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

APPLICATIONS OF AMEREDEV OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 23682 & 23683

AMEREDEV'S CONSOLIDATED PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev" or "Applicant"), the applicant in the abovereferenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Ameredev Operating, LLC ("Ameredev")

Michael H. Feldewert Adam G. Rankin Julia Broggi Paula M. Vance Holland & Hart, LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Ameredev seeks orders pooling all uncommitted interests in the Wolfcamp (Jal; Wolfcamp, West [33813]) formation underlying the referenced acreage all in Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

- Under Case No. 23682, Ameredev seeks to pool a standard 640-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying the E/2 W/2 and W/2 E/2 of Sections 28 and 33 and initially dedicate this spacing unit to the proposed Tea Olive Fed Com 25 36 33 104H well (API No. 30-025-50739) and Tea Olive Fed Com 25 36 33 124H well (API No. 30-025-50745), both to be horizontally drilled from surface locations in the NE/4 NW/4 (Unit C) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 28, Township 25 South, Range 36 East; and Tea Olive Fed Com 25 36 33 105H well (API No. 30-025-50740) and the Tea Olive Fed Com 25 36 33 115H well (API No. 30-025-50742), both to be horizontally drilled from surface locations in the NW/4 NE/4 (Lot 2) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 28, Township 25 South, Range 36 East.
- Under Case No. 23683, Ameredev seeks to pool a standard 640-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying the E/2 E/2 Section 28 and Section 33 and the W/2 W/2 of Section 27 and Section 34 and initially dedicate this spacing unit to the proposed Tea Olive Fed Com 25 36 33 118H well (API No. 30-025-50884) and Tea Olive Fed Com 25 36 33 128H well (API No. 30-025-50886), both to be horizontally drilled from surface locations in the NE/4 NE/4 (Lot 1) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 28, Township 25 South, Range 36 East.

The completed interval for the wells will meet the statewide setbacks for oil wells; however, the completed interval of the **Tea Olive Fed Com 25 36 33 124H** well and **Tea Olive Fed Com 25 36 33 128H** well are expected to remain within 330 feet of the offsetting quarter-quarter sections

or equivalent tracts to include them in a standard horizontal well spacing unit. Ameredev has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners and unleased mineral interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Lizzy Laufer, Landman	Self-Affirmed Statement	Approx. 5	
Parker Foy, Geologist	Self-Affirmed Statement	Approx. 7	

PROCEDURAL MATTERS

Ameredev requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

Bv:

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Paula M. Vance

Post Office Box 2208

Santa Fe, NM 87504

505-988-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

jbroggi@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR AMEREDEV OPERATING, LLC

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 245105

QUESTIONS

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	245105
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	