

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

**APPLICATION OF BREITBURN OPERATING LP FOR APPROVAL
OF A WATER DISPOSAL WELL, HARDING COUNTY, NEW MEXICO.**

CASE NO. 15431

APPLICANT'S PRE-HEARING STATEMENT

Breitburn Operating LP, the applicant in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Breitburn Operating LP
1401 McKinney Street
Houston, TX 77010

ATTORNEY

Michael H. Feldewert, Esq.
Jordan L. Kessler, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
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OPPONENT

Norman Libby, Jr.
Libby Cattle Company
400 Libby Road
Bueyeros, NM 88415

ATTORNEY

Gary D. Alsup, Esq.
Alsup Law Office
Post Office Box 518
Clayton, New Mexico 88415
(575) 374-2526
(575) 374-2759 Facsimile

APPLICANT'S STATEMENT OF CASE

Applicant seeks an order approving the disposal of produced water into the San Andres and Glorieta formations at a depth of 1480-1631 feet subsurface in the Breitburn Operating LP 1930 SWD No. 12-4-G, to be located 2265 feet from the North line and 1493 feet from the East line (Unit G), Section 12, Township 19 North, Range 30 East, NMPM, Harding County, New

Mexico. A royalty owner (Loretta Hayoz) subject to a mineral lease issued to Breitburn's predecessor and a nearby landowner (Norman Libby, Jr.) have filed protests to the administrative application, necessitating this hearing.

APPLICANT'S PROPOSED EVIDENCE

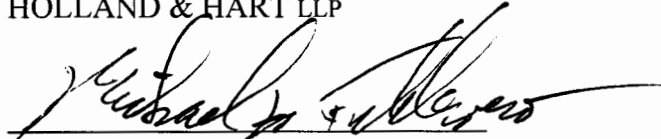
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
James R. Alexander (Landman)	Approx. 10	Approx. 3
Landon Berg (Geologist)	Approx. 10	Will review the administrative Application as necessary
Nicholas La Tulip (Engineer)	Approx. 10	Will review the administrative Application as necessary

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR
BREITBURN OPERATING LP**

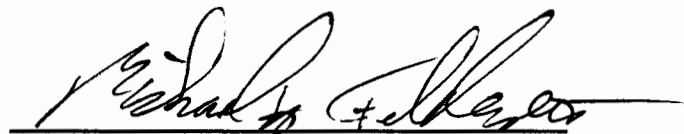
CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2015, I served a copy of the foregoing document to the following via U.S. mail to:

Loretta Hayoz
P.O. Box 93663
Albuquerque, NM 87199

Norman Libby, Jr.
Libby Cattle Company
400 Libby Road
Bueyeros, NM 88415

Gary D. Alsup, Esq.
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Post Office Box 518
Clayton, New Mexico 88415

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", written over a horizontal line.

Michael H. Feldewert

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