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. 21532

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

Michael H. Feldewert, Esq.
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

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 320-acre, more or less, spacing unit comprised of the E/2 W/2 of Sections 29 and 32, Township 25 South, Range 36 East, N.M.P.M., Lea County, New Mexico. Ameredev proposes to dedicate the above-referenced spacing unit to the **Redbud Fed Com 25 36 32 122H**Well, which will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 32, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 29. The completed interval of the Redbud Fed Com 25-36-32 122H Well will comply with statewide setbacks for oil wells.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	By Affidavit	Approx. 4
Parker Foy – Geologist	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

15780864 v1