



**MONTGOMERY  
& ANDREWS  
LAW FIRM**

**J. SCOTT HALL**

Cell: (505) 670-7362  
 Email: shall@montand.com  
 Reply To: Santa Fe Office  
 www.montand.com

RECEIVED OGD  
 2010 NOV 10 P 3:40

November 10, 2010

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

**Hand Delivered**

Re: <sup>14571</sup> ~~14565~~ **NMOCD Case No. 14565: Application of BC Operating, Inc. for  
 Authorization to Inject Water for Lease Pressure Maintenance  
 Operations and Designation of a Project Area, Lea County, New Mexico**

Dear Ms. Davidson:

On behalf of BC Operating, Inc., enclosed is a Pre-Hearing Statement in the  
 above-referenced case.

Very truly yours,

*Karen Williams*

Karen Williams  
 Assistant to J. Scott Hall

:kw  
 Enclosure

{00232829-1}

**REPLY TO:**

325 Paseo de Peralta  
 Santa Fe, New Mexico 87501  
 Telephone (505) 982-3873 • Fax (505) 982-4289  
 Post Office Box 2307  
 Santa Fe, New Mexico 87504-2307

6301 Indian School Road NE, Suite 400  
 Albuquerque, New Mexico 87110  
 Telephone (505) 884-4200 • Fax (505) 888-8929  
 Post Office Box 36210  
 Albuquerque, New Mexico 87176-6210

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

RECEIVED OOD

IN THE MATTER OF THE APPLICATION  
OF BC OPERATING, INC. FOR  
AUTHORIZATION TO INJECT WATER  
FOR LEASE PRESSURE MAINTENANCE  
OPERATIONS AND DESIGNATION OF A  
PROJECT AREA, LEA COUNTY, NEW  
MEXICO

2010 NOV 10 P 3:40

CASE NO. ~~14565~~  
14571

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BC Operating, Inc., as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

BC Operating, Inc.

APPLICANT'S ATTORNEY

J. Scott Hall  
Montgomery & Andrews  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 986-2646

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval to convert the following well for the injection of water for lease pressure maintenance operations in the San Andres Formation, Lovington Grayburg-San Andres Pool (40580) and designation of the E/2 NE/4 of Section 11 Township 17 South, Range 36 East NMPM Lea County, New Mexico as the project area for the pressure maintenance operations:

Angell Well No. 3  
API No. 30-025-39690  
1650' FNL and 660' FEL (Unit H)  
Section 11  
T-17-S, R-36-E, NMPM

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Jason Wacker, Petroleum Engineer	20 minutes	6

OPPONENT

EST. TIME                      EXHIBITS

WITNESSES

**PROCEDURAL MATTERS**

N/A

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: 

J. Scott Hall  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 982-3873 - Telephone  
(505) 982-4289 – Fax  
Attorneys for BC Operating, Inc.

00232642