

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

28 November 1984

EXAMINER HEARING

IN THE MATTER OF:

Application of Samson Resources  
Company for compulsory pooling  
and an unorthodox location, Lea  
County, New Mexico.

CASE  
8421

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation  
Division:

Jeff Taylor  
Attorney at Law  
Legal Counsel to the Division  
State Land Office Bldg.  
Santa Fe, New Mexico 87501

For the Applicant:

W. Thomas Kellahin  
Attorney at Law  
KELLAHIN & KELLAHIN  
P. O. Box 2265  
Santa Fe, New Mexico 87501

1  
2  
3 MR. STOGNER: We will call next  
4 Case Number 8421.

5 MR. TAYLOR: The application of  
6 Samson Resources Company for compulsory pooling and an  
unorthodox location, Lea County, New Mexico.

7 Applicant has requested that  
8 this case be continued.

9 MR. STOGNER: Case Number 8421  
10 will be continued and readvertised for the Examiner Hearing  
11 scheduled for December 19th, 1984.

12 (Hearing concluded.)  
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## C E R T I F I C A T E

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

Sally W. Boyd CSR

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 8421,  
heard by me on November 28 1984.

Michael E. Stogner, Examiner  
Oil Conservation Division

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

19 December 1984

EXAMINER HEARING

IN THE MATTER OF:

|                                     |      |
|-------------------------------------|------|
| Application of Samson Resources     | CASE |
| Company for compulsory pooling, and | 8421 |
| an unorthodox location, Lea County, |      |
| New Mexico.                         |      |

BEFORE: Gilbert P. Quintana, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

|                          |                                 |
|--------------------------|---------------------------------|
| For the Oil Conservation | Jeff Taylor                     |
| Division:                | Attorney at Law                 |
|                          | Legal Counsel to the Commission |
|                          | State Land Office Bldg.         |
|                          | Santa Fe, New Mexico 87501      |

|                    |                            |
|--------------------|----------------------------|
| For the Applicant: | W. Perry Pearce            |
|                    | Attorney at Law            |
|                    | MONTGOMERY & ANDREWS       |
|                    | Paseo de Peralta           |
|                    | Santa Fe, New Mexico 87501 |

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I N D E X

CHARLES L. LUNDEEN

|                                   |   |
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GEORGE LAMBERT

|                                   |    |
|-----------------------------------|----|
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3 MR. QUINTANA: We'll call next  
4 Case 8421.

5 MR. TAYLOR: Application of  
6 Samson Resources Company for compulsory pooling and an unorthodox location, Lea County, New Mexico.

7 MR. PEARCE: May it please the  
8 Examiner, I am W. Perry Pearce of the law firm of Montgomery  
9 and Andrews, P. A., Santa Fe, New Mexico, appearing on behalf of the applicant.

10  
11 I have two witnesses who need  
12 to be sworn.

13 MR. QUINTANA: I don't think  
14 there's any other appearances in here.

15 (Witnesses sworn.)

16  
17 CHARLES E. LUNDEEN,  
18 being called as a witness and being duly sworn upon his  
19 oath, testified as follows, to-wit:

20 DIRECT EXAMINATION

21 BY MR. PEARCE:

22 Q Thank you, sir. For the record would  
23 you please state your name, employer, and position of employment?  
24

25 A My name is Charles E. Lundeen, L-U-N-D-E-

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E-N.

I'm a landman for Samson Resources Company.

Q Mr. Lundeen, have you previously testified before the New Mexico Oil Conservation Division or one of its Examiners?

A No, I haven't.

Q Would you please briefly for us describe your educational background and work experience?

A I graduated from the University of Oklahoma in 1979 with a Bachelor's degree in business administration, PLM.

I worked for Monsanto Petrochemical; worked for them for a year.

Worked for Union Oil Company of California for a year in Lafayette, Louisiana.

Worked for Amerada Hess Corporation.

Worked for Cotton Petroleum Corporation, and I worked for Samson Resources, all as a landman.

Handled Texas, New Mexico, Oklahoma, Louisiana, and Arkansas.

Q Okay, sir. Would you please briefly describe what it is that applicant seeks in this case?

A We seek -- Samson is wanting to drill a 9750 foot test on the northwest quarter of Section 8, 9 South, 34 East, Lea County.

There's one party in there. It's an in-

1  
2 interest that we cannot ascertain as to who owns at this  
3 point.

4 We feel we knew who owns it and we con-  
5 tacted them and they have denied owning it.

6 It's an unusual situation.

7 The company who has record title is Dela-  
8 ware Apache Corporation. Delaware Apache Corporation was  
9 subsequently Natomas North America and Natomas North America  
10 has turned over all their interest to Apache Corporation and  
11 Apache hasn't got this in their filing system yet. They  
12 deny that they own it.

13 But we, Samson owns 100 percent of the  
14 unit except for this 20-acre tract.

15 Q Do you also seek an unorthodox location?

16 A Yes.

17 Q What is that location?

18 A Our location is 525 feet from the west  
19 line and 330 feet from the north line.

20 Q And as part of the pooling you also seek  
21 consideration of allocation of well costs, operating costs,  
22 charges for supervision, and charge for risk, is that cor-  
23 rect?

24 A That's correct.

25 Q All right, sir. At this time would you  
please turn to what's been marked as Exhibit Number Two and  
point out for the Examiner the location of the proposed  
well?



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A This is it right here.

Q Yes, sir. That is the triangle symbol in the northwest quarte of Section 8, 9 South, 34 East, is that correct?

A That's correct.

Q All right, sir. What is the objective formation of this well?

A This is a Penn Bough C, 9750 feet, I think.

Q And the interest which your records reflect should be held by Apache Corporation is the only interest you seek to pool in this proceeding, is that correct?

A That's correct.

Q All right, will you please turn to what we've marked as Exhibit Number One to this proceeding? That is a letter to Natomas North American. Would you briefly summarize once again your attempt to trace down ownership of this parcel?

A We sent it to Natomas. Natomas advised us that it had gone to Apache.

We sent a copy of the letter to Apache, talked to them. They do not show it in their filing system. They do not have record of this interest. They said they can't do anything.

We've contacted it and we've called them and they're denying it.

We called the broker who bought the

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lease. He said, yes, I bought it for Delaware Apache, which they should have it.

And so until such time as they get it in their filing system, I guess, they -- they have just not claimed it.

And they're aware of what we're doing.

Q Okay. Mr. Lundeen, what is the total estimated cost of this well?

A The total well cost is \$663,300.

Q Okay.

MR. PEARCE: Mr. Examiner, we have not marked the proposed AFE as an exhibit. We do, however, have one, and I would propose to mark that as our last numbered exhibit subsequent to the hearing, if I may.

Q Mr. Lundeen, what are Samson Resources usual charges for overhead during drilling and producing of wells?

A Our drilling well rate for a well at this depth, a gas well, is \$4350 and the producing well rate at this depth is \$585.

Q And in your opinion are those rates reasonable for a depth of this -- for a well of this depth?

A Yes.

Q And do you propose that those rates be included in any order issued by the Division in this matter?

A Yes, I do.

MR. PEARCE: Mr. Examiner, we

1 have nothing further of this witness at this time.

2 MR. QUINTANA: What -- didn't  
3 you want to mark this now, Exhibit Number Six, I assume it  
4 is?

5 MR. PEARCE: That becomes Num-  
6 ber Eight, Mr. Examiner.

7  
8 CROSS EXAMINATION

9 BY MR. QUINTANA:

10 Q I have a question for you, Mr. Lundeen.

11 A Okay.

12 Q On what do you base your determination  
13 that these costs are within line?

14 A The drilling well rate?

15 Q The drilling well rate, the producing  
16 rate?

17 A We just have a set company policy as to  
18 depth in a gas or oil well, and I don't really know how they  
19 were determined.

20 It's -- we -- we make company surveys.  
21 It's done by our drilling department.

22 MR. PEARCE: Excuse me, if I  
23 may, Mr. Examiner, can I get in the middle of this?

24 Are those the rates that are  
25 usually charged by Samson Resources for wells to this depth  
which it operates in other producing areas?

A Yes.

1  
2 MR. PEARCE: And that -- that  
3 is in fact the set company rate which is applied to all of  
4 their wells at this depth and the rate varies depending upon  
5 the depth of the well, is that correct?

6 A That's correct.

7 MR. PEARCE: Thank you, sir.  
8 Nothing further, Mr. Examiner. I apologize for interrup-  
9 ting.

10 MR. QUINTANA: I don't have  
11 anything further of the witness either.

12 Anybody else have anything?

13 CROSS EXAMINATION

14 BY MR. TAYLOR:

15 Q Did you give actual notice to them of  
16 compulsory pooling?

17 MR. PEARCE: Yes, sir, they  
18 were told that we were proceeding to this step if we could  
19 not get them into the case -- I'm sorry.

20 You will notice by the applica-  
21 tion, Mr. Examiner, that there are a number of other compan-  
22 ies listed as being pooled. Those companies have all either  
23 joined or agreed to join in the future, and so we are not  
24 attempting to pool those interests.

25 Q Either a copy of that or a letter went  
to Natomas or Delaware Apache, whoever they are?

MR. PEARCE: Yes.

1  
2 MR. TAYLOR: Is there a copy of  
3 that in our file?

4 MR. PEARCE: I'm not sure but  
5 we'll provide that, sir.

6 MR. TAYLOR: Okay, thank you.

7 A I've got an exhibit where -- do they have  
8 the exhibit where the letter came back?

9 MR. QUINTANA: Where it says no  
10 such address?

11 MR. PEARCE: Yes.

12 A Yes.

13 MR. PEARCE: That was initially  
14 sent to Natomas, was then forwarded to Apache Corporation.

15 MR. TAYLOR: But that doesn't  
16 inform them that you're going to compulsory pool, and if you  
17 did send a letter we need a copy of that.

18 A Okay, I can get that for you.

19 MR. QUINTANA: I have no fur-  
20 ther questions of the witness.

21 He may be excused.

22 MR. PEARCE: Thank you, sir.

23 GEORGE LAMBERT,  
24 being called as a witness and being duly sworn upon his  
25 oath, testified as follows, to-wit:

## DIRECT EXAMINATION

BY MR. PEARCE:

Q Would you please state your name, employer, and position?

A My name is George Lambert. I am a geologist with Samson Resources Company in Tulsa, Oklahoma.

Q Mr. Lambert, let's begin, if you would direct your attention, please, to what's been marked as Exhibit Number Two to this proceeding. Discuss that for the Examiner, please, and the information contained on it.

A This is a production map of the wells immediately surrounding the 160-acre unit that we are trying to set up in the northwest quarter of Section 8.

What is shown is the cumulative oil production and any average daily production rate on existing or wells that are currently still producing, as well as cumulative gas production on those wells.

One thing that I might point out in just visibly looking at this map, as you can see, most of the wells on here have been depleted and plugged and those wells that are still producing are at a close to economic limit.

We're looking at a mature reservoir that is largely drained at this point.

Q All right, sir, let's refer now to what's been marked as Exhibit Number Three. Would you discuss that briefly, please?

A Okay. This is a subsurface structure map

1  
2 with respect to sea level.

3                   What is shows is regional southeast dip.  
4 There is no visible structuring occurring within the forma-  
5 tion on which this map is made, which is the top of the Penn  
6 Bough C limestone.

7                   Our location, in the northwest quarter of  
8 Section 8, is anticipated at a -5300 foot subsea depth and  
9 which puts it basically on strike to wells -- the two wells  
10 up in Section 5, the south half of Section 5, as well as the  
11 two wells in the north half of Section 7 to the west.

12                   Q           Okay, let's now -- let's now look at Ex-  
13 hibit Number Four, and if you'll discuss that, please, sir.

14                   A           This is an Isopach map showing the gross  
15 interval of the Penn Bough C limestone in the area sur-  
16 rounding the proposed location.

17                   Basically what this map shows is that  
18 there are -- the zone is relatively uniform throughout the  
19 area. There are no wells in here in which the zone has been  
20 found absent.

21                   What it shows is basically that we are  
22 anticipating a thickness of somewhere between about 25 to  
23 about 28 feet, or so.

24                   Q           All right, sir.

25                   A           Gross thickness.

26                   Q           And Exhibit Number Five, is that the  
27 basis upon which Exhibit Number Four was prepared?

28                   A           Yes, this is more or less a -- shows the

1 wells within the immediate offset. In fact, they're -- if  
2 you'll look on the little index map to the -- on the cross  
3 section there, if you'll locate Section 8, our proposed lo-  
4 cation in the northwest quarter there, you can see that this  
5 cross section, basically, kind o rings around that location  
6 there with the wells to north, east, and south.

7 Q Anything else you'd like to comment on  
8 about that exhibit at this time?

9 A Basically it just shows the uniform na-  
10 ture of the zone. It shows what tests were conducted on  
11 each of these wells, what intervals were perforated.

12 It also shows a couple of the dry holes  
13 in here, and we may refer back to this later in terms of  
14 discussing the inherent risk in terms of finding porosity  
within this formation.

15 Q All right, sir. With regard to porosity,  
16 then, let's turn to what has been marked as Exhibit Number  
17 Six, if you would, please.

18 A This is an Isopach map of the thickness  
19 of porosity greater than, or equal to four percent within  
20 the Bough C limestone interval.

21 What is shows is that there's about a  
22 maximum thickness in this area of around 15 to 16 feet of  
23 porosity. The proposed location we have mapped somewhere in  
24 the vicinity of about 10 to 12 feet of porosity through  
there.

25 There is a dry hole in the -- or a string



1 of dry holes in the north half of Section 5, extending on  
2 into Section 6, and there's a little isolated dry hole in  
3 the southeast of the northwest of Section 8, which lies  
4 within the 160-acre unit that we are trying to put together  
5 in there, and the part of the -- the purpose of this map is  
6 to illustrate the potential risk in terms of finding poros-  
7 ity within the Bough C limestone.

8 Q All right, sir, with regard to that risk,  
9 in view of the dry holes in the sections immediately north  
10 and the dry hole to the direct southeast of your proposed  
11 location, do you believe that the maximum statutory penalty  
12 of 200 percent is appropriate for imposition on the pooled  
interest?

13 A Yes, I do, for this and other reasons.

14 Q All right, sir, would you like to discuss  
15 --

16 A The other --

17 Q -- them?

18 A The other reason being primarily the po-  
19 tential for depletion within the formation here.

20 There are wells to the north and to the  
21 west here and once again, this is largely a depleted reser-  
22 voir and these wells have produced a substantial amount of  
oil and potential does exist in here for depletion.

23 The well in the southeast of the south-  
24 east of Section 5 there, which shows 12 feet of porosity,  
25 was a TXO well that was drilled back in 1983, and in refer-

1  
2 ring back to Exhibit Number Three, which is the structure  
3 map, you can see that well fell down dip from the two pro-  
4 ducing wells in the south half of Section 5, and that TXO  
5 well was on production test substantially drained.

6 And so there is a distinct inherent risk  
7 in here of significant drainage, and this is one reason why  
8 we feel we need to move as far to the northwest of Section 8  
9 as we can.

10 Q All right, sir. In addition to moving to  
11 the northwest for that reason, would you now address --  
12 focus your attention, please, on what's been marked as Exhi-  
13 bit Number Seven.

14 A Right.

15 Q And discuss that for the Examiner?

16 A This is a map showing the location of a  
17 salt water disposal system in the immediate area of our pro-  
18 posed location. In fact, our original location had been  
19 chosen on this map, as indicated here, at 600 feet from the  
20 north line, 525 feet from the west line.

21 In staking this location our field per-  
22 sonnel determined that there was a pipeline in the area and  
23 that we were going to have to move our location either north  
24 or south.

25 A south, moving to the south would have  
put us at a less preferable structural position or an unac-  
ceptable structural position, and so we at that point moved  
the location, proposed location, to 330 from the north line

1 and 525 from the west line at that time.

2  
3 After that point, we were able to obtain  
4 this plat showing the actual location of the -- the particu-  
5 lar salt water disposal line that was causing our problem  
6 and as the tract, the little square around our proposed lo-  
7 cation shows, we lie within that area that they would prefer  
8 that we stay out of in drilling that or in drilling our  
9 well.

10 Q And in fact, in view of the state of this  
11 reservoir and your estimate as to structure, you believe  
12 that this unorthodox location is more appropriate?

13 A Right, yes, sir.

14 Our main reason for needing to move, in  
15 addition to the problems that we would have in locating next  
16 to this pipeline, would be the necessity for gaining the  
17 structure that we feel would be necessary to avoid signifi-  
18 cant drainage.

19 Q And the proposal of Samson Resources in  
20 this matter is that Samson Resources be named the operator  
21 of this well, is that correct?

22 A Yes, sir.

23 Q Do you have anything further that you  
24 would like to address to the Examiner?

25 A One -- one additional thing, and that  
would be in terms of the risk involved in drilling a well  
here, concerning the aspect of depletion, and that would be  
that in drilling the well we would not be able to determine

1 the -- whether the reservoir was drained except by at-  
2 tempting to complete the well, and from that standpoint,  
3 that adds substantially to your risk dollars that you're  
4 considering in terms of drilling the well, and I would add  
5 that as a point in terms of our feeling the necessity of the  
6 maximum penalty.

7 Q Thank you, sir.

8 MR. PEARCE: Mr. Examiner, we  
9 have nothing further on direct.

10 At this time I would move that  
11 Samson Resources Exhibit One -- Exhibits One through Eight  
12 be admitted.

13 MR. QUINTANA: Exhibits One  
14 through Eight will be admitted into evidence.

15 CROSS EXAMINATION

16 BY MR. QUINTANA:

17 Q To the northeast and to the southwest of  
18 the well, the proposed well, I notice there's -- it shows on  
19 your Exhibit Number Two, it shows cumulative production of  
20 oil in terms of average daily oil production and gas produc-  
21 tion next to each of the wells.

22 A Right.

23 Q And noticing to the northwest, to the  
24 northeast of the proposed injection -- producing well, the  
25 M. L. Brown Well produced 205,892 barrels of oil and the one  
right next to that, directly east of that one, produced

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146,534 barrels of oil.

A Yes, sir.

Q Relatiavely close together.

Looking to the southwest, the lease in Section 7 to the southwest, the P&A'd well there in the furthest to the northeast of Section 7, northwest of Section 7, produced 170,118, and the one directly east of that well produced 145,925, and directly south of that produced 150,588.

The point I was trying to make was all these wells are relatively close together, producing substantial amount of oil.

A Right.

Q In light of that fact, taking into account the large distance between those wells to the northeast and the southwest, do you still -- is it still your professional opinion that you will have occurred -- drainage will have occurred in that area, to the -- to allow me to grant the maximum penalty for risk?

A Yes, sir. The reason why is because these wells were all drilled within a relatively short span of time, ranging from about 1971 to about 1975, and most of them were actually in '72 to '73 time frame.

And so it's unlikely that any of these wells, because of the -- the timing involved in those wells, I'm not sure how well, you know, how they might have affected each other.

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2 My main concern about the risk does cen-  
3 ter from the standpoint of the TXO Well drilled in the  
4 southeast portion of Section 5.

5 That well, as I said, was drilled last  
6 year, 1983, and in completing that well TXO found that well  
7 to be noncommercial. It was drained. They got back minimal  
8 returns, in the neighborhood of maybe 10 to 15 barrels of  
9 fluid a day, of which very small amounts, maybe trace  
amounts of oil were incurred there.

10 So their location was substantially  
11 drained in here.

12 So these wells, I mean that well alone  
13 provides significant evidence that these wells can drain  
large enough areas here.

14 We would not be able to consider drilling  
15 a location -- the location that we were considering drilling  
16 here if there was a well located in the southeast portion of  
17 Section 6 somewhere that had produced, say, a similar amount  
18 of oil in here. We would have severe doubts as to whether  
19 we could drill there without incurring substantial drainage  
20 in here.

21 As it is, it's unlikely that we are going  
22 to be substantially draining the offsetting acreage in here  
23 because of the nature of the wells which have already pro-  
duced.

24 So I feel like there is evidence in here  
25 to substantiate the concern that we have over the drainage.

Q Samson owns 100 percent except for that small acreage that you're pooling, is that correct?

A Yes, sir. They -- they -- we have either obtained through farmouts or other means all of the interest except for the 20 acres in question.

Q Had you acquired these 20 acres voluntarily would you still have drilled the well?

A Excuse me, would you --

Q Would you still have -- would you have drilled the well had you acquired these 20 acres under lease, had you leased these 20 acres?

A Oh, yes. Yes.

MR. QUINTANA: No further questions.

Does anybody have questions of the witness?

It not, he may be excused.

Case 8321 will be taken under advisement.

(Hearing concluded.)

## C E R T I F I C A T E

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

Sally W. Boyd CSR

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 8426  
heard by me on Dec. 19 1984.

Gilbert P. Quintana, Examiner  
Oil Conservation Division