

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

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

CASE NO. 22949

AMEREDEV'S PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Ameredev Operating, LLC

ATTORNEY

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APPLICANT'S STATEMENT OF THE CASE

Under **Case 22949**, Ameredev seeks an order pooling all uncommitted interests in the Wolfcamp formation [Jal; Wolfcamp, West Pool (33813)] underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 and E/2 W/2 of Section 28 and the W/2 E/2 and E/2 W/2 of Section 33, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev seeks to pool and initially dedicate this Wolfcamp spacing unit to the proposed

Tea Olive Fed Com 25-36-33 104H well, the **Tea Olive Fed Com 25-36-33 114H well**, and the **Tea Olive Fed Com 25-36-33 124H well**, all to be horizontally drilled from a surface location in the NE/4 NW/4 (Unit C) of Section 4, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico, to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 28, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico.

The completed intervals of the **Tea Olive Fed Com 25-36-33 104H well**, the **Tea Olive Fed Com 25-36-33 114H well**, and the **Tea Olive Fed Com 25-36-33 124H well**, are all expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit under NMAC 19.15.16.15.B(1)(b).

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza, Landman	Affidavit	Approx. 5
Parker Foy, Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Ameredev intends to present this case by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

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