STATE OF NEW MEXICO ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION 1 STATE LAND OFFICE BLDG. SANTA FE, NEW MEXICO 2 18 November 1987 3 EXAMINER HEARING 4 5 IN THE MATTER OF: 6 Application of BTA Oil Producers for CASE an unorthodox gas well location, 9258 7 Lea County, New Mexico. 8 9 10 11 BEFORE: David R. Catanach, Examiner 12 13 14 15 TRANSCRIPT OF HEARING 16 17 18 APPEARANCES 19 20 For the Division: Jeff Taylor Attorney at Law 21 Legal Counsel to the Division State Land Office Bldg. 22 Santa Fe, New Mexico 87501 23 24 For the Applicant: W. Thomas Kellahin 25 Attorney at Law KELLAHIN, KELLAHIN & AUBREY P. O. Box 2265 Santa Fe, New Mexico 87504

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3 1 MR. CATANACH: Call next Case 2 Number 9258. 3 MR. TAYLOR: The application of 4 BTA Oil Producers for an unorthodox gas well location, Lea 5 County, New Mexico. 6 MR. 7 CATANACH: Are there appearances in this case? 8 MR. KELLAHIN: If the Examiner 9 please, I'm Tom Kellahin of the Santa Fe law firm of 10 Kellahin, Kellahin, and Aubrey, appearing on behalf of the 11 applicant, and I have one witness to be sworn. 12 MR. CATANACH: Are there any 13 other appearances in this case? 14 Will the witness please stand 15 and be sworn? 16 17 (Witness sworn.) 18 19 MARVIN L. ZOLLER, 20 being called as a witness and being duly sworn upon 21 his oath, testified as follows, to-wit: 22 23 24 25

4 1 2 DIRECT EXAMINATION 3 BY MR. KELLAHIN: 4 Q Zoller, for the record would you Mr. 5 please state your name? 6 А Marvin Zoller. 7 0 Mr. Zoller, by whom are you employed and 8 in what capacity? 9 Α I'm representing BTA Oil Producers in a 10 consulting capacity. 11 С Have you previously testified before the 12 Oil Conservation Division of New Mexico as a petroleum geo-13 logist? 14 Yes, I'm sure I have. А 15 0 And have you prepared certain geologic 16 exhibits, evaluations, and have you reached certain geologic 17 opinions with regards to this application? 18 A Yes, sir, I have. 19 MR. KELLAHIN: Mr. Examiner, we 20 tender Mr. Zoller as an expert petroleum geologist. 21 MR. CATANACH: He is so quali-22 fied. 23 Zoller, let me refer you to both Ex-0 Mr. 24 hibit Number One, which is your Antelope Ridge Atoka struc-25 ture map; Exhibit Number Two is your structural cross sec

5 tion map; were both these exhibits prepared by you? 1 Yes, sir. А 2 Let me turn first to Exhibit Number Two, 0 3 if you will, and let's start with the cross section. There 4 is a location plat on the righthand side of the cross sec-5 tion. Would you take a moment and give the Examiner some of 6 the background with regards to the proposed well? For exam-7 ple, what is the acreage dedication for the well? 8 А It would be the north half of Section 35, 9 22 South, 34 East. 10 And approximately where is this? 0 We are 11 in what field? 12 А Lea -- Lea County. It's the Antelope 13 Ridge Field, Antelope Ridge Atoka Field. 14 0 The proposed well location is for the 2-B 15 Well in the red circle? 16 А Yes, sir. 17 And that footage location is 660 from the 18 0 west boundary of the section and 1980 from the north bound-19 ary? 20 А Yes, sir. 21 What is identified as the gas well 1-B on Q 22 that same north half spacing unit? What is that? 23 That is a Morrow producer. 24 Α Q The proposed formation that you will test 25

I is the Atoka formation?

2 А Yes, sir. 3 Would you take a moment and identify 0 on 4 this exhibit using this plat, the other wells that you've 5 used for geologic control? 6 Well, the northeasternmost well Α is a 7 Phillips Petroleum Company dry hole. I think it would be 8 beneficial just to glance across the exhibit for a moment 9 and see, I have colored blue the Atoka limestone and you 10 will see that the Phillips Petroleum Company well had vir-11 tually no Atoka limestone. 12 As you move southwest to the next well, 13 which I identified as a Morrow producer, you can see on the 14 left side that it had sufficient Atoka limestone but on the 15 righthand side of the log you see that it had virtually no 16 porosity. 17 As you move on southwest, I projected in 18 our No. 1 Maddox Federal, which is a very good Atoka produ-19 cer, and again on the righthand side you will see colored in 20 red is the gas effect on the neutron curve and the purple is 21 the remainder of the porosity. 22 I will skip the next well and go to the 23 well on the left end of the cross section. 24 You'll see that it is also an Atoka pro-25 ducer but it produces from an upper limestone bank, has vir-

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1 tually no porosity in the lower limestone bank. 2 Now, moving back to the log that we 3 skipped, you see it has a great amount of limestone. It 4 mainly produces from the lower member; however, it seems to 5 have some perforations in the upper member. 6 What we're going to see as we move on to 7 the next exhibit is that these two limestone banks are very 8 distinct and separate things and we are trying to see if we 9 can develop the lower limestone bank, which is represented 10 by the well in the middle of the cross section. 11 While we have the display, Exhibit Number 0 12 Two before us, can you identify for us the ownership of the 13 various offsetting spacing units, starting first with the 14 south half of Section 35? 15 A The south half of Section 35 is owned and 16 operated by BTA Oil Producers. 17 0 If we go to the east half of 34, who's 18 the operator ---19 That is --Α 20 0 -- of that property? 21 А That is Maxus, formerly Diamond Shamrock. 22 Q And as we go into Section 27 and Section 23 26, who's the ownership there? 24 А That is now Apache. It recently has 25 been, oh, MGF, I believe.

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8 Q Okay, and who are the other operators? ۱ Well, northeast in the southwest quarter А 2 of Section 25 is a lease owned by Amerada Hess and in Sec-3 tion 36, since I prepared these exhibits, Maxus has also an-4 nounced a location for that section, so they own that now. 5 All right, let's turn to Exhibit Number 0 6 One now and look at the structural map that you have pre-7 pared. 8 Would you identify and describe that Ex-9 hibit Number One for us? 10 А Yes. This is a structure map made on the 11 base of this Atoka limestone that I -- you saw on Exhibit 12 You can see by the build-up in the different Number Two. 13 wells that a map contoured on the top of the limestone would 14 be a very false map. So the base is a relatively good 15 structure point. 16 Section 3 you will notice In two wells 17 that are circles in red. Those two wells produce only from 18 the upper limestone bank. 19 Moving over to the east in Section 35 and 20 Section 2 there are three wells colored solid red. Those 21 three wells produce only from the lower limestone bank. 22 Now, there are six or seven other wells 23 you will see that are half colored and half circled. that 24 Those wells produce from both limestone banks. 25

1 I think what the exhibit tends to show is 2 that the upper limestone bank runs almost right down the 3 crest of the structure, whereas the lower limestone bank 4 seems to mainly form on the east flank of the structure. 5 What the cross section would tend to rep-6 resent to us is that the BTA No. 1-B Maddox Federal had very 7 little porosity in the limestone bank. 8 Going southwest to the Maxus No. 2 Fed-9 eral, that is a recent well. It has just been completed for 10 about a million and a half a day. It had to be acidized 11 twice and fraced once in order to make the million and a 12 a day; whereas, the BTA No. 1 Maddox Federal flowed half 13 over 7-million cubic feet of gas per day on completion and 14 has already made about 3-1/2 billion cubic feet of gas. 15 The indication from the exhibits is that 16 the better part of the porosity runs west of the BTA 1-B and 17 east of the Maddox No. 2 Federal. 18 Within that area how did you determine 0 19 in your opinion was the optimum location for which to what 20 test for Atoka production? 21 А Well, all you can do with this thing, 22 I've tried to Ispach it and you can't make any sense out of 23 it, what is says to me is this Atoka trend starts about a 24 mile south of this mapped area but for five miles the Atoka 25 production in the lower zone seems to have pretty well have

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10 stayed on the flank, east flank, of this structure, 1 and we're trying to see if we can push it one more location 2 north. 3 Up at the north end of the map you'll see 4 four wells, two dry holes, two former producers, and none of 5 those have any limestone build-up in them. They look very 6 much like the Phillips well on the northeast end of the 7 cross section. 8 0 The Well 1-B, that's the Morrow well, 9 at a standard location 1980 from the west line that's 10 and 660 from the south line of that spacing unit? 11 Yes, sir. А 12 0 In your opinion, then, you need to have a 13 location that's closer to the west boundary, still staying 14 to the south side of that proration unit, in order to have 15 the optimum location from which to test for Atoka production 16 in the spacing unit. 17 That's the way I feel about it. Α 18 0 In your opinion is the closest standard 19 locations for wells in this spacing unit represent an un-20 reasonable risk to the operator? 21 No, I don't think so. 22 Α The standard has 23 been broken on a number of occasions. In fact, I believe we have two of them just west of us that are not drilled on 24 25 standard.

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11 Which ones are not on standard locations? 1 0 The Maxus No. 2, which has just been com-А 2 pleted, and west of there, the Maxus No. 3, which is probab-3 ly about to the pay zone today. 4 Okay. So this is a --Q 5 Ã Now, as I see it, the Maxus No. 3, if my 6 geology has got any value at all, is trying to develop the 7 upper limestone bank, not the lower. 8 When looking at the Upper Atoka 0 Okay. 9 limsetone bank, then, within the north half of 35, in your 10 opinion there is not an acceptable standard location within 11 that spacing unit that represents a reasonable risk to the 12 operator. 13 А I don't think there will be any upper 14 limestone bank in the north half of 35 and I think that is 15 the only location that you could possibly drill for the low-16 er limestone. 17 18 MR. KELLAHIN: Mr. Examiner, Exhibits Three, Four, and Five represent executed waivers by 19 the various offset operators. 20 Exhibit Three is a waiver from 21 Amerada Hess. Exhibit Four is a waiver from Maxus Explora-22 tion Company. Exhibit Five is a waiver from Apache Corpora-23 tion. 24 25 At this time we would move the

12 introduction of Exhibits One through Five and that concludes ١ my direct examination of Mr. Zoller. 2 MR. CATANACH: Exhibits One 3 through Five will be admitted into evidence. 4 5 CROSS EXAMINATION 6 BY MR. CATANACH: 7 0 Mr. Zoller, have the wells in Section 3 8 been tested in the upper -- upper limestone bank or is it 9 present? 10 In wells -- in wells in Section 3? А 11 Q In Section 3? 12 They produce from the upper limestone A 13 bank. 14 I have copies of the logs colored up just 15 like these on the cross section on every well on this map if 16 there's anything important. 17 The wells in Section 2, have those -- do 18 0 you know anything about those? 19 20 Ά The wells in Section 2 both produced only from the lower limestone bank. 21 22 MR. KELLAHIN: There's a color coded legend at the very bottom of the display that identi-23 24 fies the wells. 25 А The BTA No. 1 Antelope in the north half

13 of Section 2 has no limestone in the Upper Atoka. 1 The BTA No. 1 State in the south half of 2 Section 2 has no limestone available in the upper part of 3 the Atoka. Only the lower member exists. 4 Was the Well No. 1-B in Section 35, was 0 5 that tested in the lower part or was that just --6 No, sir, it was not, but, as you know, А 7 drill stem tests are not too often performed, particularly 8 in the Atoka. 9 The only drill stem test, you'll notice 10 Phillips well on the cross section ran two drill stem the 11 tests and there's not another drill stem test on any of the 12 wells on the cross section. 13 But according to the log information from Ũ 14 the 1-B, that zone wouldn't be worth testing? 15 Oh, I think you might make a well out of А 16 it but I don't think you'd make any money on it. 17 you can see on the righthand side As of 18 the log, oh, three or four little zones of 3 to 5 feet, may-19 be, and the south offset has 50 feet of porosity. 20 CATANACH: I think that's MR. 21 all I have of the witness. He may be excused. 22 there anything further Is in 23 this case? 24 25 MR. KELLAHIN: No, sir.

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CERTIFICATE Ι, SALLY W. BOYD, C.S.R., DO HEREBY that the foregoing Transcript of Hearing was CERTIFY 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 <u>C572</u> I do hersel contine that the foregoing is a complete accord of the proceedings in For used that hearing of Gase No. 1258 neurd by me on Nocomber 18 1987. L, Examiner Oil Conservation Division

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