

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

APPLICATION OF AMEREDEV OPERATING, LLC  
FOR A NON-STANDARD SPACING AND  
PRORATION UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

RECEIVED OCD  
2011 NOV 22 P 3:00  
CASE NO. 15894

AMEREDEV'S PRE-HEARING STATEMENT

Ameredev Operating, LLC, ("Ameredev") submits this pre-hearing statement as required by the Oil Conservation Division Rule 19.15.4.13.B.

APPEARANCES

APPLICANT

Ameredev Operating, LLC

ATTORNEY

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
Email: mfeldewert@hollandhart.com  
Email: jlkessler@hollandhart.com

APPLICANT'S STATEMENT OF CASE

Ameredev seeks an order (1) creating a 320-acre, more or less, spacing and proration unit comprised of the E/2 W/2 of Section 4 and the E/2 W/2 of Section 9, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation. This spacing unit will be the project area for the proposed **Firethorn Fed Com 26-36-04 No. 113H Well**, which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 33, Township 25 South, Range 36 East to a standard bottom

hole location in the SE/4 SW/4 (Unit N) of Section 9, Township 26 South, Range 36 East. The completed interval for this well will remain within the 330-foot standard offset required by the Statewide Rules set forth in 19.15.15 NMAC.

**APPLICANT'S PROPOSED EVIDENCE**

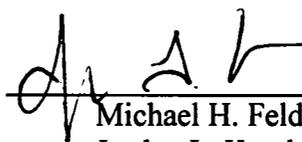
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Noah Bramble, Vice President of Land	Approx. 10 minutes	Approx. 6
Eric Rhoden, Vice President of Geology	Approx. 10 minutes	Approx. 4

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert  
Jordan L. Kessler

Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile  
Email: [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
Email: [jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

**ATTORNEYS FOR AMEREDEV OPERATING, LLC**