

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

**APPLICATION OF AMEREDEV II, LLC
FOR AUTHORIZATION TO DRILL AN
ACID GAS INJECTION WELL, LEA
COUNTY, NEW MEXICO.**

Case No. 21381

**ENTRY OF APPEARANCE,
PRE-HEARING STATEMENT,
AND
MOTION FOR CONTINUANCE**

I. ENTRY OF APPEARANCE.

James Bruce enters his appearance in the above case on behalf of Tap Rock Operating, LL ("Tap Rock").

II. MOTION FOR A CONTINUANCE.

In addition, Tap Rock moves for a continuance of the above application to the next available Commission docket, and in support thereof, states:

1. In this case Ameredev II, LLC ("Ameredev") seeks approval to drill the Independence AGI Well No. 1 in the NE/4NW/4 of Section 20, Township 25 South, Range 36 East, NMPM.

2. Tap Rock was sent notice of the application by letter dated August 26, 2020. Tap Rock's regulatory personnel just received the notice this afternoon. As a result, it does not have adequate time to time to review the application and prepare for hearing.

3. In addition, counsel for Tap Rock will be traveling on the day of the hearing (September 17th) on family business, and will be unable to prepare for or attend the hearing.

III. PRE-HEARING STATEMENT.

Tap Rock's initial impression is to oppose the hearing. However, it desires additional time to discuss the application with Ameredev. That may result in the parties working out any differences they have.

If Tap Rock needs to attend a hearing, the following (incomplete) list of witnesses: Taylor Ford (landman), _____ (geologist), and _____ (engineer).

IV. REQUEST.

Tap Rock requests that the hearing on this matter and be scheduled for a later date.

Tap Rock has contacted counsel for Ameredev, but has not been informed yet if Ameredev objects to this request.

Respectfully submitted,



James Bruce
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(505) 982-2043

Attorney for Tap Rock Operating, LLC

CERTIFICATE OF SERVICE

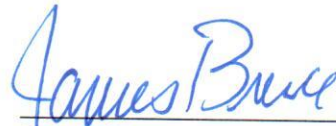
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 10th day of September, 2020 by e-mail:

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James Bruce