

**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 AMENDED PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Avant Operating, LLC

**ATTORNEY**

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**INTERESTED PARTY**

Permian Resources Corporation, Chisholm  
Energy Operating, Inc., and Earthstone  
Permian LLC

**ATTORNEY**

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**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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
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 9th day of May, 2023.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:  \_\_\_\_\_

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*Attorneys for Avant Operating, LLC*

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 9th day of May 2024, as follows:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
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QUESTIONS  
  
Action 342607

QUESTIONS

Operator:  Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID:  330396
	Action Number:  342607
	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.