# 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. 20222** 

## AMEREDEV OPERATING, LLC'S PRE-HEARING STATEMENT

Ameredev Operating, LLC ("Ameredev") (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. Jordan L. Kessler, Esq. Julia Broggi, 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 jlkessler@hollandhart.com jbroggi@hollandhart.com

#### APPLICANT'S STATEMENT OF CASES

Ameredev seeks an Order pooling all uncommitted interest in the Wolfcamp formation in the 640-acre spacing unit comprised of the W/2 W/2 of Sections 27 and 34 and the E/2 E/2 of Sections 33 and 34, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico.

Ameredev proposes to dedicate the above-referenced spacing unit to the proposed **Juniper Fed**Com 25 36 34 No. 111H Well. This well will be horizontally drilled from a surface location in

the NW/4NW/4 (Unit D) of Section 3, Township 26 South, Range 36 East to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 27, Township 25 South, Range 36 East. Pursuant to NMAC 19.15.16.15(B)(1)(b), Ameredev will incorporate the proximity tracts into its horizontal spacing unit. Incorporating the proximity tracts, the completed interval for the well will remain within the standard offset required by the statewide rules set forth in 19.15.15 NMAC.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brandon Forteza – Landman	Approx. 8	Approx. 4
Parker Foy – Geologist	Approx. 8	Approx. 4

#### **PROCEDURAL MATTERS**

If unopposed, Ameredev anticipates presenting this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert

Jordan L. Kessler

Julia Broggi

P.O. Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

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

ATTORNEYS FOR AMEREDEV OPERATING, LLC