

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

12 June 1986

EXAMINER HEARING

IN THE MATTER OF:

Application of Amoco Production Com- CASE
pany for NGPA Price Ceiling Category 8848
Determinations, Lea County, New Mex-
ico.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:	Jeff Taylor Attorney at Law Legal Counsel to the Division State Land Office Bldg. Santa Fe, New Mexico 87501
For Amoco Production:	Clyde A. Mote Attorney at Law Amoco Production Company Post Office Box 3092 Houston, Texas 77253
For Southland Royalty and Meridian Oil:	William F. Carr Attorney at Law CAMPBELL & BLACK P. A. P. O. Box 2208 Santa Fe, New Mexico 87501

1

2

I N D E X

3

4

STATEMENT BY MR. MOTE

5

5

6

KAREN SULLIVAN GLASER

7

Direct Examination by Mr. Mote

7

8

Cross Examination by Mr. Stogner

33

9

Redirect Examination by Mr. Mote

40

10

Recross Examination by Mr. Stogner

41

11

Redirect Examination by Mr. Mote.

51

12

13

STEPHEN P. SCHEFFLER

14

Direct Examination by Mr. Mote

51

15

Cross Examination by Mr. Stogner

76

16

17

STATEMENT BY MR. CARR

86

18

19

20

E X H I B I T S

21

22

Amoco Exhibit One, Map

8

23

Amoco Exhibit Two, Map

9

24

Amoco Exhibit Three, Log

10

25

Amoco Exhibit Four, Map

11

I N D E X CONT'D

1		
2		
3		
4	Amoco Exhibit Five, Diagram	12
5	Amoco Exhibit Six, Isopach	16
6	Amoco Exhibit Seven, Isopach	17
7	Amoco Exhibit Eight, Map	19
8	Amoco Exhibit Nine, Cross Section	22
9	Amoco Exhibit Ten, Log	25
10	Amoco Exhibit Eleven, Cross Section B-B'	26
11	Amoco Exhibit Twelve, Cross Section C-C'	28
12	Amoco Exhibit Thirteen, Perforation History	57
13	Amoco Exhibit Fourteen, Map	59
14	Amoco Exhibit Fifteen, Contour Map	60
15	Amoco Exhibit Sixteen, Curve	63
16	Amoco Exhibit Seventeen, Curve	63
17	Amoco Exhibit Eighteen, Curve	63
18	Amoco Exhibit Nineteen, Curve	64
19	Amoco Exhibit Twenty, Curve	64
20	Amoco Exhibit Twenty-one, Curve	65
21	Amoco Exhibit Twenty-two, Curve	66
22	Amoco Exhibit Twenty-three, Curve	66
23	Amoco Exhibit Twenty-four, Curve	67
24	Amoco Exhibit Twenty-five, Curve	67
25	Amoco Exhibit Twenty-six, Curve	67

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S CONT'D

Amoco Exhibit Twenty-seven, Curve	68
Amoco Exhibit Twenty-eight, Curve	69
Amoco Exhibit Twenty-nine, Comparison	70

1
2 MR. CATANACH: This hearing
3 will come to order and we'll call Case 8848, application of
4 Amoco Production Company for NGPA Wellhead Price Ceiling
5 Category Determinations, Lea County, New Mexico.

6 Are there appearances in this
7 case?

8 MR. MOTE: Mr. Examiner, I'm
9 Clyde Mote, attorney, representing Amoco Production Company
10 in association with Bill Carr of the firm of Campbell and
11 Black.

12 We will have two witnesses.

13 MR. CARR: May it please the
14 Examiner, my name is William F. Carr of the law firm Camp-
15 bell and Black and I'd like to also enter an appearance in
16 this case for Southland Royalty Company and Meridian Oil.

17 MR. CATANACH: Are there other
18 appearances in this case?

19 Will the witnesses please stand
20 and be sworn in at this time?

21
22 (Witnesses sworn.)

23
24 MR. MOTE: Mr. Examiner, I'd
25 like to make a short opening statement.

1 This is the application of Amo-
2 co for NGPA Wellhead Price Ceiling Determination for three
3 wells described in the notice of the hearing.

4 It is our belief that such
5 wells meet the NGPA Well Category criteria for new onshore
6 reservoir classification under Section 102-C (1) (c) of the
7 NGPA of 1978 and the applicable rules of the Federal Energy
8 Regulatory Commission.

9 It should be noted that Elkan
10 Wells No. 1 and 2 in Section 9 have already qualified for
11 Section 102 new onshore reservoir classification, which de-
12 termination was made by the NMOCD on the 14th day of Novem-
13 ber -- I mean October, 1982, as to the Amoco Elkan No.1 and
14 on July 15th, 1983, as to the Elkan No. 2.

15 The subject of this application
16 is for the Elkan No. 3, the Elkan No. 4, both of which are
17 in the same section as the Elkan 1 and 2, and also for the
18 State "MX" Well No. 1, which is in Section 15.

19
20 KAREN SULLIVAN GLASER,
21 being called as a witness and being duly sworn upon her
22 oath, testified as follows, to-wit:

23
24
25

DIRECT EXAMINATION

BY MR. MOTE:

Q Would you please state your name, by whom employed, in what capacity, and location?

A My name is Karen Sullivan Glaser, employed by Amoco Production Company as a Petroleum Geologist, Senior Grade, in Houston, Texas.

Q Would you please relate your educational experience?

A I have a Bachelor of Arts in geology from Colgate University in Hamilton, New York, and a Master of Science in geology from the University of Oklahoma in Norman, Oklahoma.

Q When did you get your Bachelor's degree?

A In 1980.

Q How about your Master's degree?

A In 1983.

Q And where did you go to work after graduation?

A With Amoco Production Company in Houston.

Q And have you been working for Amoco since that time?

A Yes, I have.

Q And what has been your job experience with Amoco since your employment?

1 A For most of the three and a half years
2 I've been there I've worked on the Bone Spring formation in
3 New Mexico.

4 Q Are you familiar with the subject appli-
5 cation?

6 A Yes, I am.

7 Q And are you familiar with the wells which
8 are the subject of this application?

9 A Yes, I am.

10 MR. MOTE: Are the witness'
11 qualifications acceptable?

12 MR. CATANACH: The witness is
13 considered qualified.

14 Q If you would, take out your first exhi-
15 bit, Ms. Glaser, and explain to the Examiner -- wait a
16 minute.

17 MR. CATANACH: I'm sorry, what
18 is your last name?

19 A Glaser.

20 MR. CATANACH: Thank you.

21 Q Turn to your first exhibit, Ms. Glaser,
22 as I previously requested, and explain to the Examiner
23 what's shown by this exhibit.

24 A This is a map showing some fields pro-
25 ducing in southeastern New Mexico with the Scharb Field

1 highlighted.

2 Q All right, go on to your next exhibit.

3 A Okay. The second exhibit is up on the
4 wall.

5 Q What is this exhibit, Mr. Glaser?

6 A This exhibit shows the Scharb Bone Spring
7 Pool. The pool outline is indicated by the dashed line
8 here. Amoco's acreage in the area is indicated in yellow.
9 This will be the case on all maps shown.

10 The three wells in question are indicated
11 with red arrows.

12 On this particular map the dots indicate
13 wells that are producing. The purple dots indicate produc-
14 tion from the Bone Spring. The large purple dots are cur-
15 rently producing wells; the small purple dots have produced
16 in the past from the Bone Spring but are not currently pro-
17 ducing.

18 The wells indicated in other color dots
19 are producing from some other formation, primarily Morrow,
20 Wolfcamp, and Queen, and have not produced from the Bone
21 Spring.

22 Q What does the dashed line show around
23 those wells?

24 A That indicates the pool boundary.

25 Q All right, is this going to be further

1 discussed later on by Mr. Scheffler, another witness who
2 will appear in this proceeding?

3 A Yes, it will.

4 Q All right, go on to your Exhibit Number
5 Three, if you would. What is this exhibit, Ms. Glaser?

6 A Exhibit Number Three is a type log sec-
7 tion of the Bone Spring formation in this field area.

8 It's a composite made from the log of the
9 Pennzoil United No. 1 Atlantic State, Atlantic Refining Com-
10 pany Atlantic State -- or excuse me, State 8 No. 1.

11 Q Would you please explain what's shown by
12 this exhibit?

13 A Okay. Indicated with -- there is a color
14 code for the producing intervals within the Bone Spring and
15 Scharb Field.

16 The first of these, the Ora Jackson zone,
17 is indicated with red -- in red. It is encased within the
18 first Bone Springs sand.

19 The second interval is the Second bone
20 Spring carbonate in which our Elkan reservoir is located.
21 This is located in the section between the First and Second
22 Bone Spring sands.

23 The third interval that is productive in
24 this pool is what we've called the Scharb Zone and this is
25 indicated by blue and is encased within the Second Bone

1 Spring Sand.

2 The colors that I've used on this map
3 will be -- excuse me, on this type log, will be used on all
4 subsequent cross sections.

5 Q All right. All right, turn to your Exhi-
6 bit Number Four and explain what's shown with this exhibit.

7 A Okay. Exhibit Number Four is a structure
8 map on top of the Second Bone Spring Sand. This is a sche-
9 matic indicating the approximate positions of the shelf ed-
10 ges here and the position of Scharb Field relative to these
11 shelf margins (not clearly understood) is indicated.

12 As you can see, dip in this area is to
13 the north and to the east.

14 The carbonates in the Bone Spring are de-
15 bris flow carbonates. They were sourced from these two
16 shelf margins and the dip that is represented here on this
17 map indicates the shape of the basin and the surface that
18 these debris flows were deposited on and this would -- ex-
19 cuse me, this would be what would affect the orientation of
20 these particular flows.

21 Q So what is your purpose of this exhibit,
22 Ms. Glaser?

23 A To show the general structural shape in
24 the area and the fact that the debris flows would probably
25 be oriented roughly perpendicular to dip -- to strike, ex-

1 cuse me, roughly north/south in this area. Some will be
2 roughly east/west.

3 Q Now this is the base of the zone which
4 you're making application for, is that correct?

5 A Yes, it is.

6 Q So this would be the base for what's going
7 -- what you're going to show happened --

8 A Yes.

9 Q -- in geologic age.

10 A This is the surface at which the debris
11 flows in the second carbonate would be (not clearly under-
12 stood).

13 Q All right. Let's go to your Exhibit Num-
14 ber Five. I believe that's on the wall as well, is it not?

15 A Yes, it is.

16 Q If you would, explain what's shown by
17 this schematic.

18 A This is a block diagram schematically de-
19 picting the configuration of the debris flows in the three
20 productive intervals in the Bone Spring in the Scharb zone,
21 or seen in the Scharb Pool.

22 First I'd like to discuss what's depicted
23 in the lower part of the block and what I've labeled as
24 Scharb or Ora Jackson type.

25 What we've determined to be present there

1 is -- excuse me, let me stop and tell you what the colors
2 represent.

3 Blue represents limestone or primarily
4 limestone debris flows.

5 The pink represents primarily dolomite in
6 lithology.

7 The darkness of the color indicates the
8 coarseness of the material in question in these debris
9 flows, with the coarser material being for the most part in
10 the center of the debris flows. The coarser material is al-
11 so most likely to be porous and with the best porosity with-
12 in the individual flows.

13 The lower part of the block I've shown
14 where I believe to be the orientation of the Scharb or Ora
15 Jackson time interval. They are packages of debris flows,
16 for the most part stacked, and they appear as pods.

17 In the center of the pod we have a multi-
18 ple stacked debris flows and they're clean. You have a nice
19 thick, blocky carbonate, nice (not understood). As you to
20 the flanks they become more continuous, interbedded with
21 siltstones, and tend to be tighter.

22 Further laterally you end up just having
23 siltstones in the (not clearly understood) interval. These
24 are totally separated from any other carbonates in the zone.

25 Q Now you show Scharb and Ora Jackson down

1 at the bottom. That's not the way those sands are oriented,
2 is it?

3 A Correct. The Scharb zone is within the
4 second sand and the Ora Jackson is in the first sand, but
5 they are genetically the same type of material.

6 Q And the Ora Jackson will be on top of
7 what you'd call the Elkan Reservoir?

8 A Yes, it would be.

9 Q Okay.

10 A It would be above the Elkan.

11 Q And what is it you're going to get your
12 production from? Is that the pink?

13 A The production will probably come from
14 the pink material. It will have the best developed poros-
15 ity, dolomitization; from my work what appears to be neces-
16 sary for well developed porosity in the Bone Spring.

17 Q And the more the dolomite content, the
18 better chance of hydrocarbon recovery --

19 A That's true.

20 Q -- is that correct?

21 All right, and the gray on that, what --
22 what is the gray? Did you tell me what the gray was in that
23 area?

24 A The gray represents what have been called
25 the Bone Springs Sands. They're really carbonaceous silt-

1 stones. They're very tight. They are very good fills, per-
2 meability barriers, if you will, within the formation.

3 Q Now go to your Exhibit Number Six.

4 A I'm not through --

5 Q Excuse me, go ahead and finish that.

6 A On the upper part of the block I've de-
7 picted the Second Bone Spring Carbonate. As you can see,
8 I've shown it as being composed of a large number of debris
9 flows mixed in with one another or overlaying one another;
10 some of which are the dolomitized zones and which are not.

11 As you can see, if you have a pod with
12 some dolomite isolated and surrounded by other pods with no
13 dolomite in them, there's probably no porosity; in fact,
14 there's definitiely no porosity.

15 You have a permeability barrier around
16 this individual zone. In some areas you can get stacked or
17 adjacent pods with porosity and no permeability barrier be-
18 tween them, and this would be a more -- a larger reservoir,
19 and something like this. They would both be good
20 reservoirs.

21 But you can have them appearing to be
22 stratigraphically equivalent but actually be separated lat-
23 erally. They are separate pods and they would have tight
24 pods between them (not clearly understood.)

25 Q Does that conclude your testimony on this

1 exhibit?

2 A One final point, I've shown these yellow
3 intervals on this block diagram, as well. These are small
4 sand lenses. They're coarser grained materials than the
5 siltstones and are occasionally productive.

6 Q All right. let's go on to your Exhibit
7 Number Six. I believe that's an Isopach map on the Ora
8 Jackson, is that correct?

9 A Yes, it is.

10 Q And that's the sand which is the highest
11 up towards the surface, is that correct?

12 A It's the carbonate within the first sand,
13 yes.

14 Q All right, go ahead and explain what's
15 shown on this exhibit.

16 A Okay. My data points on this map are all
17 circled, the numbers, the footage indicated next to the data
18 point is the number in feet of clean carbonate within the
19 Ora Jackson interval.

20 I used a 30 API gamma ray cutoff to
21 determine clean carbonate for consistency.

22 I've also Isopached these data points
23 and, as you can see, the Isopach reveals you have a very
24 discontinuous carbonate here. You have isolated pods
25 throughout the field, some of which are productive; some of

1 which have not been productive.

2 The wells with red dots on them indicate
3 wells that have either tested or produced from the Elkan --
4 or excuse me, the Ora Jackson zone. The large dots are
5 currently producing; the small dots have either produced in
6 the past or attempted production.

7 As you can see, we've indicated the Amoco
8 Elkan No. 1, which is on our Elkan Lease, does have
9 perforations open in the -- excuse me, at the Ora Jackson
10 interval, but again, as the map shows, the pod that this was
11 in is entirely separated from other pods in the field.

12 Q You mentioned clean carbonate. Does the
13 fact that you have clean carbonate necessarily mean that the
14 hydrocarbonates will be present?

15 A No, it doesn't mean they'll be present.
16 It just means they may be present.

17 Q All right, and does this indicate that in
18 the Ora Jackson that you have separate pods of accumulation
19 of hydrocarbons?

20 A Yes, it does.

21 Q Let's go on to Exhibit Number Seven.
22 What do you show by your Exhibit Number Seven?

23 A Exhibit Number Seven shows a similar map
24 the last one. It is of the Scharb zone. It's an Isopach
25 map and it also uses a 30 API gamma cutoff.

1 The blue dots on the map indicate wells
2 that have or are producing from the Scharb zone.

3 As you can see by the Isopach map, there
4 is no Scharb zone present in the west -- eastern part of the
5 field where Amoco's wells are located.

6 Q We don't have one of these on the wall,
7 do we?

8 A No, we don't.

9 MR. CATANACH: Exhibit Number
10 Seven, Ms. Gloser?

11 A Number Seven, yes, sir.

12 Q All right, continue.

13 A I think that's everything on that.

14 Q All right, what you're showing here is
15 the Scharb zone, which is the lowest of the three producing
16 horizons in what we call the Scharb Bone Spring Pool, is
17 that correct?

18 A Yes, it is.

19 Q And it seems from looking at the exhibit
20 that almost -- well, in fact all of the production from the
21 Scharb zone is west of a line east of the east line of Sec-
22 tion 5, running north and south, is that correct?

23 A Yes.

24 Q And what is your dashed line that's shown
25 on this exhibit?

1 A The dashed line indicates the approximate
2 limits of the Scharb clean carbonate.

3 Q And what was it you said you consider a
4 clean carbonate? What's the cutoff?

5 A 30 API gamma ray cutoff.

6 Q All right, let's go on to your Exhibit
7 Number Eight. I believe this is a porosity map, is it not,
8 for the Second Bone Spring carbonate?

9 A It is a porosity type map for the Bone
10 Spring, Second Bone Spring carbonate.

11 Q All right, explain the map then in better
12 detail to the examiner.

13 A There were two types of porosity logs
14 available in this field; the older wells have sonic logs and
15 the newer wells have CNL/FDC or CNL/LDT logs.

16 I've indicated all the wells with sonic
17 with circles, and those with CNL/FDC or CNL/LDT logs with
18 hexagons.

19 Using the more modern logs we can make a
20 determination between matrix porosity and indications of
21 vuggy and possibly fractured porosity and I have designated
22 those.

23 The wells that I've coded in green I've
24 determined have some indications of the presence of vuggy
25 porosity; those with brown have only matrix porosity.

1 I did this again for clean carbonate,
2 using a 30 API gamma ray cutoff.

3 As you can see, in the area that we're
4 calling our Elkan Reservoir, we have wells that indicate
5 green, vuggy porosity that is surrounded on all four sides,
6 north, east, south, and west, by wells that had only tight,
7 matrix porosity in the clean carbonate. This sets up a sig-
8 nificant permeability barrier around our (not clearly under-
9 stood).

10 Q What do you show by the dashed lines on
11 this exhibit, Ms. Glaser?

12 A What I've shown with the dashed lines is
13 the limits of some of these reservoirs.

14 The first one is, as I mentioned, is the
15 Elkan Reservoir. There's one up in this northern portion
16 and we don't really see what's going on in the north side;
17 however, there may be a separate reservoir there.

18 There's indications of a third reservoir
19 to the south in Section 17, and the possibility of a fourth
20 in the southwestern portion of Section 5.

21 Q Sort of summing up your testimony with
22 regard to this exhibit, the green hexagons are the ones that
23 you have good data on. They represent vuggy porosity in --
24 in that zone, is that correct?

25 A That's correct.

1 Q And the brown hexagons are the ones where
2 you don't have too good information on but they do present
3 matrix porosity, is that correct?

4 A That's not correct.

5 Q Okay, what is correct?

6 A We have good data on those. We have the
7 same data available as we do for the green hexagons.

8 Q Okay.

9 A It's just that there's only matrix
10 porosity on those.

11 Q Okay.

12 A The uncolored circles are the ones with
13 the poor quality data.

14 Q Okay. And this then would show that you
15 have tight wells, matrix porosity, to the north, east, west,
16 and south of what you're calling the Elkan Reservoir.

17 A That is correct.

18 Q What about the Exxon "DD" State No. 1, do
19 you consider that well to be anomalous?

20 A Yes, I do. I have to --

21 Q Would you point it out there on the map
22 and then explain why you think it's anomalous?

23 A This well is located in the southwest
24 portion of Section 4. I've indicated it with a brown hexa-
25 gon.

1 I've only been able to see four feet of
2 clean carbonate within that second carbonate interval using
3 30 API cutoff; however, examination of the rest of log, and
4 it will be entered as a later exhibit, shows that there are
5 indications of vuggy porosity in some of the somewhat dirtier
6 carbonates. It may be that this well is on the fringe
7 of a pod and therefore has the poorer quality reservoir
8 rock, but nonetheless has it. It was the only well that I
9 encountered in the field that had this difference.

10 Q Okay. You show three lines of cross section.
11 You're going to show those to the examiner, is that
12 correct?

13 A Yes, I am.

14 Q Go to your A-A' cross section, which I
15 believe you've identified as Amoco Exhibit Number Nine.

16 A Yes.

17 Q And explain what you show by this cross
18 section.

19 A I've correlated the horizons as we did on
20 the type log, with the same color code. The Ora Jackson
21 interval is indicated in your red. The top of the Second
22 Carbonate is in green, and the Scharb Zone in blue.

23 And I've also indicated the top of the
24 well -- excuse me -- above the wells I do have the modern
25 log suite on the interpretation vuggy versus matrix poros-

1 ity as was shown on that map for the Second Carbonate.

2 Also shown on these logs, the perforation
3 intervals, they're indicated in red. Any cores are indi-
4 cated in yellow, and the DSTs are also indicated, where pre-
5 sent, on the right side of the logs.

6 I also have highlighted the clean carbon-
7 ate in blue and on the wells that had indications of vuggy
8 porosity, they're highlighted in red.

9 The first four wells on the cross sec-
10 tion, the Major MM State, the Exxon Charles Alvez No. 2 and
11 No. 1, and the Big 6 Hooper B No. 1, all have older logs and
12 I could not make a determination of matrix versus vuggy por-
13 osity on them. They do have clean carbonate indicated.

14 The HNG Hooper 8 No. 1 has a modern log.
15 It has a very small amount of clean carbonate. The porosity
16 curves over here track indicating limestone and there's no
17 indication of any vuggy porosity development.

18 The next well on the cross section is the
19 Big 6 Ora Jackson A No. 2. They have only a sonic log on
20 this and all I have done is highlighted clean carbonate.

21 The following well, the Southland Scharb
22 8 No. 2, we have a modern log suite. There are minor
23 amounts of clean carbonate present in the second carbonate.
24 The porosity logs track indicating a limey carbonate there
25 and there's no indication of vuggy porosity.

1 The Southland Scharb 8 No. 1, I've indi-
2 cated the cleaner carbonate in blue and there's indications
3 of some vuggy porosity here. This is the first well, the
4 westernmost well on this line of cross section that is in
5 our Elkan Reservoir.

6 The following three wells, the Scharb --
7 excuse me, Southland Scharb 9 No. 1, Southland Scharb 9 No.
8 4, and the Poe Properties Sprinkle Federal No. 2, all have
9 indications of clean carbonate, vuggy porosity, and are all
10 included in their own reservoir.

11 The final two wells, Mesa Vacuum State
12 No. 2 and the Mesa Vacuum State No. 3, have very little
13 clean carbonate and seconds carbonate; have no indication of
14 any dolomite present and have no indication of vuggy
15 porosity. They represent the eastern boundary of our reser-
16 voir on this cross section.

17 Q All right, and you might point out that
18 this cross section verifies what you previously have shown,
19 what the extent of the Scharb zone was, also, that it goes
20 through the Ora Jackson A No. 2, Big 6 Well, and it does not
21 show any further east than that across your cross section,
22 does it?

23 A Right, that is correct. It's present
24 only as far west as the -- excuse me, as far east as the Big
25 Six Ora Jackson A No. 2.

1 Q And the Ora Jackson comes and goes out
2 there.

3 A Yes, it does. It's not present in the
4 first well on the cross section, the Major MM State.

5 It's present in the following wells until
6 you get as far east as the Southland Scharb 8 No. 2, where
7 there is no longer any clean carbonate present in the asso-
8 ciated interval.

9 You then see some carbonate again in the
10 Southland Scharb 8 No. 1.

11 There's a small amount of carbonate in
12 the Southland Scharb 9 No. 1, which is not very clean.

13 You've lost the clean carbonate in the
14 Southland Scharb 9 No. 4 and the Poe Properties Sprinkle
15 Federal No. 2.

16 And also in the last two wells, the Mesa
17 Vacuum State No. 2 and 3.

18 Q Do you have a partial log of Exxon's DD
19 State No. 1, which you said was the anomalous well in the
20 area?

21 A Yes, I do.

22 Q Will you get that out, which I believe
23 we've identified as Amoco Exhibit Ten --

24 A Yes.

25 Q -- and discuss that with the examiner?

1 A I've highlighted on this well four feet
2 of clean carbonate. It's hard to see the highlight; it's in
3 the very uppermost piece of clean carbonate in the South --
4 second carbonate, excuse me.

5 I've also highlighted in red the vuggy
6 porosity I've been able to see in the lower portion of the
7 second carbonate. The carbonate there does not meet the 40
8 -- excuse me, 30 API gamma ray cutoff but it would meet a 40
9 API cutoff had I used one, and I believe that is reservoir
10 rock there.

11 Q Does that conclude your testimony on this
12 type log?

13 A Yes.

14 Q All right, let's go to your Exhibit Num-
15 ber Eleven, which is your cross section B-B', which is the
16 north/south cross section.

17 All right, would you please describe what
18 you see on cross section B-B'?

19 A Again this cross section has the same
20 items indicated as I've said on the previous cross section.

21 On this you can see the presence of the
22 Scharb zone in the Superior Mescalero Ridge No. 1 and 2,
23 Standard Hooper No. 1, Big 6 Ora Jackson A No. 2, the
24 O'Neill Ora Jackson No. 2, and the ARCO Ora Jackson No. 1.

25 The O'Neill Ora Jackson No. 3 and ARCO

1 Jackson 5 No. 1 are indicated on this cross section. We had
2 hoped to be able to the logs for you but we were unable to.

3 The final well on the cross section is
4 the Big 6 Ora Jackson No. 2. The Scharb zone is not present
5 here (not clearly understood).

6 As far as clean carbonate in the second
7 carbonate, the southernmost well, the Gulf's Peoples Secur-
8 ity D No. 1, has no clean carbonate indicated and no indica-
9 tion of vuggy porosity.

10 The Superior Mescalero Ridge No. 1 and 2
11 both have some clean carbonate indicated and some vuggy por-
12 osity highlighted in red.

13 The Standard Hooper No. 1 has a sonic
14 log, as does the Big 6 Ora Jackson A No. 2.

15 The O'Neill Ora Jackson No. 2 has a
16 modern log suite. I've highlighted the clean carbonate and
17 the vuggy porosity.

18 The ARCO Ora Jackson No. 1 has a sonic
19 log, as does the Big 6 Ora Jackson No. 2, so I was not able
20 to make a determination on these wells.

21 Q Does that conclude your testimony with
22 regard to this exhibit?

23 A Yes.

24 Q All right, let's go to your cross section
25 C-C', which is believe is identified as Amoco Exhibit Number

1 Twelve.

2 All right, go ahead and explain what's
3 shown by your C-C' cross section.

4 A This cross section runs roughly from west
5 to east, beginning with the Big 6 Ora Jackson A No. 2 and
6 ending with the Amoco State MX No. 1.

7 Again on this cross section you can see
8 the discontinuous nature of the Ora Jackson interval. I
9 have it highlighted in red.

10 The interval is present in the Southland
11 Scharb A No. 2 but it's not clean, indicating there's a
12 break between the Big 6 Ora Jackson A No. 2 and the Amoco
13 Snyder Ranch A No. 1. Oh, excuse me, it's not present in
14 the Snyder Ranch No. 1, either. The interval is correlated
15 but there is no clean carbonate.

16 In the second carbonate, again, the Big 6
17 Ora Jackson A No. 2 has a sonic log so I wasn't able to
18 determine porosity type.

19 The Southland Scharb 8 No. 2 has some
20 clean carbonate; no indications of vuggy porosity.

21 The same is the case in the Amoco Snyder
22 Ranch No. 1 and the Southland Scharb 9 No. 3.

23 In the Southland Scharb 9 No. 3 there is
24 some clean carbonate with indications of vuggy porosity in
25 the Ora Jackson interval and the perforations are open in

1 this interval.

2 Amoco Elkan No. 1 has some carbonate,
3 vuggy porosity in the second carbonate, as does the 3, 4 --
4 excuse me, the 3, the 4, and the 2.

5 The Amoco No. 1 also has some clean car-
6 bonate in the Ora Jackson zone with perforations open; how-
7 ever, there's no indication of vuggy porosity in this well
8 in that interval and I believe the oil recovered is most
9 likely coming out of the second carbonate.

10 The final well on the cross section is
11 the Amoco State MX No. 1. It has no clean carbonate in the
12 second carbonate interval; no indication of either dolomite
13 or vuggy porosity.

14 Perforations that are open in this well
15 are in the Ora Jackson zone. There's really no clean car-
16 bonate in this zone, either.

17 The coring -- excuse me. The determina-
18 tion of the type of material that we're dealing with here is
19 not that it is clean carbonate; it's not a dolomitic re-
20 flow. It's a sandy carbonate, similar to those lenses I de-
21 scribed on Exhibit Number Five, and it has a different kind
22 of porosity development than we have seen in the (not clear-
23 ly understood.)

24 Q With regard to the application, you show
25 here four Amoco Elkan wells. Two of those wells, I believe

1 it's 1 and 2, have already been approved, have they not, for
2 102 classification?

3 A Yes, they have.

4 Q And the 3 and the 4 are the subject of
5 this application, is that correct?

6 A That's correct.

7 Q All right, and you think they're all com-
8 pleted in what you call the Elkan reservoir?

9 A That's correct.

10 Q And that, in your opinion, is a separate
11 and distinct reservoir.

12 A Yes.

13 Q How about the Amoco State MX No. 1, the
14 one that you called awhile ago as an anomalous well, is it
15 completed also in a separate reservoir, in your opinion?

16 A Yes, it is. It's not in the second car-
17 bonate. It's in the Ora Jackson zone and it is separate
18 from the other producers in the -- excuse me, in the Ora
19 Jackson zone.

20 It's also in a different type of reser-
21 voir.

22 Q Okay. Go back over here to your Exhibit
23 Number Eight.

24 Point out again for the examiner what you
25 consider to be the Elkan reservoir.

1 A I consider it to be the area enclosed by
2 the dashed red line, with the possible exception that I
3 would probably include the Exxon State DD No. 1 in that
4 reservoir, as well. It's on the fringe of the reservoir.

5 Q So that heart-shaped, big reservoir to
6 the more or less right of that exhibit, is that correct?

7 A That's correct.

8 Q And I believe you already stated, but to
9 make it clear for the record, do you consider this Elkan
10 reservoir to be a separate and distinct reservoir --

11 A Yes, I --

12 Q -- with its own source of supply?

13 A Yes.

14 Q Now, you might come over here to Exhibit
15 Number Five and explain why you believe that to be true.

16 A I believe it to be true because I believe
17 the Elkan reservoir to be composed of a series of different
18 pods of debris that have been dolomitized and are separated
19 by undolomitized, effectively impermeable other debris flows
20 for the rest -- for the producing wells in there.

21 Q And the pods that -- is it possible for a
22 well to be completed in more than one of those pink dolomi-
23 tized areas as shown in this schematic?

24 A Yes, it is. In fact it's most probable
25 that they will be completed in more than one zone.

1 Q Do you think it's possible, maybe, that
2 the anomalous well that we talked about may be completed in
3 more than one pod?

4 A Yes, it may be. It may be completed in
5 more than one or two zones.

6 Q Okay. Then to sum up your testimony, is
7 it your testimony that the Elkan reservoir, which you show
8 on Exhibit Number Eight enclosed in the red dashed line, is
9 a separate reservoir and you determined this by your exam-
10 ination of logs surrounding that area from north to west,
11 east, and south, and found clean carbonate with only matrix
12 porosity, which constitutes a permeability barrier?

13 A Yes.

14 MR. NOTE: That concludes the
15 testimony from this witness and we offer Exhibits One
16 through Twelve into evidence.

17 MR. CATANACH: Exhibits One
18 through Twelve will be admitted into evidence.

19 Q One other question, Ms. Glaser. These
20 exhibits were prepared by you or under your supervision and
21 direction, is that correct?

22 A That's correct.
23
24
25

CROSS EXAMINATION

BY MR. STOGNER:

Q Ms. Glaser, am I pronouncing that right?

A Close.

Q What is it?

A Glaser.

Q Glaser. Ms. Glaser, let's refer to Exhibit Number One.

The dashed lines are the pool boundaries?

A Yes.

Q And that is what pool?

A The Scharb Bone Spring Pool.

Q Do you know the history of the Scharb Bone Spring Pool, how it was extended and when?

A I'm not familiar with it but I believe the engineer is.

Q Do you understand how pool boundaries are formed?

A No, I don't.

Q You don't know if they're formed on geological reasons or engineering reasons?

A No, I had assumed that it was a combination of both, but I do not know.

Q If it was a combination of both, did you have anything to do with extending it into the Amoco ac-

1 reage?

2 A No, I did not.

3 Q So you don't know how pool boundaries are
4 extended?

5 A I have not been involved in attempting to
6 get a pool boundary extended so I do not know.

7 MR. MOTE: Who is?

8 A I do not know.

9 Q Do you know how the vertical boundary is
10 determined in this pool?

11 A If it is like other Bone Spring fields
12 that I've been acquainted with it is based on the formation
13 itself. Anything between the completion of the Delaware
14 Group and the Wolfcamp is considered Bone Spring.

15 Q What is the vertical boundaries of the
16 Bone Spring?

17 A I have indicated them on the type log.
18 That's Exhibit Number Three.

19 It would be between the purple line at
20 the top, labeled Top of Bone Spring Formation, and the aqua
21 line at the base, indicated Top Wolfcamp Formation.

22 Q While I have this Exhibit Number Three
23 out, the perforations in which your three wells that are the
24 subject of determination today, and the other two wells that
25 already have 102 pricing on them, what zone are they per-

1 forated in?

2 A The four Elkan wells are in the interval
3 between the green line and the yellow line. They're in the
4 Bone Spring Carbonate.

5 The MX Well is in the Ora Jackson zone,
6 indicated in red.

7 Excuse me, the Elkan No. 1 has perfora-
8 tions open in the Ora Jackson zone.

9 Q The MX Well is completed in the Ora Jack-
10 son?

11 A Uh-huh.

12 Q And the other Elkans wells, all of those,
13 they're solely --

14 A They're in --

15 Q -- I'm sorry.

16 A They're in the second carbonate.

17 Q Extending between the red zone and the
18 green zone?

19 A No, from the top, from the line indicated
20 in green to the yellow line below it; between the top of the
21 second carbonate and the top of the Second Bone Spring Sand.

22 Q We'll call that sand Elkan and the other
23 one Ora Jackson, is that right?

24 A In our reservoir, yes.

25 Q But none of your perforations extend out-

1 side the green zone in your Elkans wells?

2 A Only in the Elkan No. 1.

3 Q How far does that extend?

4 A Well, they are separate perforations.
5 They're also in the Ora Jackson zone. It's not a continuous
6 patch, at least not to my knowledge.

7 Q I'm still somewhat confused. Can you
8 show me the horizontal extent of this Elkan sand?

9 A It's a carbonate zone.

10 Q Okay, what is the horizontal extent
11 across this area on one of these exhibits?

12 A Okay. On, actually I believe I'll use
13 Exhibit Number Eight, what we are calling the Elkan reser-
14 voir is encased within the second carbonate and I've shown
15 the limits by this dashed red line that's based on the per-
16 meability barrier.

17 The entire second carbonate is present
18 from my work (not clearly understood) and is a regional in-
19 terval.

20 Q Explain to me what you mean by porosity
21 boundary.

22 A Okay, a difference in porosity type be-
23 tween what the reservoir rock is in the Elkan interval and
24 the equivalent section around it, the matrix porosity in the
25 clean carbonate and the wells surrounding our Elkan reser-

1	voir.
---	-------

The matrix porosity has about 2 or 3 per-
cent porosity that is essentially a permeability barrier in
this formation.

5 Q And your cutoff is two percent around
6 that dotted red line?

7 A It's matrix porosity. It's not a number
8 value cutoff. It's matrix porosity.

9 Q So outside that red dashed area the poro-
10 sity could continue.

11 A Which porosity are you talking about?

12 Q Okay, then I'm still confused. What does
13 the red dashed line mean?

14 A The red dashed line is the limits of the
15 vuggy porosity in our Elkan reservoir.

16 Q Can you show me a zero porosity line?

17 A No, I cannot show you zero porosity.

18 Q You cannot, so you don't know where that
19 zero porosity line is?

20 A I don't believe there's a zero porosity
21 line in this reservoir. I mean, not in the reservoir, ex-
22 cuse me, in the carbonate that I've been showing.

23 Q So on your cross section you do show that
24 green line extending.

25 Are you familiar in your studies with a

1 Big 6 Drilling Ora Jackson Well No. 1 located in Section 5?

2 A Yes, I'm familiar with it.

3 Q Is that a part of your cross sections
4 here?

5 A It's not on any of the cross sections
6 here.

7 Q Okay. When your studies showed, did you
8 have a log for that well?

9 A Yes, sir.

10 Q You chose not to put it on your cross
11 section line?

12 A That's correct. I (Not clearly under-
13 stood.)

14 Q Why did you not choose this one parti-
15 cular well?

16 A I didn't deliberately omit any wells. I
17 chose the cross section lines to best represent what we were
18 trying to show was Elkan reservoir.

19 I used the maps to show what was going on
20 with the rest of the wells in the field.

21 Q Do you know which well in the pool was
22 the discovery well?

23 A For the original Bone Spring Pool? I be-
24 lieve it's the Marathon State MTA No. 1, located in Section
25 4.

Q Did you use that well in any of your
ctions?

A No, I did not. The well has a sonic log
and I'm not even sure that the sonic log (not clearly
read).

Q Do you know where the perforations are in
1?

A Not off the top of my head, I don't. I was perforated in the Scharb interval, Scharb zone.

Q Does your Elkans well extend into those
here the Big 6 Drilling well I just alluded to and
athon discovery well?

A Would you rephrase that question again?

Q Does your Elkan zone extend over to those
S?

A The Elkan zone, not as we have defined,
second carbonate --

Q But you just got through telling me there
no porosity line anywhere.

A The reservoir we're discussing is made up of debris flows. It's a package of debris flows, the whole carbonate is. Individual debris flows may not be in contact with each other. There may be permeable -- impermeability barriers between them.

The fact that the carbonate interval ex

1 tends that far does not mean there's permeability between
2 individual flows laterally. I don't believe there is.

3 MR. STOGNER: I have no further
4 questions.

5 MR. MOTE: If I may, I have one
6 more question I want to ask her.

7
8 REIRECT EXAMINATION

9 BY MR. MOTE:

10 Q Ms. Glaser, you were asked questions con-
11 cerning a zero porosity and you said, I believe you said,
12 that you did not or could not draw a zero porosity line.

13 A That's correct.

14 Q Can you explain why that's -- you don't
15 believe that's -- you don't believe that's necessary or why
16 you cannot, by coming back to Section 5 and describing again
17 the condition of what you consider to be the Elkan reser-
18 voir?

19 A As I said, I believe the Elkan reservoir
20 is composed of a number of debris flows that have been dolo-
21 mitized.

22 The reservoir itself is encased within
23 the second carbonate which is composed of more of these
24 debris flows, the majority of which have not been dolomi-
25 tized.

1 In order to have permeability between
2 these flows, you need to have dolomite; you need to have
3 some kind of communication. In these limestone flows that do
4 not have their porosity, their original matrix porosity, en-
5 hanced, you do not get the kind of communication that you
6 need to extend the reservoir any further than I have on my
7 Exhibit Number Eight.

8 In drawing a porosity line, I wouldn't
9 know where to start, or I mean how to draw a line. You
10 can't map these individual flows. You can only map bound-
11 aries of -- excuse me, you can only map the second carbonate
12 itself as an interval, unlike the Scharb and the Ora Jackson
13 intervals, they are not encased and a lithology of a differ-
14 ent type, you cannot map their lateral limits.

15 We know that they're the reflows. We can
16 see the separation indicated by the different types of poro-
17 sity. Drawing a zero porosity line, or trying to draw a
18 porosity map based on the Scharb second carbonate would not
19 really reflect what was really occurring in that package.

20 MR. MOTE: I believe that's all
21 the questions I have.

22

23 RE CROSS EXAMINATION

24 BY MR. STOGNER:

25 Q Let's stay with this exhibit here. Is

1 this drawn to scale with any of your other maps?

2 A No, it's a schematic.

3 Q Just a representation --

4 A Yes, it is.

5 Q -- of what's out there. Now you said
6 that -- I believe that you said that you can't map the indi-
7 vidual flows throughout this period, is that right?

8 A I don't believe that you can.

9 Q Okay, so that one particular flow could
10 go off anywhere in this reservoir, is that right?

11 A It could go off anywhere but, if I may,
12 the thickness of the flows that we've seen this far from the
13 shelf edge, they generally range from a few inches to at
14 most 30 feet.

15 The nature of debris flows are thick, 30
16 feet in the center. They're not going to extend all that
17 far laterally. They probably will not extend over the en-
18 tire field, the individual flows. Even if they did, the
19 more porous part would be in the thicker, cleaner, center
20 part, and even if the flow did extend across the field, the
21 porosity within the individual flows would probably not.

22 Q How long are these flows usually?

23 A Well, I can't hardly say because we've
24 never been able to map just one. The best we've been able
25 to do is map something like a to do is map something like a

1 Scharb or Ora Jackson zone which, again, is composed of a
2 number of different flows.

3 They're thin. They're not very wide-
4 spread. The interval in the Scharb zone is a very coherent
5 one in this area and it tends to be approximately four miles
6 wide in this area. It runs about 12-13 miles from the shelf
7 margin to the zone four miles wide, and that is not one pod.
8 It's something unusual, in my experience.

9 But these flows are very thick; we could
10 map them.

11 Q Do these flows tend to take place in one
12 particular area or extend over the whole pool?

13 A In the case of the Scharb or Ora Jackson
14 type, they are localized occurrences and they've occurred
15 primarily in the area of what is now section or Township 19,
16 34; 19, 35; 18, 34 and 18, 35. They're not present region-
17 ally.

18 The interval in the second carbonate and
19 also the third carbonate, which is indicated on the type
20 log, this entire interval can be correlated regionally.
21 There was a very long episode of multiple debris flows and
22 ended up a veritable sheet of debris composed of many, many
23 individual pods.

24 I'm not sure if I answered the question
25 or not.

1 Q Are these pods interconnected in any way
2 geologically?

3 A They're physically in place individually.
4 It would take diagenesis to connect them and I believe that
5 is what has happened in our Elkan reservoir.

6 Q I'm sorry, what do you mean by diagenesis?

7 A Chemical change in the rock after burial.
8 In this case, dolomitization. It enhances porosity and
9 allows for -- the dolomite will fracture more easily than
10 the limestone. It allows more fracturing to occur and
11 therefore some permeability to develop.

12 Q So generally there is not crossflow --

13 A That's correct.

14 Q -- between the two pods.

15 A And in fact, the last time I checked, out
16 of 62 Bone Spring fields most of them were a 35 or one well
17 field (sic) and most of these had been offset a number of
18 times and you couldn't even offset one proration unit.

19 So your individual reservoirs are that
20 small; they're probably just one pod.

21 Q In the three particular Elkans wells do
22 you feel that there's three separate pods or do you feel you
23 got lucky and had one pod or --

24 A In my opinion what happened is there are
25 a number of pods, similar to what I've depicted here, that

1 are not stacked right on top of each other but close enough
2 that when you drill the well through you would catch a num-
3 ber of pods.

4 Each well does not necessarily have a
5 different pod or be in the same pod but they may each
6 encounter similar pods or some -- one would encounter two
7 pods, another would encounter one pod, the other one had a
8 third pod; that sort of thing. That's what I meant by that.

9 Q Okay. Does the rock makeup in these
10 pods, do they vary from pod to pod or are they basically
11 similar in type?

12 A From the core that we've been able to
13 look at they appear to be similar in type. As opposed to a
14 large amount of material derived from the shelf, some of it
15 was clasts from the shelf edge, reef-type material. Some of
16 it is actually siltstone from further back on the shelf.
17 They're all encased in siltstone. Even within these pods
18 there's some siltstone matrix.

19 I could maybe show you an example, if you
20 want.

21 Q Please do.

22 A This is from a well that's not within the
23 pool. It's just an example of a debris flow. The dark
24 material in that portion of the core, the siltstones, repre-
25 sent what have been called Bone Spring sands; it's that type

1 of material.

2 The other material in there are shelf-de-
3 rived clasts, C-L-A-S-T-S.

4 The porosity development in this type of
5 rock usually occurs in the clasts and then through fractur-
6 ing these clasts may be connected within your common reser-
7 voir.

8 Q And this type of material is what's simi-
9 lar --

10 A Yes.

11 Q -- is what you're saying.

12 A It's debris flow.

13 Q In the area between your -- in your El-
14 kan wells, what are some of the other wells that are pene-
15 trated within this Elkan zone, as we call it?

16 A You mean what wells can be included in
17 the reservoir?

18 Q Is there any other perforations in the
19 Elkan zone through any other wells besides your --

20 A Oh, yes.

21 Q -- your wells?

22 A All those that we've shown enclosed in
23 that red, dashed line in the eastern portion of the area.

24 Q And you made a study of all those wells
25 within that?

1 A I looked at the logs on all of them.

2 Q Are there any logs older than 1977?

3 A Where?

4 Q Within that red area?

5 A Yes, there is one.

6 Q Which one is that?

7 A The Big 6 Drilling Marathon State No. 1.

8 Q And could you give me the location on
9 that well?

10 A It's located in Section 4 in the south-
11 west quarter of the southeast quarter.

12 Q Okay. Did you include that well on your
13 cross sections? It has a sonic log only and it was not (not
14 clearly understood.)

15 A No, I did not.

16 Q Do you know what the perforations in that
17 particular well is?

18 A To my knowledge it wasn't perforated.
19 Mr. Scheffler can probably tell you more about that. All I
20 know about the well is that they drilled it and they didn't
21 test it.

22 Q But it did penetrate that Elkan zone.

23 A I believe it did.

24 Q The Ora Jackson zone, is it -- is that
25 flow characteristic the same as what the Elkans is?

1 A No, it's more similar to the Scharb zone.
2 It represents a time period where some debris flows came
3 down; not enough to represent a sheet and it resulted in the
4 isolated pod development that I've shown on the Ora Jackson,
5 and that's Exhibit Number Six.

6 Q On Exhibit Number Six you have some pods
7 up in the center of the map and then back to the east of
8 there, and then toward the center and then down to the
9 south.

10 A Yes.

11 Q Are these all Ora Jackson pods?

12 A They are part of the pods of clean car-
13 bonate in the Ora Jackson, yes.

14 Q What separates the pods?

15 A They are separated by either siltstones or
16 tighter carbonates in the Ora Jackson interval.

17 Q So your outer line on each pod, what ac-
18 tion does that represent?

19 A That represents a five foot Isopach line
20 of clean carbonate; potential reservoir rock.

21 There are zeros on this map, as well. I
22 did not draw a zero line.

23 Q Did your zero line encompass any two of
24 the pods?

25 A It might encompass the pod in Section 6,

1 with a smaller pod in Section 8, but none of the others
2 would be included with each other. They would be separate.

3 Q Did you feel you had enough control in
4 the area not to extend that zero line to encompass --

5 A Yes.

6 Q -- any more than that?

7 Your MX Well No. 1, I believe, is that
8 right?

9 A Yes.

10 Q Is that encompassed by one single pod or
11 --

12 A No, it shows zero. There's no clean
13 carbonate in that area. That's the one I believe was in a
14 silty -- excuse me, sandy carbonate and it's a different
15 type of reservoir.

16 Q Okay. Now this particular type of reser-
17 voir that's in the MX --

18 A Uh-huh.

19 Q -- is it laid down in a sheet across this
20 area?

21 A From my experience these sandy intervals
22 are very, very few and far between in the Bone Spring and
23 for the most part have been encountered in one or two scat-
24 tered wells.

25 In this case this is the only well in

1 this field that I've found to be --

2 Q There is a zero porosity line in that
3 particular area encompassing that.

4 A Encompassing the MX Well?

5 Q Yes.

6 A I haven't drawn one but one could be
7 drawn.

8 Q Does your Exhibit Number Five, does it
9 shows that Ora Jackson deposit?

10 A The carbonate or the one we're discussing
11 in the MX?

12 Q The one we're discussing in the MX.

13 A That's represented by these yellow lenses
14 encased in siltstone.

15 Q And if one had enough control around
16 those, those would be very easy to map out, would they not?

17 A Yes, they would with enough control and
18 if they were marginal.

19 Q I notice in Exhibit Number Five, you've
20 got the yellow lenses down in the carbonate, the gray area.

21 A In the siltstone.

22 Q In the siltstone, I'm sorry, in the silt-
23 stone in the gray area. What kind of porosity does that
24 siltstone have?

25 A I can't quote you a (not clearly

1 stood).

2 MR. STOGNER: I have no further
3 questions of this witness.

4

5 REDIRECT EXAMINATION

6 BY MR. MOTE:

7 Q Ms. Glaser.

8 A Yes.

9 Q Examiner Stogner asked you about the Big
10 6 Marathon Drilling State No. 1.

11 A Yes.

12 Q Are you familiar with that well?

13 A Yes.

14 Q Do you know when it was completed?

15 A I can't give you the exact date, no.

16 Q Can you give me about the time it was
17 completed? If you can't we can --

18 A I can't.

19 Q Has it been plugged and abandoned?

20 A Yes, it has.

21 Q A long time ago?

22 A Yes.

23 Q How many logs, generally speaking, did
24 you look at, just roughly, to get ready for your testimony
25 in this case in this area?

- 1 A For this particular area?
- 2 Q Yes.
- 3 A Somewhere around seventy.
- 4 Q And how many wells did you look at in
5 connection with your study?
- 6 A My study?
- 7 Q Yes.
- 8 A Not for this field; not for this hearing
9 necessarily?
- 10 Q For this hearing, yes.
- 11 A For this hearing approximately seventy
12 wells. Actually I looked at more logs because I looked at
13 more than one log for each well.
- 14 Q You discussed with Mr. Stogner, also, a
15 question of a sonic log as compared with the other logs.
- 16 A Yes.
- 17 Q Why did you not consider sonic logs to be
18 -- to be of as much value as more logs?
- 19 A There are two types of porosity that
20 we're dealing with here. I've called them matrix and vuggy.
21 The matrix is what is usually called pri-
22 mary porosity, occurs very early on.
- 23 The vuggy porosity is what we call secon-
24 dary porosity.
- 25 The sonic logs because of their nature do

1 not normally see secondary porosity. Sometimes they do,
2 sometimes they don't. It makes them unreliable.

3 Q You have shown some sonic logs in your
4 cross sections.

5 A Yes, I have.

6 Q But you haven't given them much -- much
7 verification from the standpoint of whether or not it's mat-
8 rix or vuggy porosity.

9 A I looked to see if there were any indica-
10 tions of vuggy porosity. There were none in the sonic logs.

11 MR. NOTE: I believe I have no
12 further questions.

13 MR. CATANACH: This witness may
14 be excused.

15 MR. NOTE: I'll next call Mr.
16 Scheffler.

17
18 STEPHEN P. SCHEFFLER,
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. NOTE:

24 Q If you would, please, state your name, by
25 whom employed, in what capacity and location.

1 A Stephen Paul Scheffler. I'm employed by
2 Amoco Production Company and I work in our Houston Regional
3 Office in our Proration Group, and I am a staff petroleum
4 engineer.

5 Q Have you previously testified before the
6 Oil Conservation Division and have your credentials as an
7 expert in the field of petroleum engineering been accepted?

8 A Yes, sir.

9 Q Are you familiar with the subject matter
10 of this application?

11 A Yes, sir.

12 Q And are you familiar with the Scharb Bone
13 Spring Pool?

14 A Yes, sir.

15 MR. MOTE: Is there any ques-
16 tion concerning Mr. Scheffler's qualifications?

17 MR. CATANACH: Mr. Scheffler is
18 considered qualified.

19 Q You'll be asked to testify concerning
20 certain exhibits. Were these exhibits either prepared by
21 you or under your supervision and direction?

22 A Yes, sir, they were.

23 Q All right, go to your -- go back first to
24 Exhibit Number Two that's already been placed in evidence by
25 Ms. Glaser.

1 Is there anything else with regard to
2 this exhibit that you'd like to add?

3 A Yes, sir, in answer to some of the Exam-
4 iner's earlier questions.

5 To help answer some of those earlier
6 questions, the discovery well in this pool which has earlier
7 been described as outlined by the dark, dashed line, was the
8 Marathon State MTA No. 1 Well, and this well was drilled in
9 approximately 1960, actually 1959, as I recall. It was com-
10 pleted in the Scharb zone and that well was drilled to a TD
11 of 14,647 feet and tested quite a few intervals up and down
12 the hole.

13 Subsequent to that test development of
14 the field took place towards the west. The majority of that
15 production that occurred towards the west occurred from this
16 lower interval which we've been referring to as the Scharb.

17 Some of the other information that I'd
18 like to point out at this point in time on this exhibit,
19 I've shown for each of the wells that subsequently were
20 developed following the completion of the initial well, and
21 those are all shown as Scharb Bone Spring Pool wells by the
22 purple dots, those purple dots that are the larger ones are
23 the active wells currently, and this was as of December,
24 1985.

25 I've shown above each of those large dots

1 the production, steady production, as averaged for the month
2 of December, as barrels of oil per day; MCFD is barrels of
3 water per day, in the parentheses.

4 Below each of these, all of the wells,
5 I've shown a completion date. That's month, date, and year,
6 as well was the well's TD.

7 As the development of this field took
8 place towards the west, with the main portion of the Scharb
9 Bone Springs Pool being developed in the Scharb, there was a
10 successful step-out to the east -- I'm sorry, developed to-
11 wards the east, there was a successful step-out to the east,
12 the Southland Scharb 4 No. 1 Well was drilled in the south-
13 west quarter southwest quarter of Section 4, as shown by the
14 orange underlined area.

15 That particular well encountered what
16 we're describing to you today, the Elkan resevoir, the
17 second carbonate.

18 That particular well was completed in
19 July of 1980 and its initial rates were realized in Septem-
20 ber of 1980.

21 So this is one of the first wells that
22 was drilled, the first well, described to you today as the
23 Elkan Reservoir, the second carbonate.

24 With regard to the well that she men-
25 tioned earlier, the Big 6 Drilling Marathon State No. 1 Well

1 located in the southeast quarter of Section 4, that well as
2 drilled and abandoned in May of 1964.

3 And I think that concludes my testimony
4 on this exhibit.

5 Q While you're over there, do you show pro-
6 duction records by each of those wells?

7 A Yes, I do. I show a daily rate, an aver-
8 age daily rate for the month of December, the last informa-
9 tion that we -- this is where we made your cutoff beginning
10 this study for information that we'd be showing the Commis-
11 sion here today.

12 Q All right, let's come back and have a
13 seat and we'll go into your next exhibit.

14 Get out your Exhibit Number Thirteen.

15 What is your Exhibit Number Thirteen, Mr.
16 Scheffler?

17 A Exhibit Number Thirteen is a partial per-
18 formance history of the Scharb Bone Springs Pool. This is
19 all the wells in the pool that were producing as of January
20 1st of 1970 through December of 1985.

21 As I mentioned earlier, this -- I didn't
22 mention it but I should now -- this pool was actually set up
23 in 1963, so there's some -- some production that existed in
24 this pool prior to 1970, from 1963 to 19 -- through 1969.
25 We didn't have the availability of that date readily at hand

1 so what we did is use a more current performance curve here,
2 but the purpose, really, of this curve is to show you that
3 again production continued along a relatively consistent de-
4 cline from all the wells that were in the pool through about
5 the third quarter of 1980, where I have that orange dot.

6 That orange dot represents the approxi-
7 mately point in time where that Southland Scharb 4 No. 1
8 Well was drilled. It was at that point in time that there
9 began, because of the successful completion realized in that
10 well in the Elkan reservoir, there began a step-out to the
11 east that resulted in significant wells being drilled, as
12 are indicated on the map that I just reviewed, and as you
13 can see, the resulting production which came primarily from
14 that area was quite significant. This production can be
15 considered to be primarily from the Elkan reservoir area;
16 not all of it but most of it.

17 So the purpose really for this is to
18 point out just how much production we actually have realized
19 and the type of the performance trend increase that we've
20 seen relative to that easternmost development in this Scharb
21 Bone Springs Pool area.

22 Q Mr. Scheffler, have you made a study as
23 to the ultimate recovery that you believe will be obtained
24 from the Scharb zone?

25 A Yes, sir.

1 Q All right, is that the subject of Exhibit
2 Number Fourteen?

3 A Yes, sir. I've shown on Exhibit Fourteen
4 an ultimate recovery contour map and this map is with regard
5 to only the Scharb interval that we spoke of earlier, that
6 is the deepest interval in the Scharb Bone Springs Pool.

7 As you can see on here, what I've done is
8 contour with a 50 MBL contour interval, anticipated ultimate
9 recovery from each of the completions that were realized in
10 the Scharb interval.

11 The light blue are the -- the light blue
12 dots identify various wells that were either completed in or
13 a completion was attempted in the Scharb interval.

14 The large blue dots show wells that are
15 currently still active. The small blue dots show wells that
16 are previously produced or there was an attempt to complete
17 in those wells but it was unsuccessful.

18 I should point out that below each of
19 those dots is identified, or off the left or right or above
20 in some cases, is identified -- the number that's on top of
21 the two numbers shown is the anticipate ultimate cumulative
22 recovery. Below that number is a date, that's month and
23 year, which addresses the initial production date from that
24 particular well or the date of the attempted completion if
25 there was no cumulative recorded.

1 The example of that might be, if we go to
2 Section 8 in the northwest quarter of the northwest quarter,
3 the HNG No. Hooper 8 No. 1, there was a test attempted in
4 the Scharb there in 4 of 84 but nothing was recovered.

5 Q As of what date is the well status
6 shown on this exhibit?

7 A This would be as of, again, December,
8 1985.

9 Q All right, does this conform to the
10 geologic interpretation presented by Ms. Glaser?

11 A It conforms very well. I don't see that
12 map on the wall but I don't recall the exhibit, but if we
13 were to look at the exhibit in which she Isopached the
14 Scharb clean carbonate, you can see that this conforms well
15 with the shape. You would see also that, as we have spoken
16 about here, the production has -- from the Scharb has
17 remained to the west of the easternmost section lines of
18 Section 8.

19 Q All right, go to your Exhibit Number
20 Fifteen.

21 I believe this is a contour map of the
22 ultimate recovery in the Second Bone Springs as a whole, is
23 that correct?

24 A Yes, sir, that's correct.

25 Q All right, explain what you show on this
exhibit.

1 A This is a similar map as the one that I
2 just previously discussed. On this map I have shown again
3 an ultimate recovery contour that is again contoured on 50
4 MBO recovery.

5 I've shown with the light green dots on
6 this exhibit the area I have defined as the Elkan reservoir
7 within the second carbonate.

8 The dark green dots that are surrounding
9 this Elkan reservoir area represent inactive -- represent
10 active and inactive wells as of December of 1985 that may be
11 completed or completion attempts were made, in the Second
12 Bone Springs Carb Area.

13 What I've also shown is the estimated ul-
14 timate recovery by each one of these wells in terms of MBO
15 and the date of first production or the date of the produc-
16 tion test.

17 The other thing I'd like to point out
18 here is that if you recall, and I think if we refer to the
19 Exhibit Number 8 that's hanging over there on the wall with
20 the cross section, the reservoir area that I've defined here
21 through performance, ultimate cumulative recoveries, con-
22 forms fairly well, very well, as a matter of fact, with the
23 approximate, or the boundaries that we've set up for our El-
24 kan reserovir area.

25 What I've shown here is two pods of

1 development, remembering, of course, we're talking about the
2 outermost contour here being in MBO interval, but I've shown
3 two pods that can be shown to overlay very well in terms of
4 a review of performance on top of the Elkan reservoir area
5 based upon the geological interpretation, geological model
6 that the geological witness has reviewed earlier.

7 The last bit of information I guess I
8 should point out on this well -- on this particular exhibit,
9 is that I have what I've called -- identified, rather, what
10 I will call line of performance that I'm going to review
11 here next for wells that lie within the Elkan reservoir
12 area, and then I will compare the type of performance that
13 we've seen for wells from the Elkan reservoir area that lie
14 in the outlying second carbonate area.

15 I will show you that there is a signifi-
16 cant difference in performance when we're talking about
17 wells within the Elkan reservoir, because those wells exhi-
18 bit performance characteristics for a reservoir that has a
19 fractured, vugular type of porosity development, signifi-
20 cantly different from the type fo performance you would see
21 and will see in those wells in the outlying second carbonate
22 area where you have just the very tight matrix porosity
23 development.

24 Q On this exhibit, Mr. Scheffler, the
25 green, the light green dots that you show on here are the

1 wells which are contained within the red outline, the sort
2 of heart-shaped Elkan reservoir shown on Exhibit Number
3 Eight?

4 A Yes, sir, that is correct.

5 Q And so if you drew a dashed line around
6 all of those light green wells, it would conform to the
7 geologic interpretation, is that what you're saying?

8 A Yes, sir, it would. I might point out
9 that the anomalous well that the geological witness referred
10 to, the Exxon New Mexico State DD No. 1 has a light green
11 dot on it. If you look at that well, it's located in the
12 southwest quarter of Section 4, just to the east of the
13 Southland Scharb 4 No. 1 Well, which has the tight area
14 around it, but that well, yes, I would include in the Elkan
15 reservoir.

16 Q Let's go on to your performance curves.
17 I believe you've listed these Exhibits Sixteen through Twen-
18 ty-Eight.

19 If you would, just go ahead and describe
20 the exhibit and tell us what the exhibit purports to show
21 and which well is shows and what you interpret from that ex-
22 hibit.

23 A To orient the examiners, I'd like to
24 start with the first well in my line of performance and that
25 well is the Amoco Elkan No. 4 Well. It's the well that lies

1 in the southeast quarter of the southwest quarter of Section
2 9. It's the first well down near the -- in the yellow
3 colored acreage with the red dot on it.

4 What I've shown as a performance curve
5 for that well, as you can see, that well initially poten-
6 tialled at a very high -- at a high rate of 120 barrels of
7 oil per day. It was completed in April of 1985. It shows a
8 steady production rate that was realized at initial poten-
9 tial. This again is through December of 1985 and as of that
10 time it had cumed some 43,000 barrels of oil. I've shown
11 the projected ultimate on the contour map.

12 Moving up the line of performance to the
13 next well, the Elkan No. 3 Well, which is the second well
14 which is the subject of this application, the previous well
15 being the first well.

16 Q And you're on Exhibit Number Seventeen.

17 A And I'm on Exhibit Seventeen. You can
18 see again this well initially potentialled at a high rate of
19 293 barrels of oil per day and has maintained a consistently
20 high producing rate as of 12 of '85 since its initial com-
21 pletion. The well has cumed as of that date over 88,000
22 barrels of oil.

23 Moving along to Exhibit Number Eighteen,
24 and after the next well's in the Elkan reservoir, the South-
25 land Scharb 9 No. 2 Well, that well was completed in June of

1 '83. It initially potentialized some 257 barrels of oil per
2 day pumping. The well is still producing, as were the pre-
3 vious wells.

4 It has cumed some 201,000 barrels of oil;
5 a very good well, which in my opinion would indicate that it
6 is into an extensive fractured, vugular system that is al-
7 lowing the well to recover that type of reserves.

8 The performance is indicative as well of
9 the type of performance I would expect from a well that is
10 encountering vugular and fractured type of porosity.

11 The next well, the Southland Scharb 9 No.
12 4 Well has recovered some 51,000 barrels of oil. That well
13 IP'ed flowing 406 barrels of oil per day, consistent with
14 the high rates; as a matter of fact, higher than the pre-
15 vious wells. It maintained a rate over 100 barrels a day
16 for some time. The well is still producing and as of 12 of
17 '85, as I had mentioned, it had cumed some 51,000 barrels of
18 oil.

19 Q That was on Exhibit Nineteen.

20 A That was Exhibit Nineteen, yes, sir.

21 Moving to Exhibit Number Twenty, we move
22 to the Scharb 4 No. 1 Well, the well that I indicated to you
23 earlier was the first successful step-out to the east that
24 we feel was the first well that encountered the Elkan reser-
25 voir area.

1 This well was completed in 9 of 80 and
2 IP'ed flowing 400 barrels of oil per day. Again as you can
3 see, the well maintained a relatively -- a very good rate
4 for a long time. It's still producing and as I mentioned,
5 or as I will mention now, it cumed some 213,000 barrels of
6 oil as of December, 1985.

7 I would like to point out to you, as you
8 can see on this particular curve, that there was a signifi-
9 cant increase in production that was realized in June of
10 1984. This resulted in the opening of some additional pay
11 in the Elkan interval itself. There was an increase in pro-
12 duction from approximately 40 barrels of oil per day up to
13 577 barrels of oil per day. This is -- this is indicative
14 and consistent with the type of model that the geological
15 witness was describing to you earlier in that here we have a
16 situation where very likely there are two separate pods that
17 are lying on top of one another that don't -- might not
18 necessarily be in pressure communication, and as a result of
19 that there is some seal, perhaps, between the two. When you
20 pop the upper interval you are able to encounter production
21 that was not being realized out of the lower interval; thus
22 the increase in production that we see.

23 The next exhibit is the Exxon New Mexico
24 State DD No. 1. Again this has a similar performance to
25 those wells we've looked at in the past. This well IP'd at

1 223 barrels of oil per day. Currently that well is shut in.

2 It's cumed some 95 MBO.

3 Q That was Exhibit Twenty-one --

4 A Yes.

5 Q -- you just talked about.

6 A Yes, sir.

7 The next well, Exhibit Number Twenty-two
8 is the last well that I will review in the Elkan reservoir
9 before I compare the similar performance in the offsetting
10 second carbonate matrix porosity.

11 This is the Vacuum State No. 1 Well.
12 It's cumed some 102 MBO; again very similar performance. It
13 potentialed high, flowing 190 barrels of oil per day and the
14 well is still producing.

15 As we move out of the Elkan reservoir in-
16 to the second Bone Springs carbonate, matrix porosity, you
17 can see a significant difference in the type of performance
18 that we realize in this particular portion of the second
19 carbonate.

20 Here we have a well that was recompleted
21 from the Wolfcamp to the Elkan in May of 1984. It IP'ed at
22 17 barrels of oil per day.

23 The status is it is currently shut-in, as
24 you would expect from a tight matrix; it recovered 1000 bar-
25 rels of oil; insignificant recovery.

1 Q That was Exhibit Twenty-three you just
2 talked about.

3 A Yes, sir.

4 Q All right.

5 A Exhibit Twenty-four shows the next well
6 in my line of performance, the Smith 5 No. 4 Well.

7 The well was completed in October of '84;
8 IP'ed at 4 barrels of oil per day. The well is still
9 producing at about 2 barrels of oil per day and this was as
10 of December of 1985.

11 It's cumed all of a little over 1 MBO;
12 again, typical matrix performance.

13 The Smith 5 No. 1 Well on Exhibit Twenty-
14 five, the next exhibit, shows the, again, performance that
15 is typical of a very poor matrix porosity area. This well
16 was recompleted from the Wolfcamp to the Elkan in October of
17 '81; IP'ed 35 barrels of oil per day. It is currently
18 producing at about 6 barrels of oil per day and it's cumed,
19 oh, just at 11 MBO. Projected recovery may be as high as 13
20 MBO.

21 The next well, the Scharb 8 No. 1 -- No.
22 2 Well was completed in December of '84. It IP'ed at 13
23 barrels of oil per day and it's currently shut-in. It
24 recovered all of 322 barrels of oil.

25 Q That was shown on Exhibit Twenty-six.

1 A Yes, sir.

2 Exhibit Twenty-seven shows the Scharb 9
3 No. 3, the last well that I'll be reviewing in the outlying
4 second carbonate matrix porosity area.

5 This well was completed in November of
6 '83 in the Elkan and the Ora Jackson; both intervals are
7 open.

8 The well potentialled at 5 barrels of oil
9 per day. It is currently shut-in and it's cumed about 1.7
10 MBO.

11 For comparison purposes, as we move back
12 into the Elkan reservoir, I've attached a performance curve
13 for the Elkan No. 1 Well. This well was completed in May of
14 '82. It cumed or it potentialled flowing 325 barrels of oil
15 per day. It has a consistently long history of very high
16 performance.

17 It has cumed as of December of '85 some
18 467 MBO. The well is still producing and again the well is
19 very, very indicative to me of a reservoir that's completely
20 separate and apart from the type of reservoir that I've de-
21 scribed to you in these outlying Second Bone Springs carbon-
22 ate wells.

23 This well had a -- I might point out to
24 you that this well was completed in both the Elkan and Ora
25 Jackson. This is the well that the geological witness was

1 referring to you earlier had both sets of perforations open.

2 We ran a production log in this well in
3 June of 1982, very soon after it was initially completed,
4 and found that there was no fluid influx from the Ora Jack-
5 son in that interval. This production is coming from the
6 Elkan reservoir.

7 As I mentioned, the well is still produc-
8 ing.

9 Q That's Exhibit Eight you've been -- Exhi-
10 bit Twenty-eight that you've just been discussing, is that
11 --

12 A That's correct.

13 Q -- correct?

14 A And that completes my comparison of wells
15 along what I've called the line of performance.

16 Q Mr. Scheffler, does the performance his-
17 tory of these wells indicate a permeability barrier in the
18 second carbonate which would separate the Elkan reservoir
19 from the remainder of the second carbonate consistent with
20 the geologic model?

21 A Yes, sir, I believe it does.

22 Q Do you have any comparison of reservoir
23 pressures in this reservoir?

24 A I have analyzed reservoir pressures in an
25 attempt to show that there is vertical separation between

1 the Ora Jackson, the Second Bone Springs carbonate interval,
2 and the Upper -- excuse me, the Ora Jackson, starting from
3 the top down, the Second Bone Springs carbonate interval,
4 which is the middle interval, and the Scharb interval which
5 is the deepest interval.

6 Q And that's the subject of your Exhibit
7 Number Twenty-nine, is that correct?

8 A That is correct.

9 Q If you would, discuss what you show on
10 this exhibit with the examiner.

11 A This exhibit is a comparison of initial
12 reservoir pressures for the Scharb Second Bone Spring carb
13 and the Ora Jackson intervals. It's based upon available
14 DST data, that is, the earliest DST data I could find within
15 this area of interest.

16 What I have shown here is a DST starting
17 -- let me go through the columns first.

18 What I've shown here is the date, month
19 and year of the DST; the operator and well name of the well
20 in which the DST was taken; location of the well; the data
21 of the well; the interval over which the DST was taken; the
22 indicated pressure, and that pressure, by the way, is the
23 higher pressure of the two periods, shut-in periods that it
24 was taken.

25 I've also shown the depth that I have

1 used as my pressure point, which is the midpoint of the DST;
2 corrected bottom hole pressure to a subsea datum of -5800
3 feet; and the shut-in time.

4 On the first well, the Marathon State NPA
5 No. 1, I've identified that the corrected bottom hole pres-
6 sure for the Scharb zone, there was a DST taken over the
7 Scharb interval, was some 4216 psi.

8 Compared to the Second Bone Springs Car-
9 bonate DST that was taken separately, you see a pressure of
10 some 3920 psi. There's a significant difference in pres-
11 sures right there at the same time, which would indicate to
12 me separation between the two reservoirs.

13 In the Southland Royalty Company Scharb 4
14 No. 1, the step-out well I've been referring to, there was
15 DST tests, DST's taken in August of 1980. The corrected
16 pressure over the Elkan reservoir, because this well is
17 within our Elkan reservoir area, was some 3855 psi. As you
18 can see, that pressure is very close to the pressure that
19 was read in the original discovery well, some 65 pounds
20 within the range of the State NPA No. 1.

21 The Southland Royalty Company Smith 5 No.
22 1 had a pressure -- or DST taken over the Second Bone
23 Springs carbonate Ora Jackson in January, 1981.

24 Again you can see, looking at the cor-
25 rected pressures, that there is a significant difference in

1 pressures between those two intervals, 3790 for the Second
2 Bone Springs Carb versus 3576 for the Ora Jackson, over 200
3 pounds difference.

4 In March of '81, the last well that I've
5 shown here is the Southland Royalty Company Scharb 8 No. 1.
6 It had a test during that time over the Scharb and Elkan in-
7 tervals.

8 The Scharb interval had a DST pressure of
9 4005 as compared to an Elkan pressure of some 3800 pounds.

10 Again, the Scharb 8 No. 1, we believe is
11 within the Elkan reservoir.

12 My conclusion here is there is definitely
13 reservoir separation vertically between the reservoirs we
14 have described to you, the intervals, and is the Ora Jack-
15 son, Elkan, and Scharb.

16 The second page of this exhibit is simply
17 the base data that I used to derive the numbers that I've
18 shown on the first page of the exhibit.

19 Q Okay, Mr. Scheffler, have you made a
20 diligent search of all records which are reasonably
21 available and contain information relative to the determina-
22 tion of a proper NGPA determination of eligibility?

23 A Yes, sir.

24 Q Would you please describe the search that
25 you made, the records which you reviewed, where the records

A I started with data, production information what we have in house. That information was taken from NMOCD records. It's updated quarterly.

I had our Hobbs District Office search the Hobbs NMOCD's District Office for C-103 information and C-105 data pertaining to workovers, completions, initial potentials, et cetera, and we felt we did a pretty thorough job of reviewing all the data on every well that had information in the file on it.

With regard to additional information, where we didn't have information on the wells from the NMOCD, we went to scout tickets, to petroleum information sources, PI summaries of initial completion information which was available in our Exploration Department and through the PI Service people.

Well information was derived through commercial logging companies where we didn't have the logs available. We have quite a complete set of well logs in our office in the Exploration as well as in the Production Department, and we used that source, as well.

For getting information regarding pres-

1 sure data, I contacted operators in the area that I thought
2 would have pertinent wells that would help me in my evalua-
3 tion.

4 I spoke to Southland in particular. They
5 seem to have done quite a bit of research in terms of trying
6 to derive some pressure information in the area from other
7 operators, so they were -- they were one of my main sources
8 for data in the Second Bone Springs Carbonate area.

9 And that pretty much concludes my
10 description of the sources I used to put together this re-
11 quest, our application.

12 Q Were there any records which would con-
13 tain information relevant to this determination which were
14 not reasonably available to you?

15 A No, sir.

16 Q Have you reached a conclusion on your re-
17 view of available records and information as to whether or
18 not the Elkan reservoir, as shown on Amoco Exhibit Number
19 Eight, is a new onshore reservoir as defined by NGPA Section
20 102-C-1-C?

21 A I believe it is.

22 Q What is your conclusion?

23 A I believe that this is a separate reser-
24 voir, the Elkan reservoir is separate from the Second Bone
25 Springs Carbonate that I've set out for you and that we've

1 talked about here today.

2 Q Do you have any knowledge or information
3 which is inconsistent with this conclusion?

4 A No, sir.

5 Q Based on your search and examination, was
6 natural gas produced in commercial quantities from the Elkan
7 reservoir, as shown on Amoco Exhibit Number Eight, prior to
8 April 20th, 1977?

9 A No, sir, it was not.

10 Q Was the Elkan reservoir penetrated before
11 April 20th, 1977, by an old well from which natural gas or
12 crude oil was produced in commercial quantities from any re-
13 servoir?

14 A No, sir, it was not.

15 Q From your review and examination, do you
16 conclude that the reservoir in which State MX No. 1 was com-
17 pleted is a new onshore reservoir as defined by NGPA Section
18 102-C-1-C?

19 A Yes, sir, I believe it is.

20 Q Do you have any knowledge or information
21 inconsistent with that conclusion?

22 A No, sir, I do not.

23 Q Based on your search and examination was
24 natural gas produced in commercial quantities from the State
25 MX No. 1 reservoir prior to April 20th, 1977?

1 A No, sir, it was not.

2 Q Was the State MX No. 1 reservoir pene-
3 trated before April 20th, 1977, by an old well from which
4 natural gas or crude oil was produced in commercial quanti-
5 ties from any reservoir?

6 A No, sir.

7 MR. MOTE: That concludes the
8 testimony from this witness and we offer exhibits through
9 Twenty-nine into evidence.

10 MR. CATANACH: Exhibits One
11 through Twenty-nine?

12 MR. MOTE: Thirteen through
13 Twenty-nine.

14 MR. CATANACH: Exhibits Thir-
15 teen through Twenty-nine will be admitted into evidence.

16 Mr. Stogner?

17 MR. STOGNER: For the record,
18 and I'm sorry, I'm Michael Stogner. I'm NGPA Coordinator
19 here in Santa Fe with the Oil Conservation Division.

20

21 CROSS EXAMINATION

22 BY MR. STOGNER:

23 Q Mr. Scheffler, I have a few generalized
24 questions.

25 A Yes, sir.

1 Q Can it be construed that if I have any
2 well that's completed in the Ora Jackson zone reservoir, we
3 might add, can I consider that as being a 102 well within
4 the Scharb Bone Springs Pool?

5 A It would depend upon within that reser-
6 voir pod, if it met the criteria of the NGPA regulations;
7 that is, if there was a well that was drilled prior to 1977,
8 encountered commercial production.

9 Q In that particular pod?

10 A In that particular pod.

11 Q So it's a case by case basis.

12 A Yes, sir.

13 Q Same questions with the Elkans reservoir.

14 A I believe that's the case, yes, sir.

15 Q Again explain to me how many reservoirs
16 you feel that we have out there in the Scharb Bone Springs
17 Pool.

18 A Let me -- let me explain it this way: We
19 have three intervals that comprise the Scharb Bone Spring.

20 The first interval we described as the
21 Ora Jackson interval. That's the shallowest within the
22 Scharb Bone Springs Pool.

23 The next, we're describing for you as the
24 Second Bone Springs Carbonate. Within that Second Bone
25 Springs Carbonate we have set up for you a reservoir

1 description called the Elkan reservoir, which we describe as
2 the new onshore reservoir area. That's the middle area.

3 The deepest interval is called the Scharb
4 interval and that is the interval that doesn't exist to the
5 east, as we've described to you, the eastmost portion of
6 Section 5, generally speaking, in Section 8. It lies back
7 to the west of that general boundary.

8 Those are the three -- three intervals
9 that we're discussing.

10 Q If I can refer to Exhibit Number Three as
11 a reference, that is the type log within this area, is there
12 any production within that, what you call or what's consid-
13 ered on here to be top third Bone Spring Carbonate, to date?

14 MR. MOTE: We don't have that
15 exhibit in front of us.

16 MR. STOGNER: I'm sorry.

17 MR. MOTE: Wait just a minute,
18 if you would.

19 A Okay, Mr. Examiner, if you could restate
20 that question.

21 Q Has there been any production from that
22 portion called the Top Third Bone Springs Carbonate?

23 A Oh, Top Third, I'm sorry.

24 I would -- let me see what the depth is
25 on that, that, I believe, has been considered to be Wolfcamp

1 production in the past.

2 I'm sorry, I tell you what. I'd best re-
3 fer that question to the geologist.

4 In my search of information, I'm just re-
5 calling from scout tickets, I limited to only the Scharb
6 zone, the Second Carbonate, and the Ora Jackson, so I really
7 can't, I guess, answer your question completely, Mr. Exam-
8 iner.

9 MR. MOTE: Would you like to
10 address that to Ms. Glaser?

11 MR. STOGNER: Yeah, I'll ad-
12 dress that question, if the examiner will let me.

13 MR. CATANACH: Proceed.

14 MS. GLASER: Are you asking if
15 there's any production from the Third Bone Spring Carbonate?

16 MR. STOGNER: Right.

17 MS. GLASER: Okay, not in the
18 Scharb Bone Spring Pool.

19 MR. STOGNER: Is there any in
20 that particular carbonate that's considered the Wolfcamp?

21 MS. GLASER: In the Scharb Bone
22 -- in the area of the Scharb Bone Spring Pool, yes, it's in
23 the Scharb Wolfcamp reservoir. That would be below the in-
24 dicated Wolfcamp marker; below the blue line.

25 MR. STOGNER: Okay, so what's

1 on here, the top Third Bone Springs Carbonate, I don't real-
2 ly -- we don't really need to consider that reservoir.

3 MR. GLASER: Not in this field.

4 MR. STOGNER: Thank you.

5 May I continue to question Mr.
6 Scheffler, Mr. Catanach?

7 MR. CATANACH: You may proceed.

8 Q Let's look at the Scharb zone. If there
9 are any penetrations through here?

10 A On the exhibit, the type log?

11 Q Yes, can that be considered as 102?

12 A Through the Scharb Zone?

13 Q Yes.

14 A Let me -- let me set this up for you, Mr.
15 Examiner.

16 Most of the production in the Scharb in-
17 terval, if we refer back to the exhibit on the wall, to the
18 Isopach map that was derived by the geologic witness, there
19 is a significant amount of wells in that Isopached area that
20 are wells that were completed prior to 1977 and penetrated
21 the subject reservoir but were producing out of another re-
22 servoir commercially prior to that date, so that generally
23 speaking, the -- like I say, there were several old wells
24 that way, that penetrated the Scharb, that is they -- they
25 were drilled and produced commercial quantities of gas from

1 some reservoir. They penetrated the Second Carbonate and
2 produced commercial quantities out of some reservoir prior
3 to 1977, which I believe, of course, would exclude the pos-
4 sibility of, in general terms, that Scharb zone from being
5 possibly considered a new onshore reservoir.

6 Q In your studies of this area have you en-
7 countered any other wells that have produced prior to 1970
8 -- or before 1977, has there been any Ora Jackson produc-
9 tion?

10 A Prior ot 1977?

11 Q Yes.

12 A The -- in the area to the east of Section
13 --

14 Q Let's --

15 A Just all encompassing?

16 Q Yes.

17 A I can answer your question, I believe, if
18 I look on this exhibit right here.

19 Q While you're up there I'm going to ask
20 you the same question about the Elkan.

21 A Okay, I really, all I can say is with re-
22 gard to the pods that we're addressing right here, in which
23 our Ora Jackson completion is in, I know, I don't see the
24 dates up here but I know that there was nothing completed in
25 this pod prior to 1977.

1 MR. MOTE: What exhibit are you
2 looking at?

3 A This is Exhibit Six. There -- I'd have
4 to review again the completion dates on the wells in the
5 other pods before I set out to answer your question com-
6 pletely. I can do that. I just don't have it right here in
7 front of me.

8 Q Do you know how many wells produced be-
9 fore 1977?

10 A Overall?

11 Q Yes.

12 A In the Ora Jackson zone?

13 Q No, in the Scharb Bone Spring Pool.

14 A Again the number, I can certainly come up
15 with, I know how to get at it but I don't have it just on
16 top of the my head. There was -- there was -- the majority
17 of those wells that produced prior to 1977 were wells that
18 were completed in the western part of the field in the
19 Scharb interval.

20 A rough gauge would be to look at the
21 completion or the spud dates on those wells, our Exhibit
22 Number Two, I believe it is.

23 Q In the future, Mr. Scheffler, do you have
24 any ideas or thoughts on how to best proceed on getting a
25 102 application approved through this area? Would you share

1 those with me?

2 A I think each well has to be taken basic-
3 ally on an individual basis and again, like I said, I think
4 that if you set up with proper geological model, based upon
5 experience and good control, that you can easily identify,
6 in this case we'll talk about pods, within each of these in-
7 tervals that would classify as new onshore reservoirs and
8 those that would not.

9 This is a complicated area, very compli-
10 cated geologically. It might be a little bit different ani-
11 mal than others that we've looked at, but for that reason I
12 would -- I would feel that each well would have to be looked
13 at on an individual basis.

14 The geological interpretation, the model
15 is here, should not change, really, in that we feel like we
16 have enough experience and data to support, as you've seen
17 today, what we've set out, so all I can offer is that the
18 review should be done on a well by well basis taking into
19 consideration detailed geology and associated production da-
20 ta.

21 Q I suppose you feel we have enough infor-
22 mation to formulate this model after today?

23 A Put it on a computer. I'll tell you this
24 much, Mr. Examiner, that we spent a significant amount of
25 time on this project, more than I've ever been involved with

1 in preparing a case, really, of any type. This was a very
2 long and involved project geologically, and even though the
3 engineering data that was presented here today seems some-
4 what short, I feel like it was conclusive, that we looked at
5 a vast amount of engineering data out here and tried to show
6 you the end result, but to get that end result required us
7 to review a significant amount of information, so we feel
8 very good about the data we've presented today.

9 And I would say, I would give it to you
10 that way, and say that there's not much more we can give
11 you. This is it.

12 Q Mr. Scheffler, if, as we look at these on
13 a case by case basis and your Elkans wells, for instance,
14 receive the 102, --

15 A Yes, sir.

16 Q -- and as we approve more 102's and find
17 that more geological information is looked at, and it can be
18 established that some of these older wells are in communica-
19 tion with these 102 wells, what should my particular divi-
20 sion with the OCD here, how should I proceed with that?

21 MR. MOTE: I think that's a
22 legal question, Mr. Stogner, and if you would, I'd like to
23 try to answer it.

24 There's a recent FERC ruling,
25 Federal Energy Regulatory Commission ruling in Docket Number

1 GP-84-44-000, combined with GP-84-45-000, and GP-85-06-000,
2 which was issued February 18th, 1986.

3 This was a controversy before
4 the Federal Regulatory Commission in which Mobil, Exxon, and
5 Gulf were involved, and the subject under consideration in
6 that proceeding was the very things which you have now
7 brought to your attention and asked for guidance on.

8 The decision was made in that
9 case, and I'm sorry, I can't tell you whether it's been ap-
10 pealed. I do not believe it has, but the very distinct de-
11 termination was made that any well determination has to be
12 made as of the time that determination is made and any sub-
13 sequent evidence which might bring contrary evidence to
14 light would not be of any value to disturb a previous find-
15 ing; that once the finding is made on evidence in the record
16 at that time, that is more or less conclusive as to the
17 future, regardless of any evidence which may come to light
18 in future drilling or future production history.

19 MR. CATANACH: Mr. Mote, can we
20 get a copy of that, please?

21 MR. MOTE: Yes, sir.

22 MR. STOGNER: I have no further
23 questions.

24 MR. CATANACH: Are there any
25 other questions of the witness?

1 MR. MOTE: No, sir.

2 MR. CATANACH: If not, he may
3 be excused.

4 MR. MOTE: That concludes our
5 presentation.

6 MR. CATANACH: There being no-
7 thing further in Case Number 8848 --

8 MR. CARR: I have a brief
9 statement.

10 MR. CATANACH: I'm sorry, Mr.
11 Carr.

12 MR. CARR: May it please the
13 Examiner, Southland Royalty Company and Meridian Oil, Inc.,
14 operate the Scharb 4 No. 1 Well and the Scharb 9 Wells Nos.
15 1, 2, and 4 within the boundary of the proposed Elkan reser-
16 voir.

17 We submit that the geologic
18 evidence presented in the case clearly shows that the pro-
19 posed Elkan reservoir is a separate and distinct source of
20 supply; that the wells therein should qualify for the NGPA
21 102 classification.

22 We support the application of
23 Amoco Production Company.

24 MR. CATANACH: Thank you, Mr.
25 Carr.

1 Is there anything further in
2 Case 8848?
3 If not, it will be taken under
4 advisement.

5

6

(Hearing concluded.)

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY
CERTIFY 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. 8848
heard by me on June 12, 19 86 :

David L. Catanzaro, Examiner
Oil Conservation Division

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

14 May 1986

EXAMINER HEARING

IN THE MATTER OF:

The disposition of cases called on
Docket 15-86 for which no testimony
was presented.

CASE
8848,
8849, 8818.

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:

Jeff Taylor
Attorney at Law
Legal Counsel to the Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

For the Applicant:

1

2

I N D E X

3

4

Case 8848, continued

3

5

Case 8849, continued

3

6

Case 8818, continued

4

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. CATANACH: Let's call next
Case Case 8848.

MR. TAYLOR: The application of
Amoco Production Company for NGPA Wellhead Price Ceiling
Category Determination, Lea County, New Mexico.

The applicant has requested
that this case be continued.

MR. CATANACH: Case 8848 will
be continued to the June 12th, 1986, hearing docket.

MR. CATANACH: Call next Case
8849.

MR. TAYLOR: The application of
Southland Royalty Company for NGPA Wellhead Price Ceiling
Category Determinations, Lea County, New Mexico.

The applicant has requested
that this case be continued.

MR. CATANACH: Case 8849 will
be continued to the June 12th, 1986, docket.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. CATANACH: Call next Case
8818.

MR. TAYLOR: Application of
Yates Petroleum Corporation for salt water disposal, Eddy
County, New Mexico.

The applicant has requested
that this case be continued.

MR. CATANACH: Case 8818 will
be continued to the May 28th, 1986, docket.

C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO HEREBY
CERTIFY 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. _____,
heard by me on May 11, 1986.

David L. Catanach, Examiner
Oil Conservation Division

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO

16 April 1986

Case No. 8872, Continued

EXAMINER HEARING

Case No. 8873, Continued

Case No. 8874, Continued

IN THE MATTER OF:

Case No. 8848, Continued

The disposition of all cases called

Case No. on this docket for which no testimony
was presented.

Case No. 8870, Continued

Case No. 8030, Continued

CASE
8872, 8873,
8874, 8848,
8875, 8870,
8030.

*Transcript in
Case 8872*

BEFORE: David R. Catanach, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Oil Conservation
Division:

Jeff Taylor
Legal Counsel to the Division
Oil Conservation Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

For the Applicant:

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

5 March 1986

DIVISION HEARING

IN THE MATTER OF:

Disposition of cases called on
Docket No. 8-86 for which no tes-
timony was presented.

CASE 8836,
8837, 8838,
8839, 8842,
8845, 8846,
8848, 8849,
8850.

BEFORE: Michael E. Stogner, Examiner

TRANSCRIPT OF HEARING

A P P E A R A N C E S

For the Division:

Jeff Taylor
Attorney at Law
Legal Counsel to the Division
State Land Office Bldg.
Santa Fe, New Mexico 87501

For the Applicant: