

4-11-2024 10:41 AM

**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.**

**CASE NOS. 16394, 16395**

**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

**APPLICANT'S STATEMENT OF CASES**

In Case No. 16394, Ameredev seeks an Order (1) creating, if necessary, a 320.50-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 5 and the W/2 W/2 of Section 8, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Bone Spring formation underlying this acreage. Ameredev proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed **Pine Straw Fed Com 25 36 08 No. 091H Well**.

In Case No 16395, Ameredev seeks an Order (1) creating, if necessary, a 320-acre, more or less, spacing and proration unit comprised of the W/2 W/2 of Section 5 and the W/2 W/2 of Section 8, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico; and (2) pooling all uncommitted mineral interests in the Wolfcamp formation underlying this acreage. Ameredev proposes to dedicate the above-referenced spacing and proration unit as the project area for the proposed **Pine Straw Fed Com 25 36 08 No. 101H Well**.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brandon Forteza – Landman	Approx. 15	Approx. 6
Parker Foy – Geologist	Approx. 15	Approx. 4

**PROCEDURAL MATTERS**

Ameredev requests that Case Nos. 16394 and 16395 be consolidated for the hearing. If unopposed, Ameredev anticipates presenting these cases 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**