# STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF AMEREDEV OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

**CASE NO. 22678** 

## AMEREDEV'S PRE-HEARING STATEMENT

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

## **APPEARANCES**

#### <u>APPLICANT</u> <u>ATTORNEY</u>

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#### **OTHER PARTIES**

Franklin Mountain Energy, LLC Earl E. DeBrine, Jr.

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

Ameredev seeks an order pooling all uncommitted interest 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 comprised of the W/2 E/2 of Sections 29 and 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev proposes to dedicate the above-referenced spacing unit to the **Red Bud 25-36-32 State Com 096H** (API 30-025-49591) to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 32 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 29.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	By Affidavit	Approx. 4
Parker Foy – Geologist	By Affidavit	Approx. 6

#### **PROCEDURAL MATTERS**

Ameredev anticipates presenting this case by affidavit if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By:

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ATTORNEYS FOR AMEREDEV OPERATING, LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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QUESTIONS

Action 94975

#### **QUESTIONS**

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	94975
	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.	