1161.23 1163.13		
68 69	1163.13 1165.02		
70 71	1165.02 1165.02		
72 73	1166.92 1166.92		
74 75	1166.92 1168.82		,
76 77	1168.82 1168.82		
78 79	1170.71 1170.71		
80 81	1170.71 1172.61		
82 83 84 90	1172.61 1172.61 1174.51 1176.40		
96 102 108.4	1178.30	> >	Maximum Pressure Recorded Pressure Falling Pressure Falling

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EC

OIL CONSERVATION DIVISION

November 7, 1988

#### HAND-DELIVERED

Mr. David Catanach
Examiner
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

Re: Oil Conservation Division Case No. 9525
Application of Benson-Montin-Greer Drilling Corporation for the Amendment of Division Order No. R-6469, as amended, Rio Arriba County, New Mexico

Dear Mr. Catanach:

I would appreciate the Division continuing the above-referenced hearing from the November 9, 1988 Examiner docket to the December 7, 1988 Examiner docket.

Your assistance in this matter is appreciated.

Very truly yours

WILLIAM F. CARR

WFC:mlh

cc: W. Perry Pearce, Esq. Mr. Albert R. Greer



#### **Amoco Production Company**

Denver, Colorado

February 1, 1989

Mr. William J. LeMay, Director New Mexico Oil Conservation Division PO Box 2088 Santa Fe, New Mexico 87504

Entry of Appearance Case No. 9525

Amoco Production Company, as an interested party to the above captioned matter, hereby enters our appearance as a party of record,

Very truly yours,

Flat g. Ind K.J. Lund

Attorney

KJL/ae

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

IN THE MATTER OF THE APPLICATION OF BENSON-MONTIN-GREER DRILLING CORPORATION FOR THE AMENDMENT OF DIVISION ORDER NO. R-6469, AS AMENDED, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NO. 9525

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OIL CONSERVATION DIVISION

#### MOTION FOR CONTINUANCE

COMES NOW Mobil Producing Texas & New Mexico, Inc. by and through its counsel, Montgomery & Andrews, P.A., and moves the Division for a continuance of Case 9525. In support of this motion, Mobil Producing Texas & New Mexico, Inc. ("Mobil") states:

- 1. The application filed in this matter seeks to reorient proration units presently in existence on the southern part of the Canada Ojitos Unit and proration units south of the present unit boundary.
- 2. Mobil is an interest owner in the S/2 of Section 23 and Section 24 of Township 24 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico.
- 3. The S/2 of these two sections are not presently in the Canada Ojitos Unit, and under the provisions of the application filed in this matter by Benson-Montin-Greer, the S/2 of each of the sections would be combined with the N/2 of each of these

sections to form two standard 640-acre spacing units, half of which is in the Canada Ojitos Unit and half of which is outside that unit boundary.

- 4. Mobil is within the next few days beginning a seismic data gathering program along this boundary between the N/2 and the S/2 of these two sections. The purpose of this seismic exploratory activity is to determine whether a geologic barrier exists separating the present Canada Ojitos Unit from lands to the south of that unit.
- 5. Mobil has contacted Benson-Montin-Greer who has expressed an interest in participating in the cost of this seismic exploration activity in exchange for sharing in the data gathered by that program.
- 6. Because of the necessity of shooting the seismic lines, interpreting the seismic data and remapping the structures as shown by that seismic data, additional time is needed so that information which is pertinent to the application in this case may be developed.
- 7. Mobil has proposed and begun to secure regulatory approval and all necessary clearances to drill three wells in this general area which will also contribute additional information on this area.
- 8. Mobil believes that it is appropriate, if applicant and the Division prefer, for the other parts of the application in Case 9525 to proceed with the proration units in Sections 23 and

24 of Township 24 North, Range 1 West, being continued to a further time.

9. Mobil has contacted counsel for Benson-Montin-Greer who does not agree to this continuance.

WHEREFORE, Mobil moves the Division to grant a continuance of that part of the application dealing with the non-standard proration units presently existing in Sections 23 and 24 of Township 24 North, Range 1 West, until such time as the parties either cooperatively or independently have the results of this seismic exploration activity available for use at the hearing.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

Ву

W. Perry Pearce

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

Attorneys for Mobil Producing Texas & New Mexico, Inc.

#### CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for Continuance to be mailed to William F. Carr, Esquire, Campbell & Black, P.A., Post Office Box 2208, Santa Fe, New Mexico 87504-2208 this 4th day of November, 1988.

W. Perry Fearce

[WPP:94]

LAWYERS

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN J. SCOTT HALL PETER N. IVES JOHN H. BEMIS MARTE D. LIGHTSTONE

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December 22, 1988

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OIL CONSERVATION DIVISION

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

Oil Conservation Division Case No. 9525

In the Matter of the Application of Benson-Montin-Greer Drilling Corp. for the Amendment of Division Order No.

R-6469, as Amended, Rio Arriba County, New Mexico

Dear Mr. LeMay:

I would appreciate the Division continuing the above-referenced hearing from the January 4, 1988 Examiner docket to the February 1, 1989 Examiner docket.

Your assistance in this matter is appreciated.

WILLIAM F.

WFC: mlh

cc: W. Perry Pearce, Esq.

Mr. Albert R. Greer

Benson-Montin-Greer Drilling Corp.

LAWYERS

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN J. SCOTT HALL JOHN H. BEMIS MARTE D. LIGHTSTONE PATRICIA A. MATTHEWS JEFFERSON PLACE

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November 28, 1988

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William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

OIL CONSERVATION DIVISION

Oil Conservation Division Case No. 9525

In the Matter of the Application of Benson-Montin-Greer Drilling Corp. for the Amendment of Division Order No.

R-6469, as Amended, Rio Arriba County, New Mexico

Dear Mr. LeMay:

I would appreciate the Division continuing the above-referenced hearing from the December 7, 1988 Examiner docket to the January 4, 1989 Examiner docket.

Your assistance in this matter is appreciated.

ry truly youns,

WILLIAM F \ CARR

WFC: mlh

cc: W. Perry Pearce, Esq.

Mr. Albert R. Greer

Benson-Montin-Greer Drilling Corp.

LAWYERS

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February 20, 1989

#### HAND-DELIVERED

W. Perry Pearce, Esq.Montgomery & Andrews, P.A.325 Paseo de PeraltaSanta Fe, New Mexico 87501

e: New Mexico Oil Conservation Division Case 9525:
Application of Benson-Montin-Greer Drilling Corp. for Amendment of Division Order No. R-6469, as Amended, Rio Arriba County, New Mexico

Dear Mr. Pearce:

Enclosed please find the additional information that you requested at the February 1, 1989 hearing in the above-referenced case for Mobil Producing Texas and New Mexico.

If you have questions, concerning the enclosed, please advise.

WILLIAM F. CARR

Very truly yours

WFC:mlh Enclosures

cc w/enclosures: / Mr. David Catanach

#### BENSON-MONTIN-GREER DRILLING CORP.

221 PETROLEUM CENTER BUILDING, FARMINGTON, NM. 87401 505-325-8874

#### February 16, 1989

Mr. William F. Carr Campbell & Black, P.A. P.O. Box 2208 Santa Fe, NM 87504-2208

> Re: NMOCC CASE NO. 9525: SUPPLEMENTARY INFORMATION REQUESTED BY MOBIL

Dear Mr. Carr:

Mobil asked for additional information - particularly raw pressure and gas volume measurement information.

We can understand that engineers unfamiliar with the tight fracture block - high capacity fracture system of reservoir geometry that exists here find it difficult to believe that wells capable of producing only 2 or 3 barrels of oil per day can accept injected reservoir gas volumes of 2000 to 3000 barrels per day - and accordingly they feel there must be something wrong in the calculations: hence Mobil's request for raw data.

Anticipating disbelief of this reservoir's behavior in other specific performances we have, several times in the past, requested that tests be witnessed by Oil Conservation Division and Department of the Interior personnel. We have not had injection tests witnessed by them but have no objection to it. The injected gas volumes have been accurately determined and reported each month to the state and federal authorities.

We send you now - for transmittal to the proper parties - information Mobil requested. We call attention to the fact that gas injected in the A-14 is measured at high pressures and accurate measurement requires recognition of the relatively large super-compressibility that exists. Included in the material herein is a graph showing gas deviation as a function of temperature and pressure for the Canada Ojitos Unit gas, from which supercompressibility factors - needed for calculation of gas volumes - can be determined.

. . .

#### BENSON-MONTIN-GREER DRILLING CORP.

Mr. William F. Carr Campbell & Black, P.A. Page No. 2 February 16, 1989

Index of materials enclosed along with remarks, is attached to this letter.

Yours truly,

BENSON-MONTIN-GREER DRILLING CORP.

BY:

Albert R. Greer, President

ARG/tlp

Enclosures

#### INDEX OF MATERIAL ENCLOSED WITH LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

1. A-14 injection well pressures by months from 1984 to 1989.

The approximate surface injection well pressures (including friction) are set out on Schedule A attached.

2. Raw pressure data for fall-off tests COU A-14.

With respect to this request, we advise as follows: 1987 test information is set out on Schedule B. Information as to the 1989 test is set out on Schedule C. Raw data records for the other tests are not readily available. Perhaps the Mobil people will be satisfied with the above two sets of raw data.

3. A-14 injection volumes by months.

Table of this information is set out in Schedule D.

4. Raw meter readings for gas volumes A-14 injection well from January 1986 to 1989.

Typically volumes are determined from 7-day charts which are integrated for daily averages of static, differential and temperature. On Schedule E attached we show samplings of 2 or 3 weeks for 7 different months, including both high volume months and low volume months. I presume this will be sufficient information to satisfy the Mobil engineers that the volumes have been properly calculated.

5. Initial bottom hole pressure on the A-14 injection well.

See Schedule F attached.

6. Initial bottom hole pressure for the L-3 well in Section 3, Township 24 North, Range 1 West.

See Schedule G attached.

7. Gas and oil production L-3 well.

See Schedule H attached.

8. Graph of Canada Ojitos Unit gas deviation as a function of temperature and pressure.

(Supplied in event Mobil may not have the deviation factors for the Canada Ojitos Unit gas.)

ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

SURFACE INJECTION WELL PRESSURES (PSIA)
(INCLUDES FRICTION)

	1984	1985	1986	1987	1988
Jan.	1510	1490-1510	1430	1430-1610	1780-1600
Feb.	1510	1490	1430	1630-1640	SI
Mar.	1510	1510	1430-1470	1640	1690-1900
Apr.	1510	1510	1470	1640	1900
May	1510	1490	1490	1510 & SI	1900
June	1510	1490	1510	SI	1900-1840
July	1510	1490	1510	1730	1890
Aug.	1510	1490-1430	1510	1640-1670	1900-1710
Sept.	1510	1470-1430	1510	1640 & SI	1710
oct.	1510	1430	1510	1710	1400-1730
Nov.	1510	1450	1510	SI & 1710	1730-1690
Dec.	1490	1450-1410	1510	1620 & SI	1730-1600

#### SCHEDULE B ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

## RAW PRESSURE DATA PRESSURE FALL-OFF TESTS 1987 TEST

The raw pressure data for the 1987 test is shown in NMOCC Case No. 9525, February 1, 1989, B-M-G Exhibit 1, Section J, Page 3, the first two columns.

The only additional information that might be of interest is the flowing surface pressure immediately prior to shut in which was 1687 psia. Injection rate was 700 MCF/D. Estimated friction - absent liquids and miscellaneous losses - for the 1.7 miles of 2" surface line and 1.22 miles of downhole tubing would be approximately 10#. Friction by instantaneous fall-off on shut in was 17#. The resulting initial injection pressure absent friction then becomes 1670 psia.

ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

		Final (Psia)	1547	1412 1359 1311 1287	1260					
	<b>5.1</b>	Recording Meter Adjustment for Meter Error	80	& & & & * * * * * *	& &					
AM F. CARR 989	SS E FALL-OFF TEST	Reading (Psia)	1555	1420 1367 1319 1295	1268					
ATTACHED TO LETTER TO WILLIAM F. DATED FEBRUARY 16, 1989	CANADA OJITOS UNIT A-14 PRESSURE  (SURFACE PRESSURES)	DWT + 11 (Psia)	1605 1532 1504 1480	1461	1231	1199	1190	1182	1178	1175
HED TO LE	RAW PRE JI TTOS UNIT (SURFY	$\frac{\text{DWI}}{(\text{PSig})}$	1594 1521 1493 1469	1450	1220	1188	1179	1171	1167	1164
ATTAC	CANADA OJ	Days S.I.	0.00 0.01 0.021 0.042	0.083 0.15 0.25 0.35	0.56 0.81 1.21	1.81	2.81	4.8	5.8	8.9
		Time		1:55 PM 3:30 PM 6:00 PM 8:30 PM 11:00 PM	1:30 PM 7:22 AM 5:00 PM	7:30 AM	7:30 AM	9:40 AM	8:05 AM	7:20 AM
		Date	1-17-89		1-18-89	1-19-89	1-20-89	1-22-89	1-23-89	1-24-89

# SCHEDULE D ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

#### CANADA OJITOS UNIT A-14 GAS INJECTION

(VOLUMES IN MCF AT 15.025)

Year	Month	MCF/Month	Year	Month	MCF/Month	Year	Month	MCF/Month
1974	January	0	1977	Januarv	2804	1980	January	2697
	February	Û		February	2544		February	2531
	March	O		March	2767		March	2715
	April	Û		April	2775		April	2689
	Mav	()		May	2981		Mav	2690
	June	0		June	2914		June	2759
	July	(ı		July	3228		Juiv	2774
	August	1686		August	3299		August	2948
	September	2955		September	3180		September	2983
	October	3062		October	3169		October	3040
	November	2652		November	2981		November	490
	December	2098		December	3899		December	1650
	Total	12453		Total	36541		Total	29986
	Cumulative	12453		Cumulative	120873		Cumulative	218352
1975	Januarv	3219	1978	Januarv	3892	1981	Januarv	2904
	February	2868		February	3578		February	2548
	March	3751		March	3179		March	3139
	April	3096		April	3116		April	2786
	Mav	3173		Mav	3234		Mav	3275
	June	2978		June	Ò		June	3492
	July	3191		July	1311		July	<b>4</b> 03 <b>6</b>
	August	3108		August	3337		Auaust	3887
	September	3010		September	3105		September	3902
	October	3159		October	3000		October	4083
	November	2886		November	2807		November	4025
	December	2998		December	2807		December	4171
	Total	37437		Total	33366		Total	42248
	Cumulative	49890		Cumulative	154239		Cumulative	260600
1976	Januarv	3149	1979	Januarv	2756	1982	January	4205
	February	2930		February	2570		February	3864
	March	3131		March	2959		March	4257
	Aaril	2841		April	2952		Aoril	4320
	May	2674		May	2492		Mav	4623
	June	2698		June	2889		June	4505
	Julv	2925		Julv	3033		July	4867
	August	2872		August	3128		August	4607
	September	2834		Sept <i>ember</i>	2943		September	4495
	October	2869		October	2987		October	4641
	November	2687		November	2669		November	4601
	December	2 <b>8</b> 32		December	2749		December	4763
	Total	34442		Total	34127		Total	53748
	Cumulative	84332		Cumulative	188366		Cumulative	314348

#### CANADA OJITOS UNIT A-14 GAS INJECTION

(VOLUMES IN MCF AT 15.025)

Year	Month	MCF/Month	Year	Month	MCF/Month
1983	January	4744	1986	January	4866
	February	4312		February	4503
	March	4921		March	5729
	April	4810		Aoril	5816
	May	5205		May	6285
	June	5093		June	6615
	July	5343		July	6929
	August	5340		August	6762
	September	5190		September	6334
	October	5341		October	2970
	November	4974		November	0
	December	5115		December	0
	Total	60388		Total	54809
	Cumulative	374736		Cumulative	557226
1984	January	5159	1987	January	7962
	February	4715		February	10011
	March	4873	•	March	10934
	April	4833		April	11405
	Mav	5241		Mav	6518
	June	5134		June	12768
	July	5290		July	22867
	August	5313		August	18489
	September	5160		September	8020
	October	5245		October	21315
	November	5070		November	776
	December	5219		December	2272
	Total	61252		Total	133337
	Cumulative	435988		Cumulative	690563
1985	Januarv	5401	1988	Januarv	26837
	February	4845		February	3573
	March	5487		March	44435
	April	5115		April	46278
	Mav	5348		Mav	39372
	June	5424		June	49599
	July	5982		July	54305
	August	5713		August	44792
	September	5169		September	29229
	October	5145		October	19672
	November	5025		November	37551
	December	5774		December	30968
	Total	64429		Total	426611
	Cumulative	500417		Cumulative	1117174

## SCHEDULE E ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

#### CANADA OJITOS UNIT A-14 RAW METER READINGS

(3000# STATIC SPRING: SQUARE ROOT CHARTS)
(METER RUN 1.939" INSIDE DIAMETER)
(INTEGRATED AVERAGES ARE FOR 7-DAY CHART PERIODS)

<u>Date</u>	Orifice Plate	Int. Average Static	Int. Average <u>Differential</u>	Average Temperature (Degrees F)
1986				
Jan. 2-8	.375	6.90	4.30	57
Jan. 9-15	.375	6.90	4.42	57
Jan. 16-22	.375	6.90	4.34	57
Mar. 2-8	.375	6.90	4.64	58
Mar. 25-31	.375	7.00	5.08	58
<u>1987</u>				
Feb. 12-18	.625	7.37	3.74	48
Feb. 19-25	.625	7.40	3.74	44
Aug. 20-26	.625	7.46	6.35	55
Aug. 27-31	.625	7.40	5.95	55
Oct. 15-21	.625	7.57	6.68	52
Oct. 22-28	.625	7.52	6.35	<b>4</b> 7
1988				
July 14-20	1.000	7.92	5.74	77
July 21-27	1.000	7.94	5.88	79
Dec. 15-21	1.000	7.32	3.18	59
Dec. 22-28	1.000	7.31	3.08	56

#### SCHEDULE F ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

### CANADA OJITOS UNIT A-14 INITIAL BOTTOM HOLE PRESSURE

Because of the extremely tight character of the fracture block in which the A-14 is completed, we initially presumed (and, accurately, as it later turned out) that the well would have to be shut in for an impracticably long time to determine an accurate pressure for the area.

We recognized that only after a substantial volume of gas had been injected and communication established with the high capacity fracture system could reliable pressures be obtained with reasonable shut in times. Accordingly the first static pressure test was made in 1978 - 4 years after injection commenced - at which time the pressure stabilized in about 60 days at approximately 1175#. This was within 10# of the surface pressure of the gas cap observation well, the K-13.

It was not necessary to measure a bottom hole pressure at that time since we have found that bottom hole pressures in the gas injection wells can be determined within a few pounds by simply adding the weight of the column of gas to the surface pressure. In this instance the bottom hole pressure was approximately 1415# at the C zone datum of +678'. Virgin pressure would have been in the range of 1800# to 1850#; so the well's pressure was 400# less than virgin pressure, but within a few pounds of the gas cap pressure in the wells to the north: clear evidence of communication with the main producing and injection wells.

#### SCHEDULE G ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

### CANADA OJITOS UNIT L-3 INITIAL BOTTOM HOLE PRESSURE

No bottom hole pressures have been measured in the L-3. Communication of the L-3 with the main producing reservoir was established by two means:

- l. Fluid level fall-off following frac treatment was still on a straight line relation with log time at the last measured point which was only 50# above virgin pressure; so the reservoir pressure in this area would necessarily have had to have been at least 150# less than virgin pressure. (Reference NMOCC Case No. 9113, March 30, 1987, B-M-G Exhibit 1, Section I, Pages 15 and 16 and testimony therein.)
- 2. From the flat production decline rate (1.7% per year for the first 18 years following commencement of gas injection. (Reference NMOCC Case No. 9113, March 30, 1987, B-M-G Exhibit 1, Section K, Pages 8 and 9 and testimony therein.)

#### SCHEDULE H ATTACHED TO LETTER TO WILLIAM F. CARR DATED FEBRUARY 16, 1989

WEST PUERTO CHIQUITO POOL. RIO ARRIBA CO.. NM BENSON-MONTIN-GREER DRILLING CORF.. COU #16 (L-3). (SW 3-24N-1W)

				DIL			GAS		GOR		WATER	
YR MO	DAYS PRODUCED	BOPH	BOFPD	BOPCD	CUM MBD	MCF/M	MCF/D	CUM MMCF	SCF/BBL	Month	8WPD	CUM MBW
1971 1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1971 2	0.0	0.0		0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
1971 3	0.0	0.0		0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
1971 4	0.0	0.0		0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
1971 5	0.0	0.0	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
1971 6	0.0	0.0	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
1971 7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1971 8	20.0	1082.0	54.1	34.9	1.1	325.0	16.3	0.3	300.4	0.0	0.0	0.0
1971 9	26.0	1063.0	40.9	35.4	2.1	319.0	12.3	0.6	300.1	0.0	0.0	0.0
1971 10	11.0	657.0	59.7	21.2	2.8	197.0	17.9	0.8	299.8	0.0	0.0	0.0
1971 11	0.0	0.0	0.0	0.0	2.8	0.0	0.0		0.0	0.0	0.0	0.0
1971 12	8.0	201.0	25.1	6.5	3.0	60.0	7.5	0.9	298.5	0.0	0.0	0.0
Subtotal	45.0	3003.0	46.2	19.6	•	901.0			-	0.0		
1972 1	0.0	0.0	0.0	0.0	3.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0
1972 2	2.0	8.0	4.0	0.3	3.0	2.0	1.0	0.9	250.0	0.0	0.0	0.0
1972 3	29.0	1599.0	55.1	51.6	4.6	480.0	16.6	1.4	300.2	0.0	0.0	0.0
1972 4	30.0	1073.0	35.8	35.8	5.7	322.0	10.7	1.7	300.1	0.0	0.0	0.0
1972 5	27.0	958.0	35.5	30.9	6.6	287.0	10.6	2.0	299.6	0.0	0.0	0.0
1972 6	30.0	973.0	32.4	32.4	7.6	292.0	9.7	2.3	300.1	0.0	0.0	0.0
1972 7	30.0	1060.0	35.3	34.2	8.7	318.0	10.6	2.6	300.0	0.0	0.0	0.0
1972 8	30.0	1008.0	33.6	32.5	9.7	302.0	10.1	2.9	299.6	0.0	0.0	0.0
1972 9	30.0	1018.0	33.9	33.9	10.7	305.0	10.2	3.2	299.6	0.0	0.0	0.0
1 <b>9</b> 72 10	11.0	533.0	48.5	17.2	11.2	160.0	14.5	3.4	300.2	0.0	0.0	0.0
1972 11	0.0	0.0	0.0	0.0	11.2	0.0	0.0	3.4	0.0	0.0	0.0	0.0
1972 12	25.0	1069.0	42.8	34.5	12.3	321.0	12.8	3.7	300.3	0.0	0.0	0.0
Subtotal	244.0	9299.0	38.1	25.4		2789.0				0.0		
1973 1	28.0		33.5	30.2	13.2		10.0	4.0			0.0	0.0
1973 2	14.0	421.0	30.1	15.0	13.7	126.0	9.0	4.1	299.3	0.0	0.0	0.0
1973 3	0.0	0.0	0.0	0.0	13.7	0.0	0.0	4.1	0.0	0.0	0.0	0.0
1973 4	0.0	0.0	0.0	0.0	13.7	0.0	0.0	4.1	0.0	0.0	0.0	0.0
1973 5	11.0	<b>660.</b> 0	60.0	21.3	14.3	198.0	18.0	4.3	300.0	0.0	0.0	0.0
1973 6	29.0	911.0	31.4	30.4	15.2	273.0	9.4	4.6	299.7	0.0	0.0	0.0
1973 7	28.0	830.0	29.6	26.8	16.1	249.0	8.9	4.8	300.0	0.0	0.0	0.0
1973 8	27.0	689.0	25.5	22.2	16.8	207.0	7.7	5.0	300.4	0.0	0.0	0.0
1973 9	25.0	877.0	35.1	29.2	17.6	263.0	10.5	<b>5.</b> 3	299.9	0.0	0.0	0.0
1973 10	31.0	1018.0	32.8	32.8	18.6	305.0	9.8	5.6	299.6	0.0	0.0	0.0
1973 11	28.0	946.0	33.8	31.5	19.6	284.0	10.1	5.9	300.2	0.0	0.0	0.0
1973 12	28.0 	5 <b>40.</b> 0	22.9	20.6	20.2	192.0	6.9	6.1	300.0	0.0	0.0	0.0
Subtotal	249.0	7929.0	31.8	21.7		2378.0				0.0		

<sup>\*</sup> BOPPD: BARRELS PER PRODUCING DAY. \* BOPCD: BARRELS PER CALENDAR DAY.

WEST PUERTO CHIQUITO PODL. RIO ARRIBA CO.. NM BENSON-MONTIN-GREER DRILLING CORP.. COU #16 (L-3). (SW 3-24N-1W)

				OIL			SAS		GOR		WATER	
	DAYS PRODUCED	BOPM	ворръ	80PCD	CUM MBD	MCF/M		CUH MMCF	SCF/BBL	Month		CUM MBW
	23.0	706.0	30.7	22.8	20.9		9.2	6.3	300.3	0.0	0.0	0.0
1974 2	24.0	781.0	32.5	27.9	21.7	234.0	9.8	6.5	299.6	0.0	0.0	0.0
1974 3	14.0	678.0	48.4	21.9	22.4	203.0	14.5	6.7	299.4	0.0	0.0	0.0
1974 4	30.0	979.0	32.6	32.6	23.4		9.8	7.0	300.3	0.0	0.0	0.0
1974 5	31.0	922.0	29.7	29.7	24.3	277.0		7.3		0.0	0.0	0.0
1974 6	29.0	892.0	30.8	29.7	25.2	268.0		7.6		0.0	0.0	0.0
1974 7	31.0	948.0	30.6	30.6	26.1	569.0	18.4	8.1	600.2	0.0	0.0	0.0
1974 8	24.0	825.0	34.4	26.6	27.0	495.0	20.6	8.6	600.0	0.0	0.0	0.0
1974 9	30.0	932.0	31.1	31.1	27.9	280.0	9.3	8.9	300.4	0.0	0.0	0.0
1974 10	21.0	959.0	45.7	30.9	28.9	288.0	13.7	9.2	300.3	0.0	0.0	0.0
1974 11	21.0	756.0	36.0	25.2	29.6	227.0	10.8	9.4	300.3	0.0	0.0	0.0
1974 12				30.1	30.5	280.0	10.4	9.7	299.8	0.0	0.0	0.0
Subtotal		10312.0		28.3	•	3627.0				0.0		
1975 1	23.0	780.0	33.9	25.2	31.3	234.0	10.2	9.9	300.0	0.0	0.0	0.0
1975 2	28.0	560.0	20.0		31.9		6.0		300.0	0.0	0.0	0.0
1975 3	0.0	0.0		0.0	31.9	0.0	0.0		0.0	0.0	0.0	0.0
1975 4	10.0	802.0	80.2	26.7	32.7	241.0	24.1		300.5	0.0	0.0	0.0
1975 5	30.0	1019.0	34.0		33.7	306.0	10.2	10.6	300.3	0.0	0.0	0.0
1975 6	30.0	935.0	31.2		34.6		18.7	11.2	600.0	0.0	0.0	0.0
1975 7	31.0	935.0	30.2	30.2	35.6		9.1	11.5	300.5	0.0	0.0	0.0
1975 8	28.0	857.0	30.6		36.4	257.0	9.2	11.7	299.9	0.0	0.0	0.0
1975 9	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1975 10	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1975 11	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1975 12	0.0	0.0	0.0	0.0		0.0	0.0		0.0	0.0	0.0	0.0
Subtotal	180.0	5888.0		16.1	•	2048.0				0.0		
1976 1	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1978 2	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1976 3	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1976 4	0.0	0.0	0.0	0.0	36.4	0.0	0.0	11.7	0.0	0.0	0.0	0.0
1976 5	7.0	604.0	86.3	19.5	37.0	362.0	51.7	12.1	579.3	0.0	0.0	0.0
1976 6	30.0	1041.0	34.7	34.7	38.1	312.0	10.4	12.4	299.7	0.0	0.0	0.0
1976 7	27.0	955.0	35.4	30.8	39.0	573.0	21.2	13.0	600.0	0.0	0.0	0.0
1976 8	29.0	948.0	32.7	30.6	40.0	284.0	9.8	13.3	279.6	0.0	0.0	0.0
1976 9	24.0	843.0	35.1	28.1	40.8	506.0	21.1	13.8	600.2	0.0	0.0	0.0
1976 10	27.0	878.0	32.5	28.3	41.7	263.0	9.7	14.0	299.5	0.0	0.0	0.0
1975 11	30.0	937.0	31.2	31.2	42.6	562.0	18.7	14.6	599.8	0.0	0.0	0.0
1976 12	26.0	849.0	32.7	27.4	43.5	255.0	9.8	14.9	300.4	0.0	0.0	0.0
Subtotal	200.0	7055.0	35.3	19.3	•	3117.0				0.0		

<sup>\*</sup> SOPPD: BARRELS PER PRODUCING DAY. \* SOPCD: BARRELS PER CALENDAR DAY.

WEST PUERTO CHIQUITO POOL. RIO ARRIBA CO.. NM BENSON-MONTIN-GREER DRILLING CORP., COU #16 (L-3). (SW 3-24N-1W)

				DIL			6AS				WATER	
	DAYS PRODUCED	80PM		BOPCD	CUM MBO	MCF/M		CUM MMCF	SCF/88L			CUM MBW
1977 1	27.0	609.0		19.6	44.1		13.5		599.3	0.0	0.0	0.0
1977 2	27.0	697.0	25.8	24.9	44.8	418.0	15.5	15.6	599.7	0.0	0.0	0.0
1977 3	31.0	867.0	28.0	28.0	45.7	520.0	16.8	16.2	599.8	0.0	0.0	0.0
1977 4	27.0	799.0	29.6	26.6	46.5	479.0	17.7	16.5	599.5	0.0	0.0	0.0
1977 5	31.0	928.0	29.9	29.9	47.4	557.0	18.0	17.2		0.0	0.0	0.0
1977 6	29.0	767.0	26.4	25.6	48.2	460.0	15.9	17.7	599.7	0.0	0.0	0.0
1977 7	31.0	903.0	29.1	29.1	49.1	542.0	17.5	18.2	600.2	0.0	0.0	0.0
1977 B	31.0	891.0	28.7	28.7	49.9	535.0	17.3	18.7	600.4	0.0	0.0	0.0
1977 9	30.0	B17.0	27.2	27.2	50.8	490.0	16.3	19.2	599.8	0.0	0.0	0.0
1977 10	30.0	857.0	28.5	27.6	51.6	514.0	17.1	19.7	599.8	0.0	0.0	0:0
1977 11	30.0	865.0	28.8	28.8	52.5	519.0	17.3	20.3	600.0	0.0	0.0	0.0
1977 12	31.0	878.0 	28.3	28.3		527.0	17.0	20.8	600.2	0.0	0.0	0.0
Subtotal	355.0			27.1	•	5926.0				0.0		
1978 1	28.0	749.0	26.8	24.2	54.1	449.0	16.0	21.2	599.5	0.0	0.0	0.0
1978 2	28.0	764.0	27.3	27.3	54.9		16.4	21.7	599.5	0.0	0.0	0.0
1978 3	5.0	376.0	75.2	12.1	55.3	226.0	45.2		601.1	0.0	0.0	0.0
1978 4	30.0	850.0	28.3	28.3	56.1	510.0	17.0	22.4		0.0	0.0	0.0
1978 5	26.0	788.0	30.3	25.4	56.9		18.2	22.9		0.0	0.0	0.0
1978 6	28.0	656.0		21.9	57.5		14.1	23.3	600.6	0.0	0.0	0.0
1978 7	5.0			6.7	57.8	125.0	25.0	23.4		0.0	0.0	0.0
1978 8	1.0	6.0		0.2	57.8	4.0	4.0	23.4	666.7	0.0	0.0	0.0
1978 9	0.0	0.0		0.0	57.8	0.0	0.0		0.0	0.0	0.0	0.0
1978 10	10.0	348.0	34.8	11.2	58.1		20.9	23.6	600.6	0.0	0.0	0.0
1978 11	25.0		46.2	38.5	59.3	694.0	27.8	24.3	600.3	0.0	0.0	0.0
1978 12	30.0	870.0		28.1	60.1	522.0	17.4	24.8	600.0		0.0	0.0
Subtotal		6771.0			•	4064.0			_	0.0		
1979 1		642.0				385.0				0.0		
1979 2	20.0	513.0	25.7	18.3	61.3	308.0	15.4	25.5	600.4	0.0	0.0	0.0
1979 3	0.0	0.0	0.0	0.0	61.3	0.0	0.0	25.5	0.0	0.0	0.0	0.0
1979 4	0.0	0.0	0.0	0.0	61.3	0.0	0.0	25.5	0.0	0.0	0.0	0.0
1979 5	6.0	292.0	48.7	9.4	61.6	175.0	29.2	25.7	599.3	0.0	0.0	0.0
1979 6	11.0	411.0	37.4	13.7	62.0	247.0	22.5	26.0	601.0	0.0	0.0	0.0
1 <b>97</b> 9 7	28.0	832.0	29.7	26.8	62.8	499.0	17.8	26.5	599.8	0.0	0.0	0.0
1979 8	29.0	834.0	28.8	26.9	63.7	500.0	17.2	27.0	599.5	0.0	0.0	0.0
1979 9	26.0	821.0	31.6	27.4	64.5	493.0	19.0	27.5	600.5	0.0	0.0	0.0
1979 10	26.0	817.0	31.4	26.4	65.3	490.0	18.8	27.9	599.8	0.0	0.0	0.0
1979 11	30.0	782.0	26.1	26.1	66.1	469.0	15.6	28.4	599.7	0.0	0.0	0.0
1979 12	30.0	800.0	26.7	25.8	66.9	280.0	9.3	28.7	350.0	0.0	0.0	0.0
Subtotal	230.0	67 <b>44.</b> 0	29.3	18.5	•	3846.0			_	0.0		

<sup>\*</sup> BOPPD: BARRELS PER PRODUCING DAY. \* BOPCD: BARRELS PER CALENDAR DAY.

WEST PUERTO CHIQUITO POOL. RIO ARRIBA CO.. NM
BENSON-MONTIN-GREER DRILLING CORP.. COU #16 (L-3). (SW 3-24N-1W)

		OIL				GAS			GOR WATER			
	DAYS PRODUCED	BOPM	BOPPD	80PCD	MBO CUM	MCF/M	MCF/D	CUM MMCF	SCF/BBL			CUM MBW
	10.0	442.0	44.2	14.3	67.3	265.0	26.5	29.0	599.5	0.0	0.0	0.0
1980 2	16.0	518.0	32.4	17.9	67.8	311.0	19.4	29.3	600.4	0.0	0.0	0.0
1980 3	0.0	0.0	0.0	0.0	67.8	0.0	0.0	29.3	0.0	0.0	0.0	0.0
1980 4	22.0	1072.0	48.7	35.7	68.9	643.0	29.2	29.9	599.8	0.0	0.0	0.0
1980 5	28.0	875.0	31.3	28.2	69.8	525.0	18.8	30.4	600.0	0.0	0.0	0.0
1980 6	30.0	800.0	26.7	26.7	70.6	480.0	16.0	30.9	600.0	0.0	0.0	0.0
1980 7	31.0	792.0	25.5	25.5	71.4	464.0	15.0	31.4	585.9	0.0	0.0	0.0
1980 B	31.0	836.0	27.0	27.0	72.2	502.0	16.2	31.9	600.5	0.0	0.0	0.0
1980 9	30.0	765.0	25.5	25.5	73.0	459.0	15.3	32.3	600.0	0.0	0.0	0.0
1980 10	31.0	815.0	26.3	26.3	73.8	0.0	0.0	32.3	0.0	0.0	0.0	0.0
1980 11	30.0	804.0	26.8	26.8	74.6	482.0	16.1	32.8	599.5	0.0	0.0	0.0
1980 12	15.0	387.0		12.5	75.0	232.0	15.5	33.i	<i>599.</i> 5	0.0	0.0	0.0
Subtotal		8106.0		22.1	•	4363.0			<del>-</del> -	0.0		
1981 1	7.0	375.0	41.7	12.1	75.4	225.0	25.0	33.3	600.0	0.0	0.0	0.0
1981 2	27.0	967.0	35.8		76.3		14.1			0.0	0.0	0.0
1981 3	12.0	323.0	26.9	10.4	76.6		15.8	33.9		0.0	0.0	0.0
1981 4	21.0	837.0	39.9	27.9	77.5		23.9	34.4	599.8	0.0	0.0	0.0
1981 5	11.0	312.0	28.4	10.1	77.8		17.0	34.5	599.4	0.0	0.0	0.0
1981 6	30.0	1078.0	35.9	35.9	78.9	657.0	21.9	35.2	609.5	0.0	0.0	0.0
1981 7	31.0	803.0	25.9	25.9	79.7		15.5	35.7	600.2	0.0	0.0	0.0
1981 8	19.0	520.0	27.4	16.8	80.2		16.4	36.0	600.0	0.0	0.0	0.0
1981 9	18.0	785.0	43.6	26.2	81.0	471.0	26.2	36.5	600.0	0.0	0.0	0.0
1981 10	31.0	845.0	27.3	27.3	81.8		16.4	37.0	600.0	0.0	0.0	0.0
1981 11	27.0	703.0	25.0	23.4		422.0	15.6	37.4	600.3	0.0	0.0	0.0
1981 12	18.0	514.0	23.6	16.6			17.1	37.7	579.2	0.0	0.0	0.0
Subtotal	254.0	 8062.0	31.7	22.1	•	4642.0				0.0		
Sancorar	204.0	0002.0	J1.7	22.1		7072.V				0.0		
	14.0					395.0						
1982 2						458.0				0.0	0.0	
1982 3	12.0	514.0	42.8	16.6	85.0	30 <b>8.</b> 0	25.7	38.9	599.2	0.0	0.0	0.0
1982 4	30.0	672.0	22.4	22.4	85.7	403.0	13.4	39.3	599.7	0.0	0.0	0.9
1982 5	23.0	445.0	19.3	14.4	86.1	267.0	11.6	39.5	600.0	0.0	0.0	0.0
1982 6	0.0	0.0	0.0	0.0	36.1	0.0	0.0	39.5	0.0	0.0	0.0	0.0
1982 7	0.0	0.0	0.0	0.0	86.1	0.0	0.0	39.5	0.0	0.0	0.0	0.0
1982 8	26.0	707.0	27.2	22.8	86.8	424.0	16.3	40.0	599.7	0.0	0.0	0.0
1982 9	23.0	332.0	14.4	11.1	87.1	199.0	8.7	40.2	599.4	0.0	0.0	0.0
1982 10	25.0	783.0	31.3	25.3	87.9	465.0	18.6	40.6	593.9	0.0	0.0	0.0
1982 11	16.0	637.0	39.8	21.2	88.6	382.0	23.9	41.0	599.7	0.0	0.0	0.0
1982 12	30.0	814.0	27.1	26.3	89.4	488.0	16.3	41.5	599.5	0.0	0.0	0.0
Subtotal	227.0	6326.0	27.9	17.3		3789.0				0.0		

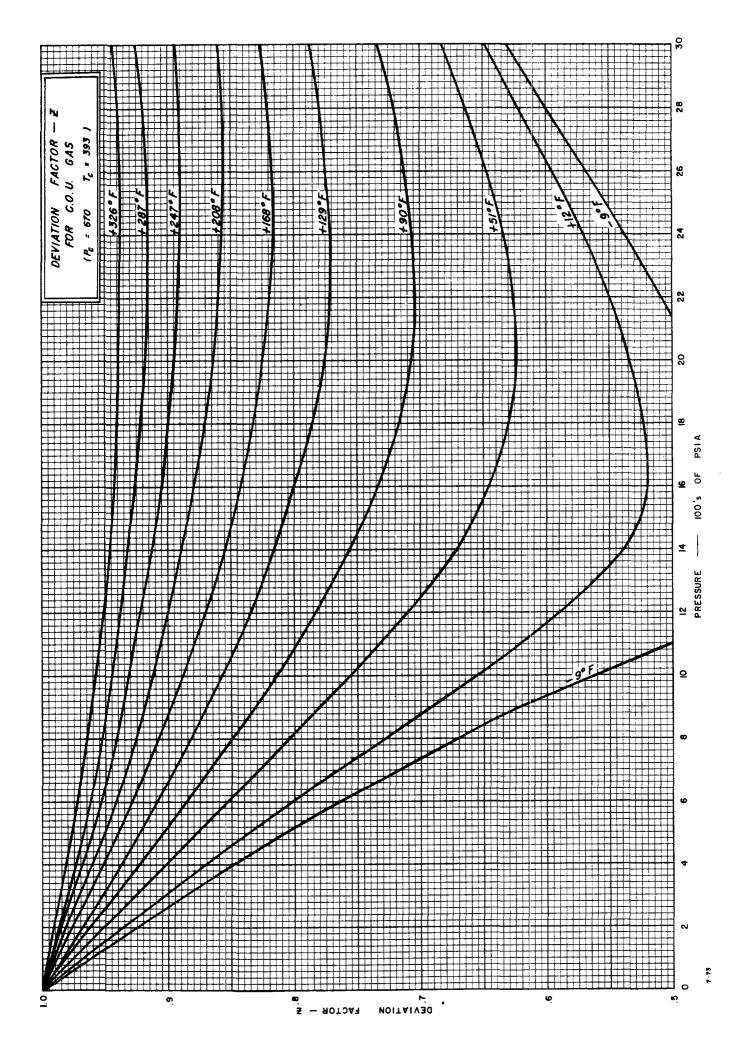
<sup>\*</sup> BOPPD: BARRELS PER PRODUCING DAY.

<sup>\*</sup> BOPCD: BARRELS PER CALENDAR DAY.

				DIL			GAS		GOR		WATER	
	DAYS PRODUCED	BOPM	80FP <b>D</b>	BOPCD	CUM MB8	HCF/M		CUM MMCF	SCF/BBL			CUM MBW
1983 1	30.0	773.0	25.B	24.9	90.1	464.0	15.5	<b>42.</b> 0	600.3	0.0	0.0	0.0
1983 2	25.0	594.0	23.8	21.2	90.7	459.0	18.4	42.4	772.7	0.0	0.0	0.0
1983 3	1.0	28.0	28.0	0.9	90.8	22.0	22.0	42.4	785.7	0.0	0.0	0.0
1983 4	24.0	850.0	35.4	28.3	91.6	66.0	2.8	42.5	77.6	0.0	0.0	0.0
1983 5	30.0	732.0	24.4	23.6	92.3	566.0	18.9	43.1	773.2	0.0	0.0	0.0
1983 <i>6</i>	30.0	677.0	22.6	22.6	93.0	523.0	17.4	43.6	772.5	0.0	0.0	0.0
1983 7	30.0	689.0	23.0	22.2	93.7	532.0	17.7		772.1	0.0	0.0	0.0
1983 8	29.0	640.0	22.1	20.6	94.4	495.0	17.1	44.6	773.4	0.0	0.0	0.0
1983 9	30.0	812.0	27.1	27.1	95.2	628.0	20.9	45.2	773.4	0.0	0.0	0.0
1983 10	14.0				95.6	315.0	22.5	45.6	772.1		0.0	0.0
1983 11	20.0	531.0		17.7			20.5	46.0			0.0	0.0
1983 12	17.0				96.7		26.9	46.4	773.3	0.0	0.0	0.0
Subtotal		7325.0	26.2	20.1	•	4937.0			-	0.0		
1984 1	18.0	733.0	40.7	23.6	97.4	567.0	31.5	47.0	773.5	0.0	0.0	0.0
1984 2	21.0	533.0	25.4		98.0			47.4	773.0		0.0	0.0
1984 3	23.0	562.0	24.4		98.5	434.0	18.9		772.2	0.0	0.0	0.0
1984 4	25.0	734.0	29.4		99.3	567.0	22.7	48.4	772.5	0.0	0.0	0.0
1984 5	27.0	655.0	24.3	21.1	99.9	506.0	18.7	48.9	772.5	0.0	0.0	0.0
1984 6	30.0	659.0	22.0	22.0	100.6	509.0	17.0	49.4	772.4		0.0	0.0
1984 7	31.0	672.0	21.7	21.7	101.2	519.0	16.7	49.9	772.3	0.0	0.0	0.0
1984 8	26.0	566.0		18.3	101.8	438.0	16.8	50.4	773.9		0.0	0.0
1984 9	4.0	172.0	43.0	5.7	102.0	133.0	33.3	50.5	773.3	0.0	0.0	0.0
1984 10	0.0	0.0	0.0	0.0	102.0	0.0	0.0	50.5	0.0		ERR	0.0
1984 11	16.0		33.1	17.6	102.5	409.0	25.6	50.9			0.0	0.0
1984 12	17.0	381.0	22.4	12.3	102.9	295.0	17.4	51.2			0.0	0.0
Subtotal		6196.0		16.9	•	4789.0				0.0		
1985 1	0.0	0.0	0.0	0.0	102.9	0.0	0.0	51.2	0.0	0.0	0.0	0.0
1985 2	0.0	0.0	0.0	0.0	102.9	0.0	0.0	51.2	0.0	0.0	0.0	0.0
1985 3	16.0	528.0	33.0	17.0	103.4	408.0	25.5	51.6	772.7	0.0	0.0	0.0
1985 4	22.0	711.0	32.3	23.7	104.1	550.0	25.0	52.2	773.6	0.0	0.0	0.0
1985 5	31.0	828.0	26.7	26.7	105.0	640.0	20.6	52.8	772 <b>.9</b>	0.0	0.0	0.0
1985 6	23.0	731.0	31.8	24.4	105.7	565.0	24.6	53.4	772.9	0.0	0.0	0.0
1985 7	31.0	600.0	19.4	19.4	106.3	464.0	15.0	53.8	773.3	0.0	0.0	0.0
1985 8	30.0	626.0	20.9	20.2	106.9	484.0	16.1	54.3	773.2	0.0	0.0	0.0
1985 9	5.0	181.0	36.2	6.0	107.1		28.0	54.5	773.5	0.0	0.0	0.0
1985 10	0.0	0.0	0.0	0.0	107.1	0.0	0.0	54.5	0.0	0.0	0.0	0.0
1985 11	0.0	0.0	0.0	0.0	107.1	0.0	0.0	54.5	0.0	0.0	0.0	0.0
1985 12	0.0		0.0	0.0	107.1	0.0	0.0	54.5	0.0	0.0	0.0	0.0
Subtotal		4205.0		11.5		3251.0			-	0.0		

WEST PUERTO CHIQUITO POOL. RIO ARRIBA CO.. NM BENSON-MONTIN-GREER DRILLING CORP.. COU #16 (L-3). (SW 3-24N-1W)

				OIL			6AS				WATER	
	DAYS PRODUCED	BOPM	BOPPD	ВОРСО	CUM M80	MCF/M	MCF/D	CUM MMCF	SCF/BBL	Month	8WPD	CUM MBW
	21.0	959.0	45.7	30.9	108.1	741.0	35.3	55.2	772.7	0.0	0.0	0.0
1986 2	28.0	850.0	30.4	30.4	108.9	<b>657.</b> 0	23.5	55.9	772.9	0.0	0.0	0.0
1986 3	11.0	530.0	48.2	17.1	109.4	410.0	37.3	56.3	773.6	0.0	0.0	0.0
1986 4	23.0	758.0	33.0	25.3	110.2	586.0	25.5	56.9	773.1	0.0	0.0	0.0
1986 5	28.0	707.0	25.3	22.8	110.9	707.0	25.3	57.6	1000.0	0.0	0.0	0.0
1986 6	0.0	0.0	0.0	0.0	110.9	0.0	0.0	57.6	0.0	0.0	0.0	0.0
1986 7	13.0	681.0	52.4	22.0	111.6	526.0	40.5	58.1	772.4	0.0	0.0	0.0
1986 8	4.0	313.0	78.3	10.1	111.9	242.0	60.5	58.3	773.2	0.0	0.0	0.0
1986 9	12.0	<b>693.</b> 0	57.8	23.1	112.6	534.0	44.7	58.9	773.4	0.0	0.0	0.0
1986 10	28.0	842.0	30.1	27.2	113.4	651.0	23.3	59.5	773.2	0.0	0.0	0.0
1986 11	19.0	757.0	39.8	25.2	114.2	585.0	30.8	60.1	772.8	0.0	0.0	0.0
1986 12	31.0			25.7			23.0	60.8	895. <i>9</i>	0.0	0.0	0.0
Subtotal		7887.0		21.6	,	6355.0			_	0.0		
1987 1	8.0	352.0	44.0	11.4	115.3	182.0	22.8	61.0	517.0	0.0	0.0	. 0.0
	15.0	354.0		12.6	115.7		10.4		440.7	0.0	0.0	0.0
1987 3	0.0	0.0		0.0	115.7		0.0		0.0	0.0	0.0	0.0
1987 4	0.0	0.0		0.0	115.7		0.0		0.0	0.0	0.0	0.0
1987 5	24.0	742.0	30.9	23.9	116.4		14.3		460.9		0.0	0.0
1987 6	17.0	345.0		11.5	116.8		11.6		571.0	0.0	0.0	0.0
1987 7	0.0			0.0	116.8		0.0		0.0	0.0	0.0	0.0
1987 8	0.0	0.0		0.0	116.8	0.0	0.0	61.7	0.0	0.0	0.0	0.0
1987 9	22.0	486.0	22.1	16.2			15.7		709.9	0.0	0.0	0.0
1987 10	31.0	383.0	12.4	12.4			9.7		788.5	0.0	0.0	0.0
1987 11	13.0	234.0	18.0	7.8			14.2		790.6	0.0	0.0	0.0
1987 12	9.0	323.0	35.9	10.4		223.0		62.8	690.4	0.0	0.0	0.0
Subtotal	139.0	3219.0		8.8	•	1932.0				0.0		
1988 1	20.0	278.0	13.9	9.0	118.5	250.0	12.5	63.0	899.3	0.0	0.0	0.0
1988 2						0.0						
1988 3	3.0	186.0	62.0	6.0	118.7	142.0	47.3	63.1	763.4	0.0	0.0	0.0
1980 4	21.0	265.0	12.6	8.8	118.9	206.0	7.8	63.4	777.4	0.0	0.0	0.0
1989 5	27.0	293.0	10.9	9.5	119.2	224.0	8.3	63.6	764.5	0.0	0.0	0.0
1988 6	30.0	243.0	8.1	8.1	119.5	190.0	6.3	63.8	781.9	0.0	0.0	0.0
1988 7	22.0	133.0	6.0	4.3	119.6	112.0	5.1	63.9	842.1	0.0	0.0	0.0
1988 8	11.0	113.0	10.3	3.6	119.7	88.0	8.0	64.0	778.8	0.0	0.0	0.0
1988 9	0.0	0.0	0.0	0.0	119.7	0.0	0.0	64.0	0.0	0.0	0.0	0.0
1988 10	0.0	0.0	0.0	0.0	119.7	0.0	0.0	64.0	0.0	0.0	0.0	0.0
1988 11	0.0	0.0	0.0	0.0	119.7	0.0	0.0	64.0	0.0	0.0	0.0	0.0
1988 12	0.0	0.0	0.0	0.0	119.7	0.0	0.0	64.0	0.0	0.0	0.0	0.0
Subtotal	134.0	1511.0	14.3	4.1	•	1212.0			<del>-</del> .	0.0		



LAWYERS

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February 15, 1989

#### HAND-DELIVERED

Mr. David Catanach
Hearing Examiner
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

Re: Oil Conservation Division Case No. 9525
In the Matter of the Application of Benson-Montin-Greer
Drilling Corporation for the Amendment of Division Order
No. R-6469, as Amended, Rio Arriba County, New Mexico

Dear Mr. Catanach:

The comments filed by Mobil Producing Texas and New Mexico Inc. on February 9, 1989 in the above-referenced case require a response from Benson-Montin-Greer Drilling Corp.

First, Benson-Montin-Greer Exhibit 1 (Sections E through T) presents evidence of drainage across the Southern boundary of the Canada Ojitos Unit in the West Puerto Chiquito Mancos Oil Pool. This evidence is relevant to the issues presented in this case, and had to be presented to refute assertions that such migration was not occurring made to the Division last August by Mobil and others in Case 9451.

Second, Mobil's written comments submitted after the February 1 hearing was concluded are just that -- comments. They are not evidence for they were not presented by witnesses under oath and subject to cross-examination. To suggest that you should contact Mr. Pearce or Mr. Craig at Mobil's Denver office to discuss this matter further is nothing more than an impermissible attempt to present additional evidence and continue the hearing on an ex parte basis. This should not be allowed nor should this evidence be considered by you in reaching a decision in this case.

Mr. David Catanach February 15, 1989 Page Two

The fact nevertheless remains that Mobil's "comments" and material will be a part of the papers filed in this case. Since Mobil has misinterpreted certain data which could mislead individuals researching these files at a future date, Benson-Montin-Greer requests that the attached response also be included in the Division's file in Case 9525.

From the record in this case it is clear that 640-acre proration units in Sections 23 and 24 of Township 24 North, Range 1 West are necessary because of migration across the Southern boundary of the Canada Ojitos Unit. No one, including Mobil, objects to the creation of these units. The case is under advisement and an Order granting the application of Benson-Montin-Greer Drilling Corp. should be entered containing all findings necessary to disclose the reasoning of the Division in granting this application -- including findings on migration across the Southern Boundary of the Canada Ojitos Unit.

Your attention to this matter is appreciated.

Very truly yours,

WILLIAM F. CARR

WFC: mlh

cc: W. Perry Pearce, Esq.

Albert R. Greer

## RESPONSE TO MOBIL'S STATEMENT OF ENGINEERING INTERPRETATIONS DATED FEBRUARY 8, 1989 IN OIL CONSERVATION COMMISSION CASE NO. 9525

Reference is made to the four items identified in Mobil's statement commencing at the bottom of page 1.

Item No. 1: Here Mobil says that pressure support from the pressure maintenance project means wells nearest to the project would have the highest GOR's. The fact of the matter is that the history of the pressure maintenance project of the Canada Ojitos Unit is replete with examples of low GOR oil being pushed ahead of the gas flood front; and wells farther out with less communication showing higher GOR's.

Of particular concern here is the high degree of communication between the C.C. State and the Wishing Well and the fact that both wells initially had similar GOR's. The fact that the C.C. State now has a significantly lower GOR than the Wishing Well implies outside influence: the most logical source of the outside influence is the pressure maintenance project.

Item No. 2: The reference to the attic oil of the Schmitz Anticline well with respect to the A-14 injector was necessary to clarify the allegation made in the August hearing, Case No. 9451, in which Amoco stated that if communication existed, the Schmitz Anticline would necessarily have to have a higher GOR. That would be true if the permeability was such as to allow gravity segregation throughout the entire area. With a "normal" attic oil situation since that is not the case, it is possible to have communication without having forced a high GOR in the Schmitz Anticline well.

Item No. 3: There is a high degree of communication between the Amoco C.C. State and the Wishing Well. This communication was refereed to in Case No. 9451, reference page 152 of the transcript, cross-examination of Amoco's Richard Jones by Tom Kellahin. The pressure decline noted by Mobil in the C.C. State in the last 12 hours of its September 108 hour test is tangible evidence of this high degree of communication between the two wells. This pressure drop in the C.C. State was caused by start up of production of the Wishing Well approximately a mile south of it, interrupting its normal buildup and cancelling its ability to reflect static reservoir pressure.

This is a classic example of communication found in many instances throughout the West Puerto Chiquito Pool: it supports the interpretation set out in Item No. 1 above in that both wells in such close communication should have similar GOR's; and the fact that they do not implies external influence - i.e. the pressure maintenance project.

Item No. 4: Wells in communication with the pressure maintenance project will experience no pressure decline only if communication is equal to the amount of withdrawal. Pressure decline means not that there is no communication; rather that it is not complete at the pressure differential existing. When the pressure differential increases with depletion of the southeast part of the West Puerto Chiquito then the amount of drainage will increase; hence the urgency of this case.

#### STATE OF NEW MEXICO

### ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
SOVERNOR

March 20, 1989

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FEINEW MEXICO 87501 (SOS) 827-5800

		(505) 827-58						
Mr. William F. Carr Campbell & Black Attorneys at Law Post Office Box 2208 Santa Fe, New Mexico	Re:	CASE NO. 9525 ORDER NO. R-6469-H Applicant: Benson-Montin-Greer Drilling						
Dear Sir:		Corporation						
Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.								
Sincerely,								
FLORENE DAVIDSON OC Staff Specialist								
Copy of order also sent to:								
Hobbs OCD x Artesia OCD x Aztec OCD x								
Other Perry Pearce, Bill Ha	wkins							