

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

AUG 30 2018 PM03:58

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

CASE NO. 16342

AMEREDEV OPERATING, LLC'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Ameredev Operating, LLC

ATTORNEY

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

INTERESTED PARTY

Tap Rock Resources, LLC
ConocoPhillips Company
Burlington Resources Oil & Gas Co. LP

ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
TEL: 505-982-2043
Email: jamesbruc@aol.com

APPLICANT'S STATEMENT OF CASE

Ameredev seeks an Order (1) creating a 233.69-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 27 and the NW/4 NW/4 and Lot 4 [W/2 NW/4] of Section 34, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the WC-025 G-08 S263620C; LWR Bone Spring (Pool Code 98150) underlying this acreage. Ameredev proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **Amen Corner State Com 26 36 27 No. 091H Well**.

APPLICANT'S PROPOSED EVIDENCE

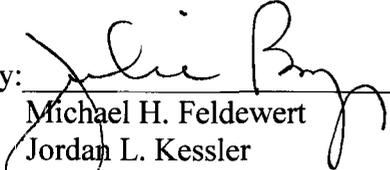
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	Approx. 10	Approx. 4
Parker Foy – Geologist	Approx. 10	Approx. 2

PROCEDURAL MATTERS

If unopposed, Ameredev anticipates presenting this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By: 
Michael H. Feldewert
Jordan L. Kessler
Julia Broggi
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
Email: mfeldewert@hollandhart.com
Email: jlkessler@hollandhart.com
Email: jbroggi@hollandhart.com

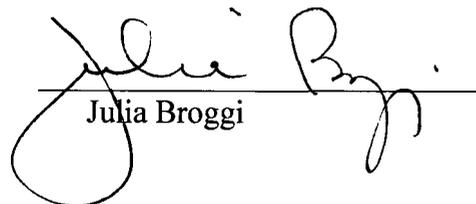
**ATTORNEYS FOR
AMEREDEV OPERATING, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
TEL: 505-982-2043
Email: jamesbruc@aol.com

***Attorneys for Tap Rock Resources, LLC,
ConocoPhillips Company, Burlington
Resources Oil & Gas Co. LP***


Julia Broggi