

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

**APPLICATION OF AVANT OPERATING, LLC  
FOR APPROVAL OF A NON-STANDARD UNIT,  
COMPULSORY POOLING AND, TO THE EXTENT  
NECESSARY, APPROVAL  
OF AN OVERLAPPING SPACING UNIT,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 24722**

**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**

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Yarithza Peña  
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**OTHER PARTIES**

EGL Resources

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Eagle Natural Resources, LLC

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**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 24722, Avant seeks an order from the Division approving a non-standard spacing unit and pooling all uncommitted interests within a 640-acre, more or less, Bone Spring horizontal spacing unit comprised of the N/2 of Sections 35 and 36, Township 18 South, Range 32 East, N.M.P.M., Lea County, New Mexico. Avant also seeks, to the extent necessary, approval of an overlapping spacing unit. This spacing unit will be dedicated to the following wells: the **Lone Wolf 36 Fed Com #304H, Lone Wolf 36 Fed Com #504H, and Lone Wolf 36 Fed Com #604H** wells with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 36, and a proposed last take point in the SW/4 NW/4 (Unit E) of Section 35; and the **Lone Wolf 36 Fed Com #305H, Lone Wolf 36 Fed Com #306H, Lone Wolf 36 Fed Com #505H, Lone Wolf 36 Fed Com #506H, Lone Wolf 36 Fed Com #605H, and Lone Wolf 36 Fed Com #606H** wells with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 36, and a proposed last take point in the NW/4 NW/4 (Unit D) of Section 35. The wells will be drilled at orthodox locations. This proposed horizontal spacing unit will partially overlap with a 160-acre Bone Spring horizontal spacing unit comprised of the N/2 N/2 of Section 36, Township 18 South, Range 32 East, dedicated to Mewbourne Oil Company’s Lone Wolf 36 B2DM State Com 1H well (API 30-025-42695). 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 miles south of Maljamar, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Landman: Sophia Guerra	Approx. 10 minutes	Approx. 7
Geologist: John Harper	Approx. 10 minutes	Approx. 10
Reservoir Engineer: Shane Kelly	Approx. 5 minutes	Approx. 3

### PROCEDURAL ISSUES

On October 23, 2024, EGL Resources withdrew its objection to this case proceeding by affidavit and dismissed its competing case. Thus, there are no objection to this case proceeding by affidavit and Avant intends to present this case by affidavit on October 31, 2024.

Respectfully submitted,

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

By: Deana M. Bennett

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS

Action 395647

**QUESTIONS**

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 395647
	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	3
Testimony time (in minutes)	<i>Not answered.</i>