

**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 NO. 24497

AVANT OPERATING, LLC'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Avant Operating, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
MODRALL, SPERLING, ROEHL,
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(505) 848-1800

OTHER PARTIES

Fasken Oil & Ranch, Ltd.

ATTORNEY

Michael H. Feldewert
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STATEMENT OF CASE

APPLICANT:

In Case No. 24497, Avant seeks an order from the Division pooling all uncommitted interests within a standard 640-acre, more or less, Bone Spring horizontal spacing unit comprising the E/2 of Sections 15 and 22, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico. This spacing unit will be dedicated to the **Ruby Federal Com #300H, Ruby Federal Com #500H, and Ruby Federal Com #600H** wells with proposed first take points in the NW/4NE/4 (Unit B) of Section 15 and proposed last take points in the SW/4SE/4 (Unit O) of Section 22, and the **Ruby Federal Com #301H, Ruby Federal Com #302H, Ruby Federal Com #501H, Ruby Federal Com #502H, Ruby Federal Com #601H, and Ruby Federal Com #602H** wells with proposed first take points in the NE/4NE/4 (Unit A) of Section 15 and proposed last take points in the SE/4SE/4 (Unit P) of Section 22. The wells will be drilled at orthodox locations. The completed intervals for the Ruby Federal Com #301H, Ruby Federal Com #501H, and Ruby Federal Com #601H wells are expected to be less than 330 feet from the adjoining tracts, thereby allowing for the inclusion of the proximity tracts within the proposed spacing unit. 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 24 miles west of Hobbs, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Tiffany Sarantinos	Approx. 10 minutes	Approx. 10
Geologist: John Harper	Approx. 10 minutes	Approx. 13

PROCEDURAL ISSUES

If there are no objections, Avant intends to present this case by affidavit.

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 June 6, 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
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 351404

QUESTIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 351404
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	<i>Not answered.</i>