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

APPLICATION OF MAGNUM HUNTER PRODUCTION, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. 24756-24759

ENTRY OF APPEARANCE AND NOTICE OF OPPOSITION TO PRESENTATION BY AFFIDAVIT

James P. Parrot, Miguel A. Suazo, Sophia A. Graham, and Kaitlyn A. Luck of Beatty & Wozniak, P.C., hereby enter their appearances on behalf of Avant Operating, LLC. ("Avant") in the above-referenced matters and further provides notice that it objects to presentation of these cases by affidavit under Rule 19.15.4.12(A)(1)(b). Avant has filed applications in Case Nos. 24632 and 24633, which are set for a contested hearing on October 8, 2024, and compete for a portion of the subject lands in the above-referenced cases.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
Kaitlyn A. Luck
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com

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 12th day of August 2024, as follows:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
(970) 385-4901 Fax
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Magnum Hunter Production, Inc.

Rachael Ketchledge