

## Goetze, Phillip, EMNRD

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**From:** Goetze, Phillip, EMNRD  
**Sent:** Wednesday, August 26, 2015 1:42 PM  
**To:** Pam Stevens (pstevens@bcoperating.com)  
**Cc:** Jason Wacker (jwacker@bcoperating.com); Jones, William V, EMNRD; McMillan, Michael, EMNRD; jamesbruc@aol.com  
**Subject:** Protest of Application to Inject - Pearson SWD No. 1

RE: Pearson SWD No. 1 (API 30-025-24438; former R F Leggett No. 1) – Sec 34, T. 21 S., R. 33 E., NMPPM, Lea County.

Ms. Stevens:

OCD was notified through counsel that Devon Energy Production is protesting this application for approval of a salt water disposal well. This party indicated that the well has the potential to adversely impact their offsetting acreage. Therefore, you are being notified that if BC Operating, Inc. wishes for this application to be considered, it must either go to hearing or may be reviewed administratively if the protests are withdrawn as a result of a negotiated resolution with these parties. The application will be retained by OCD, but suspended from further administrative review. Please contact OCD once you have made a decision regarding the application within the next 30 days. If the protest remains after 30 days, OCD will initiate the process for the application to be reviewed at hearing. Please call me with any questions regarding this matter. PRG

Contact Information:

Jim Bruce, Attorney  
P.O. Box 1056  
Santa Fe, NM 87504  
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E-mail: [jamesbruc@aol.com](mailto:jamesbruc@aol.com)

Phillip R. Goetze, P.G.  
Engineering and Geological Services Bureau, Oil Conservation Division  
1220 South St. Francis Drive, Santa Fe, NM 87505  
O: 505.476.3466 F: 505.476.3462  
[phillip.goetze@state.nm.us](mailto:phillip.goetze@state.nm.us)



JAMES BRUCE  
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[jamesbruce@aol.com](mailto:jamesbruce@aol.com)

August 13, 2015

Via e-mail

Phillip Goetze  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: BC Operating, Inc.  
Administrative SWD application

Pearson SWD Well No. 1  
Unit H §33-21S-33E  
Lea County, New Mexico

Dear Mr. Goetze:

Devon Energy Production Company, L.P. objects to the above application due to its potential adverse effect on Devon's offsetting leasehold.

Very truly yours,

  
James Bruce

Attorney for Devon Energy Production Company, L.P.

cc: BC Operating, Inc.

**Goetze, Phillip, EMNRD**

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**From:** jamesbruc@aol.com  
**Sent:** Monday, October 19, 2015 10:05 AM  
**To:** Goetze, Phillip, EMNRD; Jones, William V, EMNRD; michaelmcmillan@state.nm.us  
**Cc:** shall@montand.com  
**Subject:** BC Operating/Pearson SWD No. 1

Gentlemen: Devon objected to the administrative application for this well, which is now set for hearing as Case 15398. Devon hereby withdraws its objection.

Jim

P. O. Box 3418  
MIDLAND, TX 79702  
432/770-0913 CELL  
432/686-0847  
888/789,5245 FAX



## AMTEX ENERGY, INC.

September 2, 2015

RECEIVED OCD

2015 SEP -4 P 1:30

Mr. Phillip Goetz  
Engineering and Geological Services Bureau  
Oil Conservation Division  
1220 South Saint Francis Dr.  
Santa Fe, NM 87505

RE: Protest of Application for Injection  
Pearson SWD #1  
API# 30-025-24438

Mr. Phillip Goetz,

Amtex Energy, Inc. ("Amtex") is hereby notifying the New Mexico Oil Conservation Commission ("NMOCD") that Amtex is protesting the BC Operating, Inc. ("BC") application for injection into the Pearson SWD #1 (API # 30-025-24438), located on Sec. 33, T21S, R33E, Lea County, New Mexico. Amtex is the lessee of the Oil and Gas Lease covering all of Section 33, T21S, R33E, Lea County, NM, which it purchased from the BLM. Amtex is hereby identifying itself as the party which is at risk from this well to adversely impact hydrocarbon resources on this lease and in this area.

Additionally, Amtex considers this currently plugged and abandoned well, API # 30-025-24438, based on its historic record of its mechanical condition, and the proposed injection interval depths, to pose an environmental risk to the fresh water and brackish water aquifers in the area. The current reentry proposal is inadequate to protect and eliminate the possibility of pollution from injection of salt water going out of zone by communication behind the casing. Furthermore, Amtex does not consider the proposed secondary cement job planned to be adequate to definitively prevent communication out of zone for this proposed reentry well for salt water injection disposal.

I am very confident that BC Operating, Inc., the surface owner (Pearson), the BLM and the NMOCD share Amtex concerned about this well's potential to adversely impact hydrocarbon resources and its environmental risk, with no cement currently behind the casing in this well, which was drilled in 1974 and Plugged and Abandoned in 1976.

Sincerely,

  
William J. Savage

CC: Mr. James S. Rutley

## Goetze, Phillip, EMNRD

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**From:** Goetze, Phillip, EMNRD  
**Sent:** Tuesday, September 08, 2015 1:09 PM  
**To:** Pam Stevens (pstevens@bcoperating.com)  
**Cc:** McMillan, Michael, EMNRD; Jones, William V, EMNRD; Bill Savage (bsavage@amtexenergy.com); jamesbruc@aol.com  
**Subject:** Second Protest to Inject - Pearson SWD No. 1

RE: Pearson SWD No. 1 (API 30-025-24438; former R F Leggett No. 1) – Sec 34, T. 21 S., R. 33 E., NMPM, Lea County.

Ms. Stevens:

OCD was notified that Amtex Energy is protesting this application for approval of a salt water disposal well. This party indicated that the well has the potential to adversely impact acreage which is under lease to Amtex. Therefore, you are being notified that if BC Operating, Inc. wishes for this application to be considered, it must either go to hearing or may be reviewed administratively if the protests are withdrawn as a result of a negotiated resolution with these parties. The application will be retained by OCD, but suspended from further administrative review. Please contact OCD once you have made a decision regarding the application within the next 30 days. If the protest remains after 30 days, OCD will initiate the process for the application to be reviewed at hearing. Please call me with any questions regarding this matter. PRG

Contact Information:

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