KOCH EXPLORATION COMPANY NMOCD Case No. <u>3946</u> Exhibit No. <u>284</u>

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	SUMMARY	ALLOWABLE	702	BOPD	588	CU FT/80		
	DIL BY OPERATOR	R	4/86	6/86	% P	ROPOSED	%	
			OIL	OIL	INCR	OIL	INCR	
	AMCCO				0.0		0.0	
-	DUGAN			138	430.8	138	430.8	
	MALLON		1,699	1,619	-4.7	1,157	-31.9	
	MERIDIAN		437	343	-21.5	343	-21.5	
	MARRION		13		-100.0		-100.0	
	MESA GRANDE		753	806	· 7.0	790	5.0	
	MCHUGH		1,875	2,800	49.3	2,495	33.1	
•.	MOBIL		· · · · · · · · ·		0.0		0.0	
	READING & BATES	5			0.0		0.0	
	TOTAL GAVILAN_F	POOL AREA	4,803	5,706				
	BMG		948	1,065	12.3	750	-20.9	
	TOTAL_STUDY_ARI	EA	5,751	6,771			-1.3	
	RB BY OPERATOR		4/86	6/86	ΣP	80205ED	Ÿ	
			RB	RB	INCR	RB	INCR	
	AMOCO				0.0		0.0	
	DUGAN					272		
	MALLON		3,253	4,107	26.2	2,787	-14.3	
	MERIDIAN		1,279	1,156	-9.6	1,155	-9.7	
	MARRION		117_		-100.0_			
	MESA GRANDE		3,658	3,077	-15.9	2,645	-27.7	
	MCHUGH		4,844	7,828	61.6	6,261	29.3	
	MOBIL							
	READING & BATES	5		/	0.0		0.0	
	TOTAL GAVILAN P	POOL AREA	13,196	16,437		13,120	-0.6	
	BMG		1,350	2,247	66.5	1,441	6.8	
		= ^	14 544	10 405	20 E	14 547	0.0	

KOCH EXPLORATION COMPANY NMOCD Case No. <u>3914</u> 4 Exhibit No. <u>21</u> 5

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EFFECT OF ALLOWABLE REDUCTION ON POOL OIL PRODUCTION AND RESERVOIR WITHDRAWLS

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	SUMMARY	ALLOWABLE	200	BOPD	1000	CU FT/BO		
	DIL BY OPERA	TOR	4/86	6/86	% P	ROPOSED	%	••
			OIL	OIL	INCR	OIL	INCR	
	AMOCO				0.0		0.0	
	DUGAN		26	138	430.8	138	430.8	
	MALLON		1,699	1,619	-4.7	645	-62.0	
	MERIDIAN		437	343	-21.5	231	-47.1	
	MARRION	the second s	13		-100.0		-100.0	
	MESA GRANDE		753	806	. 7.0	777	3.2	
	MCHUGH		1,875	2,800	49.3	1,562	-16.7	
	MOBIL				0.0	-	0.0	
	READING & BA	TES			0.0		0.0	-
	TOTAL GAVILA	N POOL AREA	4,803	5,706	18.8	3,353	-30.2	
	BMG		948	1,065	12.3	509	46.3	
	TOTAL STUDY	AREA	5,751	6,771	177	3,862	-32.9	andersonan en
		.US	4/86	6786	* P	RUBUZED	7	
-	NE DI CIENNI	• 6	RR	07.00 	INCP	PR	TNCP	an anala ang an ang ang ang ang ang ang ang ang
	8 M O C O				0.0	ND	0.0	
	DUGAN		45	269	498.0	272	504.4	
	MALLON	n an an an an an an an an an	3.253	4.107	26.2	1.514		
	REPIDIAN		1,279	1,156	-9.6	762		
	MARRIAN		117	19130	-100.0	102	-100.0	
	MESA CRANDE	enne ogsje jerne en e	3.658	3-077	-15.9	2-283		
	MCHIIGH		4.844	7.828	61.6	3,902	-19.5	
	MORTI		17011	1,020		J,702	0.0	
	READING & BA	TES			0.0		0.0	
	TOTAL GAVILA	N. POOL AREA	13,196	16,437_	24.6	8,732	-33.8.	
	BMG		1,350	2,247	66.5	914	32-3	
	TOTAL STUDY	AREA	14,546	18,685	28.5	9,647	-33.7	

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KOCH EXPLORATION COMPANY

NMOCD Case No. <u>Exhibit No.</u>

PRODUCTION CONSEQUENCES OF PROPOSED ALLOWABLE REDUCTION THREE-MONTH PERIOD BASED ON JUNE 1986 PRODUCTION

			Current Allowable	-	Applicant's Proposal	=	Immedia ce Loss
0i1	Production,	bbls.	513,540	-	301,770	=	(211,770)
Gas	Production,	MCF	738,990	-	386,640	=	(352,350)

KOCH EXPLORATION COMPANY

NMOCD Case No.

Exhibit No.

REVENUE CONSEQUENCES OF PROPOSED ALLOWABLE REDUCTION THREE-MONTH PERIOD BASED ON JUNE 1986 PRODUCTION

	Current Allowable	Applicant's - Proposal	3	lmmediate Loss
New Mexico Production Taxes	\$ 745,113	- \$ 427,772	=	(\$317,341)
Working Interest Revenue	6,896,510	- 4,009,318	=	(2,887,192)
Royalty Interest Revenue	985,215	- 572,760	=	(#12,455)
Total	\$8,626,688	\$5,009,850		(\$3,616,838)

Assumes:	Averag	e Roya	ilty	- 1/8
	0il Pr	ice -	\$15.	00/B0
	Gas Pr	ice –	\$1.2	5/MCF

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KOCH EXPLORATION COMPANY NMOCD Case No. <u>8946</u> Exhibit No. <u>386</u>9

ECONOMIC COST OF REPRESSURIZATION THREE-MONTH PERIOD BASED ON JUNE 1986 PRODUCTION

	Current Allowable	-	Applicant's Proposal	=	Reduction
Reservoir Voidage, bbls.	1,479,330	-	785,610	=	693,720
Gas Volume Required, MCF	831,060	-	441,360	=	389,700
Cost of Gas	\$1,246,590	-	\$662,040	=	\$584,550

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Assumes: Gas Price - \$1.25/MCF Injection Costs - \$0.25/MCF Gas Formation Volume Factor = 1.78 RB/MCF

BEFORE THE OIL CONSERVATION COMMISSION Seria M. New Mexico Case No. 8946- 115 Sebasten Hearing Date

Case No. <u>8946</u> KOCH EXPLORATION COMPANY SUMMARY OF POSITION

Koch is a major owner of the production which the Application here seeks to restrict. As a major owner, Koch is as interested as anyone in assuring the greatest ultimate oil recovery from the Gavilan Pool. That is why we have participated in the owner's study which has been mentioned and why we have conducted our own independent studies.

We conclude the ultimate recovery from the Gavilan Pool will <u>not</u> be enhanced by further limiting oil production. Whether the reservoir drive mechanism is a secondary gas cap, as Mallon-Mesa Grande concludes, or merely solution gas, the Commission's current regulations will allow maximum recovery, at least through March 1987, without damaging the Gavilan Pool.

Conversely, the proposed production cut will drastically cut income of owners like Koch and income of royalty owners. The State of New Mexico will lose significant tax revenue. All are already suffering from perhaps the worst depression the Oil Industry has ever seen. All that hardship is to no purpose because Gavilan will not benefit from the energy saved. Even if all the studies are completely wrong, and the reservoir <u>would</u> benefit from higher pressure, the drastic cut proposed would save only a meaningless few pounds of pressure.

In any event, even if a few pounds should be saved, the Application would cut oil production, when free <u>gas</u> production is the culprit. If the Commission chooses to further limit production, the rational way to conserve reservoir energy is to conserve free gas. Therefore, we have proposed alternatively that gas production should be limited to the solution gas ratio of 588 SCF per STB with oil production still restricted by the existing depth bracket allowable to 702 BOPD.

OIL CONSERVATION DIVISION

MR. STAMETS

BENSON-MONTIN-GREER DRILLING CORP. EXHIBITS IN CASE NO. 8950 BEFORE THE OIL CONSERVATION DIVISION OF THE NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

AUGUST 7, 1986



BENSON-MONTIN-GREER DRILLING CORP. EXHIBITS IN CASE NO. 8950 BEFORE THE OIL CONSERVATION DIVISION OF THE NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

AUGUST 7, 1986

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SECTION A. Application.

SECTION B. Orientation maps.

- Item 1. Plat showing well spacing and drilled density of pools in the vicinity of the Gavilan pool as of November, 1983 (time of spacing hearing for Gavilan).
- Item 2. Plat showing for Boulder, West Puerto Chiquito and Lindrith Gallup-Dakota the per-acre effective hydrocarbon pore space volumes for the Mancos formation.
- SECFION C. Structural contour map.
- SECTION D. A comparison of the permeability/porosity relation for reservoirs of sandstone matrix porosity with those of fracture porosity only.
 - Item 1. Relation of permeability to porosity for sandstone reservoirs as evidenced by Bulnes and Fittings, AIME Transactions 1945, Volume 160 (2 pages - gold).
 - Item 2. Graph showing relation of permeability to porosity for sandstone reservoirs and fracture reservoirs.
 - Item 3. Graph of Item 2 above with arbitrarily selected "A", "B" and "C" characteristics.
 - Item 4. Graph of Item 3 above with data extended to higher permeabilities and porosities.
 - Item 5. Graph of per acre oil in place as dependent on transmissibility and calculated from the number of feet shown and "A", "B" and "C" characteristics identified on Item 3 above (yellow).
 - Item 6. Fracture permeability described by Muskat (2 pages white).

- SECTION D. Continued.
 - Item 7. Schedule showing calculated values of permeability and porosity for fracture systems of horizontal flow and a fixed number of equal-width fractures per foot. (Calculated from Muskat's basic formula and law of parallel flow assuming an impermeable matrix.) (1 page white).
 - Item 8. Sample calculation by Craft and Hawkins of fracture permeability for fracture .005" wide and for one fracture per foot in formation of very low matrix permeability. (2 pages - pink, note calculated value about the same as red point plotted on graph under Item 2 above.)
 - Item 9. Sample calculation by Aguilera of fracture permeability for fracture .01" wide and for one fracture per foot in formation of very low matrix permeability. (2 pages - blue, note calculated value about the same as blue point plotted on graph under item 2 above.)
- SECTION E. Lithology of reservoir rock.
 - Page 1. General description.
 - Page 2. Results of interference tests evidence the fact that the reservoir pore space consists of fracture porosity only, with no contribution from a "matrix" porosity (green).
- SECTION F. Solution gas drive recovery for fractured reservoirs.
 - Item 1. Relative permeability of fractured formations (blue).
 - Item 2. Comparison of oil recoveries from fractured reservoir and typical sand reservoir.
- SECTION G. Comparison of depletion rates: Canada Ojitos Unit with Gavilan.
- SECTION H. Opposition arguments identified and refuted.
 - Page 1. Introduction (yellow).
 - Page 2. Opposition argument: A change in allowables during development of a field is an improper regulation since it adversely impacts industry's plans made at an earlier time (pink).

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SECTION H. Continued.

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- Page 3. Opposition argument: Allowable change will cause economic hardship (blue).
- Page 4. Opposition argument: Reduction in production rates from current levels, if undertaken, should be proportional to current rates of production (green).

SECTION I. Proposed order.

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BEFORE THE OIL CONSERVATION DIVISION NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE APPLICATION OF BENSON-MONTIN-GREER DRILLING CORP. FOR AMENDMENT TO THE SPECIAL RULES AND REGULATIONS OF THE WEST PUERTO CHIQUITO-MANCOS OIL POOL AS PROMULGATED BY DIVISION ORDER R-3401, AND TO ESTABLISH TEMPORARY SPECIAL PRODUCTION ALLOWABLE LIMI-TATIONS AND GAS-OIL RATIO LIMITATIONS, RIO ARRIBA COUNTY, NEW MEXICO.

Case 8950

APPLICATION

Comes now, BENSON-MONTIN-GREER DRILLING CORP., by and through its undersigned attorneys, and hereby applies to the New Mexico Oil Conservation Division for the establishment of a Temporary Gas-Oil Ratio limitation of not more than 1000 cubic feet of gas for each barrel of oil produced and an allowable of not more than 400 barrels of oil per day per 640-acre spacing and proration unit for the West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico, OR IN THE ALTERNATIVE, a similar production limitation formula that will preserve reservoir energy and prevent waste, and in support thereof would show:

1. Applicant is the operator of the Canada Ojitos Unit from which oil is produced from the West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico.

2. At the request of the applicant, the Oil Conservation Division entered Division Order R-3401 creating and adopting Special Rules and Regulations for the West Puerto Chiquito-Mancos Oil Pool (BMG West Puerto Chiquito-Mancos Pressure Maintenance

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Project), Rio Arriba County, New Mexico.

3. Currently available geologic and engineering data demonstrates that the statewide GOR and allowables applied to the West Puerto Chiquito-Mancos Oil Pool are resulting in the inefficient use of the reservoir energy and are causing waste to occur.

4. That the reservoir characteristics of the subject pool justify the establishment of a temporary gas-oil limitation of 1,000 cubic feet of gas per barrel of oil and a production limitation on allowables of not more than 400 barrels of oil per day per 640-acre spacing unit.

5. That applicant believes that a gas-oil ratio of not more than 1,000 and a daily allowable of not more than 400 barrels a day per well is necessary in order to prevent waste, increase ultimate oil recovery, and to preserve reservoir energy.

6. That in order to prevent waste and protect correlative rights immediate action needs to be taken to reduce the GOR and the production rates on pool wells for a period of not less than 90 days.

WHEREFORE, applicant requests that the Division set this matter for hearing and that after notice and hearing the Division establish a temporary special 1,000 to 1 GOR and a maximum allowable of 400 barrels of oil per day per 640-acre spacing unit, for the West Puerto Chiquito-Mancos Oil Pool, OR IN THE ALTERNATIVE, a similar production limitation formula that will preserve reservoir energy and prevent waste.

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Respectfully submitted,

CAMPBELL & BLACK, P.A. By Y

William F. Carr Post Office Box 2208 Santa Fe, New Mexico 87501 (505) 988-4421

ATTORNEYS FOR BENSON-MONTIN-GREER DRILLING CORP.





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October, 1983	By Recombination To Initial Reservoi Conditions Of Estimated Ultimate Recovery Of Gas And Oil.	By Direct Calculation Of Interferenc Test Data	Reservoir Per Acre Volume Of Effectiv Hydrocarbon Pore Space Determined B Comparison Of Production/Pressure Coefficients At Different Fractions Of Undersaturated Oil		O CHIQUITO MANCOS,) Gas Not Sold & Metered Reported GOR's May Not Be Sufficienty Accurate. 2) N.A. Gas Injection Project 	STABLISHED BY NMOCD PRODUCTION FROM VCOS FORMATION	OF PORTION OF JUAN BASIN	R 2 E R 3 E
File 56/	RECOMB.	INT. TEST	△ P/p AREA		PUERT	_	NOTES:	LS E. WITH MAN	PLAT SAN	