



MONTGOMERY  
& ANDREWS  
LAW FIRM

RECEIVED OGD  
OCT 22 P 4: 25  
SETH C. MCMILLAN  
Direct: (505) 986-2519  
Email: [smcmillan@montand.com](mailto:smcmillan@montand.com)  
[www.montand.com](http://www.montand.com)

October 22, 2015

***Hand Delivered***

Florene Davidson  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Re: NMOCD Case No. 15398: Application of BC Operating, Inc. for Authorization to Inject, Lea County, New Mexico

Dear Ms. Davidson:

Enclosed for filing on behalf of BC Operating, Inc., is a Pre-Hearing Statement.

Thank you.

Very truly yours,

Seth C. McMillan

Encl.

325 Paseo de Peralta  
Santa Fe, New Mexico 87501

T: 505.982.3873  
F: 505.982.4289

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION  
OF BC OPERATING, INC. FOR  
AUTHORIZATION TO INJECT,**

**LEA COUNTY, NEW MEXICO.**

**Case No. 15398**

**RECEIVED OGD  
2015 OCT 22 P 4:23**

**PRE-HEARING STATEMENT**

BC Operating, Inc. ("Applicant") provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

BC Operating, Inc.

**APPLICANT'S ATTORNEY**

J. Scott Hall, Esq.  
Seth C. McMillan, Esq.  
MONTGOMERY & ANDREWS, P.A.  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
Tel (505) 982-3873  
[shall@montand.com](mailto:shall@montand.com)  
[smcmillan@montand.com](mailto:smcmillan@montand.com)

**OPPONENT/OTHER PARTIES**

Amtex Energy, Inc.

COG Operating, LLC

Devon Energy (objection withdrawn)

**OPPONENT'S ATTORNEY**

Unknown at present

Unknown at present

James Bruce (has not entered appearance)

## STATEMENT OF THE CASE

Applicant BC Operating, Inc. seeks an order authorizing the injection of water for disposal into the Cherry Canyon member of the Delaware Mountain Group formation in the following well:

Pearson #1 SWD (API # 30-025-24438)  
1980' FNL & 660' FEL (Unit H)  
Section 33  
T-21-S, R-33-E, NMPM  
Lea County, New Mexico

Applicant proposes to reconfigure the well at the above location and utilize it for injection of produced water at depths of 5,790' to 6,970' subsurface. The well is located approximately 15 miles West of Eunice, New Mexico.

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Brian Hall - Landman	10 minutes	4
Mike Moylett - Senior Geologist	20 minutes	6
Billy Moore - Operations Engineer	20 minutes	6

### OPPONENT

#### WITNESSES

## PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: Seth C. McMillan

J. Scott Hall, Esq.

Seth C. McMillan, Esq.

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

(505) 982-4289 fax

[shall@montand.com](mailto:shall@montand.com)

[smcmillan@montand.com](mailto:smcmillan@montand.com)

*Attorneys for Applicant BC Operating, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 22nd day of October, 2015.

N/A

Seth C. McMillan

Seth C. McMillan