

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

**APPLICATION OF AVANT OPERATING, LLC
FOR APPROVAL OF NON-STANDARD UNIT
AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 23677

**APPLICATION OF AVANT OPERATING, LLC
FOR APPROVAL OF NON-STANDARD UNIT
AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 23678

AVANT OPERATING, LLC'S PRE-HEARING STATEMENT

Avant Operating, LLC ("Avant") submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Avant Operating, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine
Yarithza Peña
MODRALL, SPERLING, ROEHL,
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OTHER PARTIES

EOG Resources, Inc.

ATTORNEY

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(432) 488-6108

XTO Energy, Inc.

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
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STATEMENT OF CASES**APPLICANT:**

In Case No. 23677, Avant seeks an order from the Division (1) approving a non-standard 640-acre spacing unit, and (2) pooling all uncommitted mineral interests within a 640-acre, more or less, Wolfcamp horizontal spacing unit comprised of Section 23, Township 20 South, Range 33 East, N.M.P.M, Lea County, New Mexico. This spacing unit will be dedicated to the **Sandra Jean 23 Fed Com #751H; Sandra Jean 23 Fed Com #752H; Sandra Jean 23 Fed Com #753H; Sandra Jean 23 Fed Com #754H; and the Sandra Jean 23 Fed Com #755H wells** to be horizontally drilled. The producing area for the wells are expected to be orthodox. Also to be considered will be the cost of drilling and completing said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Avant Operating, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 22 miles west-southwest of Monument, New Mexico.

In Case No. 23678, Avant seeks an order from the Division (1) approving a non-standard 640-acre spacing unit, and (2) pooling all uncommitted mineral interests within a 640-acre, more or less, Bone Spring horizontal spacing unit comprised of Section 23, Township 20 South, Range 33 East, N.M.P.M, Lea County, New Mexico. This spacing unit will be dedicated to the **Sandra Jean 23 Fed Com #301H; Sandra Jean 23 Fed Com #302H; Sandra Jean 23 Fed Com #501H; Sandra Jean 23 Fed Com #502H; Sandra Jean 23 Fed Com #503H; Sandra Jean 23 Fed Com #601H; Sandra Jean 23 Fed Com #602H; Sandra Jean 23 Fed Com #603H; Sandra Jean 23 Fed Com #303H; Sandra Jean 23 Fed Com #304H; Sandra Jean 23 Fed Com #305H; Sandra Jean 23 Fed Com #504H; Sandra Jean 23 Fed Com #505H; Sandra Jean 23 Fed Com #506H; Sandra Jean 23 Fed Com #604H; Sandra Jean 23 Fed Com #605H; and the Sandra Jean 23 Fed Com #606H wells** to be horizontally drilled. The producing area for the wells are expected to be orthodox. The completed intervals for the Sandra Jean 23 Fed Com #302H; Sandra Jean 23 Fed Com #502H, Sandra Jean 23 Fed Com #602H; Sandra Jean 23 Fed Com #304H, Sandra Jean 23 Fed Com #505H; and the Sandra Jean 23 Fed Com #605H wells are expected to be less than 330 feet from the adjoining tracts, thereby allowing for the inclusion of the proximity tracts within the proposed spacing unit. Also to be considered will be the cost of drilling and completing said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Avant Operating, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 22 miles west-southwest of Monument, New Mexico.

PROPOSED EVIDENCE**APPLICANT:****WITNESS****ESTIMATED TIME****EXHIBITS**

Landman: Tiffany Sarantinos

Approx. 15 minutes

Approx. 8

Geologist: John Harper	Approx. 15 minutes	Approx. 10
Reservoir Engineer: To Be Determined	Approx. 15 minutes	Approx. 3

PROCEDURAL ISSUES

Avant has been in discussions with XTO to resolve XTO's objections. If those objections are resolved, Avant intends to proceed by affidavit at the October 5, 2023 hearing.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on September 28, 2023.

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 270283

QUESTIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 270283
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.