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

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

CASE NO. 22679-22680

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>

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In Case No. 22679, Ameredev seeks an order pooling all uncommitted interest in the Bone Spring formation [WC-025 G-08 S263620C; LWR Bone Spring (98150)] underlying a 320-acre, more or less, standard horizontal well spacing unit comprised of the E/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 098H (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 NE/4 NE/4 (Unit A) of Section 29.

In Case No. 22680, Ameredev seeks an order pooling all uncommitted interest in the Wolfcamp formation [Jal; Wolfcamp, West (33813)] underlying a 640-acre, more or less, standard horizontal well spacing unit comprised of the E/2 E/2 of Sections 29 and 32 and the W/2 W/2 of Sections 28 and 33, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev proposes to dedicate the above-referenced spacing unit to the proposed **Red**

Bud 25-36-32 State Com 107H (API 30-025-49593) and the **Red Bud 25-36-32 State Com 118H** (API pending) 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 NE/4 NE/4 (Unit A) of Section 29. The completed interval of the Red Bud 25-36-32 State Com 118H will be within 330 feet of the offsetting quarter-quarter sections or equivalent tracts to allow inclusion of these tracts in a standard horizontal spacing unit for oil wells.

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 these cases by affidavit if unopposed and requests that these cases be consolidated for purposes of hearing with Case No. 22678.

Respectfully submitted,

HOLLAND & HART LLP

By:

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 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 98779

QUESTIONS

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	98779
	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.	