

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

**APPLICATION OF AVANT OPERATING,
LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 23970 & 23971

NOTICE OF INTERVENTION

Miguel A. Suazo, James P. Parrot, and Sophia A. Graham of Beatty & Wozniak, P.C., hereby submit to the Oil Conservation Division (“Division”) this Notice of Intervention in the above-referenced cases on behalf of Lario Oil & Gas Co. (“Lario”).

In support of this application, Lario provides the following:

1. *Intervenor’s Name:*

Lario Oil & Gas Co.

2. *Address of Intervenor’s Attorneys:*

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3. *The Nature of Intervenor’s Interest in the Application:*

In Case No. 23970, Avant Operating, LLC (“Avant”) submitted to the Division an application for an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprising the E/2 of Sections 15 and 22, Township 18 South, Range 34 East, Lea County, New Mexico. In its application, Avant proposed to dedicate the Explorer 15 State Com #006H, Explorer 15 State Com #007H, and

Explorer 15 State Com #008H wells to the unit.

In Case No. 23971, Avant submitted to the Division an application for an order pooling all uncommitted interests in the Bone Spring formation underlying a standard 640-acre, more or less, horizontal spacing unit comprising the E/2 of Sections 15 and 22, Township 18 South, Range 34 East, Lea County, New Mexico. In its application, Avant proposed to dedicate the Explorer 15 State Com #301H, Explorer 15 State Com #302H, Explorer 15 State Com #303H, Explorer 15 State Com #601H, and Explorer 15 State Com #602H wells to the unit.

By Assignment, Bill of Sale and Conveyance, executed April 22, 2024 and dated effective January 1, 2024, recorded in Lea County, New Mexico at Reception No. 49074 in Book 2223 at Page 469, Avant assigned to Lario all its interest in the leases, wellbores, and property in Section 15, Township 18 South, Range 34 East, Lea County, New Mexico, which is a portion the subject lands in the above-referenced cases.

Lario has standing to intervene in Case Nos. 23970 and 23971, and Lario's participation will contribute substantially to the prevention of waste and the protection of correlative rights.

4. *The Extent of Intervenor's Opposition to Issuance of the Order:*

Lario does not oppose the issuance of the order Avant seeks, as Lario will be the successor-operator to Avant's interest. Therefore, Lario requests a final status conference on May 16, 2024, followed by a to be scheduled special contested hearing in June or July 2024.

Lario respectfully requests that the Division approve its intervention in Case Nos. 23970 and 23971 and designate Lario as the operator of record.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: _____

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Attorneys for Lario Oil & Gas Co.

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 29th day of April 2024, as follows:

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