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October 22, 2015

Hand Delivered

Florene Davidson
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: NMOCD Case No. 15398: Application of BC Operating, Inc. for Authorization to Inject, Lea County, New Mexico

Dear Ms. Davidson:

Enclosed for filing on behalf of BC Operating, Inc., is a Pre-Hearing Statement.

Thank you.

Very truly yours,

Seth C. McMillan

Encl.

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

**IN THE MATTER OF THE APPLICATION
OF BC OPERATING, INC. FOR
AUTHORIZATION TO INJECT,**

LEA COUNTY, NEW MEXICO.

Case No. 15398

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PRE-HEARING STATEMENT

BC Operating, Inc. ("Applicant") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

BC Operating, Inc.

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Seth C. McMillan, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Tel (505) 982-3873
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OPPONENT/OTHER PARTIES

OPPONENT'S ATTORNEY

Amtex Energy, Inc.

Unknown at present

COG Operating, LLC

Unknown at present

Devon Energy (objection withdrawn)

James Bruce (has not entered appearance)

STATEMENT OF THE CASE

Applicant BC Operating, Inc. seeks an order authorizing the injection of water for disposal into the Cherry Canyon member of the Delaware Mountain Group formation in the following well:

Pearson #1 SWD (API # 30-025-24438)
1980' FNL & 660' FEL (Unit H)
Section 33
T-21-S, R-33-E, NMPM
Lea County, New Mexico

Applicant proposes to reconfigure the well at the above location and utilize it for injection of produced water at depths of 5,790' to 6,970' subsurface. The well is located approximately 15 miles West of Eunice, New Mexico.

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Brian Hall - Landman	10 minutes	4
Mike Moylett - Senior Geologist	20 minutes	6
Billy Moore - Operations Engineer	20 minutes	6

OPPONENT

WITNESSES

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: Seth C. McMillan

J. Scott Hall, Esq.

Seth C. McMillan, Esq.

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Attorneys for Applicant BC Operating, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 22nd day of October, 2015.

N/A

Seth C. McMillan

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