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MR. NUTTER: We will now call Cases 4925 and 4926. 1 Case 4925: Application of Shenandoah Oil Corporation for a 2 unit agreement, Eddy County, New Mexico. Case 4926: Application 3 4 of Shenandoah Oil Corporation for a waterflood project, Eddy 5 County, New Mexico. Cases 4926 and 4926 will be consolidated for the 6 7 purpose of hearing. MR. JENNINGS: James T. Jennings appearing on behalf 8 of Shenandoah. We have one witness. Does the Examiner have 9 10 any preference as to how we proceed? MR. NUTTER: Probably take the unit agreement first 11 12 so we can get acquainted with the land. NEIL F. TOLER 13 14 was called as a witness and, after being duly sworn according 15 to law, testified as follows: DIRECT EXAMINATION 16 BY MR. JENNINGS: 17 Would you state your name, place of residence, and occupa-18 19 tion, sir. My name is Neil Toler and I am employed by Shenandoah Oil 20 Α 21 Corporation. Mr. Toler, have you appeared before and testified before 22 Õ 23 the Commission or one of its examiners in the past? 24 Yes, I have. A 25 MR. JENNINGS: Are Mr. Toler's qualifications

1		acceptable?			
2		MR. NUTTER: By whom are you employed?			
3		THE WITNESS: Shenandoah Oil Corporation.			
4		MR. NUTTER: Yes, they are.			
5	Q	(By Mr. Jennings) Are you familiar with the application			
6		filed by Shenandoah seeking approving of the Robinson-			
7		Jackson Unit Area Agreement?			
8	A	Yes, sir.			
9	δ	I believe, Mr. Toler, this was the unit agreement originally			
10		put together by Atlantic-Richfield.			
11	A	Yes, sir.			
12	Q	And after being put together and preliminary negotiations			
13		worked out, your company acquired the acreage from Atlantic-			
14		Richfield.			
15	A	That's correct.			
16	Q	Q And I believe the agreement covers 1160 acres of Federal			
17		land.			
18	А	Correct.			
19	δ	That is all in Eddy County and all in Township 17 South,			
20		Range 29 East.			
21	А	Right.			
22	Ω	O Is Shenandoah Oil Corporation the unit operator?			
23	A	A Shenandoah will be the operator.			
24	Ω	What percentage of working interests does it own?			
25	A	100%.			

What is the unitized substance as defined by the unit 1 2 agreement? 3 The Grayburg-San Andres formation. Is that specifically defined in the unit agreement? 4 5 Yes, sir. The Robinson B Well which is the offset well 6 of the No. 8 well in Section 27 is 1830 feet from the 7 south and 1730 feet from the west lines of Section 27. 8 Have you submitted this for tentative approval of the 9 USGS? 10 Yes, sir. I have a letter dated March 15th, 1973. Mr. Toler, who is the record title holder of all this 11 acreage? 12 Atlantic-Richfield is the lessee of record. 13 And they have joined in the unit agreement? 14 Yes, they have signed it. 15 Do you think the proposed unit agreement will prevent 16 waste and protect the correlative rights of all interests 17 in the area? 18 I am a firm believer in that. 19 have you obtained the approval of all royalty owners, 20 overriding royalty owners? 21 Yes, we have obtained approval of the USGS. It is all 22 23 Federal land and we have obtained USGS approval. There are overriding royalties in Tracts 1 and 1A and we 24 previously obtained approximately 77% of the overriding 25

interest owners besides the USGS. 1 What percentage of the owners have you obtained approval 2 from? 3 4 Approximately 77.19% of the overriding royalty interest 5 owners. MR. JENNINGS: At this time we will offer the unit 6 7 agreement which has been executed by all parties concerned and 8 I will just proceed with the other case. 9 MR. MUTTER: Go right ahead with your waterflood 10 project now. (Whereupon Applicant's Exhibit 1 in Case 4925 was 11 admitted in evidence) 12 (By Mr. Jennings) Mr. Toler, are you also familiar with 13 the Shenandcah application for a waterflood project in 14 Eddy County, New Mexico? 15 I am. Α 16 Briefly what does Shenandoah propose in connection with this 17 application? 18 19 A desire to initiate a waterflood project to inject fresh water into the Grayburg-San Andres formation through 16 20 existing wells as described in the application in Section 21 27, 34, and 35, Township 17 South, Range 29 East. 22 23 Are these wells all described in the application? Yes, sir. 24 With the locations set forth therein? 25

A Right, sir.

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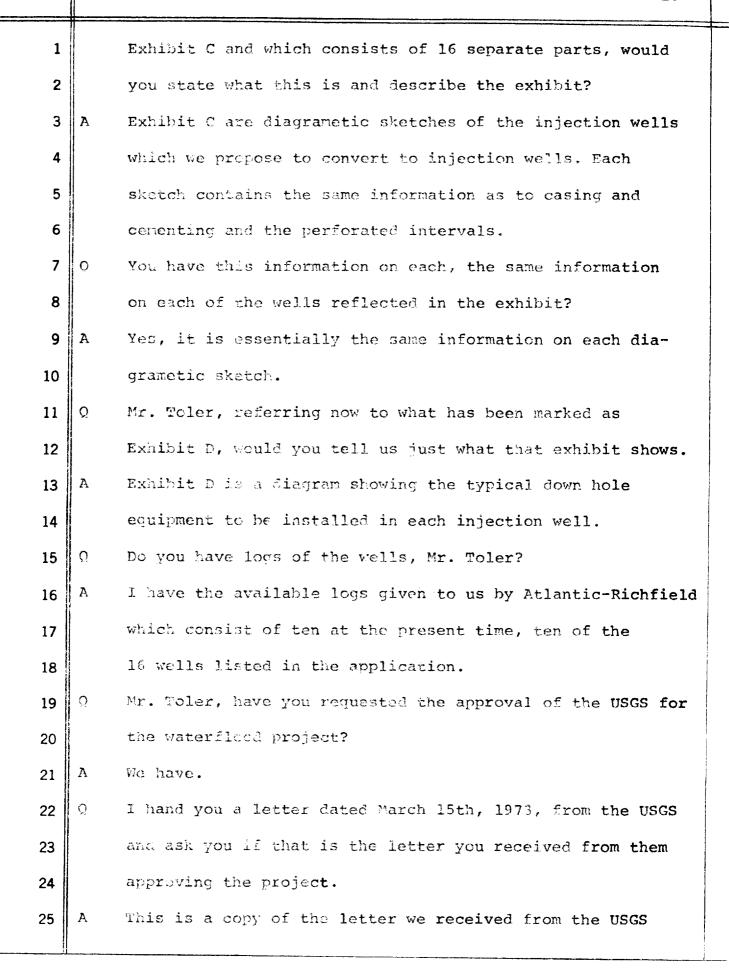
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- 2 Q. And will you state what you propose to inject into those wells.
- 4 A We propose to inject fresh water into the wells at a rate
  5 of approximately 900 barrels a day in three separate zones
  6 which are described later on in the application.
  - Q Please refer to what has been marked as Exhibit A and explain just what that is and what it shows.
- Exhibit A is a plat showing the locations of our project. 9 In this particular plat, we have the unit outlined, the 10 project area. You will notice that two wells outside of 11 the unit area are included in the project area. 12 comprised of 16 injection wells and approximately 22 pro-13 ducing wells at the present time that will probably be put 14 on production and injection in the San Andres and Grayburg 15 formations. 16
  - O Mr. Toler, this area is in the unit agreement we have just been discussing along with some adjacent land, is that true?
  - A It is shown more clearly in Exhibit B. The adjacent lands are located to the east in Section 26 as shown by the exhibit.
  - Q Referring again to Exhibit A, Mr. Toler, on that you have outlined all of your present injection wells with solid triangles.
    - A. That's correct.

1 0 And the injection wells you propose are outlined in 2 dashed triangles. 3 A That's correct. 4 Do you propose to flood these 16 wells simultaneously? 5 Α Yes, we propose to put all of those wells on initially. 6 0 What is the general nature of production in the area at 7 this time? 8 Α At the present time it is in the range of 80 to 90 barrels 9 a day from a total of 22 producing wells. 10 Q Do you fell that waterflooding these formations, the 11 Grayburg and San Andres, is feasible? 12 Α Yes, I do. 13 And will it result in ultimate increased recovery. 14 Α Yes. 15 And I believe you have stated that you're virtually sur-16 rounded by currently operating waterflood projects. 17 A That's correct. 18 Are these offsetting projects successful? 19 Α They are successful in several different categories. 20 They are partially unsuccessful because of loss of control 21 and injection. I think we will probably control our in-22 jection more specifically with bottom hole flow regulators. 23 Do you contemplate, assuming the flood is successful, 24 converting additional wells to water injection? 25 Α We have an 80 acre five-spot pattern and it's possible

1 that at some future date we might want to convert additional wells to injection in order to form a 40 acre five-spot 2 flood plan. 3 And you are requesting the Commission to grant administra-4 5 tive approval for such an application? Yes. 6 Α 7 Now, where do you propose to obtain your water from, 8 Mr. Toler? There is a commercial water company in the area to the 9 east and we will probably be getting it from one of the 10 commercial water companies. 11 12 Will you inject the produced water when it is available? Yes, when water breakthrough occurs in conjunction with 13 fresh water. 14 What are the exact zones that you propose to flood? 15 The Grayburg formation to a depth of 2359 feet and into 16 the Jackson zone of the San Andres formation to a depth 17 of approximately 2774 feet. 18 How much water do you propose to inject per day? 19 A total of 900 barrels a day. There are two zones within 20 the Grayburg formation and we will inject 300 barrels a 21 day per zone and 300 barrels into the Jackson zone of the 22 San Andres, making a total of 900 barrels of water per 23 day per well. 24 Mr. Toler, referring now to what has been designated as 25



1	outlining their approval and recommendations for further			
2	requirements in regard to plats showing treating plat			
3	locations.			
4	Q Are you prepared to comply with all of the regulations			
5	and requirements made by the USGS?			
6	A Yes, I am.			
7	Q Do you have anything further you wish to add in connection			
8	with this application?			
9	A Not at this time.			
10	MR. JENNINGS: We have nothing further to offer, but			
11	we do offer Exhibits A through E and we would also like to			
12	offer the logs as exhibits if you would like them.			
13	MR. NUTTER: Would you offer them as a package under			
14	Exhibit F?			
15	MR. JENNINGS: As a package, yes.			
16	MR. NUTTER: Without objection Applicant's Exhibits			
17	A through F will be admitted in evidence.			
18	(Whereupon Applicant's Exhibits A through F were			
19	admitted in evidence)			
20	CROSS EXAMINATION			
21	BY MR. NUTTER:			
22	O Do you anticipate that each of the injection wells will			
23	have three injection zones?			
24	A I anticipate every injection well will we have yet			
25	alot of work to do in this area and I must point out			

1		that the Jackson zone is the predominant producing zone in		
2		the area. The metex tends to thin out in Section 27 and		
3	it right be possible that we might not have metex in one			
4	or two of the injection wells. However, I feel that			
5	Leco Hills is productive in the area and we may have Loco			
6	Hills and Jackson in all the wells.			
7	Q Whether or not you had all three zones, you would still			
8	have this uppermost packer shown on Exhibit B?			
9	A Yes, sir.			
10	Q So in all cases, your annualus will be added above a packet			
11	and have a gauge at the surface.			
12	A Yes.			
13	Q And you anticipate that this 300 barrels would be the rate			
14	of injection into each of the zones per day.			
15	A	Yes. We are limiting it to that right now because if you		
16		take the total number of wells times 900 barrels, it's		
17		approximately 14,400 barrels a day. At some later date,		
18	we may be able to increase that.			
19		MR. NUTTER: Are there any further questions of Mr.		
20	Toler?			
21	(No response)			
22	MR. MUTTER: He may be excused.			
23	(Witness excused)			
24		MR. NUTTER: Do you have anything further, Mr.		
25	Jennings?			
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MR. JENNINGS: I would offer one observation even though I'm sure it's not required. We have to have this approved by July 1st. MR. NUTTER: If there is nothing further, we will take Cases 4925 and 4926 under advisement. 

1	STATE OF NEW MEXICO ) ) ss.			
2	COUNTY OF PERNALILLO )			
3	I, RICHARD E. McCORMICK, a Certified Shorthand Reporter,			
4	do hereby certify that the foregoing and attached Transcript of			
5	Hearing before the New Menico Oil Conservation Commission was			
6	reported by me; and that the same is a true and correct record			
7	of the said proceedings, to the best of my knowledge, skill and			
8	ability.			
9	PDJEMO L			
10	Certified Shorthand Reporter			
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23	included the foregoing is a control of the proceedings in			
24	the Examiner heaving of Case Ho. 4925-492 heard by me on 3/28			
25	New Mexico Oil Conservation Commission			
	CON MORELOW CAR CONTROL COMMITTEE			

1	INDEX						
2	WITNESS		Page				
3	NEIL F. TOLER						
4	Direct Examination by Mr. Jennings		3				
5	Cross Examination by Mr. Nutter		11				
6	EXHIBITS						
7		Offered	Admitted				
8	Exhibit 1 in Case 4925	6	6				
9	Exhibit A in Case 4926	7	11				
10	Exhibit C in Case 4926	10	11				
11	Exhibit D in Case 4926	10	11				
12	Exhibit E in Case 4926	10	11				
13	Exhibit F in Case 4926	11	11				
14							
15							
16							
17							
18							
19							
20							
22							
23							
24							
25							