

1 STATE OF NEW MEXICO  
2 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
3 OIL CONSERVATION DIVISION  
4 STATE LAND OFFICE BUILDING  
5 SANTA FE, NEW MEXICO

6 23 August 1989

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Devon Energy Corporation  
10 for a unit agreement, Eddy County, New  
11 Mexico, and

CASE  
9734

12 Application of Devon Energy Corporation  
13 for waterflood expansion and to amend  
14 Division Order No. R-7926, Eddy County,  
15 New Mexico.

CASE  
9735

16 BEFORE: David R. Catanach, Examiner

17 TRANSCRIPT OF HEARING

18 A P P E A R A N C E S

19 For the Division:

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21 Attorney at Law  
22 Legal Counsel to the Division  
23 State Land Office Building  
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25 For Devon Energy  
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1 MR. CATANACH: Call next Case  
2 9734 at this time.

3 The application of Devon  
4 Energy Corporation for a unit agreement, Eddy County, New  
5 Mexico.

6 Are there appearances in this  
7 case?

8 MR. KELLAHIN: Mr. Examiner,  
9 I'm Tom Kellahin of the Santa Fe law firm of Kellahin,  
10 Kellahin & Aubrey, appearing on behalf of the applicant.

11 At this time we'd like to con-  
12 solidate the unit case, 9734, with the request for water-  
13 flood modifications to our project. That's Case 9735.

14 MR. CATANACH: Okay, at this  
15 time we'll call Case 9735 and consolidate the two cases.

16 Application of Devon Energy  
17 Corporation for a waterflood expansion and to amend Divi-  
18 sion Order No. R-7926, Eddy County, New Mexico.

19 Are there any other appear-  
20 ances in either one of these cases?

21 MR. KELLAHIN: I have four  
22 witnesses to be sworn.

23 MR. CATANACH: Will the wit-  
24 nesses please stand to be sworn in?  
25

1 (Witnesses sworn.)

2  
3 MR. KELLAHIN: Mr. Examiner,  
4 our initial witness is Mr. Curtis McKinney. Mr. McKinney  
5 is a petroleum geologist with Devon Energy Corporation. He  
6 has organized his exhibit book in the blue binder.

7 While I have yet to stamp his  
8 displays with the exhibit numbers, I will do that after the  
9 hearing, we will follow in order of his presentation. Our  
10 Exhibit One will correspond to what he has inserted in  
11 pocket one of the exhibit book, which, for example, is the  
12 current status map.

13 We will then try to identify  
14 for the record each of the displays and then subsequent to  
15 the hearing I will -- I will mark them with your exhibit  
16 stamp.

17  
18 CURTIS MCKINNEY,  
19 being called as a witness and being duly sworn upon his  
20 oath, testified as follows, to-wit:

21  
22 DIRECT EXAMINATION

23 BY MR. KELLAHIN:

24 Q Mr. McKinney, for the record would you  
25 please state your name and occupation?

1           A           My name is Curtis McKinney. I'm a pet-  
2   roleum geologist for Devon Energy Corporation.

3           Q           On prior occasions, Mr. McKinney, have  
4   you testified as a geologist before the Division?

5           A           No, I have not.

6           Q           Would you take a moment, sir, and de-  
7   scribe your educational background?

8           A           I have a BS in geology taken in 1979 and  
9   subsequent to that I've been employed by Devon Energy Cor-  
10   poration for approximately 10 years as a petroleum geolo-  
11   gist.

12          Q           Pursuant to your employment as a petro-  
13   leum geologist, have you studied the geologic factors sur-  
14   rounding the Grayburg-Jackson-San Andres Flood that was  
15   formerly operated by Texas American Oil Corporation and is  
16   now operated by Devon Energy Corporation?

17          A           Yes, I have.

18          Q           And this located in Eddy County, New  
19   Mexico?

20          A           Yes.

21                       MR. KELLAHIN: At this time,  
22   Mr. Examiner, we tender Mr. McKinney as an expert petro-  
23   leum geologist.

24                       MR. CATANACH: He is so qual-  
25   ified.

1           Q           Let me ask you, sir, to take what is  
2 identified as the current status map. We have labeled that  
3 as Devon Exhibit Number One. And before we get into the  
4 geologic discussion of what you have studied and what you  
5 have concluded, Mr. McKinney, let me have you use this  
6 display and help orient the Examiner as to the type of  
7 wells involved in the flood, how to identify the outer  
8 boundary of the flood, and to show him the location of the  
9 outline of cross sections that we're going to be discus-  
10 sing.

11           A           All right. In the center of this exhi-  
12 bit. Section 16, you can see some dashed lines that circum-  
13 scribe portions of Section 16 and the northeast portion of  
14 Section 17. That outlines our leasehold in this area and  
15 that's the -- that's the area that we would like to unitize  
16 for waterflooding purpose.

17                   Of interest to our waterflood are the  
18 yellow circles or the wells that are colored yellow. Those  
19 are the Grayburg producers and it's the Grayburg formation  
20 that we wish to flood.

21                   There is a pilot injection project un-  
22 derway currently and the injectors for that project are  
23 shown as yellow triangles.

24                   Cross sections noted, there's an east-  
25 west cross section denoted as A-A', which crosses more or

1 less through the center of Section 16 in the east-west  
2 direction, and cross section B-B', which crosses Section  
3 16, as well, on a north to south direction.

4 Q When we look in the immediate area off-  
5 setting the Devon waterflood project, are there other  
6 waterflood projects being conducted by other operators in  
7 the Grayburg formation?

8 A Yes, there are. To the north and  
9 northeast, I believe it is Anadarko that has a waterflood  
10 underway that they call their Square Lake Waterflood, and  
11 to the immediate east and somewhat to the southeast there  
12 is an older waterflood, also, in the Grayburg. I don't  
13 recall the name of that waterflood but the Grayburg is  
14 being flooded offsetting us.

15 Q In reviewing the geologic data that's  
16 available to you, have you been able to formulate an opin-  
17 ion as to whether the outer boundaries of this waterflood  
18 project area, the unit, has a logical geologic explanation  
19 for inclusion within the project area?

20 A Yes, I have.

21 Q And what is that opinion?

22 A I believe that there's permeability  
23 barriers located to the -- in the northwesterly direction  
24 and to the -- to a degree, to a lesser degree, to the  
25 southerly direction and the individual reservoirs within



1 the Grayburg formation are uniform across our acreage.  
2 That's really the basis for the flood.

3 Q Can you locate within the unit area from  
4 wellbore to wellbore, Grayburg production and have that  
5 production on log correlation be continuous throughout the  
6 unit area?

7 A Yes. Yes. It's very easily demon-  
8 strated.

9 Q Geologically, do you find in your opin-  
10 ion that this is a suitable formation in a logical area by  
11 which waterflood projects or waterflood injection can oc-  
12 cur?

13 A Oh, yes.

14 Q Let's talk about the vertical relation-  
15 ship of the various formations in this immediate area and  
16 particularly look at the well-to-well correlation of the  
17 Grayburg formation and in illustrating that presentation,  
18 Mr. McKinney, let me ask you to turn to pocket 4 and let's  
19 look at cross section A-A'.

20 Let me, first of all, before you begin  
21 describing Exhibit Four, have you explain to us why you've  
22 selected this particular row of Grayburg wells to construct  
23 the east/west cross section.

24 A Well, some of the engineering data per-  
25 tinent to this project will -- comes from the existing

1 pilot flood and this cross section goes right through it.

2 It begins on the north -- excuse me,  
3 begins on the west with the Grayburg producer, goes to an  
4 injector, then to another Grayburg producer, and then fin-  
5 ishes with another Grayburg producer on the far eastern  
6 edge of the unit, proposed unit.

7 Q Is the east/west cross section, A-A',  
8 going to be typical of -- of the Grayburg wells in this  
9 area?

10 A Yes.

11 Q All right, and had you selected other  
12 wells to construct the east/west cross section with, you  
13 would have had a similar result or a similar depiction of  
14 the geology that you see here in Exhibit Four?

15 A Yes.

16 Q Let me have you identify and describe  
17 for us the major geologic conclusions that you see as an  
18 expert when you examine Exhibit Number Four.

19 A Okay. This is a stratigraphic cross  
20 section hung on the top of the Grayburg formations. The  
21 formations are labeled on the righthand side of this exhi-  
22 bit.

23 The individual reservoirs within the  
24 Grayburg are also labeled. Our primary zones of interest  
25 for flooding are the Loco Hills member, the Metex member,

1 which I break into an upper, middle and lower units, and  
2 the Premier member at the base, and the Grayburg is under-  
3 lain by the San Andres formation, and what this primarily  
4 shows is the horizontal continuity of each of these mem-  
5 bers of the Grayburg and therefor their suitability to the  
6 response to a flooding operation.

7 Q Is it geologically suitable to use the  
8 entire Grayburg formation as shown on this cross section as  
9 the flood area rather than try to flood individual or  
10 separate members of the Grayburg formation?

11 A We believe that would be the most eco-  
12 nomic way to approach the flood on our leasehold. There's  
13 -- I can think of no reason to isolate one member or an-  
14 other. Part of the reason for that is this is an old unit  
15 and it's difficult to attribute specific primary recovery  
16 to any one single member. We have -- we have production  
17 attributed to the Grayburg formation as a whole, so it  
18 would be difficult to select an individual member as having  
19 a great deal more residual oil than another, so we would  
20 opt to just flood the entire formation in the porous inter-  
21 vals as are -- which are indicated in the green on this  
22 cross section.

23 Q Let me have you go now to the B-B' cross  
24 section, which is the one that runs north/south. We're  
25 going to mark that as Devon Exhibit Number Five. Does this

1 also represent your work product, Mr. McKinney?

2 A Yes. All these exhibits are my work  
3 product.

4 Q What does this show you?

5 A It's very similar to A-A', again showing  
6 the lateral continuity of the reservoirs in a north/south  
7 direction and it ties at Well No. 19, which is your second  
8 well from the left on this cross section. It ties the  
9 other cross sections so that if a person wanted to compare  
10 the two cross sections it would be readily apparent. I  
11 believe that we do have lateral continuity within the Gray-  
12 burg formation in the units that we wish to inject water  
13 into.

14 The other -- well, that's basically --

15 Q One of the topics we're going to be dis-  
16 cussing with the Examiner is to request a surface injection  
17 pressure for the injection wells of approximately 1600  
18 psi.

19 A Yes.

20 Q Which I understand will be a pressure  
21 above the step rate pressures in certain wells and will be  
22 in excess of the .2 psi per foot of depth guideline.

23 My question for you as a geologist is to  
24 what extent you have examined the formations immediately  
25 above and below the Grayburg formation to satisfy yourself

1 that those are -- that the Grayburg is adequately sealed so  
2 that injection fluids introduced into the Grayburg forma-  
3 tion are going to remain confined to that formation.

4           A           Geologically the Queen formation, which  
5 immediately overlies the Grayburg, is -- is just a tight,  
6 nonporous lime immediately above us, and furthermore, the  
7 Grayburg itself, there are some 50 feet of Grayburg above  
8 the first zone that we will be injecting into, the Loco  
9 Hills, that is equally impermeable.

10                   Beneath us is the San Andres, which the  
11 top 70 feet or so before you get to the Lovington porosity  
12 zone, is also a tight, impermeable, nonporous lime. So  
13 geologically we don't really have any -- we have -- we have  
14 good seals above and below.

15                   Of note on this cross section is the in-  
16 jector well, which is your second well from the left. It's  
17 fairly small type but it's the Etz State No. 24. There is  
18 some engineering testimony which will follow that -- pur-  
19 suant to mine -- that is of particular interest with this  
20 well 24. So all if really want to state about this is  
21 please note from this cross section how uniform the zone is  
22 and how correlative Well 24 is to the other wells in the  
23 cross section, as well as cross section A-A', because the  
24 engineering testimony will key off of Well 24, and I --  
25 that's what I really want to demonstrate with this exhibit.

1           Q           Are you satisfied, then, that the Etz  
2 State 24 Well is -- is very typical of all the other in-  
3 jector wells that are going to be selected and utilized for  
4 injection in the flood area?

5           A           Yes. Yes, I am.

6           Q           Have you attempted to map the structure  
7 in the area immediately inclusive of the waterflood project  
8 to see what the structure, the geology looks like?

9           A           Yes. Again noting on your cross sec-  
10 tion, you'll see the Loco Hills member of the Grayburg,  
11 that's readily correlated across the area, so it gives us  
12 an idea of what the structure is immediately above us. I  
13 made a structure map on the top of the Loco Hills porosity  
14 zone.

15          Q           All right, Mr. McKinney, let me take  
16 just a moment so we can clarify for the record how we're  
17 going to identify these exhibits. I propose that we'll  
18 take the first structure map, which is the top of the Loco  
19 Hills, is it not?

20          A           Yes, that's right.

21          Q           Let's mark that as Two-A and we'll mark  
22 the top of the San Andres structure map as Two-B.

23                   Now let me have you direct your atten-  
24 tion to the structure map on top of the Loco Hills and  
25 identify and describe that structure for us.

1           A           Again the unit is centered on the map in  
2 Section 16 and 17 and it's a -- basically shows an anti-  
3 cline plunging in an easterly direction and oriented with  
4 the axis due east/west. This is on the axis of the well  
5 known Vacuum trend and this is the structure that forms the  
6 Grayburg Jackson Field, very old field in that part of the  
7 state.

8           Q           Is there a geologic relationship or  
9 logic to the shape of the -- of the unit area with regards  
10 to the structure?

11          A           Could you repeat that, please?

12          Q           Sure. When you look at the structure  
13 map as shown on top of the Loco Hills, is there a geologic  
14 explanation to the boundaries and shapes of the surface  
15 area included within the unit?

16          A           Well, we certainly can see that the  
17 structure drops off to the south, so we would be high to  
18 those wells, which would be advantageous to a flood, and it  
19 drops off also to the north of our unit, so it's also ad-  
20 vantageous; plunging to the east, that's an advantage.

21                    To the -- to the west it would be up  
22 dip; however, we are suspicious that to the west the Loco  
23 Hills, which is the best developed member of the Grayburg  
24 in this area, may be more gas productive and less oil pro-  
25 ductive and therefor would not be as good a location for

1 our flood. So we think we're well located on the axis of  
2 this structure, down dip of higher gas saturations if there  
3 be some. I don't have technical data to demonstrate that.  
4 It's mostly derived from initial potentials and such from  
5 wells over there. They're certainly not gas well, they're  
6 oil wells, but that -- that plays a part in our thinking.

7 Q Can you reach similar conclusions from  
8 an examination of the structure which is drawn on top of  
9 the San Andres?

10 A The San Andres predominantly, in con-  
11 junction with that Loco Hills structure, just shows you  
12 that these are conformable throughout the Grayburg; that  
13 the bottom of the Grayburg, top of the Grayburg are just --  
14 just lay right on top of each other and this a similar  
15 anticline trending east/west across our proposed unit.

16 Q Let's go to your isopach maps.

17 MR. KELLAHIN: There are three  
18 isopach maps in pocket number 3, Mr. Examiner, and I pro-  
19 pose to label these with the Loco Hills being Three-A, the  
20 middle porosity in the Metex is Three-B, and then the  
21 Premier Zone is Three-C.

22 Q What do you conclude as a geologist, Mr.  
23 McKinney, from having made the interpretation, drawn the  
24 isopach maps, with regards to the reservoir thicknesses  
25 involved in these three -- three mapped intervals?



1           A           The Loco Hills is the best developed in  
2 terms of gross thickness, or net thickness. It's present  
3 everywhere across our acreage and reached a maximum of ap-  
4 proximately 35 -- 34 feet, our proposed unit, and a mini-  
5 mum of perhaps 14 feet. So it's -- it is the best devel-  
6 oped of the three porosity zones that we believe most of  
7 our -- most of our production will come from if we unitize.

8                   The Middle Metex, which is Three-B,  
9 Middle Metex also is present across most of our acreage.  
10 It's -- it's thinner. The Middle Metex is the best devel-  
11 oped porosity zone within the Metex unit, so we mapped  
12 that. The Upper and Lower Metex will be less so, but the  
13 Metex will probably contribute least of the three primary  
14 objective reservoirs, but it is present across the acreage  
15 and does reach development, I believe a maximum of about 16  
16 feet, and in the far northern edge of our unit there is no  
17 porosity development.

18                   The last of the packet is the Premier.  
19 The Premier is not -- again, not as well developed as the  
20 Loco Hills but better developed than the Metex, and on the  
21 (unclear) again, it's present across our acreage. Again,  
22 data just off our unit to the south indicates that it's --  
23 that it's losing porosity in that direction. We have a  
24 maximum thickness of porosity in the Premier, of approxi-  
25 mately 13 feet -- 20 feet, excuse me, 20 feet in the far

1     northwestern corner of Section 20, and a minimum of perhaps  
2     7 feet -- excuse me, 2 feet, I see.

3                Q            Are you satisfied as a geologist that  
4     you have sufficient reservoir thickness and reservoir con-  
5     tinuity to make this an effective flood?

6                A            Yes, I am.

7                Q            Let's go to what is marked as -- what I  
8     will mark as Exhibit Number Six. It's in the pocket marked  
9     number 6.

10               I think, Mr. McKinney, this is a good  
11     display to put on the wall. If you'll help me put this one  
12     up, we might have you speak from the one on the wall.

13               First of all, if you'll identify Exhibit  
14     Number Six before you begin to describe it.

15               A            We've title this exhibit Comparison of  
16     Vertical Confinement Properties Etz State Ballard Grayburg  
17     Producing Areas, and we have a location map here, south --  
18     we're in 17 South, 30 East, in Section 16 for our well on  
19     this exhibit, which is our Well 24, which I mentioned ear-  
20     lier.

21               We're comparing it to the Ballard Gray-  
22     burg unitized area, which is approximately 8 miles distant  
23     to the southwest. The well that we have (unclear) is the  
24     Ballard GSA Unit No. 23-4.

25               What we've got on the left side of this

1 exhibit are the open hole logs from each of these wells.  
2 Logs are hung on the top of the Grayburg, so it's a strati-  
3 graphic cross section. The primary purpose there is to  
4 demonstrate the continuity in zones and then when we speak  
5 of the Loco Hills in our area, we are referring to the same  
6 Loco Hills zone in the Ballard Unit and the same applies to  
7 the remainder of the Grayburg reservoirs, the Upper Metex,  
8 Middle Metex, and the Premier.

9 The primary purpose of this portion of  
10 the exhibit is to show the continuity and the similarity of  
11 nomenclature.

12 Q All right, before you go to the second  
13 portion, what do you conclude as a geologist when you exa-  
14 mine the Anadarko Ballard type well with Devon Etz State 24  
15 type well?

16 A I believe they're geologically similar  
17 and that conclusions that can be reached in our unit or at  
18 their unit, it's reasonable to extend those conclusions  
19 from one area to the other.

20 I should add, we are working interest  
21 owners in this unit so we are privy to some information  
22 down there, as working interest owners.

23 Q Let me have you describe the other two  
24 logs on the display.

25 A On this side we have basically computed

1 products from additional sonic logs. In the Anadarko Well  
2 it's called a frac pressure, frac type log. The Devon Well  
3 is called a frac type (unclear) sonic. They are basically  
4 both showing the same thing. What we're trying to show  
5 here is the confinement pressure, confinement of the frac  
6 gradient that's necessary to frac out of the zone and this  
7 is primarily an engineering exhibit and I really don't want  
8 to say too much about that. I'm not really qualified.

9 Q Well, the purpose is you have made a  
10 proper correlation of the logs --

11 A Certainly.

12 Q -- and stratigraphically have properly  
13 hung those logs on an adequate datum point.

14 A Yes. They are all hung on the same  
15 point on top of the Grayburg, stratigraphically hung.

16 Q And have you as a geologist reviewed the  
17 Anadarko Ballard Unit geology presented in the case by  
18 which they obtained an increased injection pressure for  
19 their project with the geology available to you for your  
20 unit area?

21 A Yes, I have.

22 Q And for all purposes that are material  
23 on that issue, are they sufficiently similar enough to draw  
24 conclusions from one to the other?

25 A Yes, they are.

1 MR. KELLAHIN: I believe Mr.  
2 McKinney has included in his package of exhibits the Etz  
3 State 23 type log.

4 Q Let me simply have you identify that for  
5 us, Mr. McKinney.

6 A On your -- let's slide back to that  
7 first exhibit called current status map, I don't know what  
8 the exhibit number was on that.

9 MR. KELLAHIN: I'm going to  
10 mark this as Exhibit One-A, Mr. Examiner, which is the type  
11 log.

12 Q Why have you selected this as a type  
13 log, Mr. McKinney?

14 A It's in the center of the unit. We had  
15 a good log on it. Some of the wells on this -- on this  
16 unit are quite old and we don't have open hole logs, so it  
17 was -- I mean it is similar to all the logs in this unit,  
18 are very similar geologically. This was a good log and  
19 it's in the center of the unit and that was -- well, it's  
20 not in the center of this unit, but anyway, -- I'm  
21 confusing it with 24 -- it was a good log, a good open hole  
22 log, and it's representative in my opinion to identify  
23 where that well is. It's at the tail end or the south end  
24 of cross section B-B' on the current status map. It's a  
25 Grayburg producer, as well.

1 MR. KELLAHIN: Mr. Examiner, I  
2 have for your information made an extra copy of the prior  
3 order that was issued on behalf of Texas American Corpora-  
4 tion. It applies to this particular flood. This is the  
5 order that we're seeking to expand and to modify. It's  
6 Order No. R-7926.

7 That concludes my examination  
8 of Mr. McKinney.

9 We would move at this time the  
10 introduction of his Exhibits One through Six and the cor-  
11 responding counterparts.

12 MR. CATANACH: Exhibits Number  
13 One through Six will be admitted as evidence.

14  
15 CROSS EXAMINATION

16 BY MR. CATANACH:

17 Q Mr. McKinney, what is the unitized in-  
18 terval in this proposed unit?

19 A It's from the top of the Grayburg to the  
20 base of the Grayburg, as shown on those cross sections and  
21 also on the type log; approximately 260 feet, I believe, in  
22 our area.

23 MR. CATANACH: That's all I  
24 have at this time. The witness may be excused.

25

1  
2 STEVEN K. BLAIR,  
3 being called as a witness and being duly sworn upon his  
4 oath, testified as follows, to-wit:

5  
6 DIRECT EXAMINATION

7 BY MR. KELLAHIN:

8 Q Mr. Blair, would you please state your  
9 name and occupation?

10 A Steven K. Blair, Senior Reservoir En-  
11 gineer for Devon Energy Corporation, Oklahoma City.

12 Q Mr. Blair, have you on previous occa-  
13 sions testified before the Oil Conservation Division?

14 A No, I have not.

15 Q Would you describe for us what your ed-  
16 ucational background is?

17 A I have a 1974 degree, a Bachelor of  
18 Science in Engineering, from the University of Oklahoma.

19 After school I went to work for Texas  
20 Pacific, where I worked as a development engineer in both  
21 their Oklahoma City and Midland offices.

22 Following that I worked for Energy Re-  
23 serves Group in Oklahoma City and (unclear).

24 For the past fifteen months I've worked  
25 with Devon in the capacity I'm in now.

1 Q Okay, and that is that capacity now?

2 A Senior Reservoir Engineer.

3 Q As a senior reservoir engineer what have  
4 you done with regards to this waterflood project on the Etz  
5 State Unit?

6 A I've reviewed the log data and all the  
7 available producing data that we've had in addition to the  
8 performance of some offset waterfloods and surrounding data  
9 where available, and basically completed a field study on  
10 the feasibility of secondary recovery operations for the  
11 proposed waterflood acreage.

12 Q Have you completed that study?

13 A Yes, I have.

14 Q And did you have, in your opinion, suf-  
15 ficient information available to you from which to reach  
16 conclusions that in your opinion are reliable?

17 A Yes, I did.

18 Q Let's talk about the economics of the  
19 project for a moment. Have you reached an opinion as to  
20 whether or not there is going to be additional hydrocarbons  
21 recovered that might not otherwise be recovered if the pro-  
22 ject is not approved?

23 A Yes. Based on the analogy to the offset  
24 fields, which show a secondary to the primary ratio of any-  
25 where from .72 to 1.2 and couple that were reported as 1.5



1 that I can't verify. All indications are that the acreage  
2 in the proposed unit would recover an additional 480,000  
3 barrels of oil under secondary recovery operations, the  
4 value of which would be estimated at approximately \$7-  
5 million at current prices.

6 MR. KELLAHIN: Mr. Examiner,  
7 at this time we tender Mr. Blair as an expert reservoir  
8 engineer.

9 MR. CATANACH: He is so qual-  
10 ified.

11 Q Mr. Blair, what is the approximate cur-  
12 rent producing rate of the wells in the unit?

13 A We're making 40/45 barrels of oil a day.

14 Q Is that per well or on a unit basis?

15 A No, that's total, on a unit basis.

16 Water is ranging anywhere from 350 to  
17 400 barrels a day; gas, 75 to 120 MCF a day; and currently  
18 in the four wells that are currently having water injected  
19 to them, we're injecting 375 to 425 barrels of water a day.

20 So, essentially, right now we're in-  
21 jecting at the same volume that we're withdrawing, so at  
22 the current pressure limitations on the injection wells,  
23 we're unable to really develop any kind of pressure front  
24 and, you know, sweep efficiencies to efficiently flood this  
25 acreage.

1           Q           Is there a remaining opportunity for  
2 further primary wells to be drilled in the unit?

3           A           No, unless at some point gas prices or  
4 oil prices would support increased density which would give  
5 you some marginal recovery, probably, because of an im-  
6 provement in sweep efficiency, but at this time at current  
7 prices that's not feasible and all of the acreage has got  
8 producing wells located on them, so it's basically fully  
9 developed under current economic scenarios.

10          Q           What type of injection pattern are you  
11 planning to implement or to continue with this unit?

12          A           Basically what TAO implemented was a 5-  
13 spot pattern pilot flood with four injection wells around a  
14 single producer.

15                   We would propose extending this pattern  
16 to cover the entire unit.

17                   At this time we would like to convert  
18 two additional wells to injection and based on their per-  
19 formance possibly either convert additional wells on the  
20 edges of the unit or possibly reach lease line injection  
21 agreements with offset operators at a future date.

22          Q           Can you identify for the examiner the  
23 two additional injectors that you propose to add to the  
24 project area?

25          A           Yes. It's the No. 22 Well, which is the

1 southernmost yellow triangle on what's been marked as Ex-  
2 hibit One and the No. 1 Well in the northeast northeast  
3 corner of Section 17 on the Collier Federal Lease.

4 Q Again quantify for me the range of es-  
5 timated additional recovery that you might expect with the  
6 waterflood project.

7 A Based on my best estimates we should --  
8 we should achieve 480,000 barrels of oil through secondary  
9 recovery; an estimated, probably, 15,000 barrels has been  
10 recovered to date from the pilot flood. After the pilot  
11 flood was initiated, TAO did not filter their water and  
12 they had a lot of oil carry over and the injection wells  
13 became plugged and unable to take any water and so their  
14 flood -- I mean their injection was really not in place for  
15 more than 6 or 7 months before it basically got shut down  
16 because of their failure to adequately monitor, you know,  
17 the contaminants they were putting back in. They were  
18 using produced water and they were getting carry over.

19 Q Are your estimates of additional recov-  
20 ery based or predicated upon receiving from the Division a  
21 surface injection pressure of 1600 pounds per injector  
22 well?

23 A Yes, they are. I believe that without  
24 the permission to exceed the fracture gradient, as repre-  
25 sented in the step rate injection test, that the water in-

1     jection would be at best marginally better than what we  
2     would be withdrawing from the reservoir and therefore we  
3     would not have a good pressure front and good sweep effi-  
4     ciencies, and, in essence, would probably derive very lit-  
5     tle benefit from the water injection.

6             Q             Have you conducted or had studies con-  
7     ducted in your behalf of determine whether or not the in-  
8     jection pressure of the injector wells can be increased up  
9     to a surface pressure of 1600 pounds and do so without  
10    fracturing the confining formations of the Grayburg?

11            A            Yes, we have.

12            Q            And what did you do to satisfy yourself  
13    of that?

14            A            We took the No. 24 Well, which is cur-  
15    rently an injector, and we ran a (unclear) log, which is a  
16    Schlumberger product. It's using a long spaced sonic and  
17    they measure the arrival times of different wave fronts and  
18    from that they can develop values for rock properties, rock  
19    compressibility, for (unclear) ratio of Young's (not under-  
20    stood) of elasticity.

21                         Based on that, they can predict, based  
22    on a differential pressure above the fracture gradient,  
23    what will frac under a given pressure. Based on that, the  
24    log indicates that there will not be any injection out of  
25    zones with pressures up to as high as 600 pounds over the

1 injection or the fracture gradient, but we feel like we can  
2 get adequate water in the ground with 400 pounds over, so  
3 that's all --

4 Q I believe it was 450, was it?

5 A Well, it was 1600 pounds, 450 --

6 Q 1600 pounds. It would be 450 over the  
7 step rate number as opposed to 600. Let me have you go to  
8 Exhibit Number Six and demonstrate for us on the log what  
9 you have just described.

10 A Basically what you have presented on  
11 this log is this tract is calculated fracture height based  
12 upon properties that are calculated from the sonic log.  
13 Upon close examinations there's four different shadings in  
14 this tract that show different pressures from -- this tract  
15 is from zero to 1000 pounds differential. Each line is 200  
16 pounds differential pressure above frac pressure.

17 So, basically, the first shading, which  
18 I believe is just a small dotted pattern, which is repre-  
19 sented, it's hard to see from a distance, but it's repre-  
20 sented by a very small area immediately within the frac-  
21 tures is what is predicted to fracture if you exceed the  
22 pressure by 200 pounds.

23 What we have colored in an orange is  
24 what is expected to fracture at a 600 pound differential.  
25 You can see that based on this the injection is expected to

1 remain pretty much within the porous zones, extending just  
2 a little bit above or a little bit below the zones.

3 Now, we've further taken this data and  
4 correlated it to the well in the Ballard Grayburg Unit,  
5 where they ran a similar log that is a Welex product, but  
6 basically the same process, it's long spaced sonic and  
7 they're calculating the same properties and going through  
8 the same exercise. And in this well we have shown what was  
9 projected to frac in their well and there again, perfora-  
10 tions for both of these logs, on our well are indicated by  
11 the little diamond shaped triangles and on the Ballard  
12 Grayburg well on inside track here, and you can see in both  
13 cases that the predicted frac height stays within the zone.  
14 One thing to note, and we were unable because of our San  
15 Andres zone being plugged back, to get the log down to the  
16 top of the San Andres base, the Premier, and so therefor we  
17 were unable to show the perforations that exist in the Pre-  
18 mier. But the excellent correlation we have between the  
19 upper zones with the zones in the Ballard Grayburg would  
20 indicate to me that the same things that they see were once  
21 this fracture hit the San Andres it stopped and you can see  
22 that because of the three different closeups, the three  
23 different pressures that they're looking at here for injec-  
24 tion, they all stack and become very close, indicating a  
25 very strong barrier at the top of the San Andres.

1                   So I have no qualms in saying that based  
2 upon the correlation between the two that I believe that  
3 this log clearly shows that at the proposed injection pres-  
4 sures, that all water would stay within the Grayburg forma-  
5 tion, and in fact, not go very far out of the porous zones.

6                   Q           How confident are you in the reliability  
7 of the frac type log?

8                   A           I feel confident. The main problem that  
9 you have in doing these logs is that when you're going  
10 through casing you have to have an extremely good cement  
11 job behind casing in order to get the readings, and that is  
12 the problem that you run into a lot of times in that the  
13 cement isn't good and you can have some false readings.

14                               In our well the -- actually the open  
15 hole log was not an open hole log, it was run in a cased  
16 hole, as a cased hole sonic and it was run at the time that  
17 the well was drilled and as the initial log, and it showed  
18 extremely good bonding, extremely good sonic response and  
19 we saw the same thing. In fact, the Schlumberger person-  
20 nel said that they -- that was as good a readings as they  
21 had seen from a cased hole sonic log, so they thought the  
22 cement was excellent and the log quality was excellent and  
23 everything that I see indicates to me that there are no  
24 problems with the quality of the log and I feel very con-  
25 fident of that.

Q Is it a reliable method by which to

A        There are numerous examples in Oklahoma

So, yes, I would say that it is a very

Q Can you have a successful flood in your

A I do not believe so because it's going

Based on what we're seeing right now



1 you'd have to drill many, many more injection wells in or-  
2 der to get enough water into the ground and I don't be-  
3 lieve the economics would afford that.

4 Q Can we use the F State 24 Well as a good  
5 example of a typical injector well for this unit area?

6 A Yes. As Curtis testified, all of these  
7 wells have very similar characteristics and seem to have  
8 behaved in essentially the same manner throughout their  
9 lives, and we see such good correlation that I think this  
10 is a very typical well.

11 Q Would it serve any purpose to you as an  
12 engineer to have a similar log run on each of the injec-  
13 tors? Is that going to give you a more comfortable basis  
14 upon which to make a judgment about the injection pressure?

15 A No, I personally don't feel like it  
16 would benefit. I feel it's very clear from this log that  
17 we're not fracing out of zone if we inject at a higher  
18 pressure and I wouldn't expect anything different so I  
19 really don't think the (not clearly understood) improved.

20 Q Thank you.

21 MR. KELLAHIN: That concludes  
22 my examination of Mr. Blair, Mr. Catanach.  
23  
24  
25

## CROSS EXAMINATION

BY MR. CATANACH:

Q Mr. Blair, let's make sure I understand this process here.

The actually log measures the rock properties in the Grayburg.

A The actual log is a measurement of -- you send out a sonic wave and you'll be getting a response not much like a regular sonic, but what you're looking for is the first arrivals and you're looking for a different wave from than you are under a normal porosity type sonic log.

From the transit time of this wave front they can calculate properties using ratios between particular waves to get the (not understood) ratio and the rock compressibility so that the rock properties are actually calculated using theoretical calculations based on behavior of a sonic wave within the rock properties.

Q Once you have all these properties defined, then they -- how do they calculate what the frac pressure will be?

A Taking those -- the strength of materials was not a good course for me in college -- taking the (not understood) ratio and the Young's modulus and the rock compressibility, they can take those and based on that

1 determine shear stresses and what will happen when you  
2 apply force in a particular direction to the rock, and  
3 based on that they've got the equations that they calcu-  
4 late the fracture height and what will propagate through  
5 the rock.

6 Q Uh-huh. Well, when does reservoir  
7 pressure come into play?

8 A The reservoir pressure is -- it is in-  
9 cluded in the -- let me go back up there -- if you'll note  
10 on their well, the frac gradient above the zone shows to be  
11 a lesser gradient than the frac gradient through the zone  
12 and we believe this to be the effects of reservoir pres-  
13 sure based on the reservoir test that I supplied you and  
14 have used that data to calculate. As the pore pressure  
15 goes up, the frac gradient goes up so actually you're get-  
16 ting a smaller differential the more you inject because the  
17 frac gradient will be up.

18 Q Well, in a new injection well that is  
19 basically properly completed, wouldn't you expect these  
20 frac heights to go higher?

21 A As tight as the Grayburg is, what we've  
22 seen even after acidizing the existing wells and from the  
23 initial data that we had on the TAO injectors, the process  
24 of filling it up near wellbore and getting it repressured  
25 is very quick. I mean we did not see a period of repres-

1   suring.   They started injecting and it was -- the pressure  
2   went up almost immediately because of the tightness of the  
3   rock.

4                   I would not anticipate, you know, really  
5   any -- any problem with that because we're going to be  
6   limited waterwise to what we're going to put in trying to,  
7   you know, get uniform injection rates, and I don't believe  
8   that we're -- we're putting enough water in that even if  
9   that would be the tendency that it would create -- I guess  
10   what I'm saying is initially we're not going to have 1600  
11   pounds on the new wells because we won't need it to put the  
12   200/300 barrels of water a day we want to put into the  
13   well, and so I don't foresee that that would be a problem  
14   in the reservoir. I guess it could be if you were going  
15   to, you know, immediately go to 1600 pounds and put all the  
16   water in that it would take but we're not going to do that  
17   because we don't want to just flood out one area to the  
18   exclusion of the other.

19               Q           You're actually, then, in effect, going  
20   to be fracturing the Grayburg. Will these fractures -- how  
21   far away from the wellbore will they go?

22               A           I can't answer that exactly. Based on  
23   conversations that I've had with -- with some of the stim-  
24   ulation company's personnel, they don't believe that at the  
25   rates that we're looking at that they will extend extremely

1 distance because of the leak off. I would say that a  
2 maximum would be 2-or-300 feet, but I don't have anything  
3 firm to base that on other than some comments that I've  
4 received from some of the stimulation companies that the  
5 rates are such that it's just not -- you take a normal frac  
6 job and you're talking 10-12 barrels a minute down tubing  
7 and we're talking, you know, 10 barrels an hour down tubing  
8 and so you're going to have a lot more time for the leak-  
9 off and, you know, I would anticipate it would probably  
10 just frac near wellbores; maybe within 50 feet of the well-  
11 bore.

12 Q Okay, so you guys are initially going  
13 with a rate, not a pressure.

14 A Yes.

15 Q Do you have a set rate for these wells?

16 A What we'd like to see, probably, an  
17 injection to withdrawal ratio of somewhere maybe 4-to-1,  
18 5-to-1 at most.

19 Q Is -- is Devon not operating anything  
20 but the Grayburg wells in this unit?

21 A The other wells are all temporarily  
22 abandoned or we are the operator of them. I believe the  
23 next witness would be better qualified to answer those  
24 questions. There are no nonoperated wells within the  
25 boundaries of that unit. Some of those have been TA'd and

1 plugged. The Queen flood has been abandoned before we took  
2 over the properties.

3 Q What -- what secondary to primary ratio  
4 did you use?

5 A My calculations were based on a .72,  
6 which is what was seen in the West Square Lake, which is  
7 the Anadarko offset.

8 The other floods, the Shenandoah Park  
9 Cooperative, which is to the southeast, the only real  
10 reference I could find to that were in some studies and  
11 they said it was higher than the West Square Lake, but how  
12 much higher, I don't know.

13 The Ballard Grayburg I have calculated  
14 1.19. My calculations were based on .72.

15 Q Uh-huh.

16 A The uncertainty there as to how much  
17 actual Grayburg oil has been recovered to date, because  
18 it's been commingled with San Andres at times in the past,  
19 and I have recoveries indicated in TAO records as anywhere  
20 from 952,000 to a 1,400,000, of which I estimate 23 percent  
21 was San Andres, and that was based on some tests done by  
22 TAO and some TAO estimates, and it seems to be fairly con-  
23 sistent by the TAO reports, but the records were not very  
24 complete when we bought the properties, but, you know, I  
25 think that's reasonable based on looking at the recoveries

1 from the other floods and I'm comfortable with that number.

2 Q Have you guys actually run some step  
3 rate tests out there?

4 A Yes, we have run step rate tests on all  
5 four of the injectors.

6 Q And what have you found?

7 A I believe that the frac gradient ranged  
8 between -- I can answer that exactly. The frac gradients  
9 ranged between 1035 and 1330, the average being probably  
10 close to 1150, or so.

11 Q Okay, and you guys are asking for 1600  
12 for all -- all four -- all six wells.

13 A Yes.

14 MR. CATANACH: I believe  
15 that's all I have for now. The witness may be excused.

16

17 MACK DUCKWORTH,  
18 being called as a witness and being duly sworn upon his  
19 oath, testified as follows, to-wit:

20

21 DIRECT EXAMINATION

22 BY MR. KELLAHIN:

23 Q Mr. Duckworth, would you please state  
24 your name and occupation?

25 A My name is Mack Duckworth and I'm a

1 petroleum engineer.

2 Q Mr. Duckworth, have you previously  
3 testified before the Division?

4 A No.

5 Q Would you describe your educational and  
6 work experience as a petroleum engineer?

7 A I have a BS in petroleum engineering  
8 from the University of Texas at Austin.

9 I went to work for Texaco, Incorporated,  
10 out of school; worked for Grace Petroleum, Ribinowitz Oil  
11 Company, and for the last nine years have been employed by  
12 Devon.

13 A And what year did you get your degree?

14 A 1977.

15 Q Did you prepare the Commission Form  
16 C-108 that applies to the various injector wells that  
17 you're seeking to add to your project area?

18 A Yes, I did.

19 MR. KELLAHIN: We tender Mr.  
20 Duckworth as an expert petroleum engineer.

21 MR. CATANACH: He is so qual-  
22 ified.

23 Q Let me refer you to Exhibit Number  
24 Seven, Mr. Duckworth, and ask you if this represents a  
25 complete package of information that you have prepared and



1 supplied the Division as attachments to the Commission Form  
2 C-108?

3 A Yes, sir, it does.

4 Q Let's have you turn through that exhibit  
5 package until you find the display that shows the various  
6 colored circles.

7 A Texas American Oil Corporation had pre-  
8 viously permitted four injection wells and the -- I don't  
9 have a colored one, I've got a xeroxed package, I'm sorry.

10 The green lines are the area of -- a  
11 half mile radius area of review of those four original  
12 wells.

13 The red semicircles are the areas out-  
14 side of that original review area that I reviewed to extend  
15 the area.

16 Q Within the area of review did you make a  
17 tabulation of all the wellbore information for those wells  
18 that penetrated to or through the Grayburg formation?

19 A Yes, sir, I did, all the additional  
20 wells that were not included in the original exhibits.

21 Q In examining that information did you  
22 find any wells in your opinion as a petroleum engineer have  
23 not been properly cemented and cased through the Grayburg  
24 formation?

25 A There is only one well which I could not

1 confirm that was properly protected and that was the  
2 McIntire G Federal No. 1, which is on page 2 of the com-  
3 puter printout of the tabulation.

4 The problem there is we don't know how  
5 much cement was pumped. I could not find any public re-  
6 cord or contact anyone who knew how much cement was used  
7 and they didn't have any record of measurement of that top  
8 of cement.

9 Q Does the location of that well for which  
10 there is missing information, the location of that well in  
11 relation to the nearest injector well, give you any reason  
12 to be concerned as an engineer that that might be a source  
13 by which injector fluid could migrate to the Grayburg for-  
14 mation in that wellbore and out of that formation?

15 A It is a possibility if the well was not  
16 properly cemented but in reviewing the entire area and  
17 looking at the exhibits that were originally submitted, all  
18 of these wells were protected high enough to where the  
19 Grayburg, and in most cases, the Queen, could be produced.

20 So my educated estimate is that this  
21 well would have been properly protected also across the  
22 interval that we are concerned about.

23 Q Would you go back and let's look at the  
24 schematic that shows the example by which you propose to  
25 complete for injection either the ETZ J-22 or the Collier

1 Federal 1, either one of those? Which one would you like  
2 to look at?

3 A I have the Collier Federal No. 1 is the  
4 first one.

5 Q Well, it's the first one I have after  
6 the cover sheet. Describe for us your method of comple-  
7 tion for injection.

8 A The Queen perfs in this well have been  
9 squeezed off. We propose to go down and set a cast iron  
10 bridge plug above the San Andres at 2875 and to place a  
11 cement cap on top of that.

12 We will then run a plastic-coated  
13 2-3/8ths inch tubing string with a packer, circulate packer  
14 fluid in the annulus, set the packer, and that will be our  
15 injection string and procedure.

16 Q Will there be a method at the surface to  
17 measure or gauge the pressure on the annular spacing?

18 A Yes, sir.

19 Q Is there any different method by which  
20 you will complete for injection on the Etz J-22 Well?

21 A No, sir.

22 Q And that's the next schematic shown in  
23 the information package?

24 A Yes.

25 Q Describe for us the general method of

1 operation for the injection wells in terms of rates on a  
2 daily basis of injection water.

3 A We anticipate using 200 barrels of water  
4 per day as the initial rate, or 1200 barrels of water per  
5 day for the entire project into the six injection wells.  
6 We have already built the injection plant and installed a  
7 filtering system and settling tanks. Our supply water will  
8 come from the fresh water supply of the city of Loco Hills  
9 and a private firm that's going to furnish water to us.  
10 This is good, clean water that is compatible with the  
11 formation water.

12 Each of the wellheads has a filter at  
13 the wellhead and will receive secondary filtering.

14 Q Have you made an examination to deter-  
15 mine the location, if any, of any fresh water sources in  
16 the immediate area?

17 A To my knowledge there is no fresh water,  
18 are no fresh water sands, in this area. All of the drink-  
19 ing water, even the water for the agricultural business has  
20 to be piped in.

21 Q Have you supplied to the Division --  
22 what other information have you supplied to the Division?

23 A There are two wells that were plugged  
24 and abandoned that are in the new area of review. I sub-  
25 mitted downhole diagrams of those two wells. They are

1 properly plugged and would be adequately protected from  
2 any migration of fluids.

3 I also supplied the request for the 450  
4 psi increase above the step rate test established fracture  
5 pressure, which was 1142 for the average of the two wells.

6 Q Have you had to conduct operations and  
7 determine the effectiveness of the waterflood using pres-  
8 sure rates up to the rates allowed for the various step  
9 rates?

10 A Yes, sir, we have and we're having a  
11 real problem there.

12 In the month of August at the allowed  
13 pressures we were only able to put 16 barrels of water per  
14 day in one injection well; 107 barrels of water per day in  
15 the second injection well; zero barrels of water per day in  
16 the third injection well; and 148 barrels of water per day  
17 on the fourth injection well.

18 The additional produced water has been  
19 placed down of one of the permitted Queen injection wells,  
20 using it more or less as a disposal well.

21 Q Do you have an opinion as an engineer as  
22 to whether or not the surface injection rates for the in-  
23 jector wells can be increased up to 1600 pounds without  
24 risk of fracturing the confining formations above and below  
25 the Grayburg formation?

1           A           Yes, sir, I believe that what we're  
2 asking for at the 1600 psi is a safety margin above fracturing  
3 out of the zones. There are established injectors around  
4 us that are injecting at 1700 and 2000 psi.

5                   The Queen flood inside this unit area  
6 injected at pressures closer to 1500 psi and they have a  
7 lower fracture gradient than the Grayburg, and there were  
8 no problems with fracturing out of zone or communication to  
9 surface at all. So I feel like --

10           Q           There are no light flows on the surface  
11 from any of those operations?

12           A           No, sir, and I feel like it has been  
13 demonstrated in the area that the higher pressures can be  
14 utilized if proper casing and cementing has been put into  
15 the injection wells, the injection will be confined with-  
16 in the reservoirs themselves.

17                   MR. KELLAHIN: That concludes  
18 my examination of Mr. Duckworth.

19                   We would move the introduction  
20 of his Exhibit Number Seven.

21                   MR. CATANACH: Exhibits Number  
22 Seven will be admitted as evidence.

23  
24  
25

## CROSS EXAMINATION

BY MR. CATANACH:

Q Mr. Duckworth, did the Queen waterflood pretty much cover the same area?

A Yes, sir, it does. It's the orange -- everything that's orange inside that unit boundary is Queen production.

Q This was operated by whom?

A Texas American.

Q Was this separate from the other -- from R-7926?

A Yes, sir, it was. It was a true Queen individual waterflood.

Q It was.

A And it is totally watered out. There is no recoverable oil left in the Queen.

Q Who operates the flood?

A It is shut in and we're currently plugging all the Queen wells.

Q You are? Are you going to plug all the Queen wells?

A Yes, we are in the process of plugging three of the Queens right now, as of -- work started last Monday. We got one well plugged, we're on our second and should finish it today and begin the third. You have a

1 representative on location, has been throughout the pro-  
2 cess.

3 My recommendation to my bosses is that  
4 we plug two additional Queen wells every six months until  
5 all the Queen wells are plugged.

6 Q Are these Queen wells drilled through  
7 the Grayburg?

8 A No, sir, they are Queen wells only. The  
9 only two exceptions to that are on the east end of the  
10 flood where two of the Grayburg wells we want to use --  
11 still have the Queen open, and that, those two Queen per-  
12 foration intervals will be cement squeezed off before we  
13 utilize those wells as Grayburg producers.

14 Also, I would like to mention that all  
15 the Queen wells that were injectors were tested by the  
16 Commission within the last sixty days. The three wells  
17 that are being plugged are wells that the Commission did  
18 not feel were in good repair so they are the first three  
19 we're plugging. The other two wells do meet all of the  
20 Commission requirements, or Division requirements.

21 Q Injection wells.

22 A Yes.

23 Q Do you plan on still utilizing those  
24 wells to inject?

25 A Until we get a pressure increase on our



1 Grayburg injection wells, we're going to have to utilize at  
2 least one of the Queen wells to take the produced water.

3 Q Okay. When you say that to your know-  
4 ledge there isn't any fresh water sand in the area, did you  
5 verify that with anyone, or did you say that --

6 A We've looked at the logs and I've asked  
7 the field representative down there, and we also checked  
8 with the people that live in the area and the farmer who is  
9 currently leasing this land for grazing. As a matter of  
10 fact, he had worked out a deal with TAO to receive fresh  
11 water from them out of the system so that he could have  
12 water to -- for his cattle.

13 MR. CATANACH: No further  
14 questions of the witness. He may be excused.

15  
16 CARTER MUIRE,  
17 being called as a witness and being duly sworn upon his  
18 oath, testified as follows, to-wit:

19  
20 DIRECT EXAMINATION

21 BY MR. KELLAHIN:

22 Q Mr. Muire, for the record would you  
23 please state your name and occupation?

24 A My name is Carter Muire and I'm a petro-  
25 leum landman.

1           Q           Mr. Muire, as a petroleum landman for  
2 Devon Energy Corporation, would you describe what you have  
3 done with regards to the Etz State Unit?

4           A           I have reviewed all of the oil and gas  
5 leases, both State and Federal, and prepared a unit  
6 agreement and submitted that to the State Land Office and  
7 to the Bureau of Land Management for their preliminary  
8 approval and we've received the preliminary approval from  
9 the BLM and from the State Land Office.

10          Q           Is this a function you typically perform  
11 for your company?

12          A           Yes.

13          Q           And how long have you been a petroleum  
14 landman, Mr. Muire?

15          A           I've been a petroleum landman for eleven  
16 years.

17                               MR. KELLAHIN: We tender Mr.  
18 Muire as an expert petroleum landman.

19                               MR. CATANACH; He is so qual-  
20 ified.

21          Q           Let me turn your attention, Mr. Muire,  
22 to what is marked Exhibit Number Eight. It's a package of  
23 documents. I would ask you to identify the first document  
24 in the Exhibit package book Eight. What are we showing  
25 there?

1           A           That's the proposed unit agreement.

2           Q           And is this a unit formed that has been  
3 approved for use in this type of secondary recovery pro-  
4 ject by both the state Oil Conservation Division, the Com-  
5 missioner of Public Lands and the Bureau of Land Manage-  
6 ment?

7           A           It is.

8           Q           Let's go to the attachments in the end  
9 of the unit agreement and have you turn, sir, to Exhibit A  
10 to the unit agreement and identify that for us.

11          A           That's a plat of the proposed unit.

12          Q           When we look at the unit, what type of  
13 acreage is included in the unit?

14          A           We have Federal acreage, which is  
15 located within the north half of the northeast quarter of  
16 Section 17 and the northeast of the northeast -- I'm sorry  
17 -- southeast northeast of 17, also.

18          Q           That's the acreage that has the cross  
19 hatched --

20          A           Right.

21          Q           -- lines on it?

22          A           And the remainder of the acreage is  
23 State land under lease.

24          Q           When we go to Exhibit B, what is tabu-  
25 lated here, Mr. Muire?

1           A           We have the leasehold ownership within  
2 the unitized interval. Our rights are limited to the base  
3 of the San Andres.

4                       We also have the serial number, the  
5 number of acres committed, the description of the oil and  
6 gas leases and overriding royalty owners and the working  
7 interest owners and the participation factor of each tract  
8 within the unit interval.

9           Q           Are there any other working interest  
10 owners besides Devon Energy Corporation?

11           A           Devon owns all of the working interest  
12 within the unitized formation, or proposed unitized forma-  
13 tion.

14           Q           Have you received preliminary approval  
15 from the Commissioner of Public Lands and the Bureau of  
16 Land Management for your unit operations?

17           A           Yes, we have.

18           Q           The final attachment on here, identified  
19 as Exhibit C, represents what, Mr. Muire?

20           A           Exhibit C is the exhibit that shows the  
21 tract factors and the participation formula that was used  
22 to arrive at the specific factor for each tract.

23           Q           Is the method by which participation is  
24 calculated, is that the same for the entire unit area?

25           A           It's uniform across the unit.

1           Q           Have you received any objections from  
2 any of the parties notified about either the waterflood  
3 project or the unit?

4           A           No. sir.

5           Q           Have there been any objections filed?

6           A           No, sir.

7                       MR. KELLAHIN:   Mr. Examiner,  
8 Exhibit Number Nine represents a notification that we have  
9 sent from our office to all of the offsetting parties or  
10 anyone within a half mile radius that has operated a well  
11 or has a working interest owner (sic) in a well at this  
12 depth.

13                      Also included is notification  
14 to those owners of the surface for the injector wells, and  
15 that's marked as Exhibit Number Nine.

16                      That concludes my examination  
17 of Mr. Muire. We would move the introduction of Exhibits  
18 Eight and Nine.

19                      MR. CATANACH:   Exhibits Eight  
20 and Nine will be admitted as evidence and, Mr. Kellahin,  
21 did this include the surface owner?

22                      MR. KELLAHIN:   Yes, sir, it  
23 did.

24                      MR. CATANACH:   I don't have  
any questions. The witness may be excused.

25                      Is there anything further in

1 this case, Mr. Kellahin?

2 MR. KELLAHIN: No, sir.

3 MR. CATANACH: If not, Case  
4 9735 and 9734 will be taken under advisement.

5  
6 (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 (Commission) 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

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Examiner hearing of Case No. 9734, 9735  
heard by me on August 23, 1988.

David L. Catanzaro, Examiner  
Oil Conservation Division