

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

**APPLICATION OF B.C. OPERATING, INC.
TO AMEND ORDER NO. R-21070,
LEA COUNTY, NEW MEXICO**

Case No. 21536

**APPLICATION OF B.C. OPERATING, INC.
TO AMEND ORDER NO. R-21071,
LEA COUNTY, NEW MEXICO**

Case No. 21537

PRE-HEARING STATEMENT

Applicant B.C. OPERATING, INC. ("BCO") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

B.C. OPERATING, INC.

APPLICANT'S ATTORNEY:

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OTHER PARTY

FRANKLIN MOUNTAIN
ENERGY, LLC

OTHER PARTY'S ATTORNEY:

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STATEMENT OF THE CASE

In **Case No. 21536**, Applicant in the above-styled cause seeks an order from the Division for the limited purposes of amending Order No. R-21070, issued in Case No. 20838, to (1) conform the Order to the amended order template described in the Letter of the Division Director dated April 9, 2020 (RE: Amendments to Compulsory Pooling Order Template); and (2) extend the time to commence drilling the Broadside 13 W Fed Com 2H well (API #30-025-46518) under the Order.

In **Case No. 21537**, Applicant in the above-styled cause seeks an order from the Division for the limited purposes of amending Order No. R-21071, issued in Case No. 20839, to (1) conform the Order to the amended order template described in the Letter of the Division Director dated April 9, 2020 (RE: Amendments to Compulsory Pooling Order Template); and (2) extend the time to commence drilling the Broadside 13 W Fed Com 3H well (API #30-025-46519) under the Order.

PROPOSED EVIDENCE

APPLICANT:

WITNESS

Landman Phil Hammond

EXHIBITS

5-6

OTHER PARTY:

None known at this time.

PROCEDURAL MATTERS

Interested party Franklin Mountain Energy does not oppose presentation of these matters at hearing by affidavit. Assuming no opposition by the time of hearing, Applicant will present these matters by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

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Attorneys for B.C. Operating, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on November 25, 2020:

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Attorney for Franklin Mountain Energy, LLC

/s/Sharon T. Shaheen