

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

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

CASE NO. 24376

AVANT OPERATING, LLC’S PRE-HEARING STATEMENT

Avant Operating, LLC, (“Avant”), submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Avant Operating, LLC

ATTORNEY

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INTERESTED PARTY

None

ATTORNEY

N/A

APPLICANT’S STATEMENT OF CASE

In this Case No. 24376, Avant seeks an order to create a non-standard 1,280-acre, more or less, horizontal spacing unit (“HSU”) composed of all of Section 31, Township 18 South, Range 33 East, N.M.P.M. and all of Section 6, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico (the “Application Lands”), and to pool all uncommitted mineral interests in

the Bone Spring Formation, designated as an oil pool, underlying said HSU. Avant seeks to dedicate the above-referenced HSU to the following proposed wells:

A. **Emerald Fed Com #301H, Emerald Fed Com #302H, Emerald Fed Com #501H, Emerald Fed Com #502H, Emerald Fed Com #601H, and Emerald Fed Com #602H**, which are oil wells that will be horizontally drilled from a surface location in Lot 7 of Section 6 to a bottom hole location in the Bone Spring Formation in Lot 1 of Section 31;

B. **Emerald Fed Com #303H, Emerald Fed Com #513H, and Emerald Fed Com #603H**, which are oil wells that will be horizontally drilled from a surface location in Lot 7 of Section 6 to a bottom hole location in the Bone Spring Formation in the NE/4NW/4 (Unit C) of Section 31;

C. **Emerald Fed Com #304H, Emerald Fed Com #514H, and Emerald Fed Com #604H**, which are oil wells that will be horizontally drilled from a surface location in the SE/4SE/4 (Unit P) of Section 6 to a bottom hole location in the Bone Spring Formation in the NW/4NE/4 (Unit B) of Section 31; and

D. **Emerald Fed Com #305H, Emerald Fed Com #306H, Emerald Fed Com #515H, Emerald Fed Com #516H, Emerald Fed Com #605H, and Emerald Fed Com #606H**, which are oil wells that will be horizontally drilled from a surface location in the SE/4SE/4 (Unit P) of Section 6 to a bottom hole location in the Bone Spring Formation in the NE/4NE/4 (Unit A) of Section 31.

The wells are orthodox in their location as defined by 19.15.16.15.(C) NMAC, and the take points and laterals comply with Statewide Rules for setbacks under 19.15.16.15.(C) NMAC. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost,

the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The wells and lands are located approximately 5 miles from Hobbs, New Mexico.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Sophia Guerra, Senior Landman	Affidavit	Approx. 5
John Harper, Geologist	Affidavit	Approx. 5

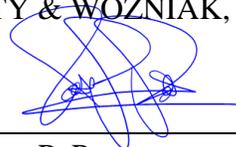
PROCEDURAL MATTERS

If uncontested at the hearing, Avant intends to present this case by affidavit.

Dated this 25th day of April, 2023.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:  _____

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