

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF B.C. OPERATING, INC. FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 21552

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

B.C. Operating, Inc.

APPLICANT'S ATTORNEY

Montgomery & Andrews, P.A.

OPPONENT

Chi Operating, Inc. and Chi Energy, Inc.
P.O. Box 1799
Midland, Texas 79702

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Bill Bergman
(432) 685-5001

OTHER PARTIES

EOG Resources, Inc.

OTHER PARTIES' ATTORNEYS

Holland & Hart LLP

Apache Corporation

Modrall Sperling P.A.

STATEMENT OF THE CASE

APPLICANT

B.C. Operating, Inc. seeks an order pooling the Bone Spring formation in all of §24-19S-27E and the W½ §19-19S-28E.

OPPONENT

Chi Operating, Inc. and Chi Energy, Inc. oppose the application. There have been insufficient negotiations between the parties. In addition, they have not received notification of the hearing as required by Division rules, and have not been able to prepare for hearing. Therefore, this matter must be continued.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Andrew Connelly
(landman)

20 min.

Approx. 4

OPPONENT

WITNESSES

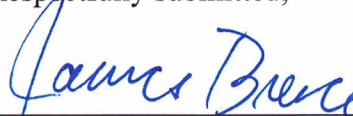
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Opponent requests that this matter be set for a status conference.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Chi Operating, Inc. and Chi
Energy, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 13th day of January, 2021 by e-mail:

Deanna Bennett
dmb@modrall.com

Michael Feldewert
mfeldewert@hollandhart.com

Adam Rankin
agrarkin@hollandhart.com

Julia Broggi
jbroggi@hollandhart.com


Kaitlyn Luck
kaluck@hollandhart.com

Earl DeBrine
edebrine@modrall.com

Lance Hough
ldh@modrall.com

Sharon Shaheen
sshaheen@montand.com

John McIntyre
jmcintyre@montand.com



James Bruce