

**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

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
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

By: 

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