

RECEIVED OCD

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

2015 FEB 11 10 59

IN THE MATTER OF THE APPLICATION
OF BC OPERATING, INC. FOR
AUTHORIZATION TO INJECT,
EDDY COUNTY, NEW MEXICO.

Case No. 15442

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
smcmillan@montand.com

OPPONENT/OTHER PARTIES

Devon Energy

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
Tel (505) 982-2043
jamesbruc@aol.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

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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 11, 2016.

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

Seth C. McMillan

Seth C. McMillan