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

APPLICATION OF AMEREDEV OPERATING, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 21531

AMEREDEV OPERATING, LLC'S PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev" or "Applicant") (OGRID No. 372224) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Ameredev Operating, LLC

Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
TEL: (505) 988-4421
FAX: (505) 983-6043
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Michael H. Feldewert, Esq.

INTERESTED PARTY

Franklin Mountain Energy, LLC

Deana M. Bennett, Esq.
Modrall Sperling Roehl Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque New Mexico 87103-2168
TEL: (505) 848-1800
dmb@modrall.com

APPLICANT'S STATEMENT OF CASE

Ameredev seeks an order pooling all uncommitted interests in the Wolfcamp formation, underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Sections 30 and 31, and the W/2 W/2 of Sections 29 and 32, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev proposes to dedicate the above-referenced spacing unit to the following initial wells:

- The Nandina Fed Com 25 36 31 107H Well, and the Nandina Fed Com 25 36 31 127H Well, both of which are to be drilled from a common surface hole location in the SE/4 SE/4 (Unit P) of Section 31 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 30; and
- The Redbud Fed Com 25 36 32 102H Well, and the Redbud Fed Com 25 36 32 112H Well, both of which are to be drilled from a common surface hole location in the SW/4 SW/4 (Unit M) of Section 32 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 29.

The completed interval for the proposed **Redbud Fed Com 25 36 32 102H Well** will be within 330' of the quarter-quarter line separating the E/2 E/2 of Sections 30 and 31 from the W/2 W/2 of Sections 29 and 32 to allow inclusion of this acreage into a standard 640-acre horizontal spacing unit.

APPLICANT'S PROPOSED EVIDENCE

WITNESS ESTIMATED TIME EXHIBITS
Name and Expertise

Brandon Forteza – Landman By Affidavit Approx. 6

PROCEDURAL MATTERS

Ameredev anticipates presenting this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

P.O. Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

Email: mfeldewert@hollandhart.com

Email: agrankin@hollandhart.com Email: jbroggi@hollandhart.com

Email: kaluck@hollandhart.com

ATTORNEYS FOR AMEREDEV OPERATING, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2020, I served a copy of the foregoing document to the following via electronic mail to:

Deana M. Bennett, Esq. Modrall Sperling Roehl Harris & Sisk, P.A.

Post Office Box 2168

Albuquerque New Mexico 87103-2168

TEL: (505) 848-1800

dmb@modrall.com

Julia Broggi