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

APPLICATION OF OXY USA INC. FOR APPROVAL OF A NON-STANDARD HORIZONTAL WELL SPACING UNITY AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NOS. 24828-24829

ENTRY OF APPEARANCE AND NOTICE OF OBJECTION TO PROCEEDING BY AFFIDAVIT

Modrall, Sperling, Roehl, Harris & Sisk, P.A., (Deana M. Bennett, Earl DeBrine,

Jr., and Yarithza Peña), hereby enters its appearance on behalf of Avant Operating, LLC

("Avant") in the above-referenced matters. Avant provides notice of objection to these

matters proceeding by affidavit.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: Dema M. Bennett

Earl E. DeBrine, Jr. Deana M. Bennett Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 deana.bennett@modrall.com earl.debrine@modrall.com yarithza.pena@modrall.com

Attorneys for Avant Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Michael H. Feldewert Adam G. Rankin Paula Vance Post Office Box 2208 Santa Fe, NM 87504 mfeldewert@hollandhart.com agrankin@hollandhart.com

Attorneys for OXY USA Inc.

By: Deena M. Bennett

Deana M. Bennett