

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

**IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING:**

**APPLICATION OF AMEREDEV
OPERATING, LLC FOR AUTHORIZATION
TO INJECT, LEA COUNTY, NEW MEXICO.**

CASE NO. 21381

JOINT MOTION FOR CONTINUANCE

AMEREDEV OPERATING, LLC (“Ameredev”), the New Mexico Oil Conservation Division (the “Division”), and the Commissioner of Public Lands, Stephanie Garcia Richard, and the New Mexico State Land Office (together the “SLO”) (collectively, the “Parties”), jointly move the Commission to continue the hearing in Case No. 21381 to a special hearing date on a day of the Commission’s preference between October 1, 2020 and October 9, 2020. In the alternative, the Parties request that the hearing be continued to the regularly scheduled Commission meeting on October 15, 2020. In the event that neither a special hearing date nor the regularly scheduled October meeting date are available, the Parties request that the hearing be continued to and set for the Commission’s earliest available hearing date. In support, the Parties state as follows:

1. Ameredev administratively filed its C-108 Application for Authorization to Inject through its proposed Independence AGI #1 for purposes of disposing treated acid gas with the OCD on July 10, 2020.

2. Ameredev timely provided notice of its application and the hearing before the Commission to the SLO.

3. Both the OCD and SLO have requested additional time to review the technical merits of the application.

4. Ameredev's position is that it currently has multiple wells shut-in and six wells awaiting completion in the area of the proposed injection well due to a lack of capacity for disposal of treated acid gas. Its position is that the proposed Independence AGI #1 will allow Ameredev to produce from its shut-in wells and other planned wells in the area.

5. Ameredev's position is that the inability to produce from its shut-in wells and complete additional wells imposes an economic hardship on Ameredev, resulting in economic waste, and is contrary to the conservation of resources. However, in order to provide the SLO and OCD additional time to review the merits of its application, Ameredev is willing to continue its hearing in this case, as stated.

6. The OCD and SLO concur with the request for a continuance and jointly move the Commission to continue the hearing in Case No. 21381 to a special hearing date on a day of the Commission's preference between October 1, 2020 and October 9, 2020. In the alternative, the Parties request that the hearing be continued to the regularly scheduled Commission meeting on October 15, 2020. In the event that neither a special hearing date nor the regularly scheduled October meeting date are available, the Parties request that the hearing be continued to and set for the Commission's earliest available hearing date.

WHEREFORE, for the reasons stated, the Parties respectfully ask the Commission to grant this motion.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Kaitlyn A. Luck, Esq.
Julia Broggi, Esq.
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
kaluck@hollandhart.com
jbroggi@hollandhart.com

ATTORNEYS FOR AMEREDEV OPERATING, LLC

AND

By: approved by email 9/14/20

Ari Biernoff
General Counsel for the Commissioner of
Public Lands, State Land Office
P.O. Box 1148
Santa Fe NM 87504-1148
(505) 827-5756
abiernoff@slo.state.nm.us

ATTORNEY FOR THE STATE LAND OFFICE

AND

By: approved by email 9/14/20

Eric Ames
Office of General Counsel
New Mexico Energy, Minerals and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Tel (505) 476-3463
Fax (505) 476-3220
eric.ames@state.nm.us

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Eric Ames
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Tel (505) 476-3463
Fax (505) 476-3220
eric.ames@state.nm.us

***Attorney for New Mexico Energy, Minerals
and Natural Resources Department***

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

Attorney for Tap Rock Operating, LLC

Ari Biernoff
General Counsel for the Commissioner of
Public Lands, State Land Office
P.O. Box 1148
Santa Fe NM 87504-1148
(505) 827-5756
abiernoff@slo.state.nm.us

Attorney for State Land Office



Adam G. Rankin