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

APPLICATION OF AMEREDEV OPERATING, LLC TO AMEND ORDER NO. R-21945, LEA COUNTY, NEW MEXICO.

CASE NO. 24230 ORDER NO. R-22864

AMEREDEV'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

ATTORNEY

Ameredev Operating, LLC ("Ameredev")

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 24230, Ameredev seeks an order to amend Order No. R-22864 ("Order") to allow for an extension of time for completing the proposed initial wells drilled under the Order. On September 11, 2023, the Division entered Order No. R-22864 in Case No. 23682 pooling the uncommitted interests in the Wolfcamp formation (Jal; Wolfcamp, West [33813]) underlying a

standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 and W/2 E/2 of Sections 28 and 33, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico (the "Unit"). Ameredev is the designated operator under the Order and the pooled spacing unit is initially dedicated to the **Tea Olive Fed Com 25 36 33 104H** (API No. 30-025-50739), **Tea Olive Fed Com 25 36 33 #124H** (API No. 30-025-50745), **Tea Olive Fed Com 25 36 33 105H** (API No. 30-025-50740), and **Tea Olive Fed Com 25 36 33 115H** (API No. 30-025-50742).

The **Tea Olive Fed Com 25 36 33 105H** (API No. 30-025-50740) was not drilled under the Order. The **Tea Olive Fed Com 25 36 33 104H** (API No. 30-025-50739) was drilled on <u>April 27, 2023</u>; the **Tea Olive Fed Com 25 36 33 115H** (API No. 30-025-50742) was drilled on <u>July 10, 2023</u>; and the **Tea Olive Fed Com 25 36 33 124H** (API No. 30-025-50745) was drilled on <u>April 24, 2023</u>.

Applicant requests that Order No. R-22864 be re-opened and amended to allow Applicant additional time to complete the wells under the Order. There is good cause for Applicant's request for an extension of time to complete the wells. Completion operations are delayed due to a force majeure event at the primary gas purchaser facility that the wells will tie into, thereby causing Ameredev to delay its intended plans to complete the wells as required by the Order.

Under the Order, Applicant would be required to complete each well no later than one year after the commencement of drilling the well; therefore, Ameredev asks for a year extension from the date of commencement of drilling each well.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Lizzy Laufer, Landman	Self-Affirmed Statement	Approx. 1	

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

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QUESTIONS

Action 323204

QUESTIONS

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	323204
	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.	