# 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. 22248** 

# AMEREDEV OPERATING LLC'S PREHEARING STATEMENT

Ameredev Operating LLC ("Ameredev") (OGRID No. 372224) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

#### **APPLICANT**

#### **ATTORNEY**

Ameredev Operating LLC

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 088, 4421

TEL: (505) 988-4421 FAX: (505) 983-6043

mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

## **APPLICANT'S STATEMENT OF CASE**

Ameredev seeks an order (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 30 and 31, Township 25 South, Range 36 East, N.M.P.M., Lea County, New Mexico, and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial

TE ITEM IN CO

Nandina Fed Com 25 36 31 #097H well to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 6, Township 26 South, Range 36 East, to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 30. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

# APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	Via Affidavit	Approx. 5
Parker Foy – Geologist	Via Affidavit	Approx. 3

### PROCEDURAL MATTERS

If unopposed, Ameredev intends to present this case by affidavits.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

P.O. Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

Email: mfeldewert@hollandhart.com Email: agrankin@hollandhart.com Email: jbroggi@hollandhart.com Email: kaluck@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

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 58449

#### **QUESTIONS**

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	58449
	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.	