

**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. 20318**

**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**

Ameredev Operating, LLC

**ATTORNEY**

Michael H. Feldewert, Esq.  
Adam G. Rankin, 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  
agrarkin@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 28 and 33, 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/4 NW/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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
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

By: 

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

P.O. Box 2208

Santa Fe, NM 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

Email: [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

Email: [agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

Email: [jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

**ATTORNEYS FOR AMEREDEV OPERATING, LLC**

12101566\_1