

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

**APPLICATIONS OF BTA OIL PRODUCERS, LLC  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 25194 & 25195**

**ENTRY OF APPEARANCE AND NOTICE OF  
OBJECTION TO PRESENTATION BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett and Yarithza Peña), hereby enters its appearance on behalf of Avant Operating II, LLC (“Avant”) in the above-referenced matters. Avant further provides notice that it objects to the above captioned cases proceeding by affidavit under Rule 19.15.4.12(A)(1)(b).

Respectfully submitted,

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

By: Deana M. Bennett

Deana M. Bennett  
Earl E. DeBrine, Jr.  
Yarithza Peña  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[deana.bennett@modrall.com](mailto:deana.bennett@modrall.com)  
[earl.debrine@modrall.com](mailto:earl.debrine@modrall.com)  
[Yarithza.Pena@modrall.com](mailto:Yarithza.Pena@modrall.com)  
*Attorneys for Avant Operating II, LLC*

**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 March 4, 2025:

HARDY MCLEAN LLC  
Dana S. Hardy  
Jaclyn M. McLean  
125 Lincoln Ave., Suite 223  
Santa Fe, NM 87505  
505-230-4410  
dhardy@hardymclean.com  
jmclean@hardymclean.com  
**ATTORNEYS FOR BTA OIL PRODUCERS, LLC**

By: Deana M. Bennett  
Deana M. Bennett