

**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 NOTICE OF FILING OF UPDATED EXHIBIT 3  
AND INTENT TO SEEK LEAVE TO FILE LATE EXHIBIT**

AMEREDEV OPERATING, LLC ("Ameredev"), the applicant in the above-referenced case, submits the attached Exhibit 3 – UPDATED, which it intends to present at the hearing in this matter on October 8, 2020.

Ameredev also gives notice that it intends to seek leave to file late exhibits in this matter pursuant to 19.15.4.13.B(2) NMAC. In response to prehearing discussions, Ameredev is preparing an additional set of exhibits at the request of the New Mexico State Land Office ("NMSLO") and the Oil Conservation Division ("OCD") to depict additional geologic modeling scenarios. The model simulations could not be completed prior to the deadline to file exhibits. Ameredev will confer with counsel for NMSLO and OCD to confirm their concurrence at the time the exhibits are filed and leave to file is requested.

Respectfully submitted,

HOLLAND & HART LLP

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**ATTORNEYS FOR AMEREDEV OPERATING, LLC**

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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### **ATTORNEY FOR TAP ROCK OPERATING, LLC**



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