

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

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

CASE NO. 24084

AMEREDEV'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Ameredev Operating, LLC

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
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
agrarkin@hollandhart.com
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

Under **Case 24084**, Ameredev seeks an order pooling all uncommitted interests in the Bone Spring formation [WC-025 G-08 S263620C; LWR Bone Spring (98150)] underlying a standard 320-acre, more or less, horizontal well spacing unit in the Bone Spring formation underlying the W/2 W/2 of Sections 28 and 33, Township 25 South, Range 36 East, NMPM, Lea County, New

Mexico. Ameredev seeks to pool and initially dedicate this Bone Spring spacing unit to the proposed **Tea Olive 25-36-33 Fed Com 71H**, to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 4, Township 26 South, Range 36 East, a first take point from the SW/4 SW/4 of Section 33, Township 25 South, Range 36 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 28, Township 25 South, Range 36 East.

The completed interval for the well will meet the statewide setbacks for oil wells. 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. 5

PROCEDURAL MATTERS

Ameredev intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:  _____

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@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

District IV
 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 297961

QUESTIONS

Operator: AMEREDEV OPERATING, LLC 2901 Via Fortuna Austin, TX 78746	OGRID: 372224
	Action Number: 297961
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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