



**MONTGOMERY
& ANDREWS**
LAW FIRM

J. SCOTT HALL

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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: ¹⁴⁵⁷¹~~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
Assistant to J. Scott Hall

:kw
Enclosure

{00232829-1}

REPLY TO:

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**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**

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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

WITNESSES

EST. TIME

EXHIBITS

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

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Attorneys for BC Operating, Inc.

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