



# RAILROAD COMMISSION OF TEXAS

## HEARINGS DIVISION

OIL AND GAS DOCKET NO. 08-0277456

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THE APPLICATION OF J. CLEO THOMPSON TO AMEND TEMPORARY FIELD RULE NOS. 5 AND 6 FOR THE WOLFBONE (TREND AREA) FIELD, PECOS, REEVES AND WARD COUNTIES, TEXAS

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HEARD BY: Brian Fancher - Technical Examiner  
Randall Collins - Legal Examiner

EXAMINERS' REPORT PREPARED BY: Richard D. Atkins, P.E. - Technical Examiner

HEARING DATE: August 16, 2012

APPEARANCES:

REPRESENTING:

APPLICANT:

John Soule  
Tim Smith

J. Cleo Thompson

### EXAMINERS' REPORT AND RECOMMENDATION

#### STATEMENT OF THE CASE

J. Cleo Thompson ("Thompson") requests that Temporary Field Rule No. 5 be amended to allow a six month extension to the exception to Statewide Rule 13(b)(5)(a), which requires producing a flowing oil well through tubing, for all wells in the Wolfbone (Trend Area) Field. Thompson also requests that Temporary Field Rule No. 6 be amended to allow a six month extension to the exception to Statewide Rule 51(a) regarding a waiver of the 10 day rule for the filing of paperwork related to the completing of oil wells in the field. No other Field Rule changes are proposed for the field.

The application is unopposed and the examiners recommend approval of the amended Temporary Field Rule Nos. 5 and 6, as requested by Thompson.



### DISCUSSION OF EVIDENCE

The Wolfbone (Trend Area) Field was created in November 2010 by the consolidation of twelve Bone Springs and Wolfcamp Fields. The average depth of the field is 13,100 feet and there are 83 producing oil wells, two producing gas wells and 17 operators carried on the proration schedules. Cumulative production from the field through January 2013 is 8.3 MMBO and 14.1 BCFG.

The Wolfbone (Trend Area) Field is under going rapid development with horizontal drainhole wells. The Wolfcamp and Bone Spring formations contain over-pressured and normally pressured zones that are fracture stimulated with as many as 15 stages. The fracture stimulation requires high pressures and large volumes of frac fluid and proppant that exceed a tubing's burst strength and volume capacity. It typically takes 2 to 8 months for wells to recover load water and establish production representing stabilized flow of native reservoir fluids. Wellhead control is maintained as a "frac tree" is typically kept on the well until tubing is run into the well. Since snubbing operations have inherent safety risks and high costs, once surface pressures are manageable, usually less than 300 psi, the tubing can be installed. Thompson opined that the average time for a typical well to recover its load water is 120 days, or about four months.

Statewide Rule 13(b)(5)(a) requires flowing oil wells to be produced through tubing and the rule does not allow for exceptions. Without an exception to this rule, flowing oil wells will be required to be rapidly depleted or killed. Thompson fears that killing a well may permanently damage the well's completion, as frac fluid will remain in the reservoir and may negatively impact the long term production characteristics of the well. In addition, rapid depletion of reservoir pressure has shown to cause damage to Wolfbone completions by destabilizing frac proppant and shortening propped frac wings, which will reduce a well's ultimate recovery. A six month exception is needed, as typically, new oil wells have high initial rates of production, followed by a steep decline and wells perform better on restricted choke sizes, resulting in longer flowback periods to clean up.

Thompson also requests that an oil well be granted administratively a six month exception to the provisions of Statewide Rule 51(a) regarding the 10 day rule for filing the potential test. This will allow for the backdating of allowables on the oil wells without requiring a waiver to be secured from all field operators. While allowables are needed to cover oil and gas volumes recovered during flowback and load recovery, early-time well test results are not representative of reservoir conditions in terms of flowing pressures and volumes of substances produced. This rule will grant the Commission the authority to issue an allowable back to the initial completion date for all oil wells in the field and will prevent unnecessary shut-ins to alleviate potential overproduction issues related to completion paperwork filings.

The current exceptions to Statewide Rule 13(b)(5)(a) and Statewide Rule 51(a) in Temporary Field Rule Nos. 5 and 6 allow operators of flowing oil wells in this field the flexibility to run tubing and file completion paperwork once the pressure and production rates have declined, without penalties for six months. The exceptions also provide for one 90 day extension. Thompson has had several wells that have flowed at over 300 psi for up to one year. Thompson requests that the current six month exceptions be amended to provide for one six month extension, resulting in a one year exception. Commission staff in the Field Operations Section have no issues with approving the amended rules.

### FINDINGS OF FACT

1. Notice of the hearing was given to all persons entitled to notice at least ten days prior to the date of hearing.
2. The Wolfbone (Trend Area) Field was created in November 2010 by the consolidation of twelve Bone Springs and Wolfcamp Fields.
  - a. The average depth of the field is 13,100 feet and there are 83 producing oil wells, two producing gas wells and 17 operators carried on the proration schedules.
  - b. The Wolfbone (Trend Area) Field is under going rapid development with horizontal drainhole wells.
3. Tubing installation can not occur until after the well has been fracture stimulated and the load water has been flowed back.
  - a. The Wolfcamp and Bone Spring formations contain over-pressured and normally pressured zones that are fracture stimulated with as many as 15 stages.
  - b. The fracture stimulation requires high pressures and large volumes of frac fluid and proppant that exceed a tubing's burst strength and volume capacity.
  - c. Since snubbing operations have inherent safety risks and high costs, once surface pressures are manageable, usually less than 300 psi, the tubing can be installed.
  - d. It typically takes 2 to 8 months for wells to recover load water and establish production representing stabilized flow of native reservoir fluids. The average time for a typical well to recover its load water is 120 days, or about four months.

4. Statewide Rule 13(b)(5)(a) requires flowing oil wells to be produced through tubing. Currently, the rule does not allow for exceptions.
5. Statewide Rule 13(b)(5)(a) does not require flowing gas wells to be produced through tubing.
6. Without an exception Statewide Rule 13, flowing oil wells will be required to be rapidly depleted or killed.
  - a. Rapid depletion of reservoir pressure has shown to cause damage to Wolfbone completions by destabilizing frac proppant and shortening propped frac wings, which will reduce a well's ultimate recovery.
  - b. Killing a well may permanently damage the well's completion, as frac fluid will remain in the reservoir and may negatively impact the long term production characteristics of the well.
  - c. A six month exception is needed as typically, new oil wells have high initial rates of production, followed by a steep decline and wells perform better on restricted choke sizes, resulting in longer flowback periods to clean up.
7. A Statewide Rule 51(a) exception will grant the Commission the authority to issue an allowable back to the initial completion date for all oil wells in the field and will prevent unnecessary shut-ins to alleviate potential overproduction issues related to completion paperwork filings.
8. Shutting-in oil wells to make up overproduction is not necessary to prevent waste.
9. A six month extension to the current six month exceptions, resulting in a one year exception, is appropriate for the Wolfbone (Trend Area) Field.

#### **CONCLUSIONS OF LAW**

1. Proper notice of this hearing was issued.
2. All things have been accomplished or have occurred to give the Commission jurisdiction in this matter.
3. Amending Temporary Field Rule Nos. 5 and 6 for the Wolfbone (Trend Area) Field will prevent waste, protect correlative rights and promote the development of the field.

**RECOMMENDATION**

Based on the above findings of fact and conclusions of law, the examiners recommend that the Commission amend Temporary Field Rule Nos. 5 and 6 for the Wolfbone (Trend Area) Field, as proposed by J. Cleo Thompson.

Respectfully submitted,



Richard D. Atkins, P.E.  
Technical Examiner



Randall Collins  
Legal Examiner