

1
STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

APPLICATION OF BTA OIL PRODUCERS,
LLC FOR AUTHORIZATION TO INJECT
PRODUCED WATER INTO THE
DELAWARE (UPPER BRUSHY CANYON)
FORMATION UNDERLYING SE/4 OF
SECTION 2, TOWNSHIP 20 SOUTH, RANGE
33 EAST, LEA COUNTY.

CASE NO. 14973

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BTA Oil Producers, LLC as required by the
Oil Conservation Division.

APPEARANCES

APPLICANT

BTA Oil Producers, LLC

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

RECEIVED OOD
2013 MAR 14 PM 3:56

STATEMENT OF THE CASE

Applicant seeks an order approving the injection of produced water into the Delaware
(upper Brushy Canyon) formation for purposes of establishing a pressure maintenance project at
a depth of 6618 feet to 6648 feet, with a maximum surface pressure of 1320 pounds per square
inch at an average rate of 500 barrels of water per day. Applicant seeks to use its existing 8705
JV-P Gem No. 3 well (API No. 30-025-30977) located 660 feet from the South line and 1980

feet from the East line of Section 2, Township 20 South, Range 33 East, N.M.P.M., Lea County, New Mexico. The proposed project area for this pressure maintenance project consists of all of said Section 2.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Robin Hughes, Petroleum Landman	Approx. 15 minutes	Approx. 5
Britton McQuien, Petroleum Engineer	Approx. 40 minutes	Approx. 8

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert
Adam G. Rankin
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com

**ATTORNEYS FOR
BTA OIL PRODUCERS, LLC**