

**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
agrarkin@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

By: 
 Michael H. Feldewert
 Adam G. Rankin
 Paula M. Vance
 Post Office Box 2208
 Santa Fe, NM 87504
 505-998-4421
 505-983-6043 Facsimile
 mfeldewert@hollandhart.com
 agrankin@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 361143

QUESTIONS

Operator: AMEREDEV OPERATING, LLC 2901 Via Fortuna Austin, TX 78746	OGRID: 372224
	Action Number: 361143
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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