## 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. 24602-24604

## **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

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 agrankin@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 formation (WC-025 G-09 S263619C, Wolfcamp [98234]) underlying the referenced acreage, all in Township 26 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 24602, Ameredev seeks an order pooling all uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit underlying the W/2 E/2 of Sections 3 and 10, and initially dedicate this Wolfcamp spacing unit to the proposed Pimento Fed Com 26-36-03 106H (API: 30-025-52799), to be horizontally drilled from a surface location in the NW/4 NE/4 (Unit B) of Section 3, a first take point from the NW/4 NE/4 (Unit B) of Section 3, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 10.
- Under Case 24603, Ameredev seeks an order pooling all uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit underlying the E/2 W/2 of Sections 3 and 10, and initially dedicate this Wolfcamp spacing unit to the proposed Pimento Fed Com 26-36-03 113H (API: 30-025-52800), to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 3, a first take point from the NE/4 NW/4 (Unit C) of Section 3, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 10.
- Under Case 24604, Ameredev seeks an order pooling all uncommitted interests in a standard 320-acre, more or less, horizontal well spacing unit underlying the E/2 E/2 of Sections 3 and 10, and initially dedicate this Wolfcamp spacing unit to the proposed Pimento Fed Com 26-36-03 117H (API: 30-025-52578), to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 3, a first take point from the NE/4 NE/4 (Unit A) of Section 3, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 10.

The completed interval for each of the wells will comply with statewide setbacks for oil wells. Ameredev has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza, Landman	Self-Affirmed Statement	Approx. 5
Parker Foy, Geologist	Self-Affirmed Statement	Approx. 5

#### 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

at By:

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QUESTIONS

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	361142
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)
QUESTIONS	

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Please assist us by provide the following information about your testimony.		
Number of witnesses	2	
Testimony time (in minutes)	5	

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