

**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. 22785-22787**

**AMEREDEV’S CONSOLIDATED PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Ameredev Operating, LLC

**ATTORNEY**

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**APPLICANT’S STATEMENT OF THE CASE**

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

- Under **Case 22785**, Ameredev seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Sections 5 and 8 and initially dedicate this

Wolfcamp spacing unit to the proposed **Pine Straw Fed Com 25-36-08 103H** well, to be drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8.

- Under **Case 22786**, Ameredev seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Sections 5 and 8 and initially dedicate this Wolfcamp spacing unit to the proposed **Pine Straw Fed Com 25-36-08 105H** well, to be drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 8.
- Under **Case 22787**, Ameredev seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 5 and 8 and initially dedicate this Wolfcamp spacing unit to the proposed **Pine Straw Fed Com 25-36-08 107H** well, to be drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 5 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 8.

The completed interval for the **Pine Straw Fed Com 25-36-08 103H** and **107H** wells will comply with statewide setbacks for oil wells. The completed interval for the **Pine Straw Fed Com 25-36-08 105H** will be at a non-standard location. Ameredev will seek administrative approval for an unorthodox well location. Ameredev has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brandon Forteza, Landman	Affidavit	Approx. 5
Parker Foy, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

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

Respectfully submitted,

HOLLAND & HART LLP

By: \_\_\_\_\_

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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QUESTIONS

Action 111379

**QUESTIONS**

Operator: AMEREDEV OPERATING, LLC 2901 Via Fortuna Austin, TX 78746	OGRID: 372224
	Action Number: 111379
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	8