

**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. 23682 & 23683**

**AMEREDEV'S CONSOLIDATED PRE-HEARING STATEMENT**

Ameredev Operating, LLC (“Ameredev” or “Applicant”), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Ameredev Operating, LLC  
 (“Ameredev”)

**ATTORNEY**

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**APPLICANT'S STATEMENT OF THE CASE**

Under these consolidated cases, Ameredev seeks orders pooling all uncommitted interests in the Wolfcamp (Jal; Wolfcamp, West [33813]) formation underlying the referenced acreage all in Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 23682**, Ameredev seeks to pool a standard 640-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying the E/2 W/2 and W/2 E/2 of Sections 28 and 33 and initially dedicate this spacing unit to the proposed **Tea Olive Fed Com 25 36 33 104H** well (API No. 30-025-50739) and **Tea Olive Fed Com 25 36 33 124H** well (API No. 30-025-50745), both to be horizontally drilled from surface locations in the NE/4 NW/4 (Unit C) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 28, Township 25 South, Range 36 East; and **Tea Olive Fed Com 25 36 33 105H** well (API No. 30-025-50740) and the **Tea Olive Fed Com 25 36 33 115H** well (API No. 30-025-50742), both to be horizontally drilled from surface locations in the NW/4 NE/4 (Lot 2) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NW/4 NE/4 (Unit B) of Section 28, Township 25 South, Range 36 East.
- Under **Case No. 23683**, Ameredev seeks to pool a standard 640-acre, more or less, horizontal well spacing unit in the Wolfcamp formation underlying the E/2 E/2 Section 28 and Section 33 and the W/2 W/2 of Section 27 and Section 34 and initially dedicate this spacing unit to the proposed **Tea Olive Fed Com 25 36 33 118H** well (API No. 30-025-50884) and **Tea Olive Fed Com 25 36 33 128H** well (API No. 30-025-50886), both to be horizontally drilled from surface locations in the NE/4 NE/4 (Lot 1) of Section 4, Township 26 south, Range 36 East, to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 28, Township 25 South, Range 36 East.

The completed interval for the wells will meet the statewide setbacks for oil wells; however, the completed interval of the **Tea Olive Fed Com 25 36 33 124H** well and **Tea Olive Fed Com 25 36 33 128H** well are expected to remain within 330 feet of the offsetting quarter-quarter sections

or equivalent tracts to include them in a standard horizontal well spacing unit. Ameredev has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners and unleased mineral interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

| <b>WITNESS<br/>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. 7       |

**PROCEDURAL MATTERS**

Ameredev requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

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.**  
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QUESTIONS

Action 245102

**QUESTIONS**

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| Operator:<br>AMEREDEV OPERATING, LLC<br>2901 Via Fortuna<br>Austin, TX 78746 | OGRID:<br>372224   |
|  | Action Number:<br>245102                                 |
|  | Action Type:<br>[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> |