## 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 #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 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** 

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 #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 NE/4 SE/4 (Unit I) of Section 27; and the N/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 N/4 NE/4 (Unit A) of Section 22, and proposed last take points in the N/4 SE/4 (Unit J) of Section 27. The wells will be drilled at orthodox locations.

2

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 8<sup>th</sup> docket date, and MRC's objection withdrawn, AOII intends to consolidate these cases for presentation by affidavit on May 8<sup>th</sup>.

MODRALL, SPERLING, ROEHL, HARRIS

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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 May 1, 2025:

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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

Operator:	OGRID:	
Avant Operating II, LLC	332947	
1515 Wynkoop Street	Action Number:	
Denver, CO 80202	457791	
	Action Type:	
	[HEAR] Prehearing Statement (PREHEARING)	

#### QUESTIONS

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

Page 6 of 6

Action 457791