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BEFORE THE NEW MEXICO OIL CONSERVATION COMMI CONFERENCE ROOM, STATE LAND OFFICE SANTA FE, NEW MEXICO February 28, 1973	
EXAMINER HEARING	
IN THE MATTER OF: Application of Anadarko Production Company for a Unit Agreement, Eddy County, New Mexico;))) Cases Nos.)) 4911 8 4912
and Application of Anadarko Production Company for a waterflood project, special rules, unorthodox locations, and pool redelineation, Eddy County, New Mexico.))))))))
BEFORE: Elvis A. Utz Examiner	-
TRANSCRIPT OF HEARING	

MR. UTZ: The Hearing will come to order, please. 1 Call Case 4911. 2 MR. CARR: Case 4911. Application of Anadarko 3 Production Company for a unit agreement, Eddy County, New 4 Mexico. 5 MR. KELLAHIN: If the Examiner please, Jason 6 Kellahin, Kellahin and Fox, Santa Fe, appearing for the 7 applicant. Also enter the appearance of Mr. Joe Kepke, a 8 member of the Oklahoma Bar. 9 In the interest of time, I would move that we 10 consolidate Case 4911 with Case 4912, the first being a unit 11 agreement and the second seeking approval of a water flood 12 project on the same unit. 13 MR. UTZ: Case 4911 and 4912 will be consolidated 14 for the purpose of testimony. Separate orders will be 15 written. 16 MR. KELLAHIN: We have one Witness I'd like to have 17 sworn. 18 (Whereupon, Mr. Paul A. Tucker was called to the 19 stand and sworn.) 20 21 PAUL A. TUCKER, 22 having been first duly sworn according to law, upon his oath, 23 testified as follows: 24

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DIRECT EXAMINATION 1 BY MR. KELLAHIN 2 Q Would you state your name, please? 3 A Paul A. Tucker. 4 By whom are you employed and in what position, Mr. Õ 5 Tucker? б Anadarko Production Company, Senior Petroleum Engineer. Α 7 Q Where are you located? 8 Fort Worth, Texas. A 9 Have you ever testified before the Oil Conservation 0 10 Commission or one of its Examiners? 11 No, sir. Α 12 Q For the benefit of the Examiner, would you briefly 13 outline your education and experience as a petroleum 14 engineer? 15 I'm a graduate of the University of Oklahoma in Α 16 Petroleum Engineering, have worked for Panhandle Eastern 17 Pipeline Company or its associated company, Anadarko, 18 since 1959, was in Panhandle's Gas Reservoir Engineering 19 Section for about through 1968, and computer work for 20 two years. 21 And then I have been with Anadarko in the 22 evaluation in reservoir engineering for, until the 23 present time. 24 In connection with your duties as a petroleum engineer, Q 25

do you handle waterflood projects, too? 1 Yes, sir. Α 2 And do you have anything to do with the proposed 3 waterflood project which is the subject of this hearing? 4 Yes, sir. I did most of the engineering work on this. Α 5 MR. KELLAHIN: Are the Witness' qualifications 6 acceptable? 7 MR. UTZ: Yes, sir. They certainly are. 8 0 (By Mr. Kellahin) Mr. Tucker, referring to what has 9 been marked as the Applicant's Exhibit Number 1, would 10 you identify that exhibit, please? 11 Α This is the Unit Agreement and Unit Operating Agreement 12 of the proposed Ballard Grayburg San Andres Unit in 13 Eddy County, New Mexico. 14 Now, does that Unit Agreement follow generally the Q 15 Federal form that has been approved by this Commission 16 in the past? 17 Α Yes, sir. 18 Has it been submitted to the U.S. Geological Survey? Q 19 Yes, sir. We have preliminary approval from the Α 20 Geological Survey. 21 Now, is that your Exhibit Number 2? Ű 22 Α Yes, sir. 23 And that is the preliminary approval of the Unit Q 24 Agreement? 25

A Yes, sir. 1 Does the Unit Agreement contain provisions for Q 2 expansion at a later date, if that is deemed advisable? 3 Yes, sir. It does, Page 7. Α 4 Yes, sir. How many acres does the proposed unit cover? Q 5 2,580.59. A 6 0 Now, what percentage of that or what portion of that is 7 Federal and what is fee? 8 Α The Federal acreage consists of 2,140 acres which is 9 about 83 percent of the unit area. The rest of it is 10 fee acreage, 440 acres, which is the remaining 17 percent. 11 Now, there is no State land involved in this unit; is 0 12 that correct? 13 Α No, sir. 14 What is this unitized formation under terms of the Unit Ō. 15 Agreement? 16 Α The unitized formation, the portion of the Grayburg and 17 San Andres Zone, which extends from 20 feet below the 18 base of the Loco Hill sand down to a depth of 450 feet 19 below the top of the San Andres. 20 There is a depth reference point defined to a 21 particular log in the Unit Operating Agreement or the 22 Unit Agreement. 23

The interval is between the depth of 2,388 feet and 3,116 feet below the surface of the land on the

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Schlumberger Gamma Ray Neutron log of Anadarko 1 Production Company's Ballard "B" Number 4 Well, which 2 is 1,980 feet from the South line and 1,980 feet from 3 the West line of Section 8, 18 South, 29 East. 4 MR. UTZ: 18, 29? 5 THE WITNESS: Yes, sir. 6 0 (By Mr. Kellahin) What page were you reading from in 7 the Agreement there? 8 Α Page 4. 9 O. Now, have all of the working interest owners within the 10 unit boundaries signed the Agreement? 11 Α Yes, sir. 100 percent of the working interest owners 12 have signed. 13 Q And do you have all of the royalty ownership signed? 14 A We have a hundred percent of the royalty interest owners 15 in all tracts except Tract 26. We expect to obtain 16 this additional ratification from those rovalty owners 17 prior to the time the unit is effective, and the facts 18 in the Unit Agreement assume that we will obtain this 19 additional ratification. 20 Now, referring to what has been marked as your Exhibit 0 21 Number 3, would you identify that exhibit? 22 It is a map showing the boundary of the proposed unit Λ 23 and the tract designations which have been signed and 24 are unified in the Unit Agreement or the Exhibit thereto. 25

1	0	Now, the tract also shows the working interest ownership,
2		does it not?
3	A	Yes, sir.
4	Ó	Is Anadarko designated as the unit operator in the
5		Agreement?
6	A	Yes, sir, they are.
7	Ó	Attached to the Exhibit Number 1, the Unit Agreement,
8		does it also contain the Unit Operating Agreement?
9	Α	Yes, sir.
10	Č.	Do you have any comments about the Operating Agreement?
11	A	No, sir, other than all of the working interest owners
12		have also ratified this.
13	Ö	Ratified the Operating Agreement. And it is a standard
14		form of Operating Agreement, is it?
15	A	Yes, sir.
16	Ö	Now, referring to what has been marked as Exhibit Number
17		4, would you identify that exhibit?
18	A	This is a decline curve or a plot of monthly oil
19		production in barrels versus time for the leases by
20		making up the tracts within the proposed unit.
21	O	Now, the graph would appear to hold a fairly level
22		decline with some peaks along the way.
23		Could you account for those?
24	Α	Well, the initial development stage occurred in the
25		1939 to 1941 period. And about the first part of 1949,

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a number of the wells were deepened to the San Andres, the pay zone of the San Andres formation.

This accounts for the 1949 increase. In about 1956, some wells were drilled, some additional development was made on Anadarko's Federal II lease in the East half of Section 8 of 18 South, 29 East.

And in 1964, there was some deepening of some wells in the, mostly owned by Depco and Texas American in the northern part of the proposed unit; and they deepened and did some fracturing work.

- Now, do you have a tabulation of the average production from the wells that were in the unit boundary?
- Yes, sir. That's Exhibit 5 which shows the current leases. It lists the number of producing wells that were contained in our production reports as of September 1972, and a graphic determination of the barrels per month production from our decline curves on those leases and an approximate average production rate as of that time.
- Now, looking at the average production rate for the average well, in your opinion, is this pool in that advanced stage of depletion?
- A Yes, sir. It is.
- In your opinion, is it ready for secondary recovery operations by waterflooding?

A Yes, sir.

- O Do you have any estimate on how much additional oil might be recovered by the secondary recovery operations?
- A We are estimating approximately 2,690,000 barrels.
- Now, referring to what has been marked as Exhibit
 Number 6, would you discuss the information shown on
 that exhibit?
- A This is a type log which shows the unitized interval, and it shows also the zones which contain the secondary oil, the zones that we plan to inject water into.

This particular log is not an injection well itself.

It was chosen because we have, it's a modern site well

Neutron log, and the best log we have to show the

porosity zones.

- Now, by offering this Exhibit and showing the intervals you propose to inject water into, is it your intention to limit your injection to those specific zones?
- A Not necessarily. We have marked on this exhibit two primary zones into which we will definitely inject water. Secondary zones are productive in certain areas of the field; and as we develop the flood and obtain more modern logs and information, water will be injected into those and perhaps some of the additional stringers within the unitized interval.

The Grayburg, the upper set, the large well, let's

see, the bracket that covers the Metex to the top of 1 the San Andres is the Grayburg interval. And then the 2 Jackson Zone porosity is located toward the lower part 3 of the diagram at about 3,000 feet. 4 Now, the Jackson porosity is within the vertical limits 0 5 of the Grayburg San Andres Pool, is it not? 6 Yes, sir. 7 Now, referring to what has been marked as Exhibit 8 Number 7, would you identify that exhibit? 9 This is a structure map of the top of the Loco Hill 10 The Loco Hill sand itself is not in the unitized 11 interval, but this is the best marker bed for showing 12 the over-all structure in the area. 13 And does the Grayburg conform closely to this structure? Q 14 Yes, sir. 15 Now, referring to Exhibit Number 8, would you discuss Q 16 that exhibit? 17 The Jackson Zone does not cover the entire area of the 18 unit which the Grayburg Zone does. This particular 19 diagram shows what we believe to be the productive 20 limits of the Jackson Zone; and as you can see, it 21 covers most of the Section 8 of 18 South, 29 East. 22 The structure itself is schematic inasmuch as there 23 is no accurate deep control to --24 That is the area you will be flooding in the Jackson; 25

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1		is that correct?
2	Λ	Yes, sir.
3	0	Now, referring to Exhibit Number 9, would you identify
4		that exhibit?
5	A	This exhibit is our initial plan of development which
6		describes what injection wells we will drill and defines
7		approximately the timing that we are expecting.
8	Ω	It also gives the well locations, does it not?
9	Α	Yes, sir. It shows the well spot at which the different
10		injection wells will be drilled.
11	Ω	Now, these locations will require approval as unorthodox
12		locations in some instances?
13	A	Yes, sir. There are three that are unorthodox locations.
14		The first one is located 20 feet from the North line
15		and 1,500 feet from the East line of Section 5 of 18
16		South, 29 East.
17		This second one is located 20 feet from the North
18		line and 1,200 feet from the West line of Section 5 of
19		18 South, 29 East.
20		MR. UTZ: That's Well Number 3?
21		THE WITNESS: It would be, yes, sir. Tract 13,
22	Well	3.
23		MR. UTZ: And the first one was Tract 8, Well 5?
24		THE WITNESS: Tract 8, Well 5.
25		MR. UTZ: Okay.

THE WITNESS: Then the third one is Tract 5, Well

12. It's located -
MR. UTZ: Tract 5, Well 12. I haven't found it yet.

THE WITNESS: I haven't either. Let me tell you where it is located. 1,320 feet from the South line and 20 feet from the East line of Section 8 of 18 South, 29 East.

MR. UTZ: You are not sure whether that is listed on your Exhibit 9 or not?

THE WITNESS: I think it's there. I just haven't found it yet. All right. It will be on, all right. Well,
I've made an error. This well is Tract 5, Well 13, and it is listed on the bottom of the second page of Exhibit 9.

MR. UTZ: Okay.

Q (By Mr. Kellahin) And that is in the third stage of development?

That's not an initial well in your project, though?

No, sir. I haven't explained that part of it yet, but
the narrative is supported by Exhibit 10 which shows
the first stage of development of the injection pattern.

It shows that well development, six wells to inject into the Grayburg formation and four wells to inject into the Jackson formation.

No, the North four wells, as shown on this exhibit in Section 5, will all be newly drilled wells to the Grayburg formation only.

1 2

The middle two wells in that set of wells are replacements for existing wells. And their locations will be within 330 feet of the present wells.

There might be a little discrepancy between Exhibit
Number 9 and Exhibit 10. As shown on Exhibit 9, I show
conversion of two existing wells two Grayburg and Jackson
Wells as follows under Item 3 on the initial stage of
development.

This well in Unit B of Section 8 which is the Texas American Ballard "B-2", we may attempt to make that a dual Jackson Well; but we are really not anticipating sufficient porosity there to actually make it feasible.

Exhibit 10. The Anadarko Federal II Number 6, which is 1,990 feet from the North line and 2,310 feet from the East line, we may go ahead and prepare that well for injection into both zones, both the Grayburg and Jackson: but in the initial stage, we may not actually initiate Jackson injection into that well.

- Now, turning to Exhibit Number 11, would you discuss that exhibit?
- A This Exhibit shows the completion of the injection pattern and also identifies four new producing wells which will probably or possibly be drilled.

This stage, Exhibit 9 on the second page, shows 1 the third stage of development. And during that third 2 stage of development, the injection would be expanded 3 as it shows in Exhibit 11 providing that performance 4 of the initial stages justifies doing that. 5 Now, Anadarko is the operator of the Far West Loco 0 6 Hills sand unit, is it not? 7 A Yes, sir. 8 Q Is that a waterflood project? 9 Α Yes, sir. It is. 10 0 And that offsets to your Ballard Grayburg San Andres 11 Unit to the East? 12 7 Yes, sir. 13 Are you fighting the same zones or formations in the Q 14 Far West Loco Hill Unit? 15 Α No, sir. The Far West Loco Hills Unit is a waterflood 16 exclusively of the Loco Hills sands. The Ballard Unit 17 will be a waterflood of Metex and Premier intervals of 18 the Grayburg. 19 There is one well in the Northeast, Northeast of 20 Section 17, being the Thompson Travis well which is 21 getting some response from the Far West Unit. 22 Will the injection of water in your Ballard Grayburg Q 23 San Andres Unit in any way have an adverse effect 24

on the Loco Hills Unit?

A No, sir.

- Now, what's the situation to the North of your proposed unit?
 - A This is a waterflood operated by Harold Kersey, the old Loco Unit. It has been active for some years. I don't have the detailed production statistics of that, but it is no longer a flush unit.

The old Loco Unit Number 13, for example, is producing about three barrels a day of oil.

- O Has the injection of water there had any effect on the wells in your proposed unit?
- A We haven't had any experience; but we have had two effects. The Depco Bay Miller Number 2 Well in the Northwest, Northwest of Section 5, 18 South, 29 East, has been shut-in due to water.

We are getting some flattening on the production on Depco's Miller lease due to water being injected in the old Loco Unit immediately to the North.

- Now, the old Loco Unit does affect the Grayburg and San Andres formation, does it not?
- A Yes, sir.
- O It is in that same formation?
- 23 A Yes, sir.
 - O Is there any waterflood project of any kind in the West?
 - A Well, there is some injection in Section 12. The zones

are Grayburg Zones of the same, the Metex and Premier 1 which we will be flooding in the Ballard Unit. 2 0 In your opinion will the flooding of the Grayburg San 3 Andres or the Jackson Zone have any adverse effects on 4 any of the offsetting operators? 5 No, sir. A 6 What volumes of water do you propose to inject in these Q 7 wells? 8 We will inject about 400 barrels per day per zone. A 9 for the initial phase as related back to Exhibit 10, 10 this will be about 4,000 barrels per day initially. And 11 then later on with full development, this would reach 12 about 10,000 barrels per day. 13 Do you have any indication what the pressure might be 0 14 on these injection wells? 15 Α We expect that the Grayburg injection pressure may reach 16 2,200 to 2,400 pounds. This may be a fairly high value 17 for that, and we would be hoping to keep it lower than 18 that if we can get the required volumes. 19 The Jackson, we expect it will take water at a 20 lower pressure than that, maybe no more than 1,500 21 pounds. These are estimates, and it's a little difficult 22 to determine exactly what these will be. 23 Now, what is the source of your water? 24

We plan to purchase water from one of the water companies

1		available in the area. There are three, the Arwood
2		Limited Water Company, the Double Eagle Water Company,
3		and the Yucca Water Company.
4		We made some informational contacts and believe
5		that we can obtain the water supply.
6	Q	Now, is that fresh water?
7	A	Yes, sir. The Exhibits 12 and 13 show the water analysis
8		that is taken from the Arwood and Double Eagle system.
9	Ŏ	And as the waterflood progresses, would you plan to
10		reinject produced water?
11	A	Yes, sir. We would.
12	Ō	Now, referring to what has been marked as Exhibit
13		Number 14, would you identify that Exhibit?
14	A	That's a schematic diagram referring to the type of
15		injection well that we would drill for the new Grayburg
16		Zone completions.
17		This would be, this particular sketch would apply
18		to all of the new wells to be drilled to the Grayburg
19		formation. Their locations and descriptive information
20		about them are located in the lower left-hand corner.
21	δ	Now, will you use internally coated tubing?
22	A	Yes, sir.
23	Ω	Will you inject under a backer?
24	A	Yes, sir.
25	ű	Do you plan to fill the casing tubing annulus with an

inert fluid? 1 A Yes, sir. 2 Will you install a packer gauge at the surface? 3 Yes, sir. Α O Now, referring to Exhibits 15 through 29, what are those 5 exhibits? 6 Those are exhibits describing individually the other A 7 injection wells, schematic diagrams of the other 8 injection wells. 9 Q These are the wells that will be converted to injection? 10 Α Well, there is one new well in that batch. 11 be Exhibit, well, really, there is an alternate exhibit. 12 So it would be Exhibit 23. And Exhibit 24 would refer 13 to the new Grayburg injection well. 14 Q Now, some of the exhibits are marked as alternate. 15 do you mean by that? 16 \mathbf{A} Well, for instance, Exhibit 23 and 24, one method of 17 injecting into both zones would be down a single tubing 18 string into the Jackson Zone and the Grayburg 19 The Jackson and the Grayburg would be separated by 20 a packer, and there would be a packer above the Grayburg 21 The volumes injected into the, the control of 22 the volumes injected into the two different zones would 23 be by means of a flow control. We may find this to be 24

suitable.

1		The alternate method shows dual string whereby you
2		have separate tubing strings, one for the Jackson, one
3		for the Grayburg. And we have not determined which we
4		considered to be the best type.
5		So we would like to be able to use either method
6		in that well and in another well where we have an
7		alternative exhibit.
8	Ω	On Exhibits 19 and 20, you have an alternate proposal
9		there, do you not?
10	A	Yes, sir. 19 and 20 both refer to two methods of
11		completing the same well.
12	ő	Now, you are asking for approval giving you sufficient
13		lattitude to use either method; is that correct?
14	Λ	Yes, sir.
15	Ω	Because you haven't determined yet which one you will
16		use?
17	Α	No, sir.
18	Ö	But in each case will you be injecting through
19		internally coated tubing and under a packer?
20	A	Yes, sir.
21	Õ	Even under the alternate method of completion?
22	A	By either method.
23	Ö	And you will fill the casing tubing annulus with inert
24		fluid in each case and have a pressure gauge at the
25		surface; is that correct?

Yes, sir, as shown on the exhibits. 1 Α 0 Now, Mr. Tucker, in connection with this flood, do you 2 anticipate there may be a need for additional injection 3 or producing wells at unorthodox locations? 4 Α Yes, sir. This is possible. 5 Q And are you asking for an administrative procedure for 6 approval of additional wells for injection or production 7 at both orthodox and unorthodox locations? 8 Α Yes, sir. We are. 9 Were Exhibits 2 through 29 prepared by you or under 0 10 your supervision? 11 Yes, sir. They were. Α 12 And Exhibit 1 is a copy of the Unit Agreement and Unit 0 13 Operating Agreement as submitted; is that right? 14 Yes, sir. Α 15 And Exhibit 2 is a copy of the letter from the Q 16 Department of the Interior giving preliminary approval? 17 Yes, sir. Α 18 0 Now, there is one other matter in connection with this 19 application. 20 The Northwest quarter of Section 7. 21 A It would be 18 South, 29 East. 22 18 South, 29 East. Is that presently in the Artesia Ũ 23 Pool? 24

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Yes, sir.

1	Q Is that the same formation that is in the Grayburg?
2	A Yes, sir.
3	Q San Andres Pool?
4	A Yes, sir.
5	O Are you asking that that quarter-section be deleted from
6	the Artesia Pool and included in the Grayburg San Andres
7	Pool?
8	A Yes, sir. That's right.
9	MR. KELLAHIN: At this time, I'd like to offer
10	into evidence Exhibits 1 through 29 inclusive.
11	MR. UTZ: I want to get that straight. The
12	Northwest, you want this deleted from the Artesia Pool and
13	put in the Grayburg?
14	MR. KELLAHIN: The Grayburg and San Andres.
15	THE WITNESS: Well, the Loco Hills Grayburg and San
16	Andres.
17	MR. UTZ: Without objection, Exhibits 1 through 29
18	will be entered into the record of this case.
19	CROSS-EXAMINATION
20	BY MR. UTZ
21	Q Mr. Tucker, at this point, I'm a little confused about
22	the number of wells, whether they are converted wells,
23	new wells, and on non-standard locations.
24	Now, does Exhibit Number 9 list all of the wells
25	that you want to have approved?

Yes, sir. They are all in there. Α 1 0 And I believe you have four stages of development? 2 Yes, sir. There are two main stages, the initial and A 3 the third which is the development of injection and the 4 Stage 2 and Stage 4 is well work and lease equipment to 5 maintain the production. 6 Q Now, altogether, how many wells are you asking approval 7 for at this time to convert to injection? 8 To convert? Α 9 All right, sir. Now, let's take the converted wells Q 10 and then the new wells. 11 Α All right. There are 12 conversions. There are 11 new 12 wells for injection. And of those 11, three are in the 13 unorthodox locations which we previously described. 14 0 Now, under the initial stage of development, we have 15 four of the 11 wells listed there; is that correct? 16 Yes, sir. Α 17 Well, we have ll more to find, and where are they, or Q 18 seven more, I mean? 19 Α All right. Under the third stage of development on the 20 second page of the Exhibit 9, there are six additional 21 Grayburg Wells described. 22 Now, under Item 2 there, there is a Grayburg and 23 Jackson dual or at least into both zones. So that would 24 be the 11. Under the initial stage of development, Item

1, there are four Grayburg injection wells. 1 Under the third stage of development, Item 1, there 2 are six Grayburg injection wells. Under Item 2 of the 3 third stage, there is a Grayburg Jackson Well listed. 4 Now, that's the 11 injection wells to be drilled. 5 Well, what I need is a list of name and number of each Q 6 well and location of each well. And I don't believe I 7 can get it out of here. 8 Well, we haven't got it marked as an exhibit, but --Α 9 Well, if you can furnish me that list, well, that will Q 10 preclude any more questioning on this exhibit. 11 MR. KELLAHIN: Would you like this marked as an 12 exhibit? 13 MR. UTZ: Sure would. 14 MR. KELLAHIN: That will be 30. 15 I assume this list includes 23 wells; Q (By Mr. Utz) 16 is that right? 17 Yes, sir. Injection wells. That does not include the --Α 18 Okay. We have 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 new Q 19 wells listed here. And Exhibit Number 9 shows your 20 non-standard locations, and I can get those from that 21 exhibit. 22 Now, this is all of the wells that you want to 23 approve at the present time, both new and conversions? 24 Injection wells. Α 25

1	Q And you don't plan to drill any new producing wells at
2	the present time?
3	A Not in the first, not in the initial stage.
4	Q Okay.
5	MR. UTZ: Any other questions of the Witness?
6	MR. KELLAHIN: I'd like to offer into evidence
7	Exhibit Number 30.
8	MR. UTZ: Exhibit Number 30 will be entered into
9	the record in this case. The Witness may be excused.
10	Are there statements in the case?
11	The case will be taken under advisement.
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STATE OF NEW MEXICO) ss COUNTY OF BERNALILLO) I, JANET RUSSELL, a Notary Public, in and for the County of Bernalillo, State of New Mexico do hereby certify that the foregoing and attached Transcript of Hearing before the New Mexico Oil Conservation Commission was reported by me; and that the same is a true and correct record of the said proceedings to the best of my knowledge, skill and ability. My Commission Expires: November 24, 1976 I do hereby certify that the foregoing is a complete tesord of the proceedings in the Exacting Respins of Care No 4911-12 hord by no on Jak New Mexico Oil Conservation Commission

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