

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. 20256

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.
Adam G. Rankin, 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
agrarkin@hollandhart.com
jlkessler@hollandhart.com
jbroggi@hollandhart.com

APPLICANT'S STATEMENT OF CASES

Ameredev seeks an Order pooling all uncommitted interest in the Wolfcamp formation in the 640-acre spacing unit comprised of the E/2 W/2 of Sections 15 and 22 and the W/2 E/2 of Sections 15 and 22, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev proposes to dedicate the above-referenced spacing unit to the proposed **Magnolia State Com 26 36 22 No. 125H Well**. This well will be horizontally drilled from a surface

location in the SW/4SE/4 (Unit O) of Section 22 to a bottom hole location in the NW/4NE/4 (Unit B) of Section 15. Pursuant to NMAC 19.15.16.15(B)(1)(b), Ameredev will incorporate the proximity tracts into its horizontal spacing unit. Incorporating the proximity tracts, the completed interval for the well will remain within the standard offset required by the statewide rules set forth in 19.15.15 NMAC.

APPLICANT'S PROPOSED EVIDENCE

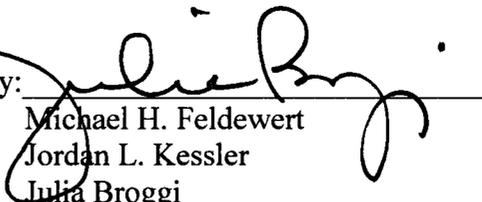
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	Approx. 8	Approx. 4
Parker Foy – Geologist	Approx. 8	Approx. 4

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