

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

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IN THE MATTER OF THE APPLICATION
OF BC OPERATING, INC. FOR AUTHORIZATION
TO INJECT, EDDY COUNTY, NEW MEXICO.

Case No. 15442

DEVON ENERGY PRODUCTION COMPANY L.P.'S
PRE-HEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

BC Operating, Inc.

APPLICANT'S ATTORNEYS

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OPPONENT/OTHER PARTIES

Devon Energy Production Company, L.P.

OPPONENT'S ATTORNEY

Gary W. Larson
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STATEMENT OF THE CASE

Applicant BC Operating, Inc. ("BC Operating") seeks an order authorizing the injection of water for disposal into the Bell Canyon and Upper Cherry Canyon members of the Delaware Mountain Group in the Grande State #1 SWD well, which is located in Township 23 South, Range 29 East, NMPM, in Eddy County. BC Operating proposes to reconfigure the well and utilize it for injection of produced water at depths of 2,780 to 4,900 feet. Devon opposes the application because the proposed injection of produced water could negatively impact Devon producing wells.

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Harmon Murphy (Landman)	10 minutes	Approx. 4
Mike Moylett (Senior Geologist)	20 minutes	Approx. 6
Jason Wacker (Petroleum Engineer)	10 minutes	Approx. 6

OPPONENT

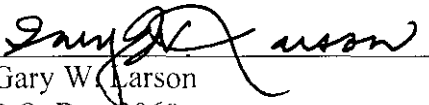
<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Zach Graham (Landman)	10 minutes	Approx. 4
Patrick Johnston (Geologist)	15 minutes	Approx. 5

Devon reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Devon's counsel has contacted BC Operating's counsel regarding a continuance of the current March 3rd hearing date, but has not yet been informed of BC Operating's position regarding the request for a continuance.

HINKLE SHANOR, LLP

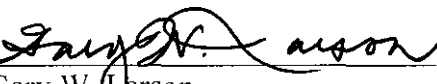

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*Counsel for Devon Energy Production
Company, L.P.*

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2016, I served a true and correct copy of the foregoing *Devon Energy Production Company, L.P.'s Pre-Hearing Statement* via email to:

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