

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

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

**CASE NOS. 24543-24544**

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

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

**APPEARANCES**

**APPLICANT**

Avant Operating, LLC

**ATTORNEY**

James P. Parrot  
Miguel A. Suazo  
Sophia A. Graham  
Beatty & Wozniak, P.C.  
500 Don Gaspar Ave.,  
Santa Fe, NM 87505  
(505) 946-2090  
Fax: 800-886-6566  
[msuazo@bwenerylaw.com](mailto:msuazo@bwenerylaw.com)  
[jparrot@bwenerylaw.com](mailto:jparrot@bwenerylaw.com)  
[sgraham@bwenerylaw.com](mailto:sgraham@bwenerylaw.com)

**INTERESTED PARTY**

COG Operating LLC

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
(505) 988-4421  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

EOG Resources, Inc.

Jordan L. Kessler  
125 Lincoln Ave., Suite 213

Santa Fe, NM 87501  
(432) 488-6108  
[jordan\\_kessler@eogresources.com](mailto:jordan_kessler@eogresources.com)

Prima Exploration, Inc.

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, NM 87501  
(970) 385.4401  
[darin@abadieschill.com](mailto:darin@abadieschill.com)  
[andrew@abadieschill.com](mailto:andrew@abadieschill.com)  
[bill@abadieschill.com](mailto:bill@abadieschill.com)

### **APPLICANT'S STATEMENT OF CASE**

In these consolidated cases, Avant seeks orders to approve non-standard 1,280-acre, more or less, horizontal spacing units (“HSUs”) composed of all of Sections 25 and 36, Township 18 South, Range 33 East, N.M.P.M., Lea County, New Mexico (the “Application Lands”), and to pool all uncommitted mineral interests in the Bone Spring and Wolfcamp formations, designated as oil pools, underlying said HSUs.

Under **Case 24543**, Avant seeks to pool the Wolfcamp formation underlying the Application Lands and seeks dedicate the HSU to the following proposed wells:

A. **Royal Oak 25 Fed Com #006H**, which is an oil well that will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) of Section 25 to a bottom hole location in the Wolfcamp Formation in the SW/4SW/4 (Unit M) of Section 36;

B. **Royal Oak 25 Fed Com #007H**, which is an oil well that will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) of Section 25 to a bottom hole location in the Wolfcamp Formation in the SE/4SW/4 (Unit N) of Section 36;

C. **Royal Oak 25 Fed Com #008H**, which is an oil well that will be horizontally drilled from a surface location in in the NW/4NE/4 (Unit B) of Section 25 to a bottom hole location in the Wolfcamp Formation in the SE/4SW/4 (Unit O) of Section 36; and

D. **Royal Oak 25 Fed Com #009H**, which is an oil well that will be horizontally drilled from a surface location in in the NW/4NE/4 (Unit B) of Section 25 to a bottom hole location in the Wolfcamp Formation in the SE/4SE/4 (Unit P) of Section 36.

Under **Case 24544**, Avant seeks to pool the Bone Spring formation underlying the Application Lands and seeks dedicate the HSU to the following proposed wells:

E. **Royal Oak 25 Fed Com #501H**, which is an oil well that will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) of Section 25 to a bottom hole location in the Bone Spring Formation in the SW/4SW/4 (Unit M) of Section 36;

F. **Royal Oak 25 Fed Com #502H**, which is an oil well that will be horizontally drilled from a surface location in the NW/4NW/4 (Unit D) of Section 25 to a bottom hole location in the Bone Spring Formation in the SE/4SW/4 (Unit N) of Section 36;

G. **Royal Oak 25 Fed Com #301H and Royal Oak 25 Fed Com #601H**, which are oil wells that will be horizontally drilled from a surface location in the NE/4NW/4 (Unit C) of Section 25 to a bottom hole location in the Bone Spring Formation in the SW/4SW/4 (Unit M) of Section 36;

H. **Royal Oak 25 Fed Com #302 and Royal Oak 25 Fed Com #602H**, which are oil wells that will be horizontally drilled from a surface location in the NE/4NW/4 (Unit

C) of Section 25 to a bottom hole location in the Bone Spring Formation in the SE/4SW/4 (Unit N) of Section 36;

I. **Royal Oak 25 Fed Com #303H, Royal Oak 25 Fed Com #503H, and Royal Oak 25 Fed Com #603H**, which are oil wells that will be horizontally drilled from a surface location in in the NW/4NE/4 (Unit B) of Section 25 to a bottom hole location in the Bone Spring Formation in the SE/4SW/4 (Unit O) of Section 36; and

J. **Royal Oak 25 Fed Com #304H, Royal Oak 25 Fed Com #504H, and Royal Oak 25 Fed Com #604H**, which are oil wells that will be horizontally drilled from a surface location in in the NW/4NE/4 (Unit B) of Section 25 to a bottom hole location in the Bone Spring Formation in the SE/4SE/4 (Unit P) of Section 36.

The wells are orthodox in their location as defined by 19.15.16.15.(C) NMAC, and the take points and laterals comply with Statewide Rules for setbacks under 19.15.16.15.(C) NMAC. Also to be considered will be the cost of drilling and completing the Wells and the allocation of the cost, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The wells and lands are located approximately 28 miles west from Hobbs, New Mexico.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Sophia Guerra, Senior Landman	Affidavit	Approx. 5
John Harper, Geologist	Affidavit	Approx. 5

**PROCEDURAL MATTERS**

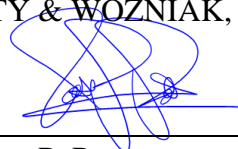
If uncontested at the hearing, Avant intends to present these cases by affidavit.

Dated this 20th day of June, 2023.

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  
[msuazo@bwenerylaw.com](mailto:msuazo@bwenerylaw.com)  
[jparrot@bwenerylaw.com](mailto:jparrot@bwenerylaw.com)  
[sgraham@bwenerylaw.com](mailto:sgraham@bwenerylaw.com)  
[kluck@bwenerylaw.com](mailto:kluck@bwenerylaw.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 20th day of June 2024, as follows:

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

*Attorneys for COG Operating LLC*

Jordan L. Kessler  
125 Lincoln Ave., Suite 213  
Santa Fe, NM 87501  
(432) 488-6108  
[jordan\\_kessler@eogresources.com](mailto:jordan_kessler@eogresources.com)

*Attorney for EOG Resources, Inc.*

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
214 McKenzie Street  
Santa Fe, NM 87501  
(970) 385.4401  
[darin@abadieschill.com](mailto:darin@abadieschill.com)  
[andrew@abadieschill.com](mailto:andrew@abadieschill.com)  
[bill@abadieschill.com](mailto:bill@abadieschill.com)

*Attorney for Prima Exploration, Inc.*

  
\_\_\_\_\_  
Rachael Ketchledge

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 356351

**QUESTIONS**

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 356351
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>