

2016 FEB 25 A 9:06

**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,  
EDDY COUNTY, NEW MEXICO.**

**Case No. 15442**

**AMENDED PRE-HEARING STATEMENT**

BC Operating, Inc. ("Applicant") provides this Amended 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**

Devon Energy

**OPPONENT'S ATTORNEY**

Gary W. Larson, Esq.  
Hinkle Shanor, LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Tel (505) 982-4554  
[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

**STATEMENT OF THE CASE**

Applicant seeks an order authorizing the injection of water for disposal into the Bell Canyon and Upper Cherry Canyon members of the Delaware Mountain Group in the following well:

Grande State #1 SWD (API # 30-015-31910)

660' FNL & 1980' FWL (Unit C)

Section 32

T-23-S, R-29-E, NMPM

Eddy County, New Mexico

Applicant proposes to reconfigure the well at the above location and utilize it for injection of produced water at depths of 2,780' to 4,900' subsurface. The well is located approximately 5.5 miles Southeast of Loving, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Harmon Murphy – Landman

10 minutes

4

Mike Moylett – Senior Geologist

20 minutes

6

Jason Wacker – Petroleum Engineer

10 minutes

6

OPPONENT

WITNESSES

Unknown at this time.

**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

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 and U.S. Mail on February 25, 2016.

Gary W. Larson, Esq.

Hinkle Shanor, LLP

P.O. Box 2068

Santa Fe, NM 87504-2068

glarson@hinklelawfirm.com

Seth C. McMillan

Seth C. McMillan