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. 22400-22401

AMEREDEV'S CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

ATTORNEY

Ameredev Operating, LLC

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APPLICANT'S STATEMENT OF CASE

In Case No. 22400, Ameredev seeks an order (1) pooling all uncommitted interest in the Bone Spring formation, in a 320-acre, more or less, standard spacing unit comprised of the E/2 W/2 of Sections 29 and 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial **Red Bud** Fed Com 25 36 32 #093H well (API No. 30-025-pending), to be horizontally drilled from

a surface location in 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 of the well will comply with statewide setbacks for oil wells.

In Case No. 22401, Ameredev seeks an order (1) pooling all uncommitted interests in the Wolfcamp formation, in a 320-acre, more or less, standard spacing unit comprised of the E/2 W/2 of Sections 29 and 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) dedicating the above-referenced horizontal spacing unit to the proposed initial wells, both are to be horizontally drilled from a surface location in 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: (1) Red Bud Fed Com 25 36 32 #104H well (API No. 30-025-pending), and (2) Red Bud Fed Com 25 36 32 #114H well (API No. 30-025-pending). The completed interval of the wells will comply with statewide setbacks for oil wells.

<u>APPLICANT'S PROPOSED EVIDENCE</u>

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 these cases by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By:_____

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 69416

QUESTIONS

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	69416
	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.	