

**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**

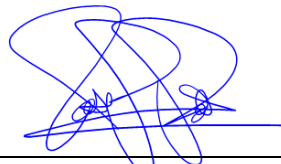
**CASE NOS. 24684 - 24687**

**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 competing applications for a portion of the subject lands.

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@bwenerylaw.com](mailto:jparrot@bwenerylaw.com)  
[msuazo@bwenerylaw.com](mailto:msuazo@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 15th day of July 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](mailto:darin@abadieschill.com)  
[andrew@abadieschill.com](mailto:andrew@abadieschill.com)  
[bill@abadieschill.com](mailto:bill@abadieschill.com)

*Attorneys for Magnum Hunter Production, Inc.*



---

Rachael Ketchledge