

1 NEW MEXICO OIL CONSERVATION DIVISION

2 STATE LAND OFFICE BUILDING

3 STATE OF NEW MEXICO

4 CASE NO. 10965

5
6 IN THE MATTER OF:

7
8 The Application of Southland Royalty
9 Company for a High Angle/Horizontal
10 Directional Drilling Pilot Project
and Special Operating Rules Therefor,
San Juan County, New Mexico.

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14
15 BEFORE:

16 MICHAEL E. STOGNER

17 Hearing Examiner

18 State Land Office Building

19 May 12, 1994

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22 REPORTED BY:

MAY 25 1994

23 CARLA DIANE RODRIGUEZ
24 Certified Shorthand Reporter
for the State of New Mexico

25
ORIGINAL

A P P E A R A N C E S

FOR THE APPLICANT:

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BY: W. THOMAS KELLAHIN, ESQ.

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1 EXAMINER STOGNER: At this time I'll
2 call next case, No. 10965, which is the
3 application of Southland Royalty Company for a
4 high-angle/horizontal directional drilling pilot
5 project, special operating rules therefor, San
6 Juan County, New Mexico.

7 At this time I'll call for appearance.

8 MR. KELLAHIN: Mr. Examiner, I'm Tom
9 Kellahin of the Santa Fe law firm Kellahin &
10 Kellahin, appearing on behalf of the Applicant,
11 and I have three witnesses to be sworn.

12 EXAMINER STOGNER: Are there any other
13 appearances? Will the witnesses please stand to
14 be sworn.

15 [And the witnesses were duly sworn.]

16 MR. KELLAHIN: Thank you, Mr.
17 Examiner. We'll call at this time Mr. John Zent.
18 Mr. Zent is a petroleum landman with Meridian.
19 He resides in Farmington.

20 **JOHN ZENT**

21 Having been first duly sworn upon his oath, was
22 examined and testified as follows:

23 EXAMINATION

24 BY MR. KELLAHIN:

25 Q. For the record, sir, would you please

1 state your name and occupation?

2 A. My name is John Zent. I'm a petroleum
3 landman employed by Meridian, Oil, Inc.

4 Q. On prior occasions have you testified,
5 Mr. Zent, as a petroleum landman, and had your
6 qualifications accepted as a matter of record
7 before the Division?

8 A. Yes, sir.

9 Q. In your capacity as a landman with your
10 company, have you made a study of the land
11 ownership involved in this application by
12 Southland Royalty Company to drill a high-angle
13 horizontal well in San Juan County, New Mexico?

14 A. Yes, I have made a study of the area of
15 ownership in the general vicinity of our
16 application, and I've prepared two exhibits,
17 Exhibits Nos. 2 and 3 in the exhibit book.

18 MR. KELLAHIN: We tender Mr. Zent as an
19 expert petroleum landman at this time.

20 EXAMINER STOGNER: Mr. Zent is so
21 qualified.

22 Q. Mr. Zent, let's turn to the plat behind
23 Exhibit tab No. 2.

24 MR. KELLAHIN: Exhibit 1, Mr. Examiner,
25 is simply another copy of the application which

1 outlines the request.

2 Q. Behind Exhibit tab No. 2, Mr. Zent, is
3 this the first display that you prepared?

4 A. Yes, it is. And what Exhibit 2 depicts
5 is spatially the dedicated proration unit for the
6 Jernigan No. 3 Dakota, the location being the
7 east half of Section 24, 27 North, 9 West.

8 It also shows the current surface
9 location of said well, being 1290 feet from the
10 north line and 1100 feet from the east line of
11 said Section 24, and an approximate azimuth and
12 projected total depth, or projected bottomhole
13 depth of location.

14 That isn't to say that Southland will
15 take the well to that extent, but that is the
16 maximum extent that we would drill and still be
17 in the legal window for the Dakota proration
18 unit, staying 790 feet from the exterior boundary
19 of the east half of Section 24.

20 Q. If the project is successful, the
21 Jernigan No. 3 well would be productive in what
22 pool?

23 A. It would be in the Basin-Dakota Pool.

24 Q. Spacing for the Basin-Dakota Pool is
25 what, sir?

1 A. 320 acres.

2 Q. And the proposed dedication, then, to
3 the well, would be what portion of Section 24?

4 A. It would be the east half of Section
5 24.

6 Q. Have you made a tabulation of the
7 offset operators to that spacing unit, and are
8 they identified on this spacing unit?

9 A. Yes, I have identified the offset
10 operators, and have shown on the exhibit those
11 direct and diagonal offsets. No. 1 shows
12 Meridian to be the offset operator. The
13 northeast diagonal offset operator is Amoco,
14 identified as No. 2, and the northwest diagonal
15 offset operator is Texaco, Inc., identified as
16 No. 3, with their mailing addresses.

17 Q. Have you caused notification to be sent
18 to those offsetting operators of this
19 application?

20 A. Yes, I have.

21 Q. To the best of your knowledge, Mr.
22 Zent, have any of those offsetting operators
23 filed an objection to the granting of this
24 application?

25 A. They have not.

1 MR. KELLAHIN: Mr. Zent, marked in the
2 exhibit package is Exhibit 9. It's not in the
3 book itself but is submitted with the exhibits.
4 That is our certificate of mailing, and the
5 return receipt cards from Amoco and Texaco.

6 Q. Employees of Meridian Oil Company act
7 as agents or personnel on behalf of Southland
8 Royalty Company, do they not, Mr. Zent?

9 A. That is correct. Southland Royalty
10 Company is a wholly-owned subsidiary of Meridian
11 Oil Holdings, Inc. Southland is a bonded
12 operator and will operate this well under their
13 name. All of their activities are conducted by
14 employees of Meridian Oil, Inc.

15 Q. When we look at the east half of
16 Section 24, what type of leasehold ownership are
17 we dealing with?

18 A. That is a Navajo tribal lease, one
19 lease covering the entire east half of Section
20 24. The lease was dated 1956, with a five-year
21 primary term. It's been held by continuous
22 production since that date.

23 Q. In order to obtain approval for
24 drilling of a well on that type of lease, to whom
25 do you submit your application for permit to

1 drill?

2 A. To the Bureau of Land Management.

3 Q. Let me ask you, sir, to tell us
4 approximately where we are. Where's this
5 project?

6 A. This project is approximately 12 miles
7 northeast of Huerfano Trading Post. Huerfano
8 Trading Post is a small trading post located on
9 Highway 44, from Cuba to Farmington, and it's
10 about 12 miles northeast of there.

11 Immediately adjacent to Huerfanito
12 federal unit area, in the same approximate area.

13 Q. In the east half of 24, are there any
14 currently existing Dakota wells, other than the
15 Jernigan No. 3?

16 A. No, there are not.

17 Q. What is your understanding of the
18 current status of the Jernigan No. 3?

19 A. The Jernigan No. 3 well is currently a
20 nonproductive well that previously produced out
21 of both the Mesaverde and the Dakota formations.

22 Q. Let's turn now, sir, to the document
23 behind Exhibit tab No. 3. Identify for us what
24 you've shown on that display.

25 A. What Exhibit No. 3 shows is a

1 nine-section area immediately surrounding our
2 Jernigan No. 3 application. The Jernigan No. 3
3 drill block is depicted with a horizontal
4 cross-hatch, and we show the orientation of all
5 the Dakota wells in those nine sections.

6 As you can see, nearly all the Dakota
7 wells are stand-up proration units, and we also
8 depict all the Dakota locations on those nine
9 sections. I might say, this was a
10 computer-generated map, and I have a little bust
11 in that Township 9 West shows an offset that
12 isn't actually there. As you can see on
13 subsequent exhibits, that offset doesn't occur
14 like that. Again, it just is a computer bust on
15 our part.

16 Q. The alignment of the sections is
17 misconfigured, if you will?

18 A. That is correct.

19 Q. As far as Section 24 goes, to the best
20 of your knowledge, that is a standard size and
21 shape of a section?

22 A. Yes, sir. It contains 320 acres.

23 Q. The east half will contain 320 acres?

24 A. That is correct. I'm sorry.

25 Q. Your proposed orientation for this

1 spacing unit, if you're successful with the
2 horizontal technology, is to continue to be the
3 east half of the section?

4 A. That is correct.

5 MR. KELLAHIN: That concludes my
6 examination of Mr. Zent. We move the
7 introduction of Exhibits 1, 2, 3 and 9.

8 EXAMINER STOGNER: Exhibits 1, 2, 3 and
9 9 will be admitted into evidence at this time,
10 and I have no questions of Mr. Zent.

11 MR. KELLAHIN: Call at this time Mr.
12 Chip Head. Mr. Head is a geologist, also
13 residing in Farmington.

14 And, for your information, Mr.
15 Examiner, behind Exhibit tab No. 4, Mr. Head has
16 provided a summary of his project. We don't
17 propose to read that to you.

18 We're going to start with Exhibit No. 5
19 as the display from which he will describe his
20 project, and in doing so he'll cover all the
21 points that are shown on the written narrative
22 behind Exhibit tab No. 4.

23 **CHARLES F. HEAD**

24 Having been first duly sworn upon his oath, was
25 examined and testified as follows:

EXAMINATION

BY MR. KELLAHIN:

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

A. Yes. My name is Charles Head, and I'm a petroleum geologist employed by Meridian Oil in Farmington.

Q. On prior occasions, Mr. Head, have you testified and qualified as an expert witness in the field of petroleum geology?

A. Yes, sir, I have.

Q. Do your duties as a petroleum geologist for Meridian Oil Company include determining any remaining potential in what is about to be identified as the basal Dakota sandstone of the Dakota pool?

A. Yes, they do.

Q. As part of that study, have you completed a geologic evaluation and now have certain recommendations to the Examiner with regards to the application of horizontal technology for wells drilled to that formation?

A. That is correct.

MR. KELLAHIN: We tender Mr. Head as an expert petroleum geologist.

1 EXAMINER STOGNER: Mr. Head is so
2 qualified.

3 Q. For the record, Exhibit tab No. 4,
4 behind that tab is your written summary?

5 A. That is correct.

6 Q. Let's turn behind Exhibit tab No. 5.
7 Before we talk about the details, give us a
8 general geologic summary, or a characterization,
9 of the geologic target that you're looking for
10 here.

11 A. Okay. The geologic target that we are
12 attempting to characterize in this booklet is a
13 basal Dakota sandstone, which is at the base of
14 the Dakota-producing interval and it rests
15 unconformably on a water-producing member of the
16 Upper Morrison, which we refer to as the Burro
17 Canyon.

18 Q. The Examiner is familiar with the
19 vertical distance of the Dakota pool. When we
20 look at that entire vertical distance, give us a
21 general idea of where we're going to find this
22 basal Dakota sandstone.

23 A. Probably the best illustration of that
24 would be in Exhibit No. 6. You'll note at the
25 bottom of the three-well cross-section there, the

1 basal sandstone member of the Dakota is at the
2 bottom there and is highlighted with a red target
3 annotation with an arrow. The subject well, by
4 the way, is the right-hand member of that
5 three-well cross-section.

6 Q. Let's start there. Let's look at that
7 cross-section, and give me a historical summary
8 of what has happened with the Jernigan No. 3
9 well.

10 A. Okay. The Jernigan No. 3 well was
11 originally completed in the Marine Dakota
12 interval, the perforations of which are noted on
13 the cross-section, on the right-hand log, between
14 approximately 6400 and 6510. The lower
15 perforations around 6500 are actually the Dakota
16 main body, which is a nonMarine interval.

17 Q. Does the Dakota main body contribute
18 production in the Dakota pool?

19 A. Yes, it does. The Dakota main body
20 consists of distributary deposits of fluvial and
21 deltaic sandstones, which are variable in
22 thickness and somewhat discontinuous across the
23 area. Where they are very thick, they provide
24 good reservoirs, as we can see in the log to the
25 left of the three-well cross-section.

1 Q. Your plan is to reenter the Jernigan
2 No. 3 well, and drill a horizontal well to test
3 for production in the basal sandstone?

4 A. That is correct.

5 Q. Describe for us the characteristics and
6 the geologic position of the basal sandstone in
7 the relation to the Dakota main body and to the
8 Burro Canyon immediately underneath the basal
9 sandstone.

10 A. The basal sandstone member of the
11 Dakota formation is a valley-fill deposit, which
12 rests unconformably on the Burro Canyon, which is
13 a fluvial sandstone.

14 Q. Have vertical wells been drilled into
15 the basal sandstone, in a effort to achieve gas
16 production out of that member?

17 A. Yes, they have. Approximately 15 to 20
18 wells in the study area have been completed in
19 the basal Dakota sandstone, along with the Upper
20 Marine and nonMarine sandstone members of the
21 Dakota.

22 However, the high treating pressure of
23 the basal Dakota sandstone has somewhat limited
24 the efficiency of the fracture stimulation
25 efforts to produce it, and we feel that a lot of

1 the energy that was spent on these completions
2 went into the more porous and permeable and
3 pressure-depleted, for that matter, Marine and
4 nonMarine sands above it.

5 And also, some attempts to complete
6 were met with water production, which drowned out
7 whatever gas production was associated with the
8 basal sandstone, and we feel that that water was
9 probably from the underlying Burro Canyon
10 sandstone, directly beneath the basal Dakota.

11 Q. Geologically, then, what are you trying
12 to achieve with a horizontal well that you have
13 not been able to achieve with a vertical well?

14 A. We're trying to avoid any kind of
15 contact with the underlying Burro Canyon which,
16 once again, is highly water-saturated. We feel
17 this is one of a couple of methods or
18 technologies, if you will, that we would like to
19 employ in the area, to attempt to produce
20 commercial hydrocarbons from this unit.

21 Q. Let's go back now to the area map,
22 which is the display behind Exhibit tab No. 5.
23 Can you identify, from this display, the
24 potential area for which horizontal technology
25 could be applied if this initial effort is

1 successful?

2 A. Yes, I can.

3 Q. Describe that for us.

4 A. First of all, this is a basal Dakota
5 sandstone isopach with a contour interval of five
6 feet. The darker-shaded areas indicate thicker
7 trend in that sand, and the green dots indicate
8 approximately 40 existing wells, which we feel
9 are prospective for basal Dakota development
10 based upon isopach thickness of 15 feet or more.

11 Q. Why have you chosen the east half of
12 Section 24 for the initial reentry of an old
13 vertical well and the application of the
14 horizontal technology?

15 A. The criteria which we defined, as being
16 indicative of basal Dakota hydrocarbon potential,
17 are favorable in the east half of Section 24.
18 And also, that wellbore is mechanically favorable
19 in that it has 5-1/2-inch casing run, which will
20 allow us to use somewhat larger tools in our
21 horizontal leg.

22 And also. It is a BLM demand well or
23 inactive well as was stated earlier, so there are
24 several factors involved that make that a
25 favorable location for attempting this

1 technology.

2 Q. Apart from the identification of the
3 Jernigan No. 3 well, on Exhibit 5, you've
4 identified two other wells by name?

5 A. That is correct.

6 Q. Those are the other two wells on the
7 cross-section that we just looked at?

8 A. The two wells in the cross-section are
9 just wells that were used for correlation
10 purposes.

11 The other two wells which we are
12 planning to exploit, to attempt to exploit,
13 isolate and exploit the basal Dakota, are
14 actually on the map area there on the thick trend
15 on the isopach map, in approximately the center
16 of the map.

17 Q. Let's turn past that display and look
18 at the next display. That's identified as figure
19 2, and it's shown to be basal Dakota porosity?

20 A. That is correct. This is a basal
21 Dakota apparent porosity isopach, with a contour
22 interval of two percent porosity.

23 Q. How is this information meaningful to
24 you, as a geologist?

25 A. This is additional criteria that I used

1 to select favorable areas for basal Dakota
2 development. Basal Dakota porosity ranges from
3 approximately 5 to 14 percent. The average is
4 around 9 percent. The Jernigan porosity is
5 around 11 percent, so we feel that it is a little
6 bit more favorable, relatively.

7 And also, the more porous trends that
8 are illustrated on this isopach map coincide with
9 thicker isopach trends on the previous map.

10 Q. Having identified a spacing unit that
11 has the minimum criteria for the porosity
12 thickness that you want, what other criteria did
13 you look at, geologically, to decide if this
14 spacing unit was acceptable for this project?

15 A. We could turn to the next exhibit.

16 Q. All right, sir. What is that? It's
17 identified as figure 3, and says "Basal Dakota
18 Water Saturation Isopach"?

19 A. Right. That is a relative basal Dakota
20 water saturation isopach. Once again, this is
21 additional criteria that I used to high grade my
22 prospects.

23 Q. Are you still mapping that same basal
24 sandstone member of the pool that we identified
25 on the cross-section?

1 A. That is correct.

2 Q. This is the same interval that you
3 showed on your Dakota porosity isopach?

4 A. That is correct.

5 Q. What does this water saturation isopach
6 show you?

7 A. First of all, the contour interval is
8 10 percent water saturation. The light-colored
9 portions of the map indicate areas with lower
10 water saturation, specifically less than 40
11 percent.

12 The areas that are shaded in blue,
13 indicate areas of apparent water saturation
14 greater than 40 percent. The 40 percent cutoff
15 was arrived at to distinguish what I feel is
16 irreducible water versus movable water in the
17 basal Dakota interval.

18 And, once again, there is good
19 agreement with the lower water saturation trends
20 illustrated on this map with the isopach thick
21 trends, and also the porosity thicks.

22 Q. What's the point of this information,
23 then, in terms of deciding where to locate the
24 horizontal well?

25 A. To attempt to avoid any movable water

1 that could be in the matrix of the basal Dakota.

2 Q. You've described for us geologically
3 the reason that you want to have a horizontal
4 well versus a vertical well. You've described
5 for us the characteristics of the reservoir, why
6 you've picked this half section.

7 Describe for us now why you've decided
8 to go in the direction you've chosen--which was
9 southwest, wasn't it?

10 A. Yes, sir. We might refer to Exhibit
11 No. 7 for that.

12 Q. Behind Exhibit tab 7, there are four
13 displays on figure 5?

14 A. Right.

15 Q. What are we looking at?

16 A. This is a natural fracture strike
17 histogram from formation micro scanner images
18 that were taken from a nearby well last year.
19 The data is from the shallow cretaceous, but it
20 agrees quite well with images that were taken
21 from the lower cretaceous, approximately 10 miles
22 to the west.

23 I might draw your attention to the
24 figure in the upper right-hand side. You'll note
25 that the azimuth, primary azimuth, of

1 well-developed, open, natural fractures, is
2 northeast/southeast.

3 Q. That's identified as the Lower
4 Fruitland formation?

5 A. That is correct.

6 Q. Why is that of importance to you over
7 the other three?

8 A. Because that, we feel, is--the cleating
9 and the fractures in the Fruitland formation, we
10 feel, reflects the fracturing in the Pictured
11 Cliffs, which is in the lower left, and that's
12 also a reflection of the deeper cretaceous
13 fracture orientations.

14 Q. Based upon this data, then, what is the
15 orientation of the fracture system, as you expect
16 to find it, in the basal Dakota?

17 A. I expect the fractures to be oriented
18 approximately northeast/southwest.

19 Q. How does that information, then, help
20 you decide which way to orient the azimuth of the
21 horizontal?

22 A. We plan on orienting our horizontal
23 sidetrack in the same general azimuth; in other
24 words, to the south/southwest from the well
25 location.

1 Q. What's your reason to go parallel to
2 the strike of the potential fracture system, as
3 opposed to perpendicular to the strike of the
4 fracture?

5 A. Well, our intent is to avoid fracture
6 communication with the underlying water prone
7 Burro Canyon formation.

8 Q. It's an effort to minimize, again, the
9 opportunity of having this wellbore affected or
10 influenced by water?

11 A. That's correct. It's an effort to
12 minimize the risk associated with intersecting
13 water-filled natural fractures from the Burro
14 Canyon and the Morrison below.

15 Q. In the prior cases we've done for your
16 company as well as for Meridian, applying
17 horizontal technology, do we have a similar
18 example of anything that we've done thus far, for
19 this type of reservoir that you've just
20 described?

21 A. No, sir, we really don't. This is the
22 first time that we have attempted to employ this
23 technology to avoid a known matrix water-bearing
24 zone.

25 Q. Summarize, then, for us, what you're

1 proposing to do.

2 A. We're attempting to exploit a sand
3 which heretofore has been very difficult to
4 exploit but, because of its high treating
5 pressure and close proximity to a water-bearing
6 zone, this is one of two techniques that we're
7 going to attempt this year in order to try to
8 produce commercial hydrocarbons from this
9 particular interval.

10 Also, there are a number of depleted
11 Dakota wells in the immediate area that we could
12 employ this technology on or in, if it is
13 successful. So it's quite attractive to us.
14 There's a lot of up-side that's associated with
15 this, if it's successful, but it is extremely
16 risky.

17 Q. The typical vertical Dakota well,
18 historically, has been gas productive out of
19 other members of the pool, other than this basal
20 Dakota sandstone member?

21 A. That's correct.

22 Q. That is because the water encroachment
23 has come up from the Burro Canyon--

24 A. That's correct.

25 Q. --into the basal sandstone, and either

1 precluded or made extremely difficult the removal
2 of gas from the basal sandstone?

3 A. That's correct. And, when that
4 happens, we have to squeeze the basal interval to
5 try and isolate the water, and that's extremely
6 difficult to do.

7 Q. And then typically what's happened, if
8 there's gas reserves in the basal sandstone,
9 they've been abandoned because of the water
10 encroachment?

11 A. That's correct. Because the water from
12 this relatively overpressured zone, I say
13 "relatively overpressured," to the marine sands,
14 will tend to drown out or could drown out and
15 damage the formation, the Marine or the main
16 gas-productive members of the Dakota.

17 Q. Describe the composition of the Burro
18 Canyon and the basal sandstone. Is there any
19 kind of barrier to flow between those two zones
20 or formations?

21 A. In the study area, no, there's not,
22 with the exception of just a couple of wells, and
23 one of those wells we've targeted for a limited
24 rate fracture stimulation. But, for the most
25 part, it is a sand on sand unconformable

1 relationship, with little or no barrier between
2 the two.

3 Q. What are you going to tell the drilling
4 engineer to do with regards to where he keeps and
5 positions the horizontal?

6 A. I will make a detailed structure map
7 based on the top of the target, and I will be out
8 on location communicating with him at each survey
9 point to ensure that our well path is going to
10 intersect the top of the target, where we want to
11 intersect it.

12 And also, we will be able to stay
13 within the target without going through the
14 bottom of it, into the water productive zone
15 below.

16 Q. How thick is the basal sandstone member
17 that is your horizontal target?

18 A. Roughly, it's about 16 feet. And, of
19 that 16 feet, about half of it has some primary
20 matrix porosity. That's in the upper portion of
21 the sand, and that's where we intend to keep the
22 drill bit over the entire lateral extent.

23 Q. In order to make those type of
24 operational decisions in the field, do you desire
25 the flexibility of being allowed to change the

1 azimuth or the direction, so long as you stay
2 within a drilling window that's confined by a
3 rectangle 790, inside the standard sized spacing
4 unit?

5 A. Yes.

6 Q. In terms of the length of the lateral,
7 what is the anticipated maximum project length of
8 that lateral?

9 A. Right now we have programmed the well
10 for 800 feet in length, but we would be--that's
11 certainly subject to change, depending on what
12 sort of hydrocarbon shows we have.

13 Q. So in the field, when you're doing the
14 process, you and the drilling people will make
15 judgments and decisions about how far to drill
16 the lateral?

17 A. That's correct.

18 MR. KELLAHIN: That concludes my
19 examination of Mr. Head. We would move the
20 introduction of his Exhibits 4, 5, 6 and 7.

21 EXAMINER STOGNER: Exhibit 4 through 7
22 will be admitted into evidence at this time.

23 EXAMINATION

24 BY EXAMINER STOGNER:

25 Q. Mr. Head, in looking at your Exhibit

1 No. 7. You show the fracture orientations but
2 don't show the fracture orientations of the
3 Dakota. Was that not available, or was that
4 survey not run down to that area?

5 A. That is correct. This data was taken
6 from a Fruitland Coal-Pictured Cliffs well
7 approximately a year ago, so the formation at
8 total depth was the Pictured Cliffs.

9 Q. Are there any wells in the area that
10 you could verify this information, or have you
11 verified it?

12 A. As I mentioned before, this data agrees
13 quite well with a well that was drilled through
14 the Gallup-producing interval, approximately 10
15 miles to the west of this location, and the
16 fractured strike histogram data agreed quite
17 well. And the Gallup, of course, is directly
18 above the Dakota, so that is the best data that
19 we have at this point in time.

20 Q. Even though you're talking about a
21 total depth of the Dakota out here of, what,
22 several hundred feet?

23 A. Total interval thickness of the Dakota?

24 Q. Yes.

25 A. Probably about 400 feet, right.

1 Q. You feel that's still accurate, even
2 down to the basal?

3 A. I do.

4 Q. It's interesting that you're going
5 parallel, avoiding the fractures, if I understand
6 you right, is that correct?

7 A. That is correct.

8 Q. Do you propose any stimulation to the
9 wellbore, the horizontal section?

10 A. No, sir. I don't think that that is an
11 alternative for us or an option at this point
12 because of the probability of fracturing into the
13 underlying Burro Canyon.

14 Q. I take it the water encroachment is up
15 through these fractures in the Dakota, or is it
16 into the matrix also?

17 A. I think that it's mainly
18 fracture-filled water, but in some cases we've
19 seen a wet response on resistivity and neutron
20 data in the area that indicates that the matrix
21 has been contaminated by water, or gas has been
22 displaced, and that's the reason why I decided to
23 map apparent water saturation in the basal Dakota
24 sand.

25 Q. What is the Burro Canyon? What kind of

1 formation is it?

2 A. That's a fluvial or river channel sand
3 that meanders through the area. It's highly
4 variable in thickness, and it's quite porous
5 relative to the basal Dakota. It's about 16
6 percent average porosity versus, oh, around half
7 that for the target sand.

8 Q. When I look at your figure 3 of your
9 Exhibit No. 5, which is the water saturation, is
10 this actual Dakota water or is it part of the
11 Burro that has contaminated the Dakota interval?

12 A. That's unknown. The resistivity of
13 water data that we have indicates that it's
14 probably Burro Canyon water, to the best of our
15 knowledge, but it's extremely difficult to
16 isolate a water sample or to correlate it to a
17 specific interval in the Dakota.

18 Q. Is it more likely than not, in
19 completing these wells out here, to not perforate
20 the basal Fruitland?

21 A. To not perforate? I'm sorry.

22 Q. To not perforate that basal sandstone?

23 A. Yes. It has been avoided by most
24 operators. That's why only 20 wells out of
25 approximately 250 or so in the study area, have

1 been completed or attempted completions in that
2 interval.

3 EXAMINER STOGNER: I have no other
4 questions of this witness at this time, Mr.
5 Kellahin. He may be excused.

6 MR. KELLAHIN: Call at this time our
7 drilling engineer, Mr. Dan Voecks.

8 DAN T. VOECKS

9 Having been first duly sworn upon his oath, was
10 examined and testified as follows:

11 EXAMINATION

12 BY MR. KELLAHIN:

13 Q. Sir, would you please state your name
14 and occupation?

15 A. My name is Dan Voecks. I'm a drilling
16 engineer with Meridian Oil in the Farmington
17 office.

18 Q. On previous occasions, Mr. Voecks, have
19 you testified before the Oil Conservation
20 Division as a drilling engineer?

21 A. No, sir, I have not.

22 Q. Summarize for us your education.

23 A. I worked in the oil field from 80 to
24 87. I went to San Juan College in Farmington
25 from 87 to 90, and then I transferred to New

1 Mexico Tech, and received my bachelor's of
2 science in petroleum engineering in May of 93.

3 Q. Subsequent to graduation, have you been
4 employed as a drilling engineer by any other
5 company?

6 A. No, sir, I have not.

7 Q. How long have you been employed by
8 Meridian Oil Company?

9 A. I started work with Meridian Oil on
10 January 3, 1994.

11 Q. How long have you been employed in the
12 capacity of drilling engineer?

13 A. Since that time.

14 Q. Describe for us generally what your
15 duties are as a drilling engineer.

16 A. My duties are to prepare cost estimates
17 for drilling wells, and write procedures for the
18 drilling operation.

19 Q. Have you been asked to do those
20 activities for the Jernigan No. 3 reentry, and to
21 design a program for that well to be utilized as
22 a horizontal well?

23 A. Yes, sir, I have.

24 Q. Describe for us what activity you have
25 undertaken.

1 A. As far as the drilling procedure?

2 Q. Yes, sir. You have a drilling program
3 that includes a drilling procedure?

4 A. That's correct.

5 Q. You can describe that procedure, and
6 then you can identify for us on the displays the
7 illustration of how you're going to initiate and
8 complete that drilling program?

9 A. Okay.

10 MR. KELLAHIN: We tender Mr. Voecks as
11 an expert drilling engineer.

12 EXAMINER STOGNER: Mr. Voecks is so
13 qualified.

14 Q. Let's start first with the horizontal
15 view, if you will, the first display. You have a
16 surface location and a proposed project
17 bottomhole. As I asked Mr. Head, are you going
18 to be able to drill and complete this well and
19 stay confined to a drilling producing window that
20 is 790 feet from the outer boundaries of the
21 spacing unit?

22 A. To the best of our ability, we will.

23 Q. All right, sir. Let's take the
24 existing well, the Jernigan No. 3. What's its
25 current status?

1 A. It's nonproductive.

2 Q. What will you do, first of all, with
3 regards to that well?

4 A. The first thing we will do is cement
5 the existing Dakota perforations and the
6 Mesaverde perforations.

7 Q. What will you do to determine the
8 mechanical integrity of the existing wellbore?

9 A. After we've cemented the Dakota and
10 Mesaverde perfs, we'll run a cement bottom log
11 and repair the casing as necessary.

12 Q. Then what do you do?

13 A. After we've assured that we have a good
14 integrity in our casing, we'll then set a whip
15 stock and mill a window in our existing casing,
16 at our kickoff point of 6252.

17 Q. All right, sir, let's turn to the well
18 plan that's shown on the vertical scale. You've
19 got that display in front of you?

20 A. Yes, sir.

21 Q. How was the decision made to use 6252
22 as the kickoff point?

23 A. The geologist, Mr. Head, told me where
24 he would like to be horizontal in that basal
25 Dakota, and he and I decided to use a

1 medium-radius build for our build angle. And we
2 back-calculated up to the existing casing where
3 we needed to exit.

4 Q. You have your kickoff point
5 established. Now what do you do?

6 A. After we've established our kickoff
7 point, as I stated previously, we'll set a whip
8 stock and cut a window in our existing casing,
9 then we'll run a 4-3/4-Inch bit on a downhole
10 motor with a steering tool, that will have a
11 gamma ray and a measurement-while-drilling
12 device.

13 Q. Is that device sophisticated enough so
14 you'll be able to know where it is, subsurface,
15 as you monitor from the surface?

16 A. Yes, it will. There's three things
17 that will help us. We have a gamma ray which
18 will correlate back to our vertical hole and tell
19 us where we are, as far as formation tops go, and
20 the tool itself will tell us an azimuth and an
21 inclination, to tell us which direction we're
22 heading and what angle.

23 Q. Then what do you do?

24 A. Then we'll build this at approximately
25 16 degrees per hundred foot until we get to our

1 horizontal at 90 degrees.

2 Q. Then what happens?

3 A. At that point, we'll continue
4 horizontal for another 800 foot.

5 Q. And you and Mr. Head worked together
6 and tried to maintain, to the best of your
7 ability, a certain position within the basal
8 sandstone member of the Dakota?

9 A. Exactly.

10 Q. Once you're satisfied that you've
11 drilled the well as far horizontally as you want
12 to go, and you stop drilling, what, then, will
13 you do?

14 A. It's going to be an open hole
15 completion. We'll then just remove all our
16 drilling tools and we'll run our production
17 tubing back in the hole and, more than likely,
18 set a packer in the five and a half, to
19 completion.

20 Q. What are your choices on where you set
21 that production tubing in relation to the packer?

22 A. We can put a tailpipe below the packer,
23 and run it to any depth that we want in the well.

24 Q. Where will you set the packer?

25 A. We'll set the packer immediately above

1 the window that we set.

2 Q. And then you're ready to produce the
3 well, right?

4 A. Ready to produce.

5 Q. There won't be any kind of stimulation
6 program, frac treatment, acid job or anything
7 else?

8 A. There could possibly be an acid job.

9 Q. You can make those choices in the field
10 at the time you set up the well for protection?

11 A. More than likely, we would try to
12 produce the well. If it wasn't producing, we
13 would probably try an acid job to enhance the
14 production.

15 MR. KELLAHIN: That concludes my
16 examination of Mr. Voecks. We move the
17 introduction of his exhibits behind Exhibit tab
18 No. 8.

19 EXAMINER STOGNER: Exhibit No. 8 will
20 be admitted into evidence at this time.

21 MR. KELLAHIN: That concludes my
22 examination.

23 EXAMINATION

24 BY EXAMINER STOGNER:

25 Q. This will be done with a downhole

1 motor, is that correct?

2 A. Yes, sir.

3 Q. What will the drilling fluid consist
4 of?

5 A. To optimize our motor performance and
6 bit performance, we're going to use a water with
7 some polymer, a light-weight water, to try and
8 keep it at about 8.8 pounds per gallon.

9 Q. There will be, subsequent to the
10 drilling of this well, no other attempted
11 completions, as far as reperfs or anything such
12 as that, in the Upper Dakota area?

13 A. No, sir, there will not.

14 Q. The kickoff point at 6252, is that in
15 the Dakota or is that above the Dakota?

16 A. That will be above the Dakota.

17 EXAMINER STOGNER: I have no other
18 questions of Mr. Voecks. He may be excused.

19 MR. KELLAHIN: That concludes our
20 presentation,.

21 EXAMINER STOGNER: Does anybody else
22 have anything further in Case 10965? If not,
23 this case will be taken under advisement. And
24 with that, this hearing is adjourned.

25 (And the proceedings certify that the foregoing is
a complete record of the proceedings in
the Examiner hearing of Case No. 10965,
heard by me on 12 May 1994.

 Examiner

CERTIFICATE OF REPORTER

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Carla Diane Rodriguez, Certified
Shorthand Reporter and Notary Public, HEREBY
CERTIFY that the foregoing transcript of
proceedings before the Oil Conservation Division
was reported by me; that I caused my notes to be
transcribed under my personal supervision; and
that the foregoing is a true and accurate record
of the proceedings.

I FURTHER CERTIFY that I am not a
relative or employee of any of the parties or
attorneys involved in this matter and that I have
no personal interest in the final disposition of
this matter.

WITNESS MY HAND AND SEAL May 20, 1994.


CARLA DIANE RODRIGUEZ, RPR-
CCR No. 4