

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

**APPLICATION OF AMEREDEV  
OPERATING, LLC TO RE-OPEN CASE  
NO. 20416 TO ADD ADDITIONAL  
INITIAL WELLS UNDER THE TERMS  
OF COMPULSORY POOLING ORDER  
NO. R-20608, LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 20416 (Re-Opened)  
ORDER NO. R-20608**

**AMEREDEV OPERATING LLC'S  
PREHEARING 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**

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### APPLICANT'S STATEMENT OF CASE

In this re-opened case, Ameredev seeks to add additional initial wells pursuant to the terms of Order No. R-20608. The spacing unit, pool, and all other provisions remain the same under Order No. R-20608. Division Order No. R-20608, entered June 6, 2019, created a 640-acre, more or less, horizontal oil well spacing unit in the Jal; Wolfcamp, West Pool (Pool Code 33813), comprised of the E/2 W/2 and W/2 E/2 of Sections 5 and 8, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. The spacing unit now will be dedicated to five initial wells, with the following two initial wells already designated to the spacing unit under Order No. R-20608:

- **Holly Fed Com 26-36-05 103H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8; and
- **Holly Fed Com 26-36-05 113H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8.

Additionally, Ameredev intends to dedicate the following three additional initial wells to the horizontal spacing unit:

- **Holly Fed Com 26-36-05 104H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8;
- **Holly Fed Com 26-36-05 114H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8; and

- **Holly Fed Com 26-36-05 123H Well**, which will be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 5 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 8.

The completed interval for the **Holly Fed Com 26-36-05 114H Well** will remain within 330 feet of the W/2 E/2 of Sections 5 and 8 to allow these tracts to be incorporated as proximity tracts, pursuant to NMAC 19.15.16.15(B)(1)(b), into a standard 640-acre horizontal well spacing unit.

#### **APPLICANT'S PROPOSED EVIDENCE**

| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b> | <b>EXHIBITS</b> |
|---------------------------------------|-----------------------|-----------------|
| Brandon Forteza – Landman             | Via Affidavit         | Approx. 5       |
| Parker Foy – Geologist                | Via Affidavit         | Approx. 3       |

#### **PROCEDURAL MATTERS**

If unopposed, Ameredev intends to present this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

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