LEWIS B. BURLESON PRESIDENT LEWIS B. BURLESON, INC. OIL & GAS PROPERTIES BOX 2479 - PHONE 683-4747 MIDLAND, TEXAS 79702 June 27, 1984



Oil Conservation Division P.O. Box 2088 Santa Fe, NM 87501

Attn: Mr. Joe Ramey

Case 8294

Re: Harrison # 2 Unit N, Section 25, T-24-S, R-36-E, Lea County, New Mexico

Gentlemen:

Enclosed for your review and approval please find our Application for Classification as a Hardship Gas Well on the above referenced well, together with the necessary supporting data.

By copy of this letter we are forwarding copies of this application to the working interest owners, the purchaser (El Paso Natural Gas Company), the District office of the Commission and all off-set operators.

If you have any questions please do not hesitate to contact me.

Yours very truly,

Iten Barbson

Steven L. Burleson

cc: Oil Conservation Division Box 1980 Hobbs, NM 88240 El Paso Natural Gas Co. Box 1492 El Paso, TX 79978

WORKING INTEREST OWNERS

Doyle Hartman Box 10426 Midland, TX 79702 Jack Huff Box 471 Midland, TX 79702

## OFF-SET OPERATORS

Doyle Hartman Box 10426 Midland, TX 79702

Sun Oil Company Box 1861 Midland, TX 79702

Millard Deck Estate Eunice, New Mexico 88321 Getty Oil Company Two Midland National Center Midland, TX 79701

Shell Oil Company 600 N. Marienfeld, Suite 310 Midland, TX 79701

Convest Energy Corp. 2401 Fountain View Drive, Suite 700 Houston, TX 77057 APPLIERS FOR FOR MANAGERS AND MARDSHEET GAS WILLS

Cuse 8.294

Operator	Lewis B. Burleson, Inc.	Contact Party Lewis B. Burleson									
Address_	P.O. Box 2479, Midland, TX 79702	Phone No. 915-683-4747									
Lease	Harrison Well No. 2 UM	N Sec. 25 TWP 24-S RGE36-E									
Pool Same	Jalmat Gas Pool	Minimum Rate Requested 110 MCFPD									
Transport	er Name El Paso Natural Gas Company	Purchaser (if different)									

Are you seeking emergency "hardship" classification for this well? <u>y</u> yes no

Applicant must provide the following information to support his contention that the subject and a hardship gas well.

Provide a statement of the problem that leads the applicant to believe that "underground waste" will occur if the subject well is shut-in or is curtailed below its ability to produce. (The definition of underground waste is shown on the reverse side of this form)

- 2) Document that you as applicant have done all you reasonably and economically can do to eliminate or prevent the problem(s) leading to this application.
  - a) Well history. Explain fully all attempts made to rectify the problem. If no attempts have been made, explain reasons for failure to do so.
  - b) Mechanical condition of the well(provide wellbore sketch). Explain fully mechanical attempts to rectify the problem, including but not limited to:
    - i) the use of "smallbore" tubing; ii) other de-watering devices, such as plunger lift, rod pumping units, etc.

Present historical data which demonstrates conditions that can lead to waste. Such data should include:

- a) Permanent loss of productivity after shut-in periods (i.e., formation damage).
- b) Frequency of swabbing required after the well is shut-in or curtailed.
- c) Length of time swabbing is required to return well to production after being shut-in.
- d) Actual cost figures showing inability to continue operations without special relief
- 4) If failure to obtain a hardship gas well classification would result in premature abandonment, calculate the quantity of gas reserves which would be lost
- 5) Show the minimum sustainable producing rate of the subject well. This rate can be determined by:
  - a) Minimum flow or "log off" test; and/or
  - b) Documentation of well production history (producing rates and pressures, as well as gas/water ratio, both before and after shut-in periods due to the well dying, and other appropriate production data).
- 6) Attach a plat and/or map showing the proration unit dedicated to the well and the ownership of all offsetting acreage.
- 7) Submit any other appropriate data which will support the need for a hardship classification.
- 8) If the well is in a prorated pool, please show its current under- or over-produced status.
- 3) Attach a signed statement certifying that all information submitted with this application is true and correct to the best of your knowledge; that one copy of the application has been submitted to the appropriate Division district office (give the name) and that notice of the application has been given to the transporter/purchaser and all offset operators.

EXHIBIT "B"

CASE NO.

1) Definition of Undergroun( aste.

"Underground Waste as those words are generally understood in the oil and gas business, and in any event to embrace the inefficient, excessive, or improper use or dissipation of the reservoir energy, including gas energy and water drive, of any pool, and the locating, spacing, drilling, equipping, operating, or producing, of any well or wells in a manner to reduce or tend to reduce the total quantity of crude petroleum oil or natural gas ultimately recovered from any pool, and the use of inefficient underground storage of natural gas."

- 2) The only acceptable basis for obtaining a "hardship" classification is prevention of waste with the burden of proof solely on the applicant. The applicant must not only prove waste will occur without the "hardship" classification, but also that he has acted in a responsible and prudent manner to minimize or eliminate the problem prior to requesting this special consideration. If the subject well is classified as a "hardship" well, it will be permitted to produce at a specified minimum sustainable rate without being subject to shut-in by the purchaser due to low demand. The Division can "ascind approval at any time without notice and require the operator to show cause why the classification should not be permanently rescinded if abuse of this special classification becomes apparent.
- 3) The minimum rate will be the <u>minimum sustainable</u> rate at which the well will flow. If data from historical production is insufficient to support this rate (in the opinion of the Director), or if an offset operator or purchaser objects to the requested rate, a minimum flow ("log off") test may be required. The operator may, if he desires, conduct the minimum flow test, and submit this information with his application.
- 4) If a minimum flow test is to be run, either at the operator's option or at the request of the Division, the offset operators, any protesting party, the purchaser and OCD will be notified of the date of the test and given the opportunity to witness, if they so desire.
- 5) Any interested party may review the data submitted at either the Santa Fe office or the appropriate OCD District Office.
- 6) The Director can approve uncontested applications administratively if, in his opinion, sufficient justification is furnished. Notice shall be given of <u>intent to approve</u> by attaching such notice to the regular examiner's hearing docket. Within 20 days following the date of such hearing, the affected parties will be permitted to file an objection. If no objection has been filed, the application may be approved.
- 7) Should a protest be filed in writing, the applicant will be permitted to either withdraw the application, or request it to be set for hearing.
- 8) An emergency approval, on a temporary basis for a period not to exceed 90 days, may be granted by the District Supervisor, pending filing of formal application and final action of the OCD-Director. This temporary approval may be granted only if the District Supervisor is convinced waste will occur without immediate relief. If granted, the District Supervisor will notify the purchaser.
- After a well receives a "hardship" classification, it will be retained for a period of one year unless rescinded sooner by the Division. The applicant will be required to certify annually that conditions have not changed substantially in order to continue to retain this classification.
- 10) Nothing here withstanding, the Division may, on its cwn motion, require any and all operators to show cause why approval(s) should not be rescinded if abuse is suspected or market conditions substantially change in the State of New Mexico.
- 11) A well classified as a "hardship well" will continue to accumulate over and under production (prorated pools). Should allowables exceed the hardship allowable assigned, the well will be permitted to produce at the higher rate, if capable of doing so, and would be treated as any other non-hardship well. Any cumulative overproduction accrued either before or after being classified "hardship" must, however, be balanced before the well can be allowed to produce at the higher rate.

## APPLICATION FOR CLASSIFICATION AS HARDSHIP GAS WELL

1. That Lewis B. Burleson, Inc. Harrison # 2, Jalmat Gas Producer in Unit N, Section 25, Township 24 South, Range 36 East, Lea County, New Mexico should be granted a Hardship Gas Well classification because the Yates formation produces a large volume of water with the gas. Underground waste will occur if this well is not continuously produced so as to remove the large volumes of water. Reservoir engineering studies have proved that the Yates formation is sensitive to shut-in periods where the formation is being drowned with formation water. Therefore loss of gas reserves will occur if this water is not continuously removed from this formation along with the gas.

2. (a & b) This well was drilled in January of 1978 to a TD of 3620' and completed in the Queen sand from perforations from 3502 to 3578. Within six months the Queen section went to water and the well was plugged back to the Yates formation and perforated from 2895 to 3094 in April of 1979. The well was completed for 532 MCFPD. Within a two week period this well was dead due to the encroachment of large volumes of water. Gas production for July 1979 was 3500 MCF, for August 1979 - 3000 MCF, for September 1979 - 3200 MCF and for October 1979 2700 MCF. At that juncture the well was put on a large pumping unit and approximately 200 bbls. of water per day has been produced along with the gas from this formation. Showing the effects of the pumping unit, for November 1979 the gas produced was 12,000 MCF. Attached is a well bore sketch showing the plug back depth and the Yates perforations, and a production curve showing these above gas volumes.

3. a. Production history of the Harrison # 2 shows that when this well is shut-in for periods exceeding five days we must pump water at a rate of 200+ bbls. for a three to four day period before we can bring the gas back on production.

Because of the swelling clays and moderellirite present in the Yates, water that is not removed from the formation will lower the permeability of this formation and loss in productivity will occur. This characteristic of the Yates sand is well documented.

3. b. Because of the large volume of water, this well was put on the pump. Only downhole pumping equipment can handle 200 bbls. of water daily.

The large investment for pumping equipment was decided upon because of the water volumes. Swabbing this well would have had pro hibitive cost and not solved our problem. Putting gas wells on the pump is becoming common practice in the Jalmat Gas Field.

4. It is important to obtain a hardship gas well classification if we are to recover the full amount of reserves that should be obtained from this borehole. It appears from thorough reserve studies of this well that one-half of our projected remaining gas reserves will be lost if this well is permitted to be shut-in for periods by the purchaser. There appears to be approximately 238,000 MCF of recoverable gas left, which would show a loss of 119,000 MCF if special relief is not obtained.

5. Enclosed is a production history over the last two years which shows that the minimum producing rate is approximately 110 MCFPD.

THE STATE OF TEXAS COUNTY OF MIDLAND

I, Steven L. Burleson, Vice-President of Lewis B. Burleson, Inc., do hereby certify that all of the information submitted with this application for classification of our Harrison No. 2 well as a Hardship Gas Well is true and correct to the best of my knowledge and that notice of this application has been given to El Paso Natural Gas Company, the transporter/ purchaser, to the Hobbs District Office of the Oil Conservation Division and all off-set operators of this producing well.

Stern Durle

SWORN to and subscribed before me this 27th day of June, 1984.



Notary Public, State of Texas

DATE 6-18-84 WELL NO. 2 LEASE MARRISON FIELD JALMAT YATES 878" 23" CASING Set at. 1165: (mt w/ 550 sts. Circ. cmt. 23%" theg. set at 2905' "2x 144 x 12' set at 2905' E Perf. 2895 - 3094' Acidize with 1500 gal. FRAC w/ 50,000 gab. wtre + 50,000 lbs. SANd. Set CIBP At 3490'. Perf 3502-3578'. Acidize w/ 1250 gAls. - 41/2" 10.5" CASING Set At 3620'. Cont w/ 300 sks.

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