

STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION  
STATE LAND OFFICE BLDG.  
SANTA FE, NEW MEXICO  
25 June 1980

EXAMINER HEARING

IN THE MATTER OF:

Application of Benson-Montin-Greer ) CASE  
Drilling Corporation for a unit ) 6943  
agreement, Rio Arriba County, New )  
Mexico. )

BEFORE: Richard L. Stamets

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation  
Division:

Ernest L. Padilla, Esq.  
Legal Counsel to the Division  
State Land Office Bldg.  
Santa Fe, New Mexico 87501

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1 MR. STAMETS: Call next Case 6943.

2 MR. PADILLA: Application of Benson-Montin-  
3 Greer Drilling Corporation for a unit agreement, Rio Arriba  
4 County, New Mexico.

5 MR. STAMETS: At the request of the  
6 applicant this case will be continued to the July 9th Examiner  
7 Hearing.

8  
9 (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 Conservation Division was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability.

Sally W. Boyd CSR

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I do hereby certify that the foregoing is  
a correct record of the proceedings in  
the Brancher hearing of Case No. 6943  
heard by me on 6-25 1980.  
Richard P. Stuenkel, Examiner  
Oil Conservation Division

STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION  
STATE LAND OFFICE BLDG.  
SANTA FE, NEW MEXICO  
9 July 1980

EXAMINER HEARING

IN THE MATTER OF:

Application of Benson-Montin-Greer  
Drilling Corporation for a unit  
agreement, Rio Arriba County, New  
Mexico.

and

Application of Benson-Montin-Greer  
Drilling Corporation for a pres-  
sure maintenance project, Rio Arriba  
County, New Mexico.

CASE  
6943

CASE  
6944

BEFORE: Daniel S. Nutter

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation  
Division:

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I N D E X

ALBERT R. GREER

Direct Examination by Mr. Kellahin 3

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E X H I B I T S

Applicant Exhibit One, Packet of Exhibits 4

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1 MR. NUTTER: We'll call next Case Number  
2 6943.

3 MR. PADILLA: Application of Benson-Montin-  
4 Greer Drilling Corporation for a unit agreement, Rio Arriba  
5 County, New Mexico.

6 MR. NUTTER: We'll also at this time call  
7 Case Number 6944.

8 MR. PADILLA: Application of Benson-Montin-  
9 Greer Drilling Corporation for a pressure maintenance project,  
10 Rio Arriba County, New Mexico.

11 MR. KELLAHIN: I'm Tom Kellahin, of Santa  
12 Fe, New Mexico, appearing on behalf of the applicant in Cases  
13 6943 and 6944, and I have one witness to be sworn.

14 MR. NUTTER: For purpose of testimony,  
15 Cases 5943 and 6944 will be consolidated.

16  
17 (Witness sworn.)

18  
19 ALBERT R. GREER  
20 being called as a witness and having been duly sworn upon his  
21 oath, testified as follows, to-wit:

22  
23 DIRECT EXAMINATION

24 BY MR. KELLAHIN:

25 Q. Would you please state your name and occu-

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1 pation?

2 A. Albert R. Greer, G-R-E-E-R. I'm an offi-  
3 cer and petroleum engineer for Benson-Montin-Greer Drilling  
4 Corp.

5 Q. Mr. Greer, have you previously testified  
6 before the Division as a petroleum engineer and had your  
7 qualifications accepted and made a matter of record?

8 A. Yes, sir.

9 Q. And as a petroleum engineer have you made  
10 a study of and are you familiar with the facts surrounding  
11 these two applications?

12 A. Yes, sir.

13 MR. KELLAHIN: We tender Mr. Greer as an  
14 expert petroleum engineer.

15 MR. NUTTER: Mr. Greer is an expert pet-  
16 roleum engineer.

17 Q. Mr. Greer, I have taken the packet of  
18 exhibits that you have presented today and marked it as Ex-  
19 hibit One, and I would like for you to commence your testi-  
20 mony by referring to each of the parts within Exhibit Number  
21 One and if we could start with what is labeled the location  
22 plat, and have you first identify for me your proposed unit  
23 area.

24 A. Well, the unit area is shown on this  
25 location plat outlined in red. It's within the East Puerto

1 Chiquito Mancos Pool, which is outlined in green on this plat.

2 Q. Could you describe generally for us what  
3 types of acreages are involved in the unit?

4 A. Yes, sir, there are Indian lands, Federal  
5 lands, and fee lands.

6 Q. The advertisement indicates that there is  
7 some 9769 acres, more or less, to be dedicated to the unit.

8 A. Yes, sir.

9 Q. What is to be the unitized formation?

10 A. The Mancos formation.

11 Q. Is this unit being organized for purposes  
12 of primary recovery, secondary recovery, or tertiary recovery?

13 A. It's principally for secondary and ter-  
14 tiary recovery.

15 Q. Have the working interests agreed as to  
16 a form of unit agreement for this particular unit?

17 A. Yes, sir, 99.7 percent of the working  
18 interest owners of leased lands have agreed to it.

19 Q. Does the proposed -- has the proposed  
20 unit agreement been submitted to the USGS and to the State  
21 Land Commission, State of New Mexico?

22 A. The agreement about as it appears here  
23 was submitted to the USGS two years ago. There are some  
24 changes in it that they have not yet reviewed.

25 We have not submitted it to the Land

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1 Commissioner.

2 Q. Would you summarize generally what has  
3 been the history of this particular formation and your efforts  
4 to bring about a voluntary unit for secondary recovery?

5 A. Yes, sir. It's a fractured shale forma-  
6 tion. Produced initially oil, under saturated oil, and is  
7 under, to the best of our ability, we make it operate with  
8 gravity drainage completion, which means that we produce the  
9 down dip wells and as the up dip wells reach high gas/oil  
10 ratios we shut them in. And this is a procedure that we can  
11 carry out only to a certain limit, and that limit is when the  
12 down dip producers commence making gas, then we're forced  
13 either to produce high gas/oil ratio wells or shut the pro-  
14 perties in.

15 Accordingly, we commenced some fifteen  
16 years ago trying to get the area unitized. The Indian tribe,  
17 the Jicarilla Tribe, was reluctant to unitize and we put off  
18 unitization as long as we could then, because of the Indians,  
19 until we reached a point which we now have, that we can delay  
20 no longer. We're either going to have to shut the wells in  
21 or produce high gas/oil ratio wells, and when we do, we'll  
22 dissipate the energy from the secondary gas cap that's formed  
23 and the net of it is that -- that we just must unitize soon  
24 or we are going to lose a substantial -- otherwise recoverable  
25 reserves.

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1                   So in our efforts to unitize, we managed  
2 finally a year ago to bring to the attention of the Indians  
3 the amount of royalty that they would lose if we did not unit-  
4 ize, and it's a substantial difference, and when we finally  
5 got their attorneys to recognize it, then they agreed to  
6 unitize, and after considerable negotiation we reached trade  
7 terms, an increase in their royalty, net profits, and one  
8 thing and another, and we now have an agreement whereby we  
9 can unitize.

10                   Q               In your opinion, Mr. Greer, does the pro-  
11 posed unit area constitute a logical configuration by which  
12 the unit and the unit operator will have substantial and ef-  
13 fective control of the unitized formation?

14                   A               Yes.

15                   Q               In addition to the preparation of a pro-  
16 posed unit agreement, have you proposed a unit operating  
17 agreement?

18                   A               Yes.

19                   Q               If you'll commence with the unit agreement  
20 and simply go through and indicate for us some of the import-  
21 ant points in summary to familiarize the Examiner with that  
22 agreement, perhaps commencing with an explanation of why you've  
23 indicated in the unit agreement the green shading at various  
24 pages.

25                   A               Well, we've indicated in green shading

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1 the words where the Oil Conservation Division is given author-  
2 ity in the unit agreement.

3 I thought two years ago that we had fur-  
4 nished a copy to the Division for review, but in checking my  
5 files, I find that we did not. So we've made this agreement  
6 conform to one we have recently submitted on another area to  
7 the department, or to the Division, and I believe that we  
8 have the same authorities here as in the one recently approved.

9 On page one of the unit agreement we set  
10 out where the Oil Conservation Division has the authority to  
11 take part in these agreements.

12 On page two the Division is defined as  
13 we use in the agreement here.

14 Page four the Division is given authority  
15 in expansion of the unit agreement -- in expansion of the  
16 unit area.

17 Carried over onto page five it shows again.

18 On page six the Division is given author-  
19 ity under approval of the plan of operations, which carries  
20 over to page seven.

21 On page ten regarding allocation of uni-  
22 tized substances, which carries over to page eleven.

23 Also, on page eleven under Section 15, ,  
24 authority regarding what gas might be royalty-free if out-  
25 side gas is brought in for injection.

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1 On page fourteen the approval of the unit  
2 agreement, the effective date, and the term of the agreement.

3 On page fifteen perhaps one of the more  
4 important sections, Section 23, regarding rate of prospecting,  
5 development, and production, the Division is given equal  
6 authority with the USGS regarding approvals of rate of pro-  
7 specting and development; in addition, what both the USGS  
8 and the Division determine must be within the limits fixed  
9 by the Division regarding the quantity and the rate of pro-  
10 duction.

11 On page seventeen authority regarding  
12 subsequent joinder of additional parties who might want to  
13 come in at a later time.

14 Those are the authorities granted to the  
15 Division. Then there are a few particular items that we  
16 should call to the attention now.

17 One is on page seven regarding tract  
18 participations. The participation formula is 10 percent  
19 acreage; 22-1/2 percent structural position weighting factor,  
20 and that we'll go into in detail a little bit later; 67-1/2  
21 percent production.

22 Q. Do you have subsequent exhibits to indi-  
23 cate how those numbers were derived?

24 A. Right. They're explained here in the  
25 language of this particular section, but later on it's easier

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1 to understand from the exhibits.

2 Q On page eight there is indicated a special  
3 agreement with the Jicarilla Tribe. Would you identify that  
4 for us?

5 A Yes, sir. About the center of the page  
6 eight is spelled out briefly one of the terms that we agreed  
7 to with the Jicarilla Tribe, and that is after we have deter-  
8 mined the Tribe's equity as to the various leases, I think  
9 there's five or six of them, the Tribe wanted the equity re-  
10 allocated on a different basis than the basic formula. We  
11 agreed to do this. This affects only the Indians and the  
12 working interest owners.

13 Q Will that have an adverse effect in any  
14 way upon any of the other working interest or royalty owners  
15 in the unit?

16 A No, sir, it doesn't affect their equity  
17 at all.

18 MR. NUTTER: Well now, it would the other  
19 working interest owners, wouldn't it?

20 A The other working interest owners who are  
21 parties and own interest over these leases are affected, and  
22 they have all agreed to this trade.

23 MR. NUTTER: So in other words, this is  
24 changing the participation for the Indians probably to a  
25 higher rate, but it's carved out of working interest and not

1 out of any other royalty owners?

2 A. That is exactly right.

3 MR. NUTTER: Okay.

4 Q. I believe on page nine there is a need  
5 for an explanation on some of these undrilled acreage. Do  
6 you have any open acreage involved here?

7 A. Yes, sir, there's some unleased Federal  
8 acreage and a little bit of unleased fee acreage. The bottom  
9 paragraph on page nine sets out how the unleased Federal  
10 acreage will be handled, which essentially is that when it's  
11 put up for sale the successful bidder will be obligated to  
12 join the unit agreement, unless there's some reason of the  
13 equities that it should not.

14 Q. Back on page six under plan of operation,  
15 you've set forth a number of different substances that might  
16 be used for secondary and tertiary recovery.

17 You might summarize for us, if you would,  
18 the anticipated substances that could be used.

19 A. Yes, sir. We are thinking about not only  
20 water flooding and gas injection, but tertiary methods, which  
21 can include caustics, polymers, and chemicals, which we  
22 identify in the first paragraph of Section 10.

23 Q. I believe that covers most of the signi-  
24 ficant points in the unit agreement, Mr. Greer.

25 MR. NUTTER: Mr. Greer, before you get

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1 too far off on that, now that portion, wherever that section  
2 was, I lost it --

3 A. It's page six.

4 MR. NUTTER: No, the part about the lands  
5 that would be leased after the effective date of the unit.

6 Now how are you going to bind those parties  
7 that pick up these leases after the effective date? Will the  
8 government put the clause in the lease that they must join  
9 the unit?

10 A. This will be part of the -- when the leases  
11 are advertised for sale --

12 MR. NUTTER: That they're subject to this  
13 binder?

14 A. -- they'll be subject to that, yes, sir.

15 MR. NUTTER: And they take the leases  
16 under that binder?

17 A. Right, uh-huh.

18 MR. NUTTER: I see. Okay.

19 A. The same as is in an exploratory unit.  
20 The main difference here, of course, is that this is unusual  
21 for a secondary unit because ordinarily you already have --

22 MR. NUTTER: You already have the lands  
23 leased.

24 A. -- the lands leased, right. So we do have  
25 that unusual provision here.

1 MR. NUTTER: Okay.

2 Q If you'll turn to the unit operating  
3 agreement now, Mr. Greer.

4 A I think the only unusual thing here is on  
5 page eight, commences on page eight, the investment adjustment  
6 of intangible drilling and non-removable downhole equipment.  
7 Here again, for the problem of bringing in parties who have  
8 not paid for wells now and do not have any investment, if  
9 they buy a new lease, as for instance the Federal leases, then  
10 they'll be required to pay a share of the cost of the pre-  
11 viously drilled wells. We have an investment adjustment for  
12 the surface equipment, which is more or less standard in any  
13 unitization, but the problem of the intangible drilling costs,  
14 which often is taken care of in a unitization by each man  
15 drilling his own well, you have here a situation where there  
16 will be leases with no wells on them, and so that these out-  
17 side parties, then, would be required to pay a share of the  
18 intangible drilling costs.

19 We've estimated that as the cost -- what  
20 it would cost to drill wells at this time, but the well costs  
21 are depreciated at the rate of 1/2 percent a month for 50  
22 months, which means we'll take 75 percent of the estimated  
23 cost of the wells at this point, and that's the figure that  
24 will be used for the investment adjustment of the intangible  
25 drilling costs.

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1 Then for the costs of chemicals, we've  
2 added those in, and the reason for that is that depending on  
3 the plan of -- that we use for our tertiary recovery process,  
4 we could inject a substantial amount of the chemicals the  
5 first few months, or perhaps the first year. If, for instance,  
6 we spend \$1,000,000 on chemicals the first year, and then the  
7 lands come up for sale, the parties who come in at that time  
8 will get the benefit of the chemicals, which may take some  
9 20 years to do their work through the reservoir, so they  
10 again are obligated, or we feel they're obligated, to pay  
11 their share of the chemical cost. We depreciate the chemical  
12 cost over a 25-year period, assuming that in 25 years that  
13 we dissipate them.

14 Q Now in your discussion on page seven of  
15 the unit agreement you indicated a formula for the determin-  
16 ation of tract participation.

17 A Yes.

18 Q I'd like you to go to those lettered at-  
19 tachments to the exhibit, which will explain to us how you  
20 determined the tract participation.

21 A All right, sir. I might say in passing,  
22 if you looked at the different exhibits, A, B, C, D, and E,  
23 they are simply exhibits A to the unit agreement, B to the  
24 unit agreement, C to the unit agreement, D to the unit agree-  
25 ment, and E is Exhibit E to the unit operating agreement.

1 They have to do primarily with the stat-  
2 istics of what we'll be talking about here now.

3 Under Section E -- no, Section F, Section  
4 F, we have a discussion of the parameters that we used for  
5 determining the participation factors.

6 The first parameter is acreage, which is  
7 quite simple, just the acreage to each tract is given its  
8 share of a 10 percent weighting.

9 Structure position weighted acreage factor  
10 is a new concept, which the USGS geologists and engineers  
11 felt we should include, and that's for the reason that the  
12 area so far has been produced by a gravity drainage process  
13 with the primary production being taken out down dip; the up  
14 dip wells now covering the secondary gas cap, the value of the  
15 gas for a given volume of reservoir is less than the value  
16 of oil, and we have the problem of otherwise determining  
17 equity, which you ordinarily do from reservoir volume and es-  
18 timated reserves. This being a fractured shale reservoir,  
19 there's no way to do that under ordinary methods.

20 So we had to devise some other equitable  
21 approach to it. The way we wound up is giving a factor of  
22 zero in the structural position weighting factor for the  
23 uppermost contour, the 6000-foot contour interval, and in-  
24 creasing that down dip until we're just above the water/oil  
25 contact, at which point we start decreasing the weighting

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1 factor, and --

2 Q It might be helpful, Mr. Greer, if you  
3 could identify for us one of the plats of the area, and so  
4 you could summarize how you took into consideration the struc-  
5 tural position of weighted acreage factor.

6 A Under Section L, there is first a plat  
7 which shows the zones that are producing in the two areas,  
8 East Puerto Chiquito and West Puerto Chiquito. We call them  
9 Zones A, B, and C.

10 In this particular area only Zones A and  
11 B produce, the yellow and green colored ones on the plat.

12 The next map after that is a structural  
13 contour map that shows my interpretation of the fluid content  
14 of the reservoir now and also identifies the wells we plan  
15 as producing wells, injection wells, and both gas injection  
16 wells and water injection wells.

17 The area colored in yellow is area which  
18 is pretty much gas saturated now because of depletion or  
19 drainage down dip from these wells.

20 The area colored in red is essentially  
21 gas-free oil saturated.

22 And the area colored in green is princi-  
23 pally water.

24 The water/oil contact is shown halfway  
25 between the 3800 and 4000 foot contour interval, where the

1 red meets the green.

2 The 6000 foot interval which we give zero  
3 weighting on the structure position rating factor is over on  
4 the righthand side of the map.

5 And I think perhaps we should go right  
6 straight to the structural position weighting factor map.  
7 I believe that map is listed under -- in the index under H,  
8 but I think under most of these exhibits it's under G. It's  
9 a foldout plat similar to your structure contour map that we  
10 just looked at.

11 MR. KELLAHIN: It's under H.

12 A. If you look at the upper righthand part  
13 of the map, Section 9, the structural contours are given a  
14 rating factor, starting there with 3, moving southwest you  
15 can follow them up, 4, 5, 6, 7, 8, 9, 10, at which point we  
16 drop from there to the next contour down to the oil/water  
17 contact, we give that a weighting factor of 5, and then zero  
18 on the next contour, the 3600 foot contour interval.

19 And the weight --

20 MR. NUTTER: Anything below that gets zero  
21 because it's in the water.

22 A. Then the way we get those back to tract  
23 factors, we probably ought to take just a minute to look at  
24 that. If you can find the yellow, green, and blue sheets  
25 that are either in that same section or the section just

1 ahead of it. They're identified as Exhibit C, Part III,  
2 Schedules I, II, and III. The gold colored one is the first  
3 one.

4 For instance, there the first line, the  
5 northeast quarter of Section 4, if you look at Section 4, which  
6 is about the center of the map on the righthand side, go to  
7 the northeast corner of that quarter section is given a rating  
8 of 0.7; the northwest quarter, 1.2; the southwest quarter, 0.7;  
9 the southeast quarter, zero; the arithmetic 4-point average  
10 is .65.

11 So that gives the structure position  
12 weighting factor for that northeast quarter.

13 Then we go to Schedule II, which is the  
14 green colored sheets --

15 MR. NUTTER: Now you -- in other words,  
16 you've taken the northeast quarter of Section 4 and divided  
17 that into the four 40-acre tracts, and given each of those  
18 40's a value, is that it?

19 A. Well, we give the corner a value.

20 MR. NUTTER: You base this on the corner  
21 points?

22 A. Corner point, uh-huh.

23 MR. NUTTER: I see.

24 A. It's not quite as accurate, of course,  
25 as if we had planimetered, but it's a lot easier for somebody

1 else checking the thing to come up with the same numbers.

2 MR. NUTTER: But every quarter section has  
3 four points that you've taken measurements on.

4 A. Right. And then we just take the arith-  
5 metic average. That's shown on the gold colored sheets.

6 Then on the green sheets we come again to  
7 the northeast quarter of 4, that's the first one that's listed.  
8 Under Column (4) is that weighting factor we just talked about.  
9 Under Column (3) is the number of acres in each tract. For  
10 instance in the northeast of 4 there are three tracts, 3, 14,  
11 and 26. We take the acreage in each one of them, multiple  
12 it by the weighting factor, and in Column (5) we have then  
13 the structural position weighting factor for that tract in  
14 that quarter section

15 As you can see down on line about 6 and  
16 8, Tract 3 appears again and then again further down.

17 Then we summarize all those on the blue  
18 sheets, the Schedule III.

19 We go to each tract, find each one of its  
20 parts in each quarter section, sum them up, and then that is  
21 the structure position weighting factor for each tract.

22 Then we go with that and perhaps we should  
23 now look under Section C to see how it's all put together.

24 If you'll look at the last sheet of Section  
25 C, page five, you can see, for instance, for Tract 25, it's

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1 160 acres; its structural position weighting factor of 762.25;  
2 and its 1976-77 production, which is the year we used for  
3 production, 160 barrels. If you take weighting factors for  
4 each one and come up with a total and -- and that's the total  
5 participation for each such tract.

6 Then we should take a quick look at the  
7 redistribution to the reallocation to the Indian tracts.  
8 That starts on page three, Tract 17, on the righthand side  
9 the equity factor for Tract 17 would be .163733. By our  
10 special allocation it's given a rating factor about five times,  
11 or an equity factor about five times what it otherwise would  
12 have.

13 The next tract is reduced from 64 to 44  
14 percent.

15 MR. NUTTER: How did you get them to take  
16 a reduction on that?

17 A. Well, it had to come from somewhere.  
18 They didn't mind giving up 25 percent royalty for 50 percent  
19 net profits.

20 Then we might look quickly at the -- at  
21 the acreage -- the distribution of production to the tracts  
22 is fairly simple, based on the communitized acreage within  
23 each tract.

24 Under Section J there are some notes re-  
25 garding surveying, which we don't need to go into detail,

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1 but need to be a part of the record.

2 The first two pages explain some of the  
3 guidelines we used for allocating acreage to tracts.

4 The third sheet is a plat, which shows  
5 the problem we have of the homestead entry surveys right down  
6 the middle of the unit. That particular tract you can see  
7 where we had the little survey problems to work with.

8 Following that are some survey notes, the  
9 balancing of the angles, the calculating of the areas, and  
10 the plats themselves.

11 Now, under Section K we show a plat, or  
12 we have a plat which shows the lands and the wells within  
13 two mile arcs of the proposed injection wells. The color  
14 coding here, the triangular wells marked in red are those  
15 planned for gas injection; those in blue, the two center ones  
16 will be converted wells to water injection; the north and  
17 south blue triangles would be new water injection wells.

18 All of the land within those arcs that  
19 has no color means that it's leased by Benson-Montin-Greer  
20 Drilling Corp., or SNB Drilling Company, both of whom are  
21 parties to the unit agreement.

22 Lands colored are lands either unleased  
23 or owned by other parties.

24 Those in yellow are Federal lands that  
25 are not leased.



1 Those in blue are fee lands that are not  
2 leased.

3 Those in orange are owned by operators  
4 who have not yet committed to the unit agreement.

5 MR. NUTTER: In other words, what was that  
6 last?

7 A. The two little tracts colored in orange.

8 MR. NUTTER: Yeah, those are the only  
9 lands that are leased that are not committed?

10 A. Yes.

11 MR. NUTTER: By the working interest.

12 A. By the working interest, and we're nego-  
13 tiating on those and I feel that we probably will get them.  
14 It represents about 3/10ths of 1 percent of the working in-  
15 terest.

16 MR. NUTTER: How about all this open  
17 government land? Will it be put up for lease within the near  
18 future?

19 A. Well, we presume, and the discussions  
20 we've had with the USGS representative, is that once the unit  
21 is effective, then depending on their paper process, why,  
22 they will have the lands put up for sale, and how long that  
23 will take, we don't know, but by virtue of the way we have  
24 our operating agreement structured, we feel we do not have to  
25 wait on the sale in order to proceed. We can go ahead and

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1 get to work and of course the quicker they have the sale, why,  
2 the better, but we can move ahead and when the parties come  
3 in they can pay their share. If we're still drilling, well,  
4 they can pay their share then; if not, they'll just have to  
5 reimburse those who have paid.

6 MR. NUTTER: Well now, to put it bluntly,  
7 Mr. Greer, by the time you have placed a value on all these  
8 wells and all these improvements that you've got in here, and  
9 you're making those people buy these prospective leases, pay  
10 for those improvements, this puts them in a pretty bad dis-  
11 advantage trying to buy into the unit, doesn't it?

12 A. Oh, I don't know. It's -- I'd say it's  
13 not like finding a bird's nest on the ground, but --

14 MR. NUTTER: But doesn't it put you in  
15 a better position to bid on the leases if they're put up for  
16 competitive bidding?

17 A. Oh, I presume that's true in any instance  
18 where one already has an investment in a property and a new  
19 man comes in and wants to buy into it, and he hasn't paid  
20 anything, why, yeah.

21 MR. NUTTER: Well, you've already had a  
22 certain amount of use out of some of those wells.

23 A. Yes, we've had some use out of them, no  
24 question about that. But also we feel that it's not fair to  
25 us just to give them an interest. In round numbers we're

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1 talking about \$4-1/2 million worth of wells and we're talking  
2 about \$50 million worth of oil.

3 So they're certainly obligated to pay  
4 some.

5 MR. NUTTER: What's the total amount of  
6 acreage that's not leased today?

7 A. I don't have the acreage amount. The  
8 equity amount of about 5 percent.

9 MR. NUTTER: About 5 percent of the total  
10 unit.

11 A. Right.

12 MR. NUTTER: Go ahead, I'm sorry.

13 Q. In your opinion, Mr. Greer, is the pro-  
14 posed method of participation fair and equitable for all the  
15 parties?

16 A. I believe so. The -- we tried a number  
17 of different formulas, and in the end we come up with just  
18 about the same.

19 Oh, one thing before we leave this plat,  
20 we've outlined one little tract in green in the southwest  
21 quarter of Section 9. The ownership there is just a little  
22 indefinite. We think we have some leases on part of the in-  
23 terest but that's a fee tract. Three or four estates are in-  
24 volved; a number of people.

25 MR. NUTTER: Is that that old T. D. Burns

1 estate?

2 A. Right. So there is a question there as  
3 to what -- just what the status of that is.

4 Q. Would you identify for us now, Mr. Greer,  
5 those exhibits and information that establishes the -- your  
6 anticipated recovery from the institution of the secondary  
7 and tertiary projects?

8 A. Yes, sir. We might take a quick look at  
9 the laboratory analysis we've had on the tertiary work.  
10 That's under Section M.

11 The significant information is on Table  
12 4. The pages are not numbered; it's Table 4, in which three  
13 runs were made with different kinds of chemical injectants.

14 The first column is with straight sodium  
15 hydroxide, 3 percent solution. The second and third ones  
16 were with the same sodium hydroxide but with polymers added.

17 I've underlined the waterflood recovery  
18 in red under the oil recovery section, and the tertiary oil  
19 recovery underlined in red.

20 For instance, under column 1 --

21 MR. NUTTER: You don't have any underlining  
22 on mine, Mr. Greer. Where do we underline?

23 A. The one I might call attention to, the  
24 first red underline under Column 1 shows 48 cc recovered from  
25 this particular core, which incidentally, these are radial

1 floods, a special type of core analysis, I think really is  
2 pretty representative of what might be expected. The problem  
3 is, of course, we had to use Berea cores. We didn't have a  
4 formation core to use.

5 Recovered 48 cc by waterflood. Now that's  
6 both primary and a waterflood recovery.

7 Then the tertiary recovery is 30 cc in  
8 addition to that, which in terms of percent of the initial  
9 recovery is about 62 percent.

10 There's a little higher recovery in runs  
11 two and three with the polymers added, but that increases the  
12 viscosity of the water and it's my feeling that we would be  
13 better with a low viscosity water than a high viscosity where  
14 we're trying to float the oil on top of the water, and so  
15 we're thinking about straight -- straight caustic.

16 Now although this shows a 62 percent in-  
17 crease, I've assumed maybe a 3/4ths efficiency factor and the  
18 number I've used is about 46 percent that we might hopefully  
19 expect to pick up of tertiary recovery in addition to the  
20 waterflood recovery.

21 The graphs of the laboratory tests, which  
22 we might look at the first one, shows how -- how the oil cut  
23 drops off as the core is flooded, to about 2 or 3 tenths of  
24 a percent of pore volume, the water cut drops real low.

25 Then on the second graph you can see how,

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1 again after 2 or 3 tenths of pore volume is injected, the oil  
2 cut picks up.

3 Then there are some photographs at the  
4 end of that section where they took pictures of the test tubes  
5 which they gathered at every 5-hundredths of a pore volume  
6 that was flooded.

7 The upper lefthand photo, the dark color  
8 you can see is the oil that's recovered, and where it's light,  
9 that's water, and you can see that after six or eight test  
10 tubes, or about 3-tenths of a pore volume, that the oil cut  
11 drops to a very small amount.

12 Then they start the tertiary chemicals in  
13 and on the lower lefthand photograph you can see how initially  
14 the oil cut is small but it increases with -- with the flood.

15 We were surprised that this oil would  
16 respond as well as it did to caustic, but it appears to be  
17 that it could be quite helpful.

18 That's the basic information that we deal  
19 with for the expected increase through tertiary methods.

20 Now, by unitizing the -- perhaps the most  
21 important thing we can do is save dissipating the gas. By  
22 picking up the produced gas and re-injecting it, we can main-  
23 tain the reservoir pressure, keep the viscosity low, and we  
24 think we can do two things: We can let the gravity drainage  
25 process continue through the high capacity fracture system.

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1 We found that we ran tests in the West Puerto Chiquito Pool,  
2 just a few miles away, the same formation. We concluded that  
3 the reservoir is made up of blocks, kind of like a jigsaw  
4 puzzle, tight blocks with high capacity fracture system in  
5 between.

6 Initially we drained the high capacity  
7 fracture system, the gas and -- nearest to the well bores,  
8 and we produce high volumes of gas. There still, we think,  
9 is oil left in the tight blocks, and one of the questions is  
10 how do we best recover that. If we go ahead and blow the  
11 pressure down that, as soon as the gas in the high capacity  
12 system reaches the down dip producers, we're looking only at  
13 solution gas drive recovery in the tight blocks; whereas, if  
14 we can continue to maintain the pressure for a long time, we  
15 think we can get part of the oil out of those tight blocks  
16 by gravity drainage and sweep them with the gas on down the  
17 high capacity system to the producers.

18 Now this is just a theory but we think it  
19 has a little bit of substance to it through one of the tests  
20 we have run in West Puerto Chiquito Pool, and that's shown in  
21 this yellow graph under Section O.

22 In West Puerto Chiquito the same as in  
23 East Puerto Chiquito, as soon as wells reach a high gas/oil  
24 ratio, and by high we mean like, oh, four or five times their  
25 solution ratio, in West Puerto Chiquito when the ratio reached

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1 about 2000-to-1 we shut the wells in. With the exception of  
2 this particular well, the C-34, when the gas in the high cap-  
3 acity system reached this well we went ahead and produced it  
4 to see what would happen if the gas/oil ratio would just go  
5 out of sight or if it would level off somewhere if we might  
6 pick up producer oil, and it appears, in this well, at least,  
7 when the ratio reached about 10,000-to-1 it leveled off.

8 In 1974 this particular well had produced  
9 about 300,000 barrels of oil and in six years since then  
10 even that high gas/oil ratio, it's produced another 150,000  
11 barrels of oil. I think a good part of that could have come  
12 from drainage of tight rocks in support of this theory that  
13 we think the reservoir is made up of these tight rocks and  
14 high capacity system.

15 If, for instance, this well would continue  
16 on as it's indicated here for 20 years, it's already gone  
17 6, why it would produce another 400,000 barrels of oil beyond  
18 the time at which it produced 300,000. That would be over  
19 half as much would come out of perhaps the tight rocks as  
20 compared to the high capacity system.

21 And just from some of the theoretical  
22 analyses we made earlier we felt like that could be as much  
23 as half of the oil in the tight rocks, half in the high capa-  
24 city fracture system.

25 MR. NUTTER: Now, Mr. Greer, are you

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1 talking about the oil that's in the matrix itself or are you  
2 talking about in tiny fractures?

3 A. I'm really talking about -- by blocks I  
4 mean substantial areal segments of the reservoir. If you  
5 can think of it as a jigsaw puzzle and a block being like 30  
6 to 70 acres big. That's about the size that we measured  
7 through our interference tests and pressure tests in West  
8 Chiquito, and the behavior of the wells is such that -- that  
9 you've drilled a well that's in, say, a 40-acre tight block,  
10 and if it's surrounded by high capacity system, just like  
11 the ocean around it, then this is how the reservoir has be-  
12 haved, and I believe that's the way it actually is.

13 And so when I speak of a tight block, I'm  
14 speaking of a large segment of the reservoir, 30, 40, 50 acres.  
15 It drains, and oil seeps out slowly into the high capacity  
16 system. If we're cycling gas, we've got a chance of picking  
17 that up, if we don't let the pressure drop. Presumably,  
18 when the oil drains through the high capacity system it left  
19 a thin film of oil on the sides. Additional oil could fall  
20 and flow along those -- that same film, if we haven't destroyed  
21 the film. Now, if you let the pressure deplete, gas will  
22 come out of solution, that oil on the -- that thin film of  
23 oil will no longer be a film. It will be dried up and there  
24 is nothing left to get the oil out of the tight blocks and  
25 it just stops right there.

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1 So by holding the pressure up and sweeping  
2 gas through it, we feel we can pick up additional oil. The  
3 amount could be all the way up to as much as 100 percent of  
4 what we've already produced. The estimate that I've made  
5 here is that realistically we might hope for 10 percent, and  
6 that's what I put in my estimate. I hope I'm conservative.

7 I feel that we'll get maybe 10 percent  
8 more from the high capacity system that still is above the  
9 lowest producing wells.

10 Then below the lowest producing wells we  
11 have oil that I call basement oil, that exists from that  
12 structure position down to the water/oil contact. That oil  
13 we hope to get by injecting water down dip in the water zone  
14 with tertiary chemicals in it, and float the oil above that.  
15 I've estimated maybe 15 percent of what we've already produced  
16 can be recovered that way.

17 And then I feel that the tertiary chemi-  
18 cals should work on a minimum of the oil that's left in the  
19 high capacity system and where we move the water up through  
20 the basement oil now.

21 So when you add all those together, they  
22 are itemized here on the first white sheet under Section O,  
23 300,000 barrels -- the wells have produced about 3,000,000  
24 so far. 10 percent would be 300,000 barrels from the high  
25 capacity system; another 10 percent from the tight rocks,

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1 totalling 600,000 we can get from reserving the pressure and  
2 gas injection; pick up 400,000 from waterflood, and another  
3 400,000 by tertiary, and we figure 300,000 the tertiary, a  
4 direct result of the chemicals and then another 100,000 bar-  
5 rels because of drilling additional wells. We'll drill ad-  
6 ditional wells because of the front end tertiary incentive  
7 program that the Department of Energy has introduced, which  
8 lets us release this \$6.00 oil to \$40.00 if we take the in-  
9 crease in income and put it into a tertiary project.

10 Then we -- the analysis in terms of cost  
11 to institute the secondary and tertiary methods is shown on  
12 page two, summarized at the bottom.

13 For gas injection we estimate it will  
14 cost us \$400,000 to institute that system. We'll pick up,  
15 hopefully, 535,000 barrels at .34 cents a barrel.

16 And we might take a look at the graph at  
17 the end of this section to see how we've estimated -- or how  
18 these look.

19 You can see that the present rate of de-  
20 cline is 25 percent a year, the way the wells have been pro-  
21 duced now. We've had to shut wells in in order to preserve  
22 the gas and I've shown here for the middle of 1980 that if  
23 we put all wells on production now, the ones that have been  
24 shut in, we would increase the rate from roughly 40,000 bar-  
25 rels a year to 80,000 barrels a year, but I would expect a

1 very high rate of decline from there, like 75 percent a year.  
2 That's shown on the lefthand side of the yellow colored area.

3 If, however, we save that gas through a  
4 gas gathering, gas injection system, then we can stretch out to  
5 the righthand side of the yellow colored area, about 12 percent  
6 a year, and pick up that additional volume of oil.

7 The green shaded area shows what I think  
8 we'll get from waterflooding, and then the pink is the in-  
9 crease by the tertiary chemicals.

10 Then those costs shown on page two at the  
11 center of the page amounts to about \$1.30 a barrel for gas  
12 injection for the additional oil recovery, \$1.60 a barrel for  
13 waterflooding, and about \$10.00 a barrel for the extra oil  
14 that I expect to get from tertiary.

15 Under Section P we just show the plan of  
16 operation, which we will submit when we present the agreement  
17 for approval, which simply is just what we've discussed.

18 Perhaps we should mention, there's a form-  
19 ation water analysis under the section where the -- regarding  
20 the tertiary chemical laboratory data.

21 As to injected water, we're not sure what  
22 we'll use. We have the right to use one of the wells shown  
23 on the plat in Section 13 to get Dakota water for injection.  
24 We've still not run enough tests to know if that's what we  
25 want to inject or not, primarily because of how it reacts

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1 with the tertiary chemicals.

2 So that's one of the points not yet de-  
3 finitely decided.

4 As to wells within a half mile radius of  
5 the injection wells, there are none within a half mile radius  
6 of the water injection wells, and the gas injection wells,  
7 we're not certain yet which ones we'll use. We have a little  
8 bit of a problem there in that we want to inject gas into  
9 one zone and one well and the second zone in another well.  
10 In order to know which wells we can do that, we're going to  
11 have to go in and work on them and then come back and submit  
12 the details of the completion of those wells and the wells  
13 that are within a half mile radius of them.

14 Q Mr. Greer, are you familiar with Division  
15 Memo 3-77, with regards to limitation on injection pressure  
16 into injection wells?

17 A Yes, sir.

18 Q And will any of your proposed wells ex-  
19 ceed that pressure limitation factor, 0.2 psi per foot of  
20 depth?

21 A No, sir, in fact we think the water will  
22 probably go in on vacuum. I'm estimating 400 pounds surface  
23 pressure for the -- the gas injection wells. The existing  
24 pressure in the secondary gas cap now is about 150 to 175  
25 pounds.

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1 Q Was Exhibit One and all its attachments  
2 prepared by you or compiled under your direction and super-  
3 vision?

4 A Yes, sir.

5 Q In your opinion will approval of these  
6 applications be in the best interests of conservation, the  
7 prevention of waste, and the protection of correlative rights?

8 A Yes, sir.

9 MR. KELLAHIN: That concludes our exam-  
10 ination. We move the introduction of Exhibit One.

11 MR. NUTTER: Exhibit One will be admitted  
12 in evidence.

13  
14 CROSS EXAMINATION

15 BY MR. NUTTER:

16 Q Mr. Greer, now to consolidate all of your  
17 testimony, first of all, you're seeking approval of the East  
18 Puerto Chiquito Mancos Unit Area, and that's in Case Number  
19 6943.

20 A Yes, sir.

21 Q And then second, in Case Number 6944,  
22 you're asking for approval for a pressure maintenance project  
23 in that unit area?

24 A Yes, sir.

25 Q Okay. Now, the project would be by the

1 injection of what?

2 A. We'll inject gas in the up dip gas in-  
3 jection wells, and we'll inject water with some alkali metal  
4 as a tertiary recovery process. The alkali metal we're  
5 thinking of now is either sodium hydroxide or sodium carbonate.  
6 The test runs so far have indicated the oil responds better  
7 to sodium hydroxide than to sodium carbonate.

8 Q. Now would this tertiary process be begun  
9 at the beginning of the injection program or would you have  
10 a straight water injection program down dip and a gas in-  
11 jection program up dip carried out first and later on the  
12 chemical injections?

13 A. We're thinking about starting the chemi-  
14 cals right away for the reason that -- let's see, if you'll  
15 refer to the colored plat, contoured plat, under Section L,  
16 the water/oil contact is not -- not absolutely -- we don't  
17 know exactly where it is. We think it's approximately between  
18 the 3800 and 4000 foot contour interval, but wherever it is  
19 there, there's going to be a substantial amount of water  
20 move up ahead of anything we inject in the injection wells,  
21 the water injection wells, so that in a sense we are going  
22 to have a waterflood first, followed by a chemical flood,  
23 even if we start the chemicals immediately, because we don't  
24 plan on starting water in any of the oil saturated area. We  
25 just plan on putting water and the chemicals only in the

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1 water zone below the oil.

2 Q Well now, what has been going out here  
3 up to date? Have you been injecting gas?

4 A No, sir. No, all we've done is shut in --  
5 just shut in high ratio wells?

6 A -- high ratio wells, yes.

7 Q So, actually, we're going from a primary  
8 production into a tertiary production, and then where's the  
9 secondary? That's what --

10 A Actually, the secondary will come ahead  
11 of the -- the secondary waterflood will come ahead of the  
12 tertiary, just because we've got that fresh water band, and  
13 there's probably -- there may a half a million remaining  
14 barrels of water there that's going to move up to the oil zone  
15 before the tertiary chemicals hit.

16 But if we inject water first and flood it  
17 out completely and then go to tertiary chemicals, I'm afraid  
18 then that economics might not justify it, because we might  
19 have to wait then for this half a million barrels of water to  
20 move through before we see any response.

21 Q Before the chemicals would get to it.

22 A Right, and that could take several years.

23 We feel that we have to inject the water real slow. We've  
24 had very good luck in West Puerto Chiquito with gravity seg-  
25regation in this fractured formation by the difference in

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1 gravity -- or the density of the gas and the oil.

2 Q I see.

3 A We think we'll have the same thing working  
4 in our favor here, the difference in the density of the water  
5 and the oil, but we know that we must move it real slow.

6 Q Would it be fair and would it upset your  
7 cost estimates or your profit estimates if we called it a com-  
8 bination secondary-tertiary recovery program?

9 A Oh, no problem at all, because in a sense  
10 it's just all going to be going on concurrently.

11 Q But that doesn't affect you as far as  
12 DOE prices and incentives on tertiary recovery?

13 A No, sir, we --

14 Q If we call it a combination secondary-  
15 tertiary recovery pressure maintenance project.

16 A Right. There are so many questions with  
17 the Department of Energy regulations, you know, all we can do  
18 is make an educated guess as --

19 Q Just hope you come out right.

20 A --to what it's going to be, and five years  
21 from now when the auditing is all done, we'll find out whether  
22 we guessed right or not.

23 Incidentally, we've asked for an exception  
24 to their rules on determining of base production control level  
25 under unitization. Their rules are such now, which is just

1 as hard to understand, but then a lot of their rules are hard  
2 to understand, we suffer a -- having a higher BPCL by unitizing  
3 than if you take the properties individually.

4 When we asked for our exception we found  
5 that there had been one other exception asked for. That was  
6 by Shell and for the Hobbs Pool for the same thing. So we're  
7 hoping, of course, they're going to rule favorably on Shell's  
8 application and so they probably will on ours.

9 Q Okay, now, Mr. Kellahin in filing his  
10 application stated that you propose to convert the following  
11 existing wells to injection wells, and then he listed five  
12 wells, and he also proposed to drill new injection wells at  
13 the following locations, and gave us two.

14 Now, could you be specific and tell us  
15 which of those are gas injection wells and which are water  
16 injection wells?

17 A Yes, sir. If you'd look again under  
18 Section L at that plat, and we'll identify them.

19 Q Is that same colored plat?

20 A Yes, sir, the same colored plat.

21 On the lefthand side is a row of blue  
22 colored wells. The two center ones, marked H-25 and S-6 are  
23 existing wells that we will convert to water injection wells.

24 The new two wells we want to drill --

25 Q You're going too fast for me, Mr. Greer.

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- 1 A. Oh, okay.
- 2 Q. 25 and --
- 3 A. H-25, that's at Unit H in Section 25.
- 4 Q. All right.
- 5 A. And then the F-6 is Unit F in Section 6.
- 6 Q. Oh, you call that S-6 on this.
- 7 A. Oh.
- 8 Q. It's F-6, Section 6.
- 9 A. Right, uh-huh.
- 10 Q. That's a water injection well.
- 11 A. Yes.
- 12 Q. Okay, and then?
- 13 A. Then Section 19, up in the lefthand cor-  
14 ner, somewhere in that northwest quarter we want to drill an  
15 water injection well.
- 16 Q. Do you have the 40-acre tract picked out  
17 yet for that?
- 18 A. No, no, sir, we do not. We do not.
- 19 Q. Could you make that determination and  
20 let me know a 40-acre tract for it?
- 21 A. Okay.
- 22 Q. And I can just specify a Unit D, or E,  
23 or F, or whatever it is, if you'll just give me a 40.
- 24 A. Okay. One of our problems there, you  
25 know, is the Indian land. It's pretty country up there and

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1 we have to be careful just where we locate it.

2 Q. Yes.

3 A. Okay, the same thing would be true in  
4 Section 7, the northeast quarter there.

5 Q. Section 7, right.

6 A. Then the proposed gas injection wells are  
7 those colored in red.

8 Q. And those three are already drilled.  
9 That's G-29, C-2, and G-4, is that correct?

10 A. Right, uh-huh, and our plan there is to  
11 go in and test these wells. First we need to pressure test  
12 the casing and then we need to see if we can get the bottom  
13 and which are the ones -- I think one of them only goes to  
14 the first zone, and we need to -- I hope to have them in shape  
15 that we can inject in one zone in one well and another zone  
16 in the other well.

17 If we can't get enough gas in that at  
18 400 pounds pressure, we may need to convert some additional  
19 wells, which we presume we can come back to ask for that if  
20 need be.

21 Q. I think the project rules would probably  
22 specify additional wells be drilled and converted to injection.

23 A. I see.

24 Q. Now, did you have any special rules for  
25 the operation of the project that you were proposing?

1 A. Well --

2 Q. As far as production limitations or allow-  
3 able transfers, or credits on high GOR's, anything like that?

4 A. Nothing special. We will, of course, want  
5 to produce the most efficient wells with the higher rates,  
6 and --

7 Q. Will you be continuing to shut in high  
8 GOR wells?

9 A. My plan is to operate within the limits  
10 of our compressor, and what we disgned -- what we designed  
11 it for is on the assumption that we'll be producing from 100  
12 to 300 barrels a day, and we can handle up to about 3,000,000  
13 feet of gas with the compressor, which means we could go to  
14 a gas/oil ratio average of 10,000-to-1 at 300 barrels a day,  
15 or 30,000-to-1 when we get down to 100 barrels a day, and  
16 depending on how much of that gas we have to use either for  
17 gas lift or if we have to operate a little bit higher pressure  
18 than I'm estimating, then we have those limitations, but  
19 within those limitations, we just produce all the wells all  
20 the time.

21 Q. It won't be so critical to shut them in  
22 now if you're re-injecting gas.

23 A. No, as long as we re-inject gas, then I  
24 think the cycling can't do anything but help.

25 Q. Will you be stiffening this gas or running

1 it through any kind of a plant?

2 A. Well, we thought about it. It's really  
3 a small volume and I'm sure as time goes on we're going to  
4 want to be thinking about it.

5 The issues, of course, are that we're  
6 dealing with a high capacity fracture system, the gas is, al-  
7 though it will be work going through that system, whether it  
8 would get exposed to a big enough area of the reservoir to  
9 pick up additional hydrocarbons, liquid hydrocarbons, we  
10 don't know, but the odds are we'll be thinking about it.

11 In round numbers I think we'll be cycling  
12 a core volume every six or eight months in the gas zone,  
13 whereas it will probably take 20 years to cycle a core volume  
14 of water.

15 Q. Okay, now what about the configuration or  
16 the construction of the injection wells? You said you plan  
17 to test these injection wells before you ever use them to be  
18 sure that the casing and cementing programs are intact.

19 A. Right.

20 Q. Then what will you be doing, going down  
21 tubing?

22 A. Yes. Our plan will be to -- we'll have  
23 the casing cemented into the Mancos and then we'll set tubing  
24 on a packer with the packer fluid in the annulus, and of  
25 course we'd like oil for that packer fluid, and dealing with

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1 \$6.00 oil we might just as well use it as packer fluid, ex-  
2 cept of course, a little bit of additional energy we give the  
3 country, why, we probably should go to a water with treated  
4 water and give the government that oil.

5 But that would be the plan.

6 Q. Now, how about the -- how about these two  
7 wells that have already been drilled, are they drilled down  
8 into the Mancos and cemented through the Mancos?

9 A. The --

10 Q. Or will you have to recement them?

11 A. The 6 has a liner set -- it's just about  
12 where we want it, and it is drilled -- has been drilled into  
13 an open hole with cable tools into the Zone A, and it has a  
14 good capacity, like 10 or 20 barrels an hour. It will be a --  
15 I think we have a dandy injection well in that zone.

16 The H-25 just north of it has been -- has  
17 been drilled to both zones; has 7-inch casing set into the  
18 Mancos. We will clean it out and run a 5-inch liner through  
19 both zones and probably inject in only the lower zone, if we  
20 can get satisfactory injection rate in it.

21 Q. Then how about the two injection wells  
22 you propose to drill?

23 A. The other two, I have hopes that we can  
24 run liners, cement liners, to both zones and figure out a way  
25 that we can inject, either control injection into each zone,

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1 or at least be in shape where we can alternate injection in  
2 one zone and the other, depending on what it looks like we  
3 should do.

4 Q Now, you're going to using some rather  
5 toxic chemicals here, Mr. Greer. Have you made investigation  
6 as to methods and means of handling this so that it won't be  
7 contaminating any fresh water supplies, and so forth?

8 A Yes, sir, we have. In fact, we visited  
9 one of Gulf's operations in the North \_\_\_\_\_ Field here  
10 two or three weeks ago, and by the way, they were most kind  
11 to take us out and show us everything, and I was impressed,  
12 of course, by the problem of handling these caustics, and  
13 we'll be taking every precaution to -- to protect not only  
14 the fresh water zones but our people in handling them. They  
15 are dangerous.

16 Q And all injection would be through tubing  
17 and the annulus would be loaded.

18 A Right, yes, sir.

19 Q With the oil.

20 Would the injection into those three gas  
21 injection wells be through tubing, too?

22 A Yes, sir. Yes, sir, it would.

23 MR NUTTER: Are there any further ques-  
24 tions of Mr. Greer? He may be excused.

25 Do you have anything further, Mr. Kellahin?



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MR. KELLAHIN: No, sir.

MR. NUTTER: Does anyone have anything  
they wish to offer in Cases 6944 and 6943?

We'll take the cases under advisement.

(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 Conservation Division was reported by me; that the said transcript is a full, true, and correct record of the hearing, prepared by me to the best of my ability.

Sally W. Boyd C.S.R.

SALLY W. BOYD, C.S.R.

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I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the two-day hearing of Case No. 6943-6944  
heard by me on 7/9 19 80.

[Signature], Examiner  
Oil Conservation Division