NEW ME	XICO OIL CONSERVATION COMMISSION	
	EXAMINER HEARING	
	SANTA FE, NEW MEXICO	
Hearing Date	NOVEMBER 16, 1995	Time: <u>8:15 A.M.</u>
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Thomas R. Smith	Arlen Dicken	SF
Bruce Stubbs	STRATA Prod. Co	Ruswell
michael Ahr	Wes- Del	SF
SealyCavin	Stallar + Com	Alb
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NAME	REPRESENTING	LOCATION
PATRICK TOWER	ENRON	MIDLAND
David Bledsoc	Bass Enterprises	MIDLAND
Markus Thomerson	Meridian Oil	M. diand
Leslyn Swierc Fill	5.g.	
Mant Wheel	Manalo de.	reilland
Shane Longh	Maralo Inc.	Midland
Jim Dore	Texaco INC	Denver.
DAN MOREHOUSE	IMC GLOBAL	CARLSBAD
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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

)

IN THE MATTER OF THE HEARING CALLED) BY THE OIL CONSERVATION DIVISION FOR) THE PURPOSE OF CONSIDERING:)

IN THE MATTER OF CASE NO. 10,935 BEING REOPENED PURSUANT TO THE PROVISIONS OF DIVISION ORDER NO. R-10096, WHICH ORDER ESTABLISHED SPECIAL RULES FOR THE NASH DRAW-BRUSHY CANYON POOL IN EDDY COUNTY, NEW MEXICO

REPORTER'S TRANSCRIPT OF PROCEEDINGS

EXAMINER HEARING

BEFORE: DAVID R. CATANACH, Hearing Examiner

November 16th, 1995

Santa Fe, New Mexico

This matter came on for hearing before the New Mexico Oil Conservation Division, DAVID R. CATANACH, Hearing Examiner, on Thursday, November 16th, 1995, at the New Mexico Energy, Minerals and Natural Resources Department, Porter Hall, 2040 South Pacheco, Santa Fe, New Mexico, Steven T. Brenner, Certified Court Reporter No. 7 for the State of New Mexico.

* * *

STEVEN T. BRENNER, CCR (505) 989-9317

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EXHIBITS (Continued) Applicant's Identified Admitted Exhibit XI 15 20 Exhibit XII-A 16 20 Exhibit XII-B 16 20 Exhibit XIII 16 20 Exhibit XIV 17 20 Exhibit XV 17 20 * * * APPEARANCES FOR THE DIVISION: RAND L. CARROLL Attorney at Law Legal Counsel to the Division 2040 South Pacheco Santa Fe, New Mexico 87505 FOR STRATA PRODUCTION COMPANY: STRATTON & CAVIN, P.A. 320 Gold Avenue, SW Albuquerque, New Mexico 87102 P.O. Box 1216 Albuquerque, New Mexico 87103 By: SEALY H. CAVIN, JR. * * *

WHEREUPON, the following proceedings were had at 1 2 8:15 a.m.: Call the hearing to order EXAMINER CATANACH: 3 this morning for Docket Number 34-95. 4 I'm going to go ahead and call the continuances 5 and dismissals at this time. 6 7 (Off the record) EXAMINER CATANACH: At this time we'll call Case 8 10,935. 9 MR. CARROLL: In the matter of Case Number 10,935 10 being reopened pursuant to the provisions of Division Order 11 Number R-10,096, which order established special pool rules 12 for the Nash Draw-Brushy Canyon Pool in Eddy County, New 13 Mexico. 14 15 EXAMINER CATANACH: Are there appearances in this case? 16 17 MR. CAVIN: Yes, Mr. Examiner, I'm Sealy Cavin with the law firm of Stratton and Cavin in Albuquerque. 18 Ι have one witness to call today. 19 EXAMINER CATANACH: Any additional appearances in 20 21 the case? Will you swear in the witness? 22 (Thereupon, the witness was sworn.) 23 MR. CAVIN: Mr. Examiner, our first witness is 24 Mr. Bruce Stubbs. 25

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	5
1	BRUCE A. STUBBS,
2	the witness herein, after having been first duly sworn upon
3	his oath, was examined and testified as follows:
4	DIRECT EXAMINATION
5	BY MR. CAVIN:
6	Q. Mr. Stubbs, would you please state your name,
7	address, occupation and employer?
8	A. I'm Bruce A. Stubbs, I live in Roswell, New
9	Mexico. I'm presently employed by Strata Production
10	Company as a consulting engineer.
11	Q. And have you previously testified before the
12	Division in your capacity as a petroleum engineer?
13	A. Yes, I have.
14	Q. Have your qualifications as a petroleum engineer
15	been made a matter of record before the Division?
16	A. Yes, they were.
17	Q. Are you familiar with the Permian Basin, Mr.
18	Stubbs?
19	A. Yes, I've got about 20 years in the Permian
20	Basin, experience.
21	Q. Okay. Are you familiar with the Nash Draw-Brushy
22	Canyon Pool in the Permian Basin?
23	A. Yes, I am.
24	Q. And are you familiar with Case 10,935, which was
25	originally heard in March of 1994?

1	A. Yes, I helped put on that case.
2	MR. CAVIN: Okay. Mr. Examiner, we would tender
3	Mr. Stubbs as an expert witness in petroleum engineering.
4	EXAMINER CATANACH: Mr. Stubbs is so qualified.
5	Q. (By Mr. Cavin) Mr. Stubbs, have you prepared any
6	exhibits in connection with Case 10,935, Reopened?
7	A. Yes, I have. It's this little booklet with
8	Exhibits I through XV.
9	Q. Okay. And could you state, what is Strata
10	requesting today?
11	A. In March of 1994 when we had the first hearing,
12	we requested special pool rules to increase the GOR limit
13	to 8000 to 1. We would now like to make those permanent
14	pool rules.
15	Q. Okay. Do you recall your testimony and the
16	exhibits you presented at the original hearing?
17	A. Yes.
18	Q. And can you tell us some of the conclusions you
19	reached at that hearing?
20	A. The two or three conclusions we reached were that
21	this was an analogous field to the East Loving, which is
22	also a Brushy Canyon field of about six miles west, that
23	this is a typical solution gas drive reservoir. There's no
24	gas cap and no water drive.
25	Q. Okay. And did you say that Was it one of your

1	conclusions that the gas-oil ratio was not affected by the
2	rate of production?
3	A. That was one of the conclusions, and it still is
4	followed to be true.
5	Q. Okay. So based on your knowledge of the Nash
6	Draw-Brushy Canyon field today, the testimony and
7	conclusions in that hearing are still pertinent?
8	A. That's correct.
9	Q. Mr. Stubbs, I refer you to what's marked Exhibit
10	I-A and ask that you describe that for the Examiner.
11	A. This is a land plat of the Nash Draw-Brushy
12	Canyon Pool area. The area highlighted in yellow is the
13	pool the acreage covered in the pool as of August 1,
14	1995. All but one 160-acre tract is located inside the
15	Nash unit, operated by Strata Production Company.
16	BK Petroleum has just recently completed the well
17	in the northeast-northeast of Section 24, and also it
18	appears from the public records that they've also attempted
19	a completion in the well in the northwest of the southeast
20	of 24, but it hasn't been included in the pool as of
21	August, 1995.
22	Q. Okay. I'd refer you now to Exhibit I-B and ask
23	that you describe that for the Examiner.
24	A. I-B is the area map, and just to show the
25	relation of the Nash Draw Pool to the East Loving Pool and

1	the town of Loving, New Mexico, Nash Draw is about 7 miles
2	due east of Loving and about six miles or so east of the
3	East Loving field.
4	East Loving is the closest analogy pool. It
5	produces out of the same geological interval as the Nash
6	Draw Pool.
7	Q. Okay. Now, I'd refer you to Exhibit I-C and ask
8	you to describe that.
9	A. Exhibit I-C is a cumulative production plot of
10	the production from the East Loving-Brushy Canyon Pool, and
11	the significant curve to look at is the stairstep curve,
12	which is the GOR curve.
13	Presently, the GOR is approximately 11,000 to 1
14	in that pool, and it's shown a steady increase, almost
15	since the pool was drilled.
16	Q. Okay. But yet the pool rules provide for 8000 to
17	1?
18	A. That's correct. It's 8000 to 1 times the depth
19	bracket allowable of 142 barrels a day, so they're able to
20	produce about 1100 MCF a day per well.
21	Q. Okay. I refer you to your Exhibit II and ask you
22	to describe that, Mr. Stubbs.
23	A. This is a listing of all the wells that have been
24	drilled and produced from the Delaware in the Nash Draw
25	area. There's been four Nash Draw wells and the two BK

1	or one BK well and a recompletion of a BK well since the
2	last hearing.
3	Just about well, all but two wells have
4	produced out of the Brushy Canyon. The Nash 1 and the Nash
5	4 produced out of the Cherry Canyon zone, but those zones
6	have since been abandoned.
7	Q. Okay. Exhibit III is a log of the Nash 23 well.
8	What's the significance of that, Mr. Stubbs?
9	A. I just wanted to show where the top of the Brushy
10	Canyon was, and also where the two main pays in the basal
11	Brushy Canyon are, just right above the Bone Springs zone.
12	Q. Okay. And Exhibit IV-A is a structure map of the
13	"K" sand. Can you explain that and the significance of
14	that to the gas-oil ratio?
15	A. The structure map is, for the most part, regional
16	dip. It's about 130 feet per mile, dipping back to the
17	east. There's a very slight nosing over the Nash Draw.
18	If you'll refer, as far as GORs, you'll refer
19	back to Exhibit Number VII, this plot shows the initial
20	GORs and the present GORs. The highest GORs are
21	concentrated in the east half of Section 13.
22	If you'll look back at the structure map, you'll
23	see that that's the downdip edge of the field. The reason
24	that the GORs are higher is, those are slightly older
25	wells, they've been producing longer, and they're on closer

1	spacing, and the bottomhole pressure is lower in that area.
2	So it's a function of the pressure being drawn down and the
3	gas being liberated.
4	Q. Okay. Exhibit IV-B is a structure map of the "L"
5	sand, and that tells us basically the same thing?
6	A. Yes, it basically shows the same structure. It's
7	east-dipping, still about 130 feet per mile, just a very
8	slight nosing over the Nash Draw-Brushy Canyon zone.
9	Q. Okay. And in most of these wells, the "K" and
10	the "L" sand are being produced together?
11	A. That's correct.
12	Q. Is that correct? Okay.
13	Mr. Stubbs, I'd refer you to your Exhibit V-A and
14	ask that you explain that to the Examiner.
15	A. Exhibit V-A and V-B are an oil what I call an
16	oil-feet map. It's just a porosity-foot map taken one step
17	farther to get oil saturations involved. It just shows the
18	trends of the sands and where they're productive.
19	The "K" sand are two parallel sandbodies that run
20	northeast-southwest. There's a definite oil-water contact
21	on the southeast side of that particular sand, and that was
22	pretty well determined by drilling the Number 20 well.
23	That zone was right at a transition, very high water
24	saturations.
25	The "L" sand shows a similar situation with

1	northeast-southwest trending sands. As to date, we haven't
2	determined an oil-water contact in the "L" sand.
3	Q. Now, Mr. Stubbs, Exhibit VI, could you explain
4	that for the Commissioner or Examiner, excuse me?
5	A. Exhibit VI is a summary of the Nash Draw
6	production. It's very The curves are fairly similar to
7	the East Loving. You'll notice that the GOR has been
8	steadily increasing. Presently our GOR is 6300 to 1 on the
9	field average. Some wells are much higher than that, as
10	high as 16,000 to 1.
11	Q. So the Nash Draw is comparable to the East Loving
12	at that stage of development?
13	A. Right, that's correct. It just hasn't been
14	producing quite as long as the East Loving.
15	Q. Okay.
16	A. The East Loving has got about two or three years
17	longer production history.
18	Q. Okay. Your Exhibit VII, I'd ask that you
19	describe that.
20	A. Okay, we've already touched on that briefly. It
21	just gives the initial and present GORs. The higher GORs
22	are related to the amount of production and the well
23	spacing. And it's not related to the structure, so there's
24	no gas cap in that particular pool.
25	Q. Okay. So the higher GORs on the east side are

1	related to the well density there?
2	A. That's correct. Those are were initially re-
3	entries of Morrow wells. That's why the spacing is kind of
4	funny there.
5	But the closer the denser spacing has drawn
6	the pressure down in that area quicker, so there's been
7	more gas liberated.
8	And if you'll notice, on the wells we drilled on
9	the western side, the most recent wells, we've gone to a
10	little wider spacing, and we're in the process of trying to
11	determine what the optimum spacing is. We've started a
12	project to do a reservoir simulation to help us decide
13	that.
14	Q. Okay. Your Exhibit VIII shows the percentage
15	water cut in the Nash Draw-Brushy Canyon Pool. Can you
16	tell us the significance of that at this hearing?
17	A. We were trying to determine if there's any
18	significant influx of water into the reservoir, and at this
19	time it doesn't appear there is.
20	Most of the water-oil ratios remain fairly
21	constant throughout the life of the wells. The ones that
22	do increase usually have a little higher water saturation,
23	a little more mobile water, and the water doesn't decrease
24	as quickly as the oil decreases. So you get a little
25	higher percentage, but it's really the water still

1	decreasing. We can show that here on the production
2	curves.
3	Q. Okay, and Exhibit IX are those production curves
4	on a well-by-well basis; is that correct?
5	A. That's correct.
6	Q. Could you describe Exhibit IX, and particularly
7	any anomalies you see, or explain to the Examiner any
8	anomalies in the consistencies that you see with your
9	typical Delaware model?
10	A. Well, in our previous testimony at the previous
11	hearing in 1994 we used what we call our Delaware model to
12	evaluate our Delaware wells. And that model basically says
13	that during the first year the production will decline
14	about 50 percent, and over a two-year period it will
15	decline about 25 percent a year. Then it will level off to
16	about a 12-percent decline.
17	And for instance, one of the anomalies and
18	we've already touched on it a little bit on the Nash 1,
19	you'll notice that it doesn't follow the model very well.
20	But that's primarily due to the close spacing. It's
21	surrounded by four other wells, and it's on about a 30-acre
22	spacing. So it's been affected by interference pretty
23	severely.
24	You'll also notice that that well, the GOR, which
25	is the little stairstep line, is up to about 16,000 to 1.

1	If you'll turn to the next exhibit, -B, is the
2	Nash Draw 5, which is also in that tight spacing area, but
3	it's about about half of its drainage area is to the
4	back of it, and it's not affected by other wells. So it's
5	a lot closer to the model, and its GOR is up to about
6	10,000 to 1.
7	The rest of the wells, if the Examiner wants to,
8	we can go through them one by one, or if you want to just
9	pick one to analyze They're all pretty well staying on
10	the model, no great surprises at all, behaving like we
11	expect them to behave.
12	Q. There's a bit of an anomaly in the Number 11
13	well. Is there any reason for that?
14	A. About the first part of this year, we went back
15	in and perforated some additional pay zones, and we've got
16	about a 20-barrel-a-day increase in production from that
17	workover. That's why that has a
18	Q. Okay.
19	A jump in production.
20	Q. Mr. Stubbs, I'd refer you to your Exhibit X and
21	ask that you explain that and where the Nash Draw-Brushy
22	Canyon Pool is on that curve.
23	A. This is an example from Slider's Practical
24	Petroleum Engineering Handbook, depicting a typical
25	solution gas reservoir and its behavior.

The Nash Draw is presently about halfway up that 1 curve, whereas the East Loving field is just about to the 2 top of that curve. It's starting to flatten out, GORs are 3 starting to flatten out, and at some point in time they'll 4 even start declining. 5 So we're somewhere probably halfway up that curve 6 7 in this particular pool. Okay. Now, I'd refer you to your Exhibit XI, 8 Q. which is a summary of the PVT data, and ask you to describe 9 the significance of that for this hearing. 10 We ran a PVT analysis on the Number 19 well. Α. 11 From that analysis, we determined that the -- well, the 12 pressure buildup and the analysis, we determined that the 13 14 bottomhole pressure is 2963 pounds, and the bubble-point 15 pressure is 2677 pounds. So it takes just a very small amount of 16 withdrawal from the reservoir to reach bubble point, and 17 that's why we see an increase in the GORs almost 18 19 immediately within the first two or three months of production. The original solution gas-oil ratio is 1109 to 20 21 1. And what is it that happens at bubble point when 22 Q. the gas-oil ratio goes up? 23 Well, when you reach bubble point, the gas comes 24 Α. out of solution and you have free gas in the reservoir. 25

1	Q. At this time I'd refer you to your Exhibit XII
2	and ask you to describe the significance of that equation
3	and how it affects this hearing.
4	A. Exhibit XII and XII-B are the general material
5	balance equation.
6	And if you'll turn to XII-B, the only item in
7	that particular equation that's not affected by the
8	properties of the oil in the reservoir is the produced gas-
9	oil ratio. And there's really no good way to control that.
10	It's going to produce that ratio sooner or later. So it
11	basically says that the wells are not rate-sensitive.
12	Q. Okay, your Exhibit XIII concerns 1987 Delaware
13	completions. Can you tell me the significance of that?
14	A. In our original testimony, we showed curves
15	similar to this for, I believe it was about a five-year
16	period for each year [sic], and we also showed curves for
17	numerous Delaware pools. And this is how we arrived at our
18	Delaware model, was taking these pools and then applying
19	the curve fit till we got a match. This was 1987 Delaware
20	completions in southeast New Mexico.
21	And you'll notice it jumps above the line after
22	it starts to flatten out, and that's primarily due
23	workovers, and I believe there's a waterflood project or
24	something in there which caused that little anomaly. But
25	for all practical purposes, this model works on about 75 or

1	80 percent of the Delaware wells in the Basin.
2	Q. And the Nash Pool fits this model?
3	A. Yes, it does.
4	Q. Your Exhibit XIV is Brushy Canyon completions in
5	Eddy County in 1990, and again, what's the significance of
6	that?
7	A. Well, this basically shows the same thing. It's
8	primarily East Loving wells coming on line in 1990. The
9	anomaly in 1994, I think, is mostly ONGARD system; part of
10	the production is not in there yet. But you can still see
11	it was jumped up to where the line was and still had about
12	the same decline. We're just missing some wells that
13	haven't been accounted for yet.
14	Q. Okay. I understand that Exhibit XV gets us into
15	showing the economics of limiting the gas-oil ratio based
16	on the general statewide rules. Can you explain what would
17	happen if we limited production in that fashion?
18	A. Well, presently there are six wells that would be
19	producing over the 2000-to-1 GOR limit in the Nash Draw
20	Pool. If we stayed with the 2000-to-1 GOR limit, it would
21	mean pinching these wells back to maintain a daily gas
22	production rate of 284 MCF a day. And so I took the Number
23	19 well and did a model of what would happen if we could
24	only produce at a 2000-to-1 GOR.
25	So the first short period of time, you could

1	produce at a fairly high rate, until the GOR got high
2	enough that you had to pinch the well back. And what that
3	in effect does is, it extends the life of the well and
4	increases the operating cost.
5	And if you'll turn to the next page, you'll see
6	that the Let's see, let's turn to the economics page.
7	Under that scenario, it takes 1.45 years to pay out,
8	discounted before tax net return on investments, 2.77 to 1.
9	The next
10	Q. The rate of return is what?
11	A. 2.77 to 1.
12	Q. Okay, what's your percentage rate of return?
13	A. Percentage is 70.76.
14	Q. Okay. So that's if you hold it to 2000 to 1?
15	A. Right.
16	Q. Okay. What happens if we go with the special
17	pool rules, 8000 to 1?
18	A. Okay, the next section is the Nash Draw 19 as it
19	is today, and as it has been produced. If you turn to the
20	economics page, you'll see that the payout is .94 years,
21	return on investment discounted is 3.62 to 1, and there
22	ends up being slightly over half a million dollars
23	discounted future net revenue increase, just because you
24	shorten the production time and increase your present worth
25	to that project.

1	0 Okay So Mr. Stubbs, based on your knowledge of
-	g. okay. bo, m. beabbb, babea on year knowledge of
2	the Nash Pool, you believe the special pool rules with a
3	gas-oil ratio of 8000 to 1 should be made permanent?
4	A. Yes, I do. In the future, as we drill more
5	wells, we're probably going to see I'm almost certain
6	we're going to see a higher GOR, and this will be a much
7	bigger problem in the future.
8	Q. Okay. And Mr. Stubbs, is it your opinion that
9	the failure to provide such a higher gas-oil ratio would
10	result in economic waste?
11	A. Yes, it would. I think at some point in time, it
12	would get to the point that you couldn't afford to drill
13	wells, you wouldn't be able to produce them.
14	Q. So you believe it would also result in physical
15	waste?
16	A. I believe so. You're not going to be able to
17	fully develop the field.
18	Q. Okay. Do you think the extension of these rules
19	would adversely affect Is it your opinion that the
20	extension of these rules would adversely affect correlative
21	rights?
22	A. I don't believe it would, because any other
23	operator in the area in that pool would have the same
24	ability to produce their wells to higher GOR.
25	Q. Okay. Mr. Stubbs, were Strata Exhibits I through

1	XV prepared by you or under your supervision or direction?
2	A. Yes, they were.
3	MR. CAVIN: Mr. Examiner, I move that Strata
4	Exhibits I through XV be admitted.
5	EXAMINER CATANACH: Exhibits I through XV will be
6	admitted.
7	MR. CAVIN: And I have no further questions for
8	Mr. Stubbs at this time.
9	EXAMINATION
10	BY EXAMINER CATANACH:
11	Q. Okay. Mr. Stubbs, the East Loving-Brushy Canyon
12	Pool, is that currently being developed on a higher GOR
13	than 2000 to 1?
14	A. That pool presently has 8000-to-1 GOR limits. I
15	believe those were approved back in 1993.
16	Q. Okay. Do you know if that's on a permanent basis
17	for that pool?
18	A. Yes, it is, I believe so.
19	Q. It is. And the You're producing the same
20	interval in the Nash Draw as is being produced in the East
21	Loving Delaware?
22	A. That's correct, it's the basal Brushy Canyon,
23	what we're calling the "K" and "L" zones, "K", "K2" and
24	"L".
25	In our previous testimony, the geologist

20

correlated those and had a cross-section. There's probably 1 2 one in your file. Those sands -- Is it the same sands that are 3 ο. 4 found in both pools? 5 They correlate, yes. We don't know what happens Α. in between there, but they correlate very well on the logs. 6 Are the "K" and "L" sands separated and not in 7 Q. 8 communication with each other? 9 Α. I believe that's correct. We just got through 10 doing a 200-foot full core of the "K" and "L" interval, and there's many shale barriers. It's a laminated -- highly 11 12 laminated sands, and there's many shale barriers even in the -- like the "K" and "L" interval themselves. There's 13 many separate reservoirs in those intervals. 14 So do these separate reservoirs exhibit the same 15 ο. reservoir characteristics? 16 Yes, they do, very similar. In the early stages 17 Α. of the development of this reservoir, we did the zones 18 separately . We would complete the "K" zone or the "L" 19 zone and produce it for a few months and come back and do 20 the "K" zone, and the production is very similar. 21 22 Presently, we just perforate it all and frac it 23 all at one time. 24 Q. You've seen no evidence in any of the separate 25 reservoirs of the presence of any type of gas cap?

1	A. No.
2	Q. The PVT data was at What was that run on? Was
3	that run on full in a well that had both the "K" and "L"
4	sands
5	A. That's correct.
6	Q completed?
7	A. Yeah, that was the Number 19. I believe the "K"
8	and "L" zone were completed together. Right, from 6721 to
9	6830.
10	Q. Okay, you mentioned 11,000 to 1 as being the
11	current GOR for the pool?
12	A. The 11,000 to 1 is what's presently being
13	produced in the East Loving Pool. Our
14	Q. That's the average?
15	A. Yes. If you'll turn to Exhibit I-C, the little
16	stairstep curve is just above 10,000 to 1.
17	Q. Okay, that's the East Loving Pool?
18	A. That's the East Loving. Our present GOR on a
19	field average is about 6300 to 1.
20	Q. Is the East Loving a much older pool?
21	A. Yes, it was its development really started
22	If you'll notice on that curve, production really started
23	to peak or climb up in 1989, so it's got about three more
24	years' production than the Nash Draw. Nash Draw started in
25	1992.

1	Q. Do you feel like it's the age of those wells that
2	are dictating the high GORs in that east half of Section
3	13?
4	A. I believe that's correct. Those wells have been
5	producing the longest, and they're also on the closest
6	spacing. So the reservoir pressure is lower in that area,
7	and more gas has been liberated from the oil.
8	Q. Now, you mentioned Let's see. The 2963, was
9	that the initial bottomhole pressure?
10	A. That's correct.
11	Q. Okay.
12	A. That was measured in the Number 19 well, up in
13	Section 12.
14	Q. What is the reservoir pressure at this time?
15	A. We haven't run a pressure buildup recently, so I
16	don't know. We're scheduled to do that probably on the
17	next well.
18	Q. Well, have you seen evidence that shows that the
19	wells in the east half of Section 13 do have a lower
20	bottomhole pressure?
21	A. Just by the production and the GOR. If you go
22	back to the completion schedule on the PVT data, you can
23	see how much gas would be released, you know, a certain
24	pressure. So you can kind of draw a conclusion as what the
25	pressure is in that area.

1	Q. How many operators are in the pool? Do you know?
2	A. Just two. Strata has the wells on the Nash Draw
3	Unit, and then BK Exploration has just recompleted or
4	drilled one well in 24 and then recompleted another well in
5	24.
6	But both of those wells, if you'll turn to
7	Exhibits IX-N and IX-O, that's the production on the BK
8	wells. They started at about 30 barrels a day and have
9	promptly dropped off. So they're right on as our map
10	indicates, they're right on the edge of the sand.
11	Q. Have you guys been in contact with those
12	operators, or with that operator?
13	A. I haven't personally. The geologists have talked
14	to them, but I haven't.
15	Q. You're not aware that they're opposed in any form
16	or fashion to this?
17	A. I don't think so. In fact, they're not real
18	happy with what they have, so I don't think they're going
19	to do much more, the way it sounds.
20	Q. Do you anticipate having to come back in and
21	getting an increased GOR for this pool?
22	A. I don't anticipate that. As the oil production
23	continues to decline and the GOR goes up, we're still going
24	to be at 8000 to 1 GOR. That would allow us to produce
25	about 1.1 million per well, so that should pretty well

1 cover us. 2 Also, we're in the process, as I mentioned, of doing a reservoir simulation, and hopefully that will lead 3 4 us to some kind of secondary or enhanced recovery project 5 on this field. The reservoir simulation is to -- for what 6 ο. 7 purpose? We want to determine -- Well, two or three main 8 Α. Number one, what's the optimum spacing? We're not 9 things. 10 sure of that yet. It's definitely not 30 acres, and it's 11 probably -- We're drilling them on approximately 80-acre 12 spacing now, and that may be a little bit too big a 13 So we want to determine the optimum spacing. spacing. 14 We also want to determine if some kind of 15 secondary or enhanced recovery project is economical or feasible, and then of course what kind of recoveries we 16 17 might get from that. Tell me again about your -- the model that you 18 Q. constructed for the Delaware. 19 Which exhibit are you --20 Α. Well, generally, I'm just looking at IX-A, but 21 0. 22 that does have the Delaware model on it, right, the upper portion of that curve. 23 24 Α. Yes, the solid black line is the model, 25 superimposed over the production.

1	Q. And the solid black line, that is the GOR?
2	A. No, the solid black line is the oil production.
3	Q. Okay.
4	A. The GOR is the little stairstep curve there in
5	the middle, and it's right now about 16,000 to 1 on that
6	Number 1 well.
7	Q. Okay, the top area of that curve, that's the
8	Delaware model you put together?
9	A. Yeah, the heavy straight line is the Delaware
10	model.
11	Q. And on that you've got plotted the oil decline
12	in oil production?
13	A. That's correct, the solid black line, the jagged
14	line, is the oil production.
15	Q. Okay. What data did you use to construct that?
16	A. Well, that goes back to If you go back to
17	Exhibit 13, when we originally developed this model, we
18	looked at every year of Delaware production from 1985 to
19	present and did a curve-fit, just like we did in this
20	this is 1987 completions and came up with this model.
21	Then we took it farther and applied it to each
22	Delaware field and found that that model pretty well fit
23	the fields. There's about 20 or 25 percent of Delaware
24	wells that this doesn't work on, and probably half of those
25	are kind of the poor Delaware wells, and they just drop off

1	and they don't ever flatten out.
2	And there's another group that actually has some
3	water influx, and the pressures are kept up, and it has
4	fairly stable production.
5	Q. Mr. Stubbs, from the data that you've looked at
6	and analyzed, you do have an opinion that this production
7	at this GOR is not going to decrease the ultimate recovery
8	of oil from the pool?
9	A. I believe that's correct. I don't think it's
10	rate-sensitive.
11	Q. Are there going to be more wells drilled?
12	A. Yes, we drill about two to four wells a year out
13	there, and next year we're planning on drilling four wells.
14	Q. So you've really you've not found the edge of
15	the reservoir?
16	A. No, the only edge that we've found is in the "K"
17	interval on the southeast side where we hit a transition
18	zone in the Number 20 well, and we're seeing a higher water
19	saturation. So the "K" zone probably doesn't extend down
20	to that southeast side. We have not found any oil-water
21	contact or boundaries in the "L" zone as of yet.
22	There's many other problems out there. We're in
23	the potash area, and there's some areas we're either going
24	to have to directionally drill or not be able to drill, and
25	we have to contend with surface problems like playa lakes.

27

So it's getting to be pretty difficult to get wells drilled 1 in there. 2 EXAMINER CATANACH: Okay. I believe that's all I 3 have, Mr. Cavin. The witness may be excused. 4 Is there anything further that you have in this 5 case? 6 7 MR. CAVIN: No, Mr. Examiner. EXAMINER CATANACH: Okay. There being nothing 8 9 further, Case 10,935 will be taken under advisement. (Thereupon, these proceedings were concluded at 10 9:00 a.m.) 11 12 * * * 13 14 15 I de bran a que se recent the foregoing is 16 a co proceedings in the 👘 cse No. 10435 17 hears mar 16 1991 18 . Examiner **Cil** Conservation Division 19 20 21 22 23 24 25

CERTIFICATE OF REPORTER

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

I, Steven T. Brenner, Certified Court Reporter and Notary Public, HEREBY CERTIFY that the foregoing transcript of proceedings before the Oil Conservation Division was reported by me; that I transcribed my notes; and that the foregoing is a true and accurate record of the proceedings.

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

WITNESS MY HAND AND SEAL November 19th, 1995.

STEVEN T. BRENNER CCR No. 7

My commission expires: October 14, 1998