

**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. 24688

AVANT OPERATING, LLC'S PRE-HEARING STATEMENT

Avant Operating, LLC ("Avant") submits this Pre-Hearing Statement for the above-referenced cases 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,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

OTHER PARTIES

None

ATTORNEY

STATEMENT OF CASE

APPLICANT:

In Case No. 24688, 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 S/2 of Sections 35 and 36, Township 18 South, Range 32 East, N.M.P.M., Lea County, New

Mexico. This spacing unit will be dedicated to the Alpha Wolf 36 Federal Com 301H; Alpha Wolf 36 Federal Com 302H; Alpha Wolf 36 Federal Com 303H; Alpha Wolf 36 Federal Com 501H; Alpha Wolf 36 Federal Com 502H; Alpha Wolf 36 Federal Com 503H; Alpha Wolf 36 Federal Com 601H; Alpha Wolf 36 Federal Com 602H; and Alpha Wolf 36 Federal Com 603H wells, to be horizontally drilled. The producing area for the wells are expected to be orthodox. The completed intervals for the Alpha Wolf 36 Federal Com 302H, Alpha Wolf 36 Federal Com 502H, Alpha Wolf 36 Federal Com 602H 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 10.8 miles south of Maljamar, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS

ESTIMATED TIME

EXHIBITS

Landman: Sophia Guerra
Geologist: John Harper

Approx. 10 minutes
Approx. 10 minutes

Approx. 7
Approx. 7

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

QUESTIONS

Action 365336

QUESTIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 365336
	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>