

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

MAR 15 2018 PM03:43

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

CASE NO. 16022

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, Esq.
Adam G. Rankin, Esq.
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: agrankin@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 W/2 W/2 of Section 21 and the W/2 W/2 of Section 16, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation. Ameredev proposes to dedicate the above-referenced spacing and proration unit as the project area for two proposed initial wells, to be drilled and completed simultaneously: the proposed **Camellia Fed Com 26-36-21 No. 111H Well** and the **Camellia Fed**

Com 26-36-21 No. 121H Well. These wells will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 21 to a standard bottom hole location in the NW/4 NW/4 (Unit D) of Section 16. 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

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza, Landman	Approx. 10 minutes	Approx. 6
Parker Foy, Geology	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



Michael H. Feldewert

Adam G. Rankin

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

Email: mfeldewert@hollandhart.com

Email: agrankin@hollandhart.com

ATTORNEYS FOR AMEREDEV OPERATING, LLC