

**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 MOTION FOR LEAVE TO FILE LATE EXHIBIT**

AMEREDEV OPERATING, LLC ("Ameredev"), the applicant in the above-referenced case requests leave to file a late exhibit, attached hereto as Ameredev Exhibit 3 – UPDATED 2, which it intends to present at the hearing in this matter on October 8, 2020. In support, Ameredev states the following in support.

Ameredev prepared an additional set of exhibit slides at the request of the New Mexico State Land Office ("NMSLO") and the Oil Conservation Division ("OCD") to depict additional geologic modeling scenarios. They have been incorporated into what has been marked as Ameredev Exhibit 3 – UPDATED 2, attached hereto and submitted concurrently herewith. However, the additional model simulations could not be completed prior to the deadline to file exhibits on October 1, 2020. When the additional exhibits were requested, counsel for Ameredev informed counsel for NMSLO and OCD that, given the work required to run additional modeling scenarios and prepare the slides depicting the model results, the exhibits would not be ready for filing by the deadline. To avoid potential prejudice, Ameredev provided NMSLO and OCD

copies of the model results, data, and slides that were used to compile the late-filed Exhibit when they were available and a copy of the proposed late-filed exhibit as soon as it was finalized. Counsel for Ameredev has conferred with counsel for NMSLO, OCD, and Tap Rock and has confirmed that they do not oppose the Motion.

Respectfully submitted,

HOLLAND & HART LLP

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**ATTORNEYS FOR AMEREDEV OPERATING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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