

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

**APPLICATIONS OF AVANT OPERATING II, LLC
FOR APPROVAL OF A NON-STANDARD UNIT
AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NOS. 25347, 25348

AVANT OPERATING II, LLC's CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Avant Operating II, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

OTHER PARTIES

MRC Permian Company

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
PO Box 2208
Santa Fe, NM 87504
(505) 988-4421

STATEMENT OF CASES

In Case No. **25347**, Avant Operating II LLC seeks an order from the Division approving a non-standard 560-acre, more or less, Wolfcamp horizontal spacing unit and pooling all

uncommitted interests in the E/2 of Section 22 and the NE/4 and N/2SE/4 of Section 27, Township 20 South, Range 32 East, N.M.P.M., Lea County, New Mexico, in the Salt Lake; Wolfcamp pool (Pool code 53570). This spacing unit will be dedicated to the following wells: the **Thai Curry 22-27 Fed Com #701H, Thai Curry 22-27 Fed Com #721H, Thai Curry 22-27 Fed Com #722H, Thai Curry 22-27 Fed Com #801H, and Thai Curry 22-27 Fed Com #802H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit A) of Section 22, and proposed last take points in the NE/4 SE/4 (Unit I) of Section 27; and the **Thai Curry 22-27 Fed Com #702H, Thai Curry 22-27 Fed Com #723H, and Thai Curry 22-27 Fed Com #803H** wells with proposed surface hole locations in the N/4 NE/4 (Unit A) of Section 22, and proposed last take points in the NW/4 SE/4 (Unit J) of Section 27. The wells will be drilled at orthodox locations.

In Case No. **25348**, Avant Operating II LLC seeks an order from the Division approving a non-standard 560-acre, more or less, Bone Spring horizontal spacing unit and pooling all uncommitted interests in the E/2 of Section 22 and the NE/4 and N/2SE/4 of Section 27, Township 20 South, Range 32 East, N.M.P.M., Lea County, New Mexico in the Salt Lake; Bone Spring pool (Pool code 53560). This spacing unit will be dedicated to the following wells: **Thai Curry 22-27 Fed Com #301H, Thai Curry 22-27 Fed Com #302H, Thai Curry 22-27 Fed Com #401H, Thai Curry 22-27 Fed Com #501H, Thai Curry 22-27 Fed Com #502H, Thai Curry 22-27 Fed Com #601H, and Thai Curry 22-27 Fed Com #602H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit A) of Section 22, and proposed last take points in the NE/4 SE/4 (Unit I) of Section 27; and the **Thai Curry 22-27 Fed Com #303H, Thai Curry 22-27 Fed Com #402H, Thai Curry 22-27 Fed Com #503H, and Thai Curry 22-27 Fed Com #603H** wells with proposed surface hole locations in the N/4 NE/4 (Unit A) of Section 22, and proposed last take points in the NW/4 SE/4 (Unit J) of Section 27. The wells will be drilled at orthodox locations.

Also to be considered will be the cost of drilling and completing the Thai Curry wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Avant Operating II, LLC as operator of the Thai Curry wells, and a 200% charge for risk involved in drilling the Thai Curry wells. Said area is located approximately 36 miles southwest of Hobbs, New Mexico.

PROPOSED EVIDENCE

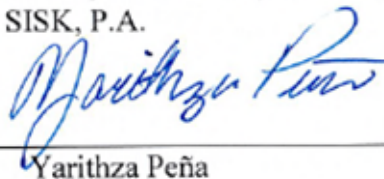
| WITNESS | ESTIMATED TIME | EXHIBITS |
|------------------------------------|-----------------------|-----------------|
| Landman: Tiffany Sarantinos | Approx. 10 minutes | Approx. 14 |
| Geologist: Josh Payne | Approx. 10 minutes | Approx. 16 |
| Reservoir Engineer: Alexey Zaitsev | Approx. 5 minutes | Approx. 2 |

PROCEDURAL ISSUES

MRC Permian Company (“MRC”) has entered an objection to the above-referenced matters proceeding by affidavit. AO II and MRC are in discussions and if those discussions are resolved prior to the May 8th docket date, and MRC’s objection withdrawn, AOII intends to consolidate these cases for presentation by affidavit on May 8th.

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

By: _____



Yarithza Peña


Deana M. Bennett
Earl E. DeBrine, Jr.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
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 May 1, 2025:

Michael Feldewert
Adam G. Rankin
Paula M. Vance
PO Box 2208
Santa Fe, NM 87504
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

By: 
Yarithza Peña

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 457789

QUESTIONS

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|---|--|
| Operator: Avant Operating II, LLC 1515 Wynkoop Street Denver, CO 80202 | OGRID: 332947 |
| | Action Number: 457789 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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|---|---------------|
| Testimony | |
| Please assist us by provide the following information about your testimony. | |
| Number of witnesses | 3 |
| Testimony time (in minutes) | Not answered. |