

1 NEW MEXICO OIL CONSERVATION COMMISSION

2 STATE LAND OFFICE BUILDING

3 STATE OF NEW MEXICO

4 CASE NO. 10508

5
6 IN THE MATTER OF:7
8 Case 10508 Being Called By the
9 Oil Conservation Commission on Its Own
10 Motion Pursuant to the Provisions of
11 Division Order No. R-6446-B, Which
Approved the Bravo Dome Carbon Dioxide
Gas Unit Agreement in Harding, Union
and Quay Counties, New Mexico.12
13 BEFORE:

14 CHAIRMAN WILLIAM LEMAY

15 COMMISSIONER GARY CARLSON

16 COMMISSIONER BILL WEISS

17
18 FLORENE DAVIDSON, Senior Staff Specialist19
20 State Land Office Building

21 Thursday, July 16, 1992

22
23 REPORTED BY:24 CARLA DIANE RODRIGUEZ
25 Certified Shorthand Reporter
for the State of New Mexico**ORIGINAL**

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1 CHAIRMAN LEMAY: Good morning. We're
2 ready to go.

3 This is the Oil Conservation
4 Commission. My name is Bill LeMay. On my left
5 is Commissioner Bill Weiss; on my right,
6 Commissioner Gary Carlson, representing the
7 Commissioner of Public Lands of the State of New
8 Mexico. I want to welcome all of you here.

9 Before we get started, it may not be
10 appropriate, but I would like to recognize a
11 person I've known for quite a few years. He's
12 sitting at the front table here, Dan Currens. I
13 knew him as an engineer. He's now a lawyer, and
14 I don't know if that's good or bad. I liked him
15 better as an engineer, but he's a pretty fair
16 lawyer. He's lived with this project for I don't
17 know how many years and I understand he's
18 retiring September 1st?

19 MR. CURRENS: That's correct.

20 CHAIRMAN LEMAY: I want to tell you
21 personally how much I've enjoyed working with you
22 all through the years, and I hope that we'll be
23 seeing you as a consultant maybe or something
24 back here?

25 MR. CURRENS: I certainly hope you do,

1 too.

2 MR. STOVALL: He said he's going to
3 charge what he's worth now.

4 MR. CURRENS: There's some doubt as to
5 whether or not I can get by on that salary. I
6 appreciate your comments and I certainly echo
7 them back to you. I've enjoyed knowing you for
8 many years and working with you. Thank you.

9 CHAIRMAN LEMAY: We appreciate all the
10 service you've given to the state, and we hope
11 you'll come back.

12 MR. CURRENS: Thank you.

13 CHAIRMAN LEMAY: Okay. We shall begin
14 by calling Case No. 10508.

15 [Proceedings in Case No. 10462 not
16 reported herein.]

17 CHAIRMAN LEMAY: Before we get into
18 Case 10508, I would like to make a couple of
19 announcements. The August docket will also
20 contain the proration hearing for the following
21 six months, so those of you that need to, kind of
22 plan ahead a little bit.

23 I think we have one other de novo on
24 that docket, the Nearburg and Yates case, so it
25 will be those three.

1 We also plan on scheduling, again for
2 your edification and planning in September,
3 probably two days. We have four de novo cases
4 concerning oil and potash, and we're going to be
5 honoring those applications on our September
6 docket.

7 Okay. We shall now call Case No.
8 10508.

9 MR. STOVALL: In the matter of Case
10 10508 being called by the Oil Conservation
11 Commission on its own motion pursuant to the
12 provisions of Division Order No. R-6446-B, which
13 approved the Bravo Dome Carbon Dioxide Gas Unit
14 Agreement in Harding, Union and Quay Counties,
15 New Mexico, to permit Amoco Production Company,
16 the operator of said unit, to review operations
17 and demonstrate to the Commission that its
18 operations within the unit are resulting in the
19 prevention of waste and the protection of
20 correlative rights on a continuing basis.

21 CHAIRMAN LEMAY: Appearances in Case
22 No. 10508.

23 MR. CARR: May it please the
24 Commission, my name is William F. Carr with the
25 Santa Fe law firm, Campbell, Carr, Berge and

1 Sheridan. We represent Amoco Production
2 Company. I'm appearing in association with
3 Daniel R. Currens, attorney for Amoco, from
4 Houston, and we have three witnesses.

5 CHAIRMAN LEMAY: Additional appearances
6 in the case? Will the witnesses giving testimony
7 kindly stand, raise your right hand, and Mr.
8 Stovall will swear you in.

9 [And all witnesses were duly sworn.]

10 CHAIRMAN LEMAY: Thank you.

11 Mr. Carr.

12 MR. CARR: May it please the
13 Commission, Amoco is here today to demonstrate to
14 you that our operations in the Bravo Dome Unit
15 continue to prevent waste and to protect
16 correlative rights.

17 We also will provide a brief update of
18 our operations in this unit during the last four
19 years.

20 To fully convey to you the big picture
21 of Bravo Dome, to show you what we believe is an
22 unusually successful unitization effort, it's
23 important to not only focus on what has happened
24 just during the last four years, but also to
25 direct your attention to events which have

1 occurred back as far as the original formation of
2 this unit.

3 I think it's fair to say that when this
4 unit was originally contemplated, it was a major
5 undertaking, even for companies the size of Amoco
6 and the other working interest owners involved.
7 This is the largest gas unit in the world. It
8 contains over a million acres.

9 When early decisions had to be made
10 about this unit, we were operating with
11 relatively limited data. We didn't know, in
12 fact, how to produce CO₂, we didn't know what
13 would be required to treat it, we didn't know how
14 it could be transported. In fact, we didn't even
15 know how it would really work in the reservoir in
16 enhanced oil recovery projects. But it was
17 apparent to us there was a potential for carbon
18 dioxide in tertiary recovery operations.

19 Because of these uncertainties, because
20 of the size of the potential unit area, because
21 of the remoteness of this unit to the fields in
22 which CO₂ could realistically be used, it was
23 decided by the working interest owners that
24 unitized development was appropriate.

25 So, late in the 1970s, they met, they

1 developed a unit agreement whereby they could
2 share not only the benefits of this development
3 but also share the burdens. Now, this agreement,
4 as perhaps you know, has always been a voluntary
5 unit agreement.

6 It does contains certain unique
7 provisions and one of those is important to this
8 process here today, for the working interest
9 owners provided in their unit contract that the
10 unit could not become effective back in 1980
11 until first it had received the blessing, the
12 approval, of the New Mexico Oil Conservation
13 Commission.

14 So, in 1980 there were two hearings
15 before the Commission, and the Commission twice
16 approved this plan for unitization. Following
17 OCD approval, approval was obtained from the land
18 office and from the Bureau of Land Management and
19 the unit became effective November 1, 1980.

20 This Commission, however, has
21 maintained a continuing role in this unitization
22 effort in several ways. One thing requires that
23 at least once every four years, Amoco return to
24 you and demonstrate that its operations continue
25 to prevent waste and to protect correlative

1 rights, and for that reason we're standing before
2 you here today to report to you on our operation
3 of the unit.

4 We will call three witnesses. The
5 first is Herb Wacker. Mr. Wacker is a geological
6 associate in Amoco's North Permian Basin Unit,
7 and it is his duty to evaluate and define the
8 reservoir at Bravo Dome. He's going to share
9 with you his latest geological interpretations on
10 the deposition, structure and physical geology in
11 this area. We will show you what we've done,
12 particularly focusing on what has been done
13 during the last four years to understand the
14 tough formation in Bravo Dome.

15 Now, even though development of carbon
16 dioxide is necessarily tied to the price of oil,
17 I think we are going to be able to show you that
18 we have continued in aggressive and active way to
19 develop data and an understanding of the
20 reservoir that is necessary if we're going to
21 effectively carry out our obligations as operator
22 of this unit to move toward full development of
23 all portions of this reservoir that can be
24 commercially produced.

25 We then will call an engineering

1 witness, Mr. Jim Collier. He's a senior
2 petroleum engineering associate for Amoco. He's
3 going to show you that Amoco continues to develop
4 carbon dioxide as a marketable commodity, and
5 we're doing this by employing the most economical
6 and efficient production methods, thereby
7 maximizing recovery, enhancing revenues and at
8 the same time protecting the environment.

9 He will finally review the financial
10 benefits that are coming from the Bravo Dome Unit
11 operation, focusing on royalties not only to the
12 state but to others, and also reviewing the new
13 taxes that have been generated by this effort.

14 Finally we're going to call Mr. Ron
15 Krenek, who is our manager of our CO₂ sales and
16 supply. He's going to review our efforts to
17 successfully compete in this marketplace to
18 obtain new contracts for carbon dioxide.

19 At the conclusion of this hearing,
20 we're convinced we will have demonstrated that we
21 are operating this unit in an efficient and
22 effective way, that what we see today is a unit
23 that is working as we hoped it would in 1980, and
24 that you'll be able to see that we are continuing
25 to prevent waste and to protect correlative

1 rights on a continuing basis.

2 Mr. Currens will call the witnesses for
3 Amoco.

4 CHAIRMAN LEMAY: Thank you, Mr. Carr.

5 MR. CURRENS: Mr. Chairman, will I be
6 picked up all right here, or do I need to use the
7 podium?

8 CHAIRMAN LEMAY: Your choice.

9 MR. CURRENS: I would call first Mr.
10 Herb Wacker.

11 HERBERT J. WACKER

12 Having been first duly sworn upon his oath, was
13 examined and testified as follows:

14 EXAMINATION

15 BY MR. CURRENS:

16 Q. Mr. Wacker, will you state your name
17 for the record, please.

18 A. Herbert J. Wacker.

19 Q. By whom are you employed?

20 A. Amoco Production Corporation, Houston,
21 Texas.

22 Q. In what capacity?

23 A. I'm the reservoir geologist for the
24 Bravo Dome Unit.

25 Q. Have you ever testified before this

1 Commission before?

2 A. I have not.

3 Q. Then let's review your education and
4 work background in the field of geology. Tell us
5 about your education in the field of geology.

6 A. I received a bachelor of science in
7 geology from Texas Christian University in 1970,
8 and a master of science in geology from the
9 University of Texas at El Paso in 1972.

10 Q. Upon receipt of that master's degree,
11 what did you do?

12 A. I was assigned to the New Mexico
13 Operations Group in the Exploration Department
14 for two years.

15 Q. Have you been with Amoco ever since?

16 A. Yes, I have.

17 Q. Why don't you very briefly describe the
18 nature of your assignments in the roughly 20
19 years you've been with Amoco.

20 A. Since then I have held both technical
21 and supervisory positions in the Michigan Basin
22 for four years, East Texas for five years, the
23 Eastern United States New Ventures Group for two
24 years, and I've worked the Permian Basin for six
25 years.

1 Q. Were you recently assigned to do a
2 project concerning Bravo Dome?

3 A. Yes, I was, slightly over a year and a
4 half ago.

5 Q. What assignment were you given?

6 A. The assignment was to understand the
7 reservoir at Bravo Dome.

8 Q. For this last year and a half, that has
9 been your primary work assignment and function?

10 A. Yes, sir, it has.

11 Q. About what percentage of your time have
12 you spent on that?

13 A. About 80 percent.

14 Q. With respect to this hearing today,
15 have you brought us certain exhibits that have
16 been prepared to help us understand the studies
17 that you've made to this point?

18 A. Yes, I have.

19 MR. CURRENS: I would submit Mr.
20 Wacker's qualifications as an expert geologist in
21 this matter.

22 CHAIRMAN LEMAY: His qualifications are
23 acceptable.

24 Q. Let's turn our attention to what is
25 marked as Amoco's Wacker Exhibit No. 1.

1 MR. CURRENS: I believe all of the
2 Commissioners have a book up there. The books
3 contain the exhibits of all of the witnesses.
4 Some of them are in reduced form as compared to
5 what we'll be showing on the board.

6 Q. What do you show on Exhibit No. 1, Mr.
7 Wacker?

8 A. Exhibit No. 1 shows the location of
9 Bravo Dome Gas Unit in the northeastern quadrant
10 of New Mexico.

11 Q. Just for purposes of locating and
12 getting everyone oriented as to where we are
13 talking about, is that right?

14 A. That's right.

15 Q. Okay. Now it's this area that has been
16 the focal point of the geologic study that you've
17 been making, is that right?

18 A. Yes, it has.

19 Q. How does a geologist start in to
20 conducting a study of an area such as this?

21 A. Our first job is to try and get a feel
22 for the deposition environments that are present
23 there by looking at the rocks, and then we begin
24 to build a geological picture in our minds to
25 show others what we have.

1 Q. Well, let's see if we have some
2 examples of how you start that process, then.
3 What's your Exhibit 2?

4 A. Exhibit 2 is a diagram of the middle
5 Pennsylvanian. The block diagram shows the
6 general configuration of the Sierra Grande Uplift
7 which was in Northeastern New Mexico, and the
8 Palo Duro Basin which goes from Eastern New
9 Mexico on in to Texas.

10 It shows the general topography as a
11 geologist would imagine it, at a time about 310
12 million years ago.

13 Q. So this is sort of a mind model that
14 you have to start looking at the rock and the
15 depositional nature of the area that you're
16 interested in?

17 A. That's right.

18 Q. Where do you start looking at these
19 things? From the top or from the bottom?

20 A. Generally we start at the bottom.
21 Particularly in the case of the Bravo Dome Unit,
22 the unitized interval is from the base of the
23 Cimarron anhydrite to the top of the granite.
24 And in this part of the world, for the most part,
25 the granite wash, which is middle Pennsylvanian

1 in age, covers that early part of the unit.

2 Q. Okay. So that's the oldest rocks,
3 probably, in Bravo Dome that you're looking at in
4 this model?

5 A. That's right.

6 Q. What can you look at next? What's your
7 next time sequence?

8 A. Moving up into the late Pennsylvanian,
9 you can again see the presence of the Sierra
10 Grande Uplift and the Palo Duro Basin.

11 Q. You're looking at your Exhibit No. 3?

12 A. Yes, sir, I am. You can see that we
13 still have what we call alluvial fans. These are
14 the fans that wash out from mountains and carry
15 coarse pebbles and cobbles. There are braided
16 streams that develop across a broad, flat area.

17 It probably didn't look too different
18 from what we see around the area of Santa Fe
19 today. If you look in the streams, they're full
20 of cobbles and pebbles. There was some relief,
21 and that relief is expressed in the coarse grain
22 granite wash that we see in the lower part of the
23 section of Bravo Dome.

24 Q. Okay. And, at a later time?

25 A. At a later time, in the early Permian,

1 you can see that the Sierra Grande Uplift, as we
2 understand it, was deeply eroded and probably
3 wasn't much more than low hills.

4 Q. You're talking about what's depicted on
5 your Exhibit 4?

6 A. That's right. It's on the right-hand
7 side of Exhibit 4. On the left-hand side of
8 Exhibit 4 we see the Palo Duro Basin, and you can
9 see what we call ephemeral streams, going from
10 one side of the Sierra Grande Uplift on into the
11 Palo Duro. "Ephemeral" means there's water in
12 them sometimes.

13 These streams carry rather fine grain
14 sediments through the unit area, and represent
15 the upper part of the unitized interval that we
16 call the Tubb formation.

17 MR. STOVALL: Mr. Wacker, let me
18 interrupt you for just a minute. I think you
19 referred to the "Sierra Grande Uplift" as being
20 the right side, and the "Palo Duro Basin" as the
21 left side, and I think that can be confusing when
22 you read the transcript down the road later on.

23 The Sierra Grande is on the left,
24 right? I think you had them backwards, and
25 that's all I'm trying to do is--

1 THE WITNESS: Oh, I'm sorry. You're
2 right. Thank you very much. I do appreciate
3 that.

4 MR. CURRENS: You're looking at them
5 from different directions.

6 MR. STOVALL: You're holding them up
7 and looking the same way at them.

8 THE WITNESS: I'm afraid so.

9 Q. In that case, the Sierra Grande Uplift
10 would really be to the western portion or
11 northern portion or northwestern portion of this
12 exhibit, and the Palo Duro Basin would be back in
13 an easterly sensing, would it not?

14 A. Yes, sir, it would.

15 Q. Okay. Now, having looked at these
16 three models, does that generally encompass the
17 kind of time period that you would be looking at,
18 geologically, in this area?

19 A. Yes, it does. It covers about 40
20 million years. Most of the time it was very,
21 very arid. The sediments that were laid down
22 were what we commonly refer to as continental
23 type red beds.

24 Q. I notice a name "B. I. May," or a
25 notation "B. I. May" on all three of these last

1 exhibits, 2, 3 and 4. What's that significance?

2 A. Bruce May was a geologist with Amoco
3 and is a geologist with Amoco that developed
4 these models early on in the description of Bravo
5 Dome. We feel that they still hold true in their
6 description of the dome, and represent the work
7 that was done at that time that still holds true
8 for Bravo Dome.

9 Q. So the model that you're looking at is
10 the same sort of model that Mr. May was looking
11 at initially out here, and you both think that's
12 the appropriate starting place?

13 A. Yes, sir, we do.

14 Q. Was there anything else you wanted to
15 cover on Exhibits 2, 3 or 4?

16 A. No, sir.

17 Q. All right. Now, with this idea in mind
18 of what these depositional models might have,
19 what sort of things do geologists next move to in
20 trying to assess and understand an area?

21 A. Our next job is to understand exactly
22 what the logs, that are taken from the drilling
23 wells, have to show us and tell us about those
24 depositional environments.

25 Q. Have you prepared a type log to use in

1 this proceeding so that we'll all be on a
2 constant nomenclature, so to speak?

3 A. Yes, sir, I have.

4 Q. Would that be your Exhibit 5?

5 A. Yes, sir, it would be.

6 Q. Would you explain that?

7 A. Exhibit 5 is the electric log from the
8 Amoco Production State FD, also known as the
9 Bravo Dome 2031-231 D.

10 Q. The well name's up at the top of this
11 exhibit?

12 A. It is.

13 Q. I would like to take a little bit of
14 time with this because we're going to have a
15 number of cross-sections following this, and if
16 we identify all the parts and components here, we
17 won't have to mess with them later on.

18 So, you have the name up here on the
19 top of the well log?

20 A. Yes, sir, I do. Down the left-hand
21 side, as we look at it, there's a gamma ray log.
22 It's a correlation tool that we use to tie one
23 well to the other. On the right-hand side is the
24 porosity tool. In this case, it's a neutron
25 porosity log.

1 The location of this particular well is
2 shown in the lower left-hand side of the exhibit.

3 Q. Is that the map area with the large
4 yellow colored-in portion?

5 A. Yes. That's true. The large yellow
6 area is Bravo Dome, and the location of the well
7 is shown in a small red plus with a T next to it.

8 Q. When you say the large yellow area is
9 Bravo Dome, do you mean the outline, the exterior
10 boundary of the Bravo Dome Carbon Dioxide Gas
11 Unit?

12 A. It is the exterior outline.

13 Q. Okay. I notice further, or you
14 mentioned the symbol. Is that same symbol the
15 one shown at the very top of the log?

16 A. Yes, it is.

17 Q. Okay. Why don't you go on to the
18 symbols that are in the right-hand legend
19 portion, on the bottom of this.

20 A. On the right-hand side I you have an
21 explanation of the well symbols that we'll use
22 particularly for the Bravo Dome area. Since
23 we're dealing with carbon dioxide gas, I think
24 it's important to shape that out just a little.

25 The first notation underneath the well

1 symbol explanation is an open circle with a C2
2 next to it. That stands for currently producing
3 carbon dioxide gas well.

4 Immediately under that is what we
5 commonly know as a well with a gas show. In this
6 case it represents a carbon dioxide gas show.

7 Underneath that is what looks like a
8 dry hole symbol with a T next to it. The
9 notation here is the state's notation of
10 temporarily abandoned. These series of wells are
11 wells that are currently not productive but
12 completed as producers. They are not hooked up
13 or on line, and we'll talk about that later on.

14 Underneath that is the standard dry
15 hole symbol.

16 Q. So you might characterize those that
17 are completed in the carbon dioxide producing
18 horizon as active and inactive, with the active
19 wells being the ones with the circle and the 2?

20 A. Yes.

21 Q. And the ones with the T being inactive
22 producers?

23 A. That's right, they are inactive
24 producers.

25 Q. Okay. Having covered much of the

1 material that will be of interest on some of the
2 following exhibits as to the setup and outline,
3 why don't we go ahead and talk about the meat of
4 what you show here.

5 A. Okay. The color coding is important in
6 that it helps us see the shape and distribution
7 of different lithologic units within the
8 reservoir.

9 The Cimarron anhydrite shown here in
10 purple, represents the unit, the seal above the
11 reservoir at Bravo Dome.

12 Immediately underneath it is the Tubb
13 formation. I show here an upper Tubb in yellow.
14 That bright yellow is characteristic of what I
15 would call the true Tubb formation, as we carry
16 in down into the Permian Basin.

17 Underneath that is a rock unit that,
18 perhaps more accurately is called Abo, but for
19 purposes of the unit description I'm going to
20 call it upper, middle and lower Tubb formation.
21 I think that's important in the consistency of
22 the testimony.

23 The middle Tubb is shown here in a tan,
24 the lower Tubb is shown in a cinnamon color.
25 Underneath that is a thin bed which is granite

1 wash, and it's brown. That encompasses the
2 entire unitized interval. Below that is granite
3 basement.

4 Q. Okay. And this kind of a depiction
5 will follow through in the rest of your exhibits?

6 A. Yes, it will.

7 Q. All right. Now, you said it was
8 important to visualize this as you take the work
9 you've done on down into the Permian Basin.
10 Isn't that kind of a new twist in the way of
11 looking at things in this Bravo Dome area?

12 A. Yes, it is. In the past we've tried to
13 work hard to understand the relationships
14 well-to-well and within the existing producing
15 unit. I think sometimes it's exciting to see
16 such a large unit and understand it in that
17 context.

18 By backing away, I can see even more
19 detail in the way the Bravo Dome Unit was laid
20 out geologically.

21 Q. Has that been the basis on which you've
22 started your current study?

23 A. Yes, it has.

24 Q. Why don't we move on and see how that
25 ties together a little bit. I think your next

1 exhibit is Exhibit No. 6, and I believe we've
2 already taped that one on the wall.

3 A. Yes.

4 MR. CURRENS: Can you see all of the
5 exhibit okay here, or do I need to move the easel
6 a little bit?

7 CHAIRMAN LEMAY: I can see it.

8 A. Our understanding of the stratigraphic
9 relationships of Bravo Dome has benefited from
10 the regional analysis. What I have here is a
11 cross-section that goes from the Empire-Abo trend
12 almost all the way to Clayton, New Mexico. That
13 encompasses a distance of about 275 miles.

14 Q. You have your inset map here again, and
15 the trace on the inset map you have goes off the
16 whole east side of the state, basically, from
17 Texas to Colorado almost?

18 A. Yes, it does.

19 Q. And that geographic area is one that
20 you are depicting here in your cross-section,
21 geologically?

22 A. That's true.

23 Q. Why don't you go ahead and take us
24 through that. I believe we've covered the legend
25 fairly well and don't need to go back to that.

1 A. That's fine.

2 Q. Why don't you tell us what it is we're
3 looking at.

4 A. Okay. On the wall is a full display of
5 the geologic work that I've done along the
6 eastern side of New Mexico. On the larger
7 display, I have both the porosity log and the
8 correlation log, as well as lithology information
9 that sits in colored display down the center of
10 the log. These are descriptions of cuttings from
11 the wells.

12 These cuttings, in combination with the
13 correlation and porosity logs, help me describe
14 and make the correlations through this part of
15 New Mexico. In the books you'll only find the
16 correlation part of the log, but this is going to
17 be preserved for you at any time, and if you
18 wish, you're welcome to it. That refers to the
19 larger, long cross-section here.

20 What we show, most importantly, are two
21 unconformities. One unconformity lies at the
22 base of the Clearfork and the Tubb. It's also
23 shown and corresponds to the top of the Abo
24 formation. This particular unconformity was
25 identified by Ron Broadhead in a publication in

1 December of 1988, New Mexico Bureau of Mines and
2 Mineral Resources Publication Bulletin 119.

3 Q. Now, that is material that has been
4 published and a view that's come out since our
5 last four-year review, has it not?

6 A. That's true.

7 Q. So you've taken the latest type of
8 material in thinking to integrate into this to
9 help you with your study, is that right?

10 A. Yes. It has been quite helpful. I see
11 also an additional unconformity at the top of the
12 Tubb which goes through a similar lithologic
13 change; in other words, from sandstone to
14 evaporites, as the change from Abo to Clearfork.

15 And then we have the same kind of
16 change from sandstone to evaporites in the change
17 from the Tubb formation to the Cimarron
18 anhydrite.

19 Q. Let's get something in the record here
20 about the part of the cross-section you're
21 talking about. Give us a--

22 A. The two wells that give us the best
23 clue are the Amoco Baker and the Amoco Blackburn
24 Farms. In the books, those correspond to wells
25 No. 7 and 8, and on this larger display they

1 correspond to Wells No. 11 and 12. This is about
2 the middle of Quay County.

3 Q. Okay. They're south of the Bravo Dome
4 Unit area?

5 A. It is substantially south of the Bravo
6 Dome area where I've been able to define the
7 cross-sections.

8 Q. In fact, on the cross-section, have you
9 marked the logs of wells that are within the
10 Bravo Dome Unit area?

11 A. Yes, I have. In blue, on the far
12 right-hand side or north side of the
13 cross-section, I've underscored the Bravo Dome
14 wells with a blue line, that also indicates the
15 Bravo Dome Carbon Dioxide Gas Unit.

16 Q. Why don't you keep on moving
17 northwards, then.

18 A. Okay. Probably the most important
19 thing we've seen in the identification of these
20 two unconformities is that the true Tubb is
21 present over part of the unit but not all of it.
22 It actually truncates mid-way in the unit, and
23 you can see that where the yellow disappears
24 between two wells.

25 The lower part of the unit is described

1 again, as I call it middle and lower Tubb, but
2 it's truly Abo in formation. Again, later on in
3 the testimony I'll refer to that as middle and
4 lower Tubb.

5 Q. Okay. This is something that you
6 discover by moving out of the local area then?

7 A. Yes, it is.

8 Q. So what's been popularly called Tubb
9 through all of this time up there is a little
10 broader encompassing thing than that single, one
11 nomenclature that's attached?

12 A. Yes, it is. In Bruce May's testimony,
13 he did talk about the Tubb, the unitized interval
14 containing perhaps Tubb and Abo; and certainly
15 Ron Broadhead's work talks about the Abo being
16 present in the Bravo Dome area.

17 Q. Okay. Now, what's the significance of
18 this in understanding Bravo Dome and
19 understanding the reservoirs up there?

20 A. That's a good question. In the earlier
21 work, the thought was that the changes across
22 Bravo Dome were the result of changes in
23 depositional environment going from a fluvial to
24 a more lacustrine environment, but those changes
25 were part of a general facies track trend.

1 What I can see based on my correlations
2 is that there are three separate units. Each one
3 has the potential of having different reservoir
4 characteristics. We need to understand each of
5 those and how facies changes take place within
6 each of those depositional units.

7 Also, need to understand where one unit
8 is truncated underneath the Cimarron anhydrite
9 and how other units continue underneath the
10 Cimarron anhydrite as stratigraphic units.

11 Q. So, in going to stratigraphic work
12 here, you believe that you're making a great deal
13 of progress in understanding the reservoir?

14 A. Yes. This is a new way to look at the
15 Dome, and I think it will make for a better
16 understanding and description in the long run.
17 It is going to be substantially more detailed
18 than what we had before.

19 Q. So we're sort of sub-dissecting the
20 Tubb now, where it's been a rather gross looking
21 phase?

22 A. That's true.

23 Q. Do you have anything else that we need
24 to cover with respect to Exhibit 6?

25 A. No, sir, I don't.

1 Q. Having moved from the south end of the
2 state all the way up to Bravo Dome, do you then
3 focus your looking in the Bravo Dome area itself?

4 A. Once we see this long, regional view,
5 it is important to look at the detail. I've
6 prepared four cross-sections that help show the
7 network that I'm going to use to help build the
8 stratigraphic information to understand the
9 reservoir at Bravo Dome.

10 Q. Let's start looking at that network of
11 cross-sections, then. I believe the next one
12 would be Exhibit 7. I was simply going to say
13 that I see the familiar setup of the map of the
14 area, the unit being depicted, and a red trace of
15 the cross-section which I observe to be on the
16 eastern side of the unit.

17 And with that, why don't you go ahead
18 to the description of what is shown here.

19 A. Yes. This is a detailed and larger
20 scale cross-section, as we see it on display
21 here. It goes from the south, on the left, to
22 the north on the right, and in it you can see how
23 the upper part of the Tubb truncates from south
24 to north across the unit.

25 You can also see how the unconformity

1 has cut out the upper part of this Tubb and
2 actually eaten into or eroded away part of the
3 middle Tubb unit. In general, you can see that
4 the isopach of the Tubb formation thins from one
5 side to the other, as we go north.

6 Also, as we go from south to north, the
7 granite wash section expands substantially. This
8 is a characteristic of the eastern side of the
9 Bravo Dome Unit and shows that its a broad
10 structural nose from south to north.

11 Q. Now, when you say that the isopach
12 thins in this area, you're speaking in the
13 geologic sense of how much rock you have?

14 A. That's right. It deals only with the
15 stratigraphic interval and does not relate to
16 anything else.

17 Q. So we're assessing the rock thickness
18 and not which portion of that rock may or may not
19 be cut, in your work at this time?

20 A. That's true.

21 Q. Anything else here?

22 A. No, sir.

23 Q. Let's continue to build the network and
24 look at Exhibit No. 8.

25 A. These two cross-sections, and the

1 others that I'll show you, are all at the same
2 scale. This one is parallel to the one to the
3 east, it is on the west side of Bravo Dome, and
4 goes from south to north.

5 You can see that the overall thickness
6 of the Tubb formation has thinned quite a bit
7 even at its thickest point. It's less than 300
8 feet and it thins to less than 50 feet as we move
9 to the northern side of the cross-section.

10 Again, you can see the rapid truncation
11 of the unit that I call the upper Tubb. You can
12 see the truncation to some degree in some places
13 of the middle Tubb, and you can also see the
14 characteristics of the lower Tubb there. The
15 granite wash is an infill formation, and it has a
16 variable thickness based on the topography
17 underneath it.

18 Q. Anything else we should particularly
19 note on this one?

20 A. Just that we're closer to the Sierra
21 Grande Uplift, and that makes for the difference
22 in the total isopach. We'll see those kinds of
23 things better in the east/west cross-section.

24 Q. Let's look at that cross-section. I
25 believe this will be your Exhibit No. 9, Wacker

1 No. 9. I will note, in addition to the regular
2 depiction of the location of the cross-section,
3 it bears a striking resemblance to a bear fetish,
4 similar to one that I have at home that people
5 were so kind to give me.

6 A. This east/west cross-section, across
7 the northern part of the Dome, shows how the
8 upper Tubb is now totally truncated. The
9 Cimarron sits immediately upon the middle Tubb
10 which, in other parts of the basin we might refer
11 to as Abo, and the lower Tubb is likewise
12 truncated as we move from the east to the west
13 towards the Sierra Grande Uplift. You can get a
14 good feel here for how effective the Sierra
15 Grande Uplift was in truncating some of those
16 beds.

17 The unconformities on these diagrams,
18 through all of the diagrams, are shown by wiggly
19 lines. In this case, the unconformity at the top
20 of the middle Tubb is a red, wiggly line. The
21 unconformity at the top of the upper Tubb is a
22 blue wiggly line. We saw those in the other
23 cross-sections and we'll see those in the next.

24 Also on this cross-section you can see
25 the stratigraphic response to a structural

1 feature that we have in the Bravo Dome area
2 called the graben. The graben is a thick low, a
3 deep low, structurally, where a lot of the
4 granite wash was deposited.

5 East of that there's a forest, and
6 that's why this particular well had granite quite
7 a bit higher.

8 Q. By which particular well?

9 A. I'm sorry. Let me look. That would be
10 the Amoco State GT #3 from the east, which has a
11 much more shallower granite section than the
12 Bravo Dome Gas Unit 2332-241, which is
13 immediately next to it. They are only six miles
14 apart, and they do show substantial structural
15 relief between them.

16 Q. Thank you. Did I interrupt anything
17 that you were needing to still cover there?

18 A. No, that was fine.

19 Q. Let's move on down to a fourth
20 cross-section that you have in your network, your
21 Exhibit No. 10.

22 A. This Exhibit No. 10 is, likewise, an
23 east/west cross-section across the southern part
24 of the Dome this time. We're much further south
25 and, as a result, we're much closer to the

1 structural--the paleostructural high of the Bravo
2 Dome. I say "paleo" in that at the time of the
3 Cimarron, this was probably one of the highest
4 topographic areas.

5 You can see the Cimarron anhydrite,
6 again, in purple. You can see the unconformity
7 line immediately underneath the Cimarron is blue,
8 with yellow underneath it. This is the true Tubb
9 in the Bravo Dome Unit. It carries from the east
10 all the way to the west in this part of the Bravo
11 Dome Unit.

12 You can likewise see that the total
13 Tubb interval is quite thick. Out here it's over
14 600 feet thick. As we move further west, towards
15 the Sierra Grande Uplift, it thins to 200 feet on
16 the west side of Bravo Dome.

17 Q. All right, sir. Now, all of the things
18 we've been discussing to this point have been a
19 stratigraphic assessment of the rock in the Bravo
20 Dome Unit area?

21 A. Yes.

22 Q. You feel that that's a good step
23 forward in understanding the reservoir rock
24 itself, is that right?

25 A. Yes. The stratigraphic understanding

1 of the rocks of Bravo Dome will give us a clue to
2 the shape of the container that we call the
3 reservoir that is Bravo Dome.

4 Q. Well, speaking of the shape of the
5 container, I've been used to, over many years,
6 looking at structures. Have you paid some
7 attention to the structure that we have out here
8 as well?

9 A. Yes, sir, I have.

10 Q. Have you prepared a structure map?

11 A. I have.

12 Q. How have you done that?

13 A. The structure map is a combination of
14 geological picks that I've made in about 200
15 wells, in conjunction with work that Jim Wiles
16 has done, and his work has been presented here at
17 the court, and also a substantial amount of
18 geophysical added points, that help shape out the
19 unit.

20 I feel the integration of both
21 geological and geophysical points helps give us a
22 much more accurate view of what the configuration
23 of the unit--the topographic configuration of the
24 unit is, in the subsurface.

25 Q. Is that another step forwards that

1 we've taken since the last review period? Did it
2 go to the geophysics?

3 A. It is, in the sense that we're refining
4 the tops and making precise the formation tops.
5 Yes, it is.

6 Q. Do we have geophysical data now
7 available to us that we didn't have then, or is
8 it simply a method of analyzing it and the
9 opportunity to do so?

10 A. Right now we're in the process of
11 continuing to evaluate the seismic data that we
12 did have in 1988, using some new techniques
13 called a geologic and geophysical workstation.
14 The product name of this workstation is Sun
15 workstation, and it's a very large personal
16 computer, perhaps as big as some of the old
17 mainframe computers that companies used to have.

18 Q. Is this some technology that's just
19 recently come into play, and that we've acquired
20 to be able to use in this and other kinds of
21 work?

22 A. Yes, it is. In fact, we're working
23 with the companies that developed the software to
24 process the kinds of things we're doing here at
25 Bravo Dome.

1 Q. So you're trying to integrate all of
2 the latest thinking and all of the latest
3 techniques into your geological assessment work?

4 A. We are. We are desperately trying to
5 do things just right to make it fit together the
6 way it ought to fit together for Bravo Dome, the
7 stratigraphy and the understanding of the
8 reservoir.

9 Q. I laid the foundation for your
10 structure map a minute ago. Perhaps you have
11 that as your Exhibit 11. Could put it up there
12 and tell us what it shows?

13 A. Yes, sir. This structure map uses the
14 same well code as we've used on all of the
15 cross-sections.

16 In addition to that, I've shown the
17 display of seismic lines and geophysical datums.
18 The geophysical datums are shown on the large
19 display as black triangles. In the book they're
20 shown as small red triangles.

21 The well locations, datums that I used,
22 are present in the book as noted red circles or
23 red symbols.

24 In addition to that, I've shown the
25 distribution of the over a thousand miles of

1 seismic line on both the large scale and the
2 small scale maps as thin blue lines, noted one by
3 one, with a small crystal-looking feature at the
4 end of each line. The crystal-looking features
5 help us identify the lines that we've shot at
6 Bravo Dome.

7 Q. Okay, that's your setup. Broadly,
8 describe the structure for us, please.

9 A. Thank you. The structure does come
10 shallower and higher topographically to the
11 northwest. It drops off to the southeast as a
12 structural nose. It fades very quickly to the
13 north and east as we saw on the geologic
14 cross-sections and also on this topographic map.

15 To the south, as we go into the
16 Tucumcari Basin, the unit is rather broad and
17 flat. We can see a fold that goes across Bravo
18 Dome in the current producing area, and we can
19 see some deep low. This is the graben area.
20 It's in the north, northeast/central part of the
21 unit. And just to the east of that is a broad
22 topographic high that we call the horst.

23 Q. All right, sir. Anything else with
24 respect to any of these 11 exhibits that we've
25 used to this point?

1 A. No, sir.

2 MR. CURRENS: If the Commissioners
3 please, I have one other photograph that we'd
4 just like to tell you what it is but we don't
5 intend to put it in as an exhibit. I'll do that
6 now.

7 Q. We've mounted on the easel on the other
8 side of the room, what, Mr. Wacker?

9 A. This is a satellite photo. It's called
10 a land-sat photo. It was taken from about 270
11 miles in space. It is a photograph of the Bravo
12 Dome Unit showing 50 miles on a side that go
13 approximately from Clayton to Tucumcari.

14 You can see Logan and Ute Reservoir.
15 You can see--I've forgotten the name of that
16 reservoir--Concha. Thank you. This is Turkey
17 Mountain and Sierra Grande Peak. You can see the
18 highways.

19 In fact, you can even go so far as to
20 see the playing field in Clayton, New Mexico.
21 And when we showed this to the students in New
22 Mexico, they were ecstatic. They said, "We've
23 got to have copies," and we've made some for
24 them.

25 Q. In conjunction with this, you've

1 prepared a little overlay that points out some of
2 those features so that underneath it the land-sat
3 photo is not messed with in any way?

4 A. That's true.

5 MR. CURRENS: I thought we would leave
6 that up there for anybody's curiosity. They're
7 welcome to look at it at the break or any time
8 this morning. And let me return to his regular
9 testimony now, if I may.

10 Q. Why don't you give us a summary of your
11 work to date; where you are, what your assignment
12 is, and how you've done it?

13 A. What I've been able to show you is a
14 network of geologic cross-sections. This network
15 will form the foundation for picking tops
16 throughout the Bravo Dome Unit. I have tops on
17 over 400 wells yet to depict throughout the whole
18 unit. We need to incorporate over 1100 miles of
19 seismic. That's enough seismic to stretch from
20 here into the Pacific Ocean.

21 We've drilled as much wells as to go
22 from here to Albuquerque and back, twice. It's
23 important to understand the magnitude of the size
24 of Bravo Dome. In that sense, I feel I've come a
25 long way in understanding that we're

1 incorporating it geophysically, geologically and
2 a way to do it just right, and that really is our
3 most important concern for the benefit of Amoco,
4 the working interest owners, the state, the
5 royalty owners, everyone involved.

6 MR. CURRENS: With that, I would offer
7 Exhibits 1 through 11 of Mr. Wacker's, and offer
8 Mr. Wacker for questions.

9 CHAIRMAN LEMAY: Thank you. Without
10 objection, Exhibits 1 through 11 will be added
11 into the record.

12 Questions of Mr. Wacker?

13 COMMISSIONER CARLSON: No.

14 CHAIRMAN LEMAY: Commissioner Weiss?

15 EXAMINATION

16 BY COMMISSIONER WEISS:

17 Q. What size workstation will handle the
18 data that you just described?

19 A. The workstation that I have on my desk
20 has three gigabites. It ties to a server with 17
21 gigabites. I'm able to manipulate the geologic
22 data.

23 I have a companion that I'm working
24 with who has a comparable workstation to mine.
25 It also has three gigabites, and he is doing the

1 processing of the seismic and evaluation and
2 mapping of the geophysical data.

3 So those two things, those two
4 workstations together, in combination with what
5 we call a server, help construct the geologic
6 interpretation.

7 COMMISSIONER WEISS: Thank you. No
8 other questions.

9 CHAIRMAN LEMAY: Two questions, Mr.
10 Wacker.

11 EXAMINATION

12 BY CHAIRMAN LEMAY:

13 Q. What you define as, I guess, upper,
14 middle, lower Tubb, can you tell us a little
15 about the lithology, what kind of rocks are
16 present there?

17 A. That's a good point. The upper part of
18 the Tubb is rather fine grain. If I had to find
19 a place that looked like that, it would be Baja
20 California. The bay in Baja California has very
21 fine grain sands. The sediments have come from a
22 long way, perhaps reworked.

23 I've seen sand grains as fine as dust
24 which actually, as a rock, still compare and
25 carry porosity. It would be like the dust that

1 filters in through the window of your window pane
2 when a dust storm comes through.

3 Coarser than that we certainly have,
4 and that makes for a larger part of the reservoir
5 in the upper and middle part of the Tubb.

6 As we go lower, the grain size, just by
7 looking at core, seems to coarsen quite a bit.
8 It's less organized. It's just makes for a
9 coarser grained rock. The porosities seem to
10 change somewhat.

11 Our job is to try and pull all that
12 together and understand how it makes a different
13 as a reservoir.

14 Q. No anhydrite within the--

15 A. We have seen anhydrite pebbles,
16 nodules, that type of thing. We've picked up a
17 little bit in the way of carbonate rock; not as
18 beds, but as cements. In fact, one of the
19 directions that we're looking at right now are
20 the carbon-oxygen isotopes of the cements and
21 comparing them with the carbon dioxide that's
22 present in those particular wells, and trying to
23 understand whether or not there's a relationship
24 there.

25 There are a number of different

1 geochemical avenues that we're trying to get a
2 better feel for the reservoir, what makes it work
3 and why it changes the way it does.

4 Q. Could you make a rough comparison with
5 the lithology there as compared to, say, the
6 Pecos Slope Abo, where you have sandstones?

7 A. From what I know, and I have not
8 studied the Pecos Slope Abo, there are fluvial
9 channels in the Pecos Slope Abo and the
10 permeability is very, very low. Our permeability
11 is generally higher, and I think our porosity is
12 higher, too, but I really have not studied Pecos
13 Slope to comment effectively.

14 Q. Just one final question. I'm curious,
15 you can trace the Cimarron anhydrite all the way
16 into the 1630 area of the Permian Basin, as a
17 unit?

18 A. I call it a Cimarron marker. If you
19 look at it, we can walk through the large
20 scale--I think you would like that--I feel I can
21 make a pick that is correlative to the top of the
22 Cimarron almost all the way to the Empire-Abo
23 area, yes. It's a marker in what we would
24 normally call Clearfork, but it's generally
25 anhydritic, and I seem to be able to pick it on

1 logs.

2 CHAIRMAN LEMAY: Additional questions
3 of the witness? If not, he may be excused.
4 Thank you.

5 MR. CURRENS: My next witness will be
6 Mr. Collier. We'll give them minute here to
7 change, if we can?

8 CHAIRMAN LEMAY: Oh, sure.

9 JAMES W. (JIM) COLLIER, JR.

10 Having been first duly sworn upon his oath, was
11 examined and testified as follows:

12 EXAMINATION

13 BY MR. CURRENS:

14 Q. Will you state your name for the
15 record, please?

16 A. My name is James W. Collier.

17 Q. By whom are you employed, Mr. Collier?

18 A. I work for Amoco Production Company in
19 Houston, Texas.

20 Q. What do you do with Amoco Production
21 Company?

22 A. I'm a senior petroleum engineering
23 associate assigned to the Regulatory Affairs
24 Group in Houston.

25 Q. As part of your assignment there, would

1 your responsibilities include New Mexico and,
2 more specifically, the Bravo Dome area?

3 A. Yes, sir, it does.

4 Q. You've testified before this Commission
5 before, have you not?

6 A. Yes, sir.

7 Q. And your qualifications as an expert
8 petroleum engineer are a matter of public record?

9 A. They are.

10 Q. Your testimony today is going to cover
11 a number of operational factors and phases of our
12 Bravo Dome activity, as well as some of its
13 historical events?

14 A. Yes, it is.

15 MR. CURRENS: I would submit Mr.
16 Collier as qualified to testify at this hearing.

17 CHAIRMAN LEMAY: His qualifications are
18 acceptable.

19 Q. What's your Exhibit No. 1, Mr.
20 Collier?

21 MR. CURRENS: His exhibits will be
22 marked "C-1, 2, 3, 4" and so on, whereas Mr.
23 Wacker's were marked with "W."

24 A. All right. My first exhibit in the
25 book is labeled C-1. It's a folded map of the

1 unit. If you would turn to that and unfold it
2 this is a map of the Bravo Dome Unit.

3 I've shown the exterior boundary of the
4 unit with a heavy bold line. This unit is
5 located in Union, Harding and Quay Counties, New
6 Mexico. It contains slightly over a million
7 acres.

8 There are several symbols I would like
9 to review with you to define what I've shown
10 here. First off, there's a conventional gas well
11 symbol. That's a standard industry symbol for a
12 gas well. Those are the current CO₂ well
13 completions in Bravo Dome. There are 369 of
14 those completions in the unit at this time.

15 Q. Does that include wells, both active
16 and inactive, as were described by Mr. Wacker?

17 A. Yes, it does.

18 Q. Okay. Go on, please.

19 A. Of those 369 wells, at this time 258
20 are connected to the gathering system and are on
21 production. 111 are completed as CO₂ wells and
22 are currently shut in or inactive.

23 Additionally, I've shown with a solid
24 dot with a diagonal slash the permanently plugged
25 and abandoned wells, and there are presently 20

1 of those in the unit. As you can see from
2 looking at this exhibit, they are scattered
3 throughout the unit, and those have been plugged
4 and abandoned for various reasons.

5 There also are two open circles with
6 the label "SWD" which stands for salt water
7 disposal. Those are both in the currently active
8 producing area, which is down in the south or
9 east-central part of the unit.

10 That brings us to a total number of
11 completions, as shown down in the legend, of 391
12 wells in the unit.

13 There's also a designation right there
14 in the east-central part of the unit where I've
15 shown the location of our central conditioning
16 facility for compression and dehydration of the
17 gas.

18 Q. And that's marked "plant"?

19 A. Correct.

20 Q. Let's move on to your Exhibit 2, which
21 I think is a schematic or block diagram of the
22 plant facility, then, and ask you to take us
23 through that exhibit.

24 A. Okay. This is labeled Exhibit C-2.
25 This is simply a schematic showing the layout of

1 the central conditioning facility. This was
2 constructed in 1984 and added to in 1985. At the
3 time it was located on Highway 65, which is now
4 420.

5 Q. The plant didn't move?

6 A. Correct. The highway used to be State
7 Highway 65, it's now State Highway 420.

8 Q. Okay.

9 A. This, essentially, is the same layout
10 as we showed you four years ago, with the
11 exception of over on the east side the schematic
12 block labeled carbonic reserves has been added
13 since that time to provide for a market for
14 carbonic reserves for liquid CO₂ and carbon--dry
15 ice.

16 Q. So, since the last four-year review, in
17 addition to methods that we've discussed in the
18 past and we'll discuss again, disposition of our
19 production to pipelines, there has been a local
20 takeoff station built here as well by one of the
21 interest owners?

22 A. That's correct. That's since 1988.

23 Q. Okay. Anything else that we need to
24 cover on this general layout?

25 A. No, sir.

1 Q. I believe the next thing in your book
2 are a series of photographs which are marked
3 Collier's Exhibit 3 and lettered (a) through
4 (g).

5 Why don't you just go through those and
6 tell us what's shown on those, what we perceive
7 from them.

8 A. We've labeled all these photographs, as
9 you said, Exhibit 3. There are seven total
10 photographs. The reason for including these is
11 to give you some appreciation for the hardware
12 that's out there that we used to condition this
13 gas with.

14 The first photograph is simply a front
15 elevation view of the conditioning facility and
16 the entrance to it.

17 The second photograph, 3(b), shows on
18 the left innerstage cooling. This is a fan-air
19 cooling unit. An inlet scrubber, as shown, is
20 the vessel in the center part of the photograph,
21 and then the glycol tower on the right. This is
22 all for dehydration and cooling of gas. You can
23 see in the background other innerstage cooling
24 units.

25 Q. So the gas comes into the plant through

1 that inlet scrubber from the field--

2 A. That's correct.

3 Q. --knocks out the water and then it's
4 processed in the plant?

5 A. That is correct.

6 Q. Or some of the water?

7 A. As I mentioned, the plant was
8 constructed in two phases, a Phase I and Phase
9 II, and the next exhibit is Phase II. This shows
10 the header system coming from the compressor
11 building. Again, in the background is another
12 innerstage cooling unit and some innerstage
13 scrubbers. Those are the vessels in the center
14 part of the photograph. And then you can see the
15 base of the glycol tower on the right-hand side
16 of that photograph, and then the small tank or
17 vessel on the left-hand side is a recycled well
18 storage tank.

19 The next photograph, back to the Phase
20 I plant, again showing innerstage cooling. This
21 is the second and third stage cooling. Between
22 each stage of compression, the gas has to be
23 cooled again, and over to the left are our
24 holding tanks and working tanks for salt water
25 disposal.

1 Turning to the next photograph, these
2 compressors are very large compressors, driven by
3 electric motors. This is a shot of the inside of
4 the electrical control panel, for the electrical
5 distribution.

6 The next photograph, this would be
7 subscript (f). This is a shot inside the
8 compressor building itself. The large gray
9 vessels are pulsation dampener bottles. The
10 large one to the right, there's been a change
11 since the last review to give additional control
12 over vibration on these compressors.

13 Q. Helps with the operating
14 characteristics, reduced maintenance and so
15 forth?

16 A. Yes, sir. And the final photograph
17 there would be (g), which is a typical well out
18 in the unit. This shows the well site. There's
19 a mast as you can see on the right-hand side of
20 the well site. This small black rectangular
21 shaped thing is a solar collector. And then you
22 see just above that an antenna for data
23 transmission, as well as automation control
24 transmission. The white box in the front
25 contains the remote terminal unit for the

1 automation system. This is very typical of a
2 well out in Bravo Dome.

3 Q. All right, sir. The facilities here,
4 while compact in the one location with respect to
5 the plants, are quite extensive, however, are
6 they not, with these two phases?

7 A. They are.

8 Q. And all of this activity that you
9 depict, or all of these items that you depict in
10 the pictures, had to come along at some point
11 through the life of this in order to have gas
12 produced, gathered, conditioned and prepared for
13 shipment on down the line to the Permian Basin?

14 A. Yes. This was a very extensive
15 construction project, and I would like to turn to
16 the next exhibit, if we could, to demonstrate.
17 I've labeled this Bravo Dome CO₂ Gas Unit
18 Commodity Development. This is Exhibit C-4.
19 This is a 3-D columnar chart. There are four
20 colors, and I'll walk you through this and
21 describe each one.

22 You can see at the front of the exhibit
23 the blue columns. That is number of wells
24 drilled in Bravo Dome. This shows the drilling
25 activity which occurred upon the unitization of

1 Bravo Dome. As I mentioned earlier, as Mr.
2 Wacker mentioned, it was effective in 1980.

3 You can see that even though facilities
4 were not in place, that we undertook some
5 extensive drilling in the face of considerable
6 uncertainty. The actual start of production did
7 not start until 1984. That's when production
8 first started, in April of 1984, with the
9 completion of the Phase I facility.

10 Q. Is that that little yellow plant thing
11 at the back of the 1984 line?

12 A. Yes. I'll move to the back of the
13 graph. The yellow columns depict, by years, the
14 plant capacity, the total compression capacity of
15 our Phase I and Phase II combined. With the
16 completion of Phase I, you can see in 1984 the
17 first yellow appears, that was the--with the
18 completion of Phase I, we developed a capacity of
19 about 110 million cubic feet per day. And
20 production, which is the green, showed up, again
21 beginning in 84, at about 40 million a day for
22 that year on the average.

23 Moving along to 85, again referring to
24 the yellow columns, we completed the Phase II
25 plant and increased the total capacity for

1 compression to 390 million cubic feet per day.
2 And that is the current capacity at the central
3 facility.

4 Now, the production is shown here in
5 green. That's the second row of columns on this
6 plot. Again, we averaged about 40 million a day
7 that first year of production in 1984, and then
8 with the completion of Phase IV, that increased
9 to 272 million cubic feet per day in 1985.

10 On an annualized basis, we peaked in
11 1988 at an average of about 366 million cubic
12 feet per day. Right now, the first quarter
13 average of 1992 has been 288 million cubic feet
14 per day. That's shown on the far right-hand side
15 of the plot.

16 Q. What are the red bars?

17 A. What's important to note about the red
18 is, I've labeled that "Active Well
19 Productivity." That's the current total
20 deliverability of all wells that are connected to
21 the gathering system. What's important to show
22 is that that active well productivity has been
23 sufficient to meet our market demand of CO₂
24 throughout the entire life of this unit.

25 Q. And, I take it, since we talked about

1 active wells and inactive wells, that there are a
2 number of other wells that could be connected if
3 some additional market were achieved that
4 required additional productivities of the plant?

5 A. That's correct, sir.

6 Q. All right, sir. Now, we see here that
7 we have plenty of wells that have been drilled
8 because we have sufficient productivity with
9 respect to markets that are now available to
10 production from Bravo Dome. I believe we see
11 that from this figure, as well as the fact that
12 we have excess plant capacity in the event more
13 demand were to come about?

14 A. Yes. We do operate the unit both with
15 excess compression capacity, which is the yellow
16 showing in the back, as well as excess well
17 capacity at this time.

18 Q. But we haven't done any recent
19 construction? Have we built a new plant or
20 anything like that?

21 A. No, sir. That has not been necessary.

22 Q. Well, how do we occupy ourselves during
23 the periods when we're not building new
24 facilities out here?

25 A. Well, our efforts in the last four

1 years have been to increase operating efficiency,
2 thereby reducing cost. As I'll show you, cost is
3 a very high percentage component of total
4 investments out here. That's daily operating
5 cost.

6 So, if we turn to the next exhibit,
7 I've put together a list of representative
8 operational improvements. This is a very
9 condensed list. As such, it's still quite
10 lengthy and I won't read this into the record.

11 Q. This is your Exhibit C-5, right?

12 A. This is Exhibit C-5.

13 Q. Okay.

14 A. Many of our main efforts in the last
15 four years, since 1988, have been in the area of
16 operating efficiency and environmental controls.
17 You'll see the top four or five items on this
18 list have to do with replacing steel, tubing or
19 casing, flow lines, valves, with more corrosive
20 resistant materials, be it fiberglass or
21 stainless steel. We do this because it increases
22 the life of this equipment, it increases well
23 life, it reduces operating costs, it increases
24 our efficiency overall, which extends well life
25 and therefore makes recoverable reserves, over

1 the long run, greater. That has been our main
2 focus for the last four years.

3 We also, the third item, negotiated a
4 new electric power contract which very much
5 helped to control operating costs. This benefits
6 all the owners, the state, as well as Amoco.

7 Q. All right. You mentioned a while ago
8 that continuing operating costs were important in
9 our current activity and that there have been a
10 number of investments. Have you prepared an
11 exhibit to show where we stand with respect to
12 spending?

13 A. Yes, sir, I have.

14 Q. Let's move to that exhibit. That's
15 your C-6?

16 A. Yes sir. Exhibit C-6 is an area
17 cumulative chart or plot showing millions of
18 dollars spent on the left hand, or Y axis, and
19 time in years on the X axis.

20 I've broken down the four major
21 components to show the total expenditures in each
22 of those. The total spent is shown at the top as
23 \$374 million. That's the total investment in
24 this unit as of the beginning of 1992.

25 The red area is operating costs, and

1 you can see, as I mentioned earlier, that's a
2 very important component of total investment,
3 being over half the total expenditures in this
4 unit. That has been about \$200 million to date,
5 to the beginning of this year.

6 As far as drilling, the unit owners
7 have spent just under a hundred million dollars
8 to drill all the wells I showed you earlier, and
9 for maintenance expenditures, maintaining the
10 facilities that are out there, a little under 17
11 million.

12 And construction, this is for the
13 gathering facility and the gas conditioning
14 facility, about \$60 million, bringing us to the
15 total of \$374 million.

16 Q. Do you have a rough estimate of how
17 much we spent in the last four years?

18 A. Yes. Since the last four-year review,
19 we've spent about \$93 million in that four-year
20 time.

21 Q. Okay. We've talked then about the kind
22 of spending that has occurred. What kind of
23 benefits, say in royalty, have accrued to the
24 royalty owners in this unit?

25 A. I show that on the next exhibit, which

1 is my C-7. Again, this is an area chart showing
2 cumulative royalties paid out from Bravo Dome.

3 Again, production started in 84 so the
4 first payments were back at that time. The
5 yellow area shows the royalty payments from the
6 unit to the State of New Mexico, and in the blue
7 is the cumulative of all other royalties.

8 Together, these have come to a grand
9 total of about \$47 million as of the beginning of
10 1992. About 13 million of that has been to the
11 state and 34 million to other entities.

12 Q. In addition to the royalties that are
13 paid to the state, I know we pay a lot of taxes
14 within the state, both the production taxes and
15 ad valorem taxes in the counties and so on. Will
16 Exhibit 8 give us a picture of that as well?

17 A. Yes, sir. Exhibit 8 shows again the
18 cumulative taxes from Bravo Dome. First of all,
19 the orange area is cumulative taxes, and again
20 I've repeated in yellow the cumulative royalties
21 and added those together. So this is total taxes
22 and royalty paid by Bravo Dome since first
23 production.

24 As of the beginning of 92, that has
25 accumulated to slightly over \$40 million. 27

1 million of that has been in taxes paid to the
2 state and other local taxing entities.

3 Q. I believe that's the last exhibit of
4 yours that we have, Mr. Collier. Could you
5 summarize the things that you've discussed with
6 us today?

7 A. Yes. I think what I've tried to show
8 is that Amoco has taken obviously a very large
9 area that had a resource that was really
10 nonquantifiable, and in the face of considerable
11 uncertainty as to the size of the market, how
12 many CO₂ projects would be demanding CO₂, I think
13 we've taken this nonquantifiable resource and
14 turned it into a marketable commodity over the
15 last eight years.

16 We've operated efficiently and we
17 continued to operate efficiently, and we stand ,
18 ready to continue to do that. That's our main
19 thrust here; and to be ready, in case the market
20 does increase, to be able to provide that gas
21 from Bravo Dome.

22 MR. CURRENS: That's all I have of Mr.
23 Collier. I would offer his Exhibits 1 through 8
24 in all their parts, and would offer Mr. Collier
25 for any questions.

1 CHAIRMAN LEMAY: Exhibits 1 through 8
2 will be admitted into the record, without
3 objection.

4 Any questions of Mr. Collier?
5 Commissioner Carlson?

6 COMMISSIONER CARLSON: Yes, I had a
7 couple of questions.

8 EXAMINATION

9 BY COMMISSIONER CARLSON:

10 Q. Doesn't Amerada Hess also have a plant
11 there?

12 A. There is another takeoff. There's a
13 rosebud line that goes to supply the demand for
14 Amerada Hess, but it ties in at the Amoco
15 conditioning facility.

16 Q. It goes through the Amoco plant?

17 A. It comes from the Amoco plant and then
18 there's roughly a 20-mile lateral that ties into
19 another major gas transporter out to the west.

20 Q. Right. Okay, but they don't have their
21 own plant facility?

22 A. Not to my knowledge.

23 Q. So your numbers are total unit
24 production and total unit cost, not--

25 A. Correct.

1 Q. --not just Amoco's?

2 A. Yes. That represents the total unit,
3 Bravo Dome Unit.

4 Q. If I remember correctly, when these
5 facilities became operational, there was some
6 debate over, because of the corrosive nature of
7 CO₂, how long the facilities would last. We've
8 had eight years now.

9 What is the experience on the expected
10 life of those facilities?

11 A. There have been corrosion problems
12 mainly related to the field, you know, where you
13 have CO₂ and water produced together. That's the
14 reason for some of the changes we've made, by
15 replacing tubing with fiberglass. We've also
16 drilled a well, and that was in 1988, and
17 equipped it with fiberglass casing. That's the
18 only one like it so far. There have been some
19 line replacements, some line sleeving because of
20 corrosion; so, yes, the corrosion does exist.

21 I can't comment to whether it's more
22 severe in a non-CO₂ environment or not, but that
23 is part of our ongoing maintenance, is to change
24 metallurgy, to replace steel with fiberglass. We
25 have been producing for eight years, and so far

1 it's been a problem we've been able to manage
2 successfully.

3 Q. If I remember correctly, they
4 anticipated a 15-year life for that plant and
5 gathering system. That leaves seven years left.
6 Is that still what Amoco expects, or do you
7 expect more life out of that equipment?

8 A. Well, I can't speak to that. I'm not a
9 design engineer. I would hope that we could
10 operate longer than that without major
11 modifications. We've spent, in the last four
12 years, major modifications to the plant to reduce
13 pulsation problems. We have done significant
14 rewinding of the electric motors to extend their
15 life.

16 So, I would have to answer by saying
17 the things we've done, just in the last four
18 years, should extend the life of that facility
19 beyond that 15 years.

20 Q. You don't anticipate building a whole
21 new plant in seven years?

22 A. Not as a replacement. We hope we can
23 build another one for increased demand. But
24 expenditures that would have been made at that
25 15-year point, probably already have been made,

1 and would extend beyond 15 years.

2 Q. How much water is removed at the plant?

3 A. We produce about 500 barrels a day,
4 slightly under 500 barrels.

5 Q. You talked about scrubbers at that
6 plant. What is scrubbed out in those scrubbers?

7 A. The free water. The first stage
8 scrubbers take out the free water. There's
9 additional, of course, deliquescence further in
10 the process, but at the inlet, the bulk of the
11 free water is removed.

12 COMMISSIONER CARLSON: That's all I
13 have.

14 CHAIRMAN LEMAY: Commissioner Weiss?

15 COMMISSIONER WEISS: Yes.

16 EXAMINATION

17 BY COMMISSIONER WEISS:

18 Q. As I recall four or five years ago,
19 density was a big factor in metering. Is it
20 still, the density of CO₂?

21 A. As far as--?

22 Q. Metering CO₂?

23 A. Well, it's a factor. I think I can say
24 that we have made additional expenditures on
25 electronic gas metering. We have a very low

1 meter factor. Our meter error is very low,
2 somewhere around one percent. So it's a
3 measurable problem. We're happy with our meter.

4 Q. I guess my question is, as I recall,
5 I've seen some designs where some of the
6 operators weren't concerned about the density of
7 the gas, they merely metered it through a turbine
8 meter or through an orifice plate, something of
9 that nature. Is that how you do it?

10 A. It's electronic, yes. I believe it's
11 an infrared electronic system, I believe.

12 Q. Is density needed to make the
13 calculations?

14 A. I'm not really sure.

15 Q. You didn't say anything about reservoir
16 pressure. Do you have a comment on it?

17 A. Reservoir pressure varies across the
18 unit. We have seen some decline reservoir
19 pressure, of course, with production. It varies
20 from, oh, I think originally on the order of 350
21 or 400 pounds up to, on the western side, up to
22 the range of 550 or 600. That was original
23 pressure; and, of course, we've seen some decline
24 in that.

25 Q. Has it paid out?

1 A. I believe it has.

2 COMMISSIONER WEISS: No more
3 questions.

4 CHAIRMAN LEMAY: Will your next witness
5 be dealing with sales and issues like that, so
6 this witness will be engineering criteria?

7 MR. CURRENS: The next witness will
8 cover the marketing activity and the markets and
9 the forecast, not forecasted activity but hopes
10 on the horizon as we see them today.

11 CHAIRMAN LEMAY: I had one question
12 that was brought up, and maybe you could address
13 it.

14 EXAMINATION

15 BY CHAIRMAN LEMAY:

16 Q. Some of the higher parts of the field,
17 I understand, are producing more waters or a
18 hydrodynamic effect in this reservoir. Do you
19 know, or are there higher water recoveries maybe
20 updip, where you expect them downdip without
21 hydrodynamics?

22 A. I know there's an area of the field
23 that is more susceptible to high water
24 production. In fact, we've installed a salt
25 water disposal system in that area to handle

1 production from those wells. Now, whether it's a
2 hydrodynamic effect or a perched water contact,
3 I'm not sure. I can't speak to a hydrodynamic
4 effect, but I do know there's a higher water
5 contact in a part of the active area.

6 Q. And that area is also higher
7 structurally, is it?

8 A. Yes, it is.

9 Q. No explanation, though, as far as you
10 know for that?

11 A. I can't comment on that today.

12 CHAIRMAN LEMAY: Any more questions of
13 the witness?

14 MR. CURRENS: I have a couple for
15 clarification.

16 FURTHER EXAMINATION

17 BY MR. CURRENS:

18 Q. Mr. Collier, in response to questions
19 that you were asked by Commissioner Weiss, I
20 believe you said that the original pressures were
21 perhaps 350 to 400, and pressures on the western
22 side might have been 500 or 600?

23 A. Correct.

24 Q. Might the pressures on the western side
25 have been as high as, say, 1200 to even 1600 psi?

1 A. I believe they were measured that high,
2 yes.

3 Q. So you might have been a little bit off
4 in your memory there?

5 A. I was really speaking on a weighted
6 aerial basis, but I think some were measured that
7 high, yes.

8 Q. And with respect to our measurement out
9 in Bravo Dome, there are two fundamental
10 measuring activities that take place, if I'm
11 correct, is that right? That of the wells, and
12 that at the outlet of the plants, where it goes
13 to the two pipelines?

14 A. That's correct.

15 Q. So the kinds of measurements that take
16 place in those two areas are somewhat different
17 because of the pressures involved?

18 A. Correct.

19 MR. CURRENS: That's all.

20 CHAIRMAN LEMAY: Any additional
21 questions of the witness? If not, he may be
22 excused. Let's take a 15-minute break and we'll
23 wind it up when we get back.

24 [A recess was taken.]

25 CHAIRMAN LEMAY: Let's continue with

1 the hearing.

2 MR. CURRENS: Thank you, Mr. Chairman.
3 My next witness has assumed the chair up there,
4 and I'll ask him to state his name for the
5 record.

6 RONALD G. KRENEK

7 Having been first duly sworn upon his oath, was
8 examined and testified as follows:

9 EXAMINATION

10 BY MR. CURRENS:

11 A. Ronald Glen Krenek.

12 Q. Mr. Krenek, by whom are you employed?

13 A. Amoco Production Company in Houston,
14 Texas.

15 Q. What do you do with Amoco?

16 A. I'm the manager of CO₂ sales and
17 supply.

18 Q. How long have you occupied that
19 position?

20 A. I began as a CO₂ coordinator for Amoco
21 in July of 1989. In May of 1991, I assumed the
22 position of manager of CO₂ sales and supply.

23 Q. With respect to your duties as manager
24 of CO₂ sales and supply, are you familiar with
25 the, broadly familiar at least, with the

1 activities of Bravo Dome, with Amoco's marketing
2 efforts, with the general marketing by other
3 marketers of CO₂, and the whole broad spectrum of
4 that kind of activity?

5 A. Yes, I am.

6 Q. Have you ever testified before this
7 Commission before?

8 A. No, sir, I have not.

9 Q. Tell us briefly of your educational
10 background, then.

11 A. I graduated from the University of
12 Houston in July of 1980 with a bachelor of
13 science in industrial engineering.

14 Q. What did you do at that time?

15 A. Upon graduation I was employed by Amoco
16 Production as a production engineer in Sweeney,
17 Texas.

18 Q. And in the roughly, what, 10 years
19 since then, what sort of assignments have you
20 had?

21 A. Yes. Up until the time of July 1989,
22 when I assumed the responsibilities for Bravo
23 Dome, I had a number of various engineering jobs;
24 in operations engineering, production engineering
25 and reservoir engineering. These covered areas

1 in Texas and Southeastern New Mexico, waterflood
2 primary areas. This was both in staff and
3 supervisory positions.

4 Q. So, from that engineering background,
5 you moved into the carbon dioxide marketing
6 activity that you've been engaged in for the last
7 three years or so?

8 A. Yes, sir, I did.

9 MR. CURRENS: I would ask that Mr.
10 Krenek be accepted to testify as an expert in
11 this matter.

12 CHAIRMAN LEMAY: His qualifications are
13 acceptable.

14 Q. Mr. Krenek, I believe you have prepared
15 a number of exhibits to help us understand the
16 production and supply situation in the industry,
17 is that correct?

18 A. Yes, sir, I have.

19 Q. Let's turn to the first one of those,
20 and I'll ask you to explain what's on your
21 Exhibit No. 1.

22 MR. CURRENS: Mr. Krenek's exhibits all
23 start with a "K," K-1 through whatever.

24 A. My first Exhibit, K-1, is a series of
25 production curves that start with unit sales in

1 April of 1984.

2 Q. Could you speak just a little bit
3 louder and perhaps a little more slowly, Mr.
4 Krennek?

5 A. Yes, sir.

6 Q. Thank you.

7 A. I'll start with the green curve. This
8 represents annualized average sales for each
9 year, except for 1992, where I've represented the
10 first quarter average. The scale on the left is
11 in million cubic feet per day.

12 Since Mr. Collier has previously gone
13 over the producing history, I'll only mention
14 that we reached a peak of 366 million cubic feet
15 a day in 1988, and it declined somewhat since
16 that time.

17 Q. Now, on this curve, where you say unit
18 sales, you're talking about the output of the
19 unit down to the pipelines out of the area, or
20 any of that carbonic reserve takes from the unit,
21 is that right?

22 A. Yes, sir. That would be sales to both
23 pipelines and to carbonic reserves.

24 Q. Now, there was a question earlier
25 having to do with measurement. Perhaps you may

1 be a little more familiar with some of the
2 details of measurement than Mr. Collier was, is
3 that right?

4 A. Yes, sir, I am.

5 Q. Tell us about how we go about
6 measurement.

7 A. Okay. With reference to the question
8 about density, density is very important to our
9 measurement. In our electrical gas measurement,
10 we have developed an algorithm or correction
11 factor for that density. We don't really have a
12 lot of problems with density at our source
13 field. Of course, density can be affected by
14 temperature and composition.

15 Where we see a lot of problems are at
16 the CO₂ projects in the Permian Basin. There we
17 see the effects of temperature more readily, and
18 also we see the effects of composition because of
19 the various projects are receiving both pipeline
20 CO₂, which is usually much more pure, and it
21 receives CO₂ from recycled plants which has a
22 lower composition. Thus, this change in
23 composition can cause some problems in control of
24 the CO₂ floods; but at Bravo Dome, we really
25 don't have a lot of problems.

1 Q. Okay. Let's move on then and talk
2 about the next curve that's depicted on your K-1.

3 A. This is the red curve. This plots
4 cumulative CO₂ production for each year. The
5 scale is on the left in billions of cubic feet.

6 The red squares are plotted in the
7 middle of each year, but they represent the
8 production at the end of each year. Through the
9 first quarter of this year, we've produced 872
10 billion cubic feet.

11 Q. Through the first quarter?

12 A. Through the first quarter of 1992, that
13 is correct.

14 Q. Almost nine-tenths of a trillion?

15 A. Yes.

16 Q. And we're approaching a trillion
17 probably at the--well, next year, hopefully?

18 A. Yes, sir, that's correct.

19 Q. That's fantastic. What else is shown
20 on this curve?

21 A. The final thing that we show is at the
22 bottom of the exhibit. That is the blue curve.
23 That represents water production from the unit.
24 The scale is on the left, the values have been
25 divided by 10. You'll note that we reached a

1 peak of about 500 barrels of water per day in
2 1988. Since that time, we've declined to about
3 200 barrels of water per day in 1992.

4 Q. Okay. Anything else that we need to
5 cover, then, with respect to your Exhibit 1?

6 A. No, sir, there is not.

7 Q. Now, the production of carbon dioxide
8 from Bravo Dome has primarily been to serve
9 tertiary recovery units in the Permian Basin, in
10 both New Mexico and West Texas?

11 A. Yes, sir, that is correct.

12 Q. That's a moderately recent activity in
13 terms of years, is it not?

14 A. Yes, sir, since the early 80s.

15 Q. Have you taken a look at the
16 opportunities that might have been presented to
17 Bravo Dome owners to supply various projects, and
18 made some measurement of the success that those
19 owners have had?

20 A. Yes, sir, I have. That is Exhibit K-2.

21 Q. Let's look at that.

22 A. This exhibit will show the marketing
23 success that Bravo Dome owners have had over
24 time. I've presented that here in bar graph
25 format. Basically, it represents the CO₂ supply

1 opportunities that have been available to Bravo
2 Dome Unit suppliers; that is, all the working
3 interest owners. I want to point out that it
4 does not include all projects in the Permian
5 Basin.

6 Q. Why is that?

7 A. Because it's only those properties
8 where Bravo Dome owners have had a chance to
9 supply. There may be projects where different
10 source fuel owners have a hundred percent of that
11 project and must supply it.

12 Q. Okay. Go on.

13 A. Taking a look at the curve, first, the
14 time scale covers the period of 1983 through
15 1992. On the X axis, we have the years that the
16 actual CO₂ floods began, with the actual years
17 that they needed supply. On the Y axis, we have
18 three bars represented.

19 First, the blue is a total number of
20 projects that started that year or needed
21 supply. With the yellow, we have the total
22 number of projects that Bravo Dome owners
23 supplied in full. This would be a hundred
24 percent of that CO₂ flood project. In the red we
25 have the projects that Bravo Dome owners supplied

1 in part, thus, they would not have supplied 100
2 percent of the project but supplied part of it.

3 Q. I notice the first one here is 1983 and
4 I remember your production curve saying we didn't
5 start until 1984. How can that be?

6 A. Yes, sir, let me explain that.

7 Q. Okay.

8 A. 1983, what I do is start with the years
9 that the actual CO₂ floods needed supply or
10 started ejection. In that year, there were two
11 projects that started. These were the Denver
12 unit and the Wellman unit. I indicate that the
13 Bravo Dome suppliers supplied part of one
14 project. That was the Wellman unit. It began
15 injection in 1983, but Bravo Dome suppliers did
16 not actually start supplying it until 1985.

17 Q. So, what you show in blue is when a
18 project started, and then, even if it were a year
19 or two later, if Bravo Dome were the supplier,
20 they get credit there?

21 A. Yes, sir, that's correct.

22 Q. How come all these blues are up in the
23 early part of this curve and not in later years?

24 A. As you can see, through 1986 there was
25 a lot of activity and a lot of projects. And

1 this, of course, tied to the oil price decline
2 that we're all familiar with, and I'll explain
3 that in detail in the next few exhibits.

4 Q. All right. Let's move on to those
5 exhibits, then, if it's timely.

6 A. Yes. I think just to summarize there,
7 I would like to say that if we looked at the
8 total sum of all these projects, we indicate that
9 a total of 19 projects were supplied by Bravo
10 Dome Unit suppliers in whole or part out of the
11 total 29 that I had presented here.

12 Q. Now, relate that to oil price.

13 A. Yes. My next plot, Exhibit K-3, is a
14 plot of West Texas sour oil prices. I present
15 West Texas sour prices because that is the crude
16 posting that most projects in New Mexico and
17 Texas receive as their posting.

18 For comparison purposes, I've used the
19 same time scale as Exhibit 2, 1983 through 1992.
20 I present it here to indicate the correlation
21 between oil price and CO₂ project activity.

22 As we look at the graph, you can see
23 that oil prices were just under \$30 starting in
24 1983. As we're all familiar with, you see the
25 large decline in prices in 1986. After that, we

1 see some rebound in price, but again a decline in
2 1988. If we recall back to the previous exhibit,
3 we'll see that there were no new projects
4 contracting for supply in 1987, and only one in
5 1988.

6 Q. I noticed, though, there was a pretty
7 good spurt in 89 and then again in later years.
8 Are those new projects coming on?

9 A. Yes, sir. We did see some increase in
10 oil price activity. In 1989, we had five new
11 projects contracting for supply. There were two
12 new projects included there, but there were three
13 existing projects that were basically already
14 injecting CO₂ but needed new volumes of CO₂
15 because their original contract volume
16 obligations had been met. Thus, they wanted to
17 continue with their CO₂ flood, and went out to
18 secure a new supply.

19 Q. So while in recent years we haven't
20 seen too many new projects, operators of existing
21 projects have been keeping up their CO₂ injection
22 programs?

23 A. Yes, there has been continued
24 activities with both new projects and securing
25 supplies for existing projects.

1 Q. So apparently this is proving to be
2 quite a good process by the users?

3 A. Yes. I think the operators or users
4 have shown that CO₂ floods have worked
5 technically. It has been a technical success.
6 That is, improved oil recovery does result.

7 Q. I know that various people make
8 forecasts of what usage will be in projects
9 coming on and so on. Have you made some
10 comparison of actual CO₂ injection projects and
11 included some forecasts of others?

12 A. Yes, sir, I sure have.

13 Q. Would that be your Exhibit 4?

14 A. Yes, sir, it is. I'll turn to that
15 now. This exhibit depicts the historical
16 activity of the CO₂ floods in the Permian Basin,
17 and makes a projection of new CO₂ flood
18 activity.

19 I present it here as the last of the
20 three exhibits to kind of show the relationship
21 between CO₂ flood activity and Bravo Dome CO₂
22 demand.

23 The plot starts in 1980, the year that
24 the unit was formed. You'll note that there were
25 five existing projects at that time. If you

1 follow the black line, you'll note there was
2 increasing activity up through 1986, again
3 related to the oil price decline.

4 You'll note that we reached about 30
5 projects up to that time and then flattened out.
6 I think it's important to note that you do not
7 see a decrease. CO₂ floods may cut back on their
8 injection, but they will generally maintain some
9 injection due to the large capital investments
10 that they have made.

11 Q. Okay. So your black curve goes on out
12 to 92 and shows how many projects, then?

13 A. We had 36 active projects in 92.

14 Q. Superimposed on this, though, I also
15 see some red lines. What's their significance?

16 A. What those are are projections made by
17 the Oil & Gas Journal every two years since
18 1988. For example, looking at 1988, they made a
19 projection that there would be 34 new projects in
20 1989. This was right on.

21 Q. You said 34 new projects. You mean
22 total projects?

23 A. I mean total projects. Excuse me.
24 You'll note that in 1989, the red square overlays
25 the black line, indicating the forecast was right

1 on.

2 If we look at 1990, we'll see a
3 different story, though. There they projected
4 for 1991 that there would be a total number of
5 active projects of 40, but actually they only
6 stayed at 36. They were a little optimistic.

7 If we looked at their 1992 projection
8 made in 1990, it even grows more optimistic. We
9 continued with only 36 active projects but their
10 forecast was 45. I think this is kind of
11 characteristic of the supply industry. There's
12 still quite a bit of market uncertainty.

13 Q. Now, on this curve, you're showing that
14 there are 36 total projects in the Permian Basin
15 and on your earlier curve, your Exhibit 2, you
16 were talking about 29 projects where the Bravo
17 Dome people had been successful in supplying 66
18 percent.

19 Why do we have a difference between 29
20 and 36?

21 A. Okay. The 36 is total active projects.
22 That is all projects in the Permian Basin. The
23 29 again are the total projects that Bravo Dome
24 owners had a chance to supply, so thus there can
25 be a difference between those. There would be

1 some CO₂ flood projects where 100 percent of the
2 supply is from another source.

3 Q. Okay. Do you know, are there going to
4 be new projects coming on in the next several
5 years?

6 A. Yes. If we looked at the forecast that
7 was made by the Oil & Gas Journal for 1992, it
8 predicts about two new projects in 1993. I think
9 that's very realistic. One of those is the Salt
10 Creek Project, which part of the supply will be
11 from Bravo Dome.

12 Q. That's not included in your earlier
13 historical information?

14 A. No, it is not. That only went up
15 through 1992.

16 Q. Anything else with respect to these
17 curves on supply and demand, before I ask you to
18 kind of summarize the supply and demand picture?

19 A. Just to summarize the last three
20 exhibits, if I can--

21 Q. Go ahead and do that, please.

22 A. All right. I think we will see an
23 increase in CO₂ flood activity in the next few
24 years; that is, barring a total oil price
25 collapse. Operators have shown that the CO₂

1 floods are a technical success, as I've mentioned
2 previously, but again economics will be
3 significantly effected by oil price as we've seen
4 from the previous plots.

5 There are some positive tax incentives
6 that will help operators. Some of those are the
7 recent severance tax breaks that the states New
8 Mexico and Texas have enacted. Also there's the
9 15 percent investment tax credit that the federal
10 government has provided.

11 Q. Okay. Mr. Krenek, in addition to the
12 supply/demand picture as we see it and that
13 you've talked about, I believe you have prepared
14 two more exhibits that summarize, perhaps, some
15 information that's been discussed before but
16 perhaps some that's not, that sort of is a
17 summary of our unit activity to date?

18 A. Yes, sir, I have.

19 Q. Why don't you turn to your next one,
20 K-5, a statistical summary, and tell us what's
21 shown there.

22 A. Okay. This is the first of the summary
23 slides, Exhibit K-5. First I'll start with
24 production data. You can see we've produced in
25 the first quarter of this year just under 900

1 Bcf. You can also note that our 1991 average
2 producing rate was about 311 million cubic feet a
3 day. This compares to a peak producing rate of
4 381 million cubic feet a day which occurred in
5 February of 1987.

6 Also, you can see that our current
7 deliverability of wells connected to the system,
8 as Mr. Collier pointed out, was 340 million cubic
9 feet a day. That compares to current plant
10 capacity of 390 million cubic feet a day.

11 Q. I think the next section of that
12 particular chart contains information that's
13 already been written down and detailed by Mr.
14 Collier, so rather than repeat that, why don't
15 you move to the bottom part?

16 A. Okay. We'll move to that final
17 category. This category summarizes the road work
18 that has been done in the unit, which is quite
19 significant. There is a total of 751 miles of
20 road that are either new construction or resulted
21 from improving county roads. This work has been
22 split between 375 miles of lease roads, which
23 directly benefit individuals, and 376 miles of
24 county roads, which directly benefit the three
25 counties involved.

1 Q. That's quite impressive. Let's move to
2 your last exhibit, which is a financial summary,
3 and tell us--give us a financial summary.

4 A. Yes. This is Exhibit K-6. This
5 exhibit summarizes the costs, taxes and royalty
6 that has been paid out by working interest owners
7 since the start of the unit. Starting with cost,
8 at the end of March of 1992, owners had incurred
9 direct costs of over \$378 million. Of this,
10 approximately 30 percent, or \$157 million, has
11 been spent on drilling and facility investments.
12 Another \$17 million has been spent to maintain
13 unit operations, and over 50 percent, \$205
14 million, has been spent to operate the unit.

15 Q. Those numbers are different in total
16 than Mr. Collier presented?

17 A. Yes, sir, they are slightly different.
18 Mr. Collier's numbers went through the end of
19 1991. Mine go through the first quarter of 1992.

20 Q. Go on please, now.

21 A. The next category indicates that \$26.5
22 million in direct taxes have been paid to state
23 entities to the end of the first quarter of this
24 year. The final section just summarizes the
25 royalty costs that have been paid out that Mr.

1 Collier summarized. Those are just under \$50
2 million since the life of the unit.

3 Q. Anything else with respect to your 5 or
4 6?

5 A. No, sir.

6 Q. Let me ask you, with your familiarity
7 with all of the activity of Amoco and the other
8 working interest owners in the Bravo Dome Unit,
9 do you have an opinion as to whether or not those
10 activities have been such that they have
11 continued to move in the area of prevention of
12 waste and protect correlative rights?

13 A. Yes, sir, I think they have.

14 Q. Let me ask you if there's some overall
15 summary that you would like to wind up this
16 hearing with?

17 A. Yes, sir, I would like to make some
18 points to summarize.

19 Q. Okay.

20 A. First, I would like to say we have
21 examined the CO₂ supply history in the Permian
22 Basin and the effect that Bravo Dome suppliers
23 have had. The number of projects that Bravo Dome
24 suppliers have supplied in whole or in part has
25 been very significant. This has been an

1 environment that has been very competitive and
2 will continue to be so.

3 We have been on everything that is
4 reasonable and accessible to pursue, and we will
5 continue to have an aggressive marketing
6 approach. We've also gained a better
7 understanding of the effects that oil price has
8 on CO₂ flood activity and the resulting demand
9 from Bravo Dome.

10 Next I would point out that Bravo Dome
11 owners have invested a significant amount of
12 money to develop and maintain unit sales, the
13 \$378 million that I referenced previously.

14 As Mr. Collier pointed out, some of
15 this spending has been to make us more efficient.
16 This, of course, will make us more competitive in
17 the marketplace.

18 Through eight years of sales, royalty
19 owners have received just under \$50 million as
20 their mineral resources have been monetized.

21 Finally, although sales have declined
22 this year, we're rapidly approaching one trillion
23 cubic feet, and I think that's a significant
24 milestone. I'm also optimistic about 1993, as we
25 should see increased demand from Bravo Dome due

1 to the Salt Creek Project which I mentioned
2 previously.

3 As you have seen, we have gas available
4 to meet those needs. Also, we are prepared to
5 respond to a wide variety of possible demand
6 scenarios. Thank you.

7 MR. CURRENS: That's all I have of Mr.
8 Krennek. I would offer his Exhibits 1 through 6,
9 and I would offer Mr. Krennek for questions.

10 CHAIRMAN LEMAY: Without objection,
11 Exhibits 1 through 6 will be admitted into the
12 record. Questions of Mr. Krennek?

13 Commissioner Carlson?

14 COMMISSIONER CARLSON: Yes.

15 EXAMINATION

16 BY COMMISSIONER CARLSON:

17 Q. Your second exhibit, that supply is for
18 all the working interest owners? In other words,
19 it's not just Amoco as the supplier, it
20 represents the total unit?

21 A. That's correct.

22 Q. How many working interest owners are
23 directly marketing their own share of CO₂?

24 A. I don't know the total number, but
25 there are quite a few, such as Amoco, Amerada,

1 Shell and some smaller owners.

2 Q. There are some smaller owners that do
3 their own marketing?

4 A. Yes, sir, there are. Some of those are
5 like Markland. There's a company called Rim, and
6 a few other smaller companies that do market
7 their own CO₂.

8 Q. What percent of the total unit
9 production does Amoco market, do you know?

10 A. I think it's somewhere in the range of
11 60 to 70 percent, something like that.

12 Q. For what percent of production is Amoco
13 the actual working interest owner? Do you
14 understand the question? You market 60 to 70
15 percent, but I assume some of that is on behalf
16 of other working interest owners, is that
17 correct?

18 A. No, sir, it is not.

19 Q. That is Amoco's share of unit
20 production is the 60 to 70 percent?

21 A. Right. That's correct.

22 Q. So Amoco does not market on behalf of
23 other working interest owners?

24 A. No, sir. There's no joint marketing of
25 Bravo Dome. Each working interest owner is

1 responsible for their own marketing.

2 Q. Last time we looked into this, Amoco
3 Production Company sold, I believe at the
4 tailgate of the plant, to Amoco Oil Company. Is
5 that still the case?

6 A. That is still the case, yes.

7 Q. Are you employed by Amoco Oil or by
8 Amoco Production Company?

9 A. No, I am employed by Amoco Production
10 Company.

11 Q. But Amoco Production Company sells all
12 its production to Amoco Oil?

13 A. That's correct.

14 Q. Amoco Oil in turn, then, sells this CO₂
15 to operators of enhanced oil recovery projects in
16 the Permian Basin?

17 A. Right. They would sell it to operators
18 of the Permian Basin projects, which would
19 include Amoco Production and other parties.

20 Q. Are you involved in those transactions?

21 A. I'm involved strictly from the
22 viewpoint of Amoco Production's sales, end at the
23 tailgate. Again, I would be involved when they
24 sell it back to us at the project.

25 Q. So, you have some knowledge of those

1 sales that are occurring at the tail end of the
2 pipeline?

3 A. The projects that came to Amoco
4 Production, I would.

5 Q. Of the CO₂ that Amoco Production
6 markets out of Bravo Dome, how much does Amoco
7 Production in return buy from Amoco Oil at the
8 tail end of that pipeline?

9 A. Of the total that we--

10 Q. Yes. Here again, in percentage.

11 A. Approximately 70 percent.

12 Q. So I could say the remaining 30 percent
13 is actually marketed under arm's length
14 contracts?

15 A. Well, I think it's marketed all under
16 arm's length contracts.

17 Q. Marketed to nonaffiliates?

18 A. Yes, sir, that would be correct.

19 Q. Are you knowledgeable of the pipeline
20 rates that Bravo pipeline charges Amoco Oil?

21 A. No, sir. I'm familiar with the rates
22 but they can change from time to time, and I'm
23 not familiar with that determination.

24 Q. Those rates have changed in the last
25 four years?

1 A. Yes, sir, they have.

2 Q. I take it they have increased?

3 A. Yes, they have.

4 Q. Are those rates negotiated, or are they
5 just posted rates?

6 A. That's the business of Amoco pipeline,
7 as far as determining those rates. It is a
8 common carrier pipeline that they post, and
9 everyone can have access.

10 Q. Are those rates subject to approval of
11 any federal or state agency?

12 A. I'm not familiar with that.

13 Q. If I remember correctly, not just the
14 state leases but a lot of those private leases
15 had the opportunity to take their royalty in kind
16 from the Bravo Dome. Is any royalty owner taking
17 their production in kind?

18 A. No, sir, not that I'm aware of.

19 COMMISSIONER CARLSON: I don't have any
20 further questions.

21 CHAIRMAN LEMAY: Commissioner Weiss?

22 EXAMINATION

23 BY COMMISSIONER WEISS:

24 Q. You mentioned the Salt Creek Project.
25 Who is the operator of that?

1 A. That is Mobil.

2 Q. In your figure K-3, you've got your oil
3 price history. What's the forecast of Amoco?

4 A. I think there are probably lots of oil
5 price forecasts, and I would hate to hazard a
6 guess on that.

7 Q. I'm asking for Amoco's. Do you have
8 one?

9 A. I really can't say. We don't expect a
10 real large increase in price, but I really can't
11 make much of a guess beyond that.

12 COMMISSIONER WEISS: Thank you. No
13 other questions.

14 CHAIRMAN LEMAY: I've got a couple.

15 EXAMINATION

16 BY CHAIRMAN LEMAY:

17 Q. Out of the projects you mentioned, the
18 29 that you're supplying, are any of those in New
19 Mexico?

20 A. The Dollarhide Unit is on the Texas and
21 New Mexico line. I'm not sure if part of it is
22 in New Mexico.

23 Q. Are you supplying that?

24 A. Yes, sir. Beyond that, I don't think
25 there are any New Mexico projects.

1 Q. Maybe I can back up, and you don't have
2 to answer this if you don't have the figures, but
3 you mentioned getting close to one Tcf. How
4 about reserves in the field? Do you have any
5 figure for reserves under the unit?

6 A. All I know is that the total reserves
7 were 8 Tcf as outlined in the unit agreement. I
8 really don't have any--

9 Q. As far as you know, that hasn't changed
10 much?

11 A. No, sir, I'm not familiar with any
12 changes.

13 Q. A couple of other questions here. Your
14 average demand per project, the projects, I
15 assume, would vary with the demand, with how much
16 gas they need to put, depending on the size and
17 all.

18 Is there a profile, where you would
19 take the average life of the CO₂ injection and at
20 some point start recycling that so your demand
21 would fall off? Is that what happens in a CO₂
22 projects?

23 A. Yes, sir. A typical demand scenario
24 would be, you know, high initial rates. Those
25 would all be supplied by the pipeline CO₂ as

1 source field in the early life, but you wouldn't
2 have any breakthrough. As the project goes along
3 and you start to see breakthrough, the recycle
4 will start building and the demand from pipelines
5 will go down.

6 Q. Do you have an average project life for
7 supplying that field?

8 A. Each field is unique. I really can't
9 state what the life of those floods are. I think
10 we'll kind of see the history that we see on
11 waterfloods. As they earn more and more, they'll
12 keep operating and injecting more CO₂.

13 Q. The projects you're supplying to date,
14 when have you seen the dropoff since initial
15 supply? Was there a five years, and then it
16 started dropping off three to years?

17 A. No, sir. I think you start seeing it
18 within the two or three years.

19 Q. Two or three years, the dropoff?

20 A. Right.

21 Q. Did I hear you say that Amoco is a
22 common carrier pipeline?

23 A. What I stated was that Amoco pipeline
24 system is, that's correct.

25 Q. You're sure of that?

1 A. Yes.

2 CHAIRMAN LEMAY: Okay. That's all the
3 questions I have. Any additional questions of
4 the witness?

5 Yes, sir, Roy.

6 EXAMINATION

7 BY MR. JOHNSON:

8 Q. One I get asked an awful lot. What's
9 the price of CO₂ today at the wellhead?

10 A. As far as the price at the wellhead,
11 let me state that there's no one Bravo Dome
12 price. Of course, each working interest owner
13 markets their own gas; thus, they're all
14 responsible for their own contracts and prices.
15 Thus, there could be a myriad of different prices
16 in contracts. I'm not familiar with all of
17 those, of course, because I don't market
18 everyone's gas.

19 And that price can change monthly due
20 to the varying demands during the projects. As
21 far as what that price is at the wellhead, I
22 guess if you were a royalty owner, you could look
23 on your check and discover that.

24 CHAIRMAN LEMAY: Do you have a rough
25 guess for us here, for Amoco-supplied prices at

1 the wellhead?

2 THE WITNESS: I really don't because of
3 the change you can see in that.

4 COMMISSIONER CARLSON: Our oil reports
5 say 31 cents, and I think that's been pretty
6 constant over the last--

7 MR. STOVALL: Just for the record, let
8 it reflect that the question from the floor was
9 asked by Roy Johnson, petroleum geologist for the
10 NMOCD.

11 CHAIRMAN LEMAY: Any follow-up, Roy?
12 I'm sorry. Morris Lierz.

13 EXAMINATION

14 BY MR. LIERZ:

15 Q. Director of royalty management, New
16 Mexico State Land Office. Today, or in recent
17 past, in the recovery projects, how much CO₂ is
18 consumed or not recovered from the reservoir to
19 raise up barrels of water? I heard at one point
20 it took 5 Mcfs of CO₂ to raise a barrel of oil,
21 that you probably do not recover 2, it may stay
22 in the reservoir and you'll lose it, but you may
23 recover 3 Mcf of the 5.

24 In other words, I'm trying to get at,
25 what is the recovery or the consumption of CO₂ in

1 raising oil?

2 A. I think that's referred to as a
3 utilization factor in Mcf per barrel. I've heard
4 the same kind of numbers quoted in the 5 to 10
5 range. Some projects are higher. It just kind
6 of depends on the reservoir. I can't really
7 state any industry average, because I haven't
8 looked at that.

9 CHAIRMAN LEMAY: 5 to 10 Mcf per
10 barrel?

11 THE WITNESS: Are numbers that I've
12 seen published.

13 CHAIRMAN LEMAY: Mcf of CO₂ per barrel?

14 THE WITNESS: Right. That one
15 concluded a combination of the recycle and
16 pipeline CO₂.

17 CHAIRMAN LEMAY: Anything else, Mr.
18 Lierz?

19 Additional questions of the witness?
20 Yes.

21 MR. JARAMILLO: Arthur Jaramillo. I'm
22 an attorney here in Santa Fe. I was just
23 wondering what steps Amoco has taken, over the
24 last four years, to analyze or consider whether
25 the surface acreage allocation formula on which

1 royalties are distributed to the royalty interest
2 owners, continues to protect the correlative
3 rights of the royalty interest owners in the
4 unit?

5 MR. STOVALL: Mr. Jaramillo, are you
6 representing somebody in this hearing?

7 MR. JARAMILLO: No, I'm not
8 representing anybody in this hearing.

9 MR. STOVALL: I guess I would have
10 to--Mr. Carr, do you have any problem, or Mr.
11 Currens, with answering questions from the public
12 in general?

13 MR. CARR: Mr. Stovall, we recognize
14 there is a substantial interest in Bravo Dome,
15 but we really are here to report to you on
16 particular questions and not just have a public
17 forum or questions of that nature. I recognize
18 Mr. Jaramillo's concern, but I'm not even
19 convinced that there's an appropriate witness
20 here who can discuss a matter which really would
21 be a reevaluation of certain matters that were
22 set by the original contract and the unit
23 operating agreement.

24 I guess we object, partially because I
25 don't think we have an appropriate witness here

1 to review that kind of inquiry for Mr.
2 Jaramillo.

3 MR. STOVALL: Mr. Chairman, I would
4 state that the previous questions came from
5 representatives of the state agencies which are
6 specifically involved, and I would have to say
7 this is not a public forum for discussion. If
8 somebody were to enter an appearance on behalf of
9 a party, I would say take the question, but you
10 run the risk of opening this into a discussion
11 forum rather than a procedural hearing by
12 allowing questions from the public on the floor
13 in a proceeding of this nature.

14 CHAIRMAN LEMAY: Any other comment
15 concerning the objection? Do you have any
16 response to that? We'll rule on it in just a
17 minute.

18 MR. JARAMILLO: Just that it was
19 published as a public hearing, and it would seem
20 to me that that would be a matter that the
21 Commission ought to consider within the published
22 notice, which is whether or not the operations
23 continue to protect against--prevent waste and
24 protect correlative rights. I'm just curious why
25 the matter had not been addressed by Amoco.

1 MR. STOVALL: The question is not
2 whether his question is valid, the question is
3 whether he is the proper person to be asking a
4 question.

5 CHAIRMAN LEMAY: All right. Let's take
6 a couple minutes here.

7 [Discussion off the record.]

8 CHAIRMAN LEMAY: I think our question
9 is really directed to you, Mr. Jaramillo, if you
10 want to make an appearance on behalf of a party
11 now? If not, I think we'll uphold the objection
12 and give you an opportunity to make a statement
13 at the end, if you care to.

14 MR. JARAMILLO: I represent no party
15 here, Mr. Chairman.

16 CHAIRMAN LEMAY: Thank you. The
17 objection will be upheld, then.

18 Additional questions of the witness?
19 If not, he may be excused.

20 Wrap up, Mr. Carr or Mr. Currens??

21 MR. CARR: I will be brief. May it
22 please the Commission, the original orders that
23 approved this unit agreement recognized the value
24 of the unitized development of carbon dioxide in
25 the Bravo Dome area. This Commission found at

1 that time that efficient and effective unit
2 operations would prevent waste and would protect
3 correlative rights.

4 We submit to you that the physical
5 operations of Bravo Dome are both efficient and
6 effective. We employ state-of-the-art equipment,
7 facilities and practices. By doing this, we have
8 maximized recovery, we have enhanced the revenue
9 that is obtained from this development and, at
10 the same time, we have been sensitive to
11 environmental concerns.

12 The actual extent of the physical
13 development of this resource is tied directly to
14 the price of oil, but our efforts to define this
15 particular reservoir are not so restricted. We
16 have employed the most recent and advanced
17 techniques to define this reservoir in the unit
18 area. We have shown you what we're doing in that
19 regard. We've shown you what efforts we're
20 undertaking in trying to understand the Tubb
21 Formation and to meet our obligations to all
22 interest owners in the unit and, at the same
23 time, comply with all regulatory requirements.

24 I think in sum we simply believe we're
25 continuing to do today that which we set out to

1 do in 1980. We submit to you that the operations
2 are efficient, that they are effective, that they
3 do prevent waste, that they do protect
4 correlative rights, and that they're doing these
5 things on a continuing basis.

6 CHAIRMAN LEMAY: Thank you. Mr.
7 Currens? Anything to add to that?

8 MR. CURRENS: No. I'll not. Thank
9 you.

10 CHAIRMAN LEMAY: Are there any other
11 statements? Anything else in the case?

12 If not, we shall take the case under
13 advisement. Thank you all very much.

14 (And the proceedings concluded.)
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1 CERTIFICATE OF REPORTER

2
3 STATE OF NEW MEXICO)
4 COUNTY OF SANTA FE) ss.
5

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

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

19 WITNESS MY HAND AND SEAL July 28, 1992.
20

21
22 
23 CARLA DIANE RODRIGUEZ, RPR
24 CSR No. 4
25