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

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

**CASE NO. 24701** 

## AMEREDEV'S PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev" or "Applicant"), the applicant in the abovereferenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

#### APPLICANT ATTORNEY

Ameredev Operating, LLC Michael H. Feldewert

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## **APPLICANT'S STATEMENT OF THE CASE**

Under Case 24701, Ameredev seeks an order pooling all uncommitted interests in the Bone Spring formation [WC-025 G-08 S263620C; LWR Bone Spring (98150)] underlying a standard 640.4-acre, more or less, horizontal well spacing unit underlying Lots 1-4 and the E/2 W/2 (W/2 equivalent) of irregular Sections 30 and 31, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev seeks to initially dedicate this Bone Spring spacing unit to the

proposed **Nandina Fed Com 25 36 31 71H** well, to be horizontally drilled from a surface location in Lot 4 (SW/4 SW/4 equivalent) of irregular Section 31, a first take point from Lot 4 (SW/4 SW/4 equivalent) of irregular Section 31, to a bottom hole location in Lot 1 (NW/4 NW/4 equivalent) of irregular Section 30.

The completed interval of the **Nandina Fed Com 25 36 31 71H** well is 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.

The completed interval for the well will meet the statewide setbacks for oil wells. Ameredev has sought and been unable to obtain voluntary agreement for the development of these lands from all unleased mineral interest owners in the subject acreage.

# **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Lizzy Laufer, Landman	Self-Affirmed Statement	Approx. 5
Parker Foy, Geologist	Self-Affirmed Statement	Approx. 4

## PROCEDURAL MATTERS

Ameredev intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By:

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QUESTIONS

Action 380856

#### **QUESTIONS**

Operator:	OGRID:
AMEREDEV OPERATING, LLC	372224
2901 Via Fortuna	Action Number:
Austin, TX 78746	380856
	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.	