## STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION COMMISSION

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

**CASE NO. 24119 ORDER NO. R-23353** 

## **APPLICATION FOR HEARING DE NOVO**

COMES NOW, PBEX, LLC and E.G.L. Resources, Inc. ("PBEX"), parties adversely affected by the Division Order R-23353, and hereby applies for a hearing *de novo* before the full Commission, pursuant to NMSA 1978, Section 70-2-13.

Respectfully submitted,

**HOLLAND & HART LLP** 

By: Michael H. Feldewert

Adam G. Rankin

Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR PBEX, LLC AND E.G.L. RESOURCES, INC. AND XTO ENERGY, INC.

AND

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 505-982-2043 jamesbruc@aol.com

ATTORNEYS FOR PBEX, LLC AND E.G.L. RESOURCES, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
earl.debrine@modrall.com
yarithza.pena@modrall.com

## Attorneys for Avant Operating, LLC

Dana S. Hardy
Jaclyn M. McLean
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
(505) 982-8623 FAX
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

Attorneys for COG Operating LLC and Concho Oil & Gas LLC

Michael H. Feldewert