

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

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

**CASE NO. 24849**

**AVANT OPERATING, LLC'S AMENDED PRE-HEARING STATEMENT**

Avant Operating, LLC ("Avant") submits this Amended Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division. This Amended Pre-Hearing Statement amends the Pre-Hearing Statement filed on September 26, 2024 to add MRC Permian Company as an "Other Party" and to update the procedural posture of the case.

**APPEARANCES**

**APPLICANT**

Avant Operating, LLC

**ATTORNEY**

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Earl E. DeBrine, Jr.  
Yarithza Peña  
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**OTHER PARTIES**

MRC Permian Company

**ATTORNEY**

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## STATEMENT OF CASE

### APPLICANT:

In Case No. 24849, Avant seeks an order from the Division approving a non-standard spacing unit and pooling all uncommitted interests within a 1280-acre, more or less, Bone Spring horizontal spacing unit comprised of Sections 14 and 23, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico. This spacing unit will be dedicated to the following wells: the **Sapphire 14 Federal Com #301H, Sapphire 14 Federal Com #302H, Sapphire 14 Federal Com #501H, Sapphire 14 Federal Com #502H, Sapphire 14 Federal Com #601H, and Sapphire 14 Federal Com #602H** wells with proposed surface hole locations in the NW/4 NW/4 (Unit D) of Section 14 and proposed bottom hole locations in the SW/4 SW/4 (Unit M) of Section 23; **Sapphire 14 Federal Com #303H and Sapphire 14 Federal Com #603H** wells with proposed first take points in the NE/4 NW/4 (Unit C) of Section 14 and proposed last take points in the SE/4 SW/4 (Unit N) of Section 23; **Sapphire 14 Federal Com #513H** well with a proposed surface hole location in the NW/4 NW/4 (Unit D) of Section 14 and a proposed bottom hole location in the SE/4 SW/4 (Unit N) of Section 23; **Sapphire 14 Federal Com #304H, and Sapphire 14 Federal Com #604H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit A) of Section 14 and proposed bottom hole locations in the SW/4 SE/4 (Unit O) of Section 23; **Sapphire 14 Federal Com #514H** well with a proposed surface hole location in the NW/4 NE/4 (Unit B) of Section 14 and a proposed bottom hole location in the SW/4 SE/4 (Unit O) of Section 23; **Sapphire 14 Federal Com #505H, and Sapphire 14 Federal Com #506H** wells with proposed surface hole locations in the NW/4 NE/4 (Unit B) of Section 14 and proposed bottom hole locations in the SE/4 SE/4 (Unit P) of Section 23; and the **Sapphire 14 Federal Com #305H, Sapphire 14 Federal Com #306H, Sapphire 14 Federal Com #605H, and Sapphire 14 Federal Com #606H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit A) of Section 14 and proposed bottom hole locations in the SE/4 SE/4 (Unit P) of Section 23. The wells will be drilled at orthodox locations. The pool and pool code for Sections 14 and 23 is the Gem; Bone Spring, East Pool (Code 27230), which is an oil pool. Also to be considered will be the cost of drilling and completing said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Avant Operating, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 23 miles west of Hobbs, New Mexico.

## PROPOSED EVIDENCE

### APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Tiffany Sarantinos	Approx. 10 minutes	Approx. 10
Geologist: Josh Payne	Approx. 10 minutes	Approx. 10
Reservoir Engineer: Alexey Zaitsev	Approx. 5 minutes	Approx. 3

**PROCEDURAL ISSUES**

On September 30, 2024 MRC Permian Company ("MRC") entered an appearance and objected to this case proceeding by affidavit. On December 6, 2024, MRC filed a notice of withdrawal of objection. After receiving MRC's notice of withdrawal, counsel for Avant requested that this case be placed on the January 9, 2025 docket to proceed by self-affirmed statement and the Division agreed to this request. If there are no other objections, Avant intends to present this case by self-affirmed statement at the January 9, 2025 hearing.

Respectfully submitted,

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

By: Deana M. Bennett

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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State of New Mexico  
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Oil Conservation Division  
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QUESTIONS

Action 416111

QUESTIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 416111
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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