

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

**IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION FOR THE PURPOSE OF  
CONSIDERING:**

**APPLICATION OF AMEREDEV  
OPERATING, LLC FOR AUTHORIZATION  
TO INJECT, LEA COUNTY, NEW MEXICO.**

**CASE NO. 21381**

**AMEREDEV OPERATING LLC'S PRE-HEARING STATEMENT**

AMEREDEV OPERATING, LLC ("Ameredev"), the applicant in the above-referenced case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Commission.

**APPEARANCES**

**APPLICANT**

Ameredev Operating, LLC

**ATTORNEY**

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

Ameredev Operating, LLC (OGRID No. 372224) seeks authorization to inject treated acid gas for purposes of disposal through its proposed Independence AGI #1 well, to be located in Section 20, Township 25 South, Range 36 East, N.M.P.M., Lea County, New Mexico.

The proposed Independence AGI #1 well will be drilled at a surface location approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of said Section. The target injection zone will be from approximately 16,230 to 17,900 feet deep in the Devonian Thirty-One and Upper Silurian Wristen and Fusselman formations, as well as the upper Ordovician Montoya formation.

The well will be drilled as a vertical well with an open hole completion. The maximum allowable surface injection pressure is calculated to be psi. The proposed well will inject treated acid gas up to a maximum of 12 MMSCFD at a maximum surface injection pressure of 4,779 psi. Ameredev will present three witnesses, identified below. Exhibits are being filed contemporaneously herewith.

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

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Floyd Hammond, Chief Operating Officer, Ameredev	Approx. 20 mins.	2
Alberto A. Gutiérrez, CPG, Geology, Hydrogeology, and AGI Operation, Geolex, Inc.	Approx. 1 hour	2 (Approx. 26 slides)
David A. White, M.S., Geology, Geolex, Inc.	Approx. 1 hour 30 mins.	1 (Approx. 26 slides)

**PROCEDURAL MATTERS**

Ameredev Operating, LLC is a wholly owned subsidiary of Ameredev II, LLC.

Respectfully submitted,

HOLLAND & HART LLP

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