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

APPLICATION OF AMEREDEV OPERATING, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 16362, 16363

AMEREDEV OPERATING, LLC'S PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev") (OGRID No. 372224) submits the following

Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Ameredev Operating, LLC

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INTERESTED PARTY

ATTORNEY

ConocoPhillips Company Burlington Resources Oil & Gas Co. LP James Bruce

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APPLICANT'S STATEMENT OF CASES

In Case No. 16362, Ameredev seeks an Order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 E/2 of Section 29 and the E/2 E/2 of Section 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Bone Spring formation underlying this acreage. Ameredev proposes to dedicate the above-referenced spacing and proration unit to its proposed **Redbud State Com 25 36 32 No. 097H Well**.

In Case No 16363, Ameredev seeks an Order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 E/2 of Section 29 and the E/2 E/2 of Section 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation underlying this acreage. Ameredev proposes to dedicate the above-referenced spacing and proration unit to its proposed **Redbud State Com 25 36 32 No. 107H Well**.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	Approx. 15	Approx. 6
Parker Foy – Geologist	Approx. 15	Approx. 4

PROCEDURAL MATTERS

Ameredev requests that Case Nos. 16362 and 16363 be consolidated for the hearing. If unopposed, Ameredev anticipates presenting these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

Bv:

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ATTORNEYS FOR AMEREDEV OPERATING, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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Attorneys for ConocoPhillips Company and Burlington Resources Oil & Gas Co. LP

Julia Broggi

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