

**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. 24699**

**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

ConocoPhillips

**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

Elizabeth Ryan  
Keri L. Hatley  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505) 780-8000  
beth.ryan@conocophillips.com  
keri.hatley@conocophillips.com

**APPLICANT’S STATEMENT OF THE CASE**

Under **Case 24699**, 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 E/2 W/2 of Sections 29 and 32, Township 25 South, Range 36 East, NMPPM, Lea County, New Mexico. Ameredev seeks to initially dedicate this Bone Spring spacing unit to the proposed **Red Bud Fed Com 25 36 32 73H** well, to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 32, a first take point from the SE/4 SW/4 (Unit N) of Section 32, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 29.

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, unleased mineral interest owners and non-participating royalty interest owners in the subject spacing unit.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Lizzy Laufer, Landman	Self-Affirmed Statement	Approx. 5
Parker Foy, Geologist	Self-Affirmed Statement	Approx. 4

**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**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Elizabeth Ryan  
Keri L. Hatley  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, New Mexico 87501  
(505) 780-8000  
*beth.ryan@conocophillips.com*  
*keri.hatley@conocophillips.com*

*Attorneys for ConocoPhillips*



---

Paula M. Vance

**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 380853

**QUESTIONS**

Operator: AMEREDEV OPERATING, LLC 2901 Via Fortuna Austin, TX 78746	OGRID: 372224
	Action Number: 380853
	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	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>