

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

**APPLICATIONS OF AVANT  
OPERATING, LLC FOR  
COMPULSORY POOLING AND  
APPROVAL OF AN OVERLAPPING  
NON-STANDARD HORIZONTAL  
SPACING UNIT, LEA COUNTY,  
NEW MEXICO.**

**CASE NOS. 24632-24633**

**APPLICATIONS OF MAGNUM  
HUNTER PRODUCTION, INC.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 24756-24759  
CASE NOS. 24913-24916**

**APPLICATIONS OF MRC PERMIAN  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 24760-24767**

**UNOPPOSED MOTION TO MODIFY BRIEFING DATE**

Avant Operating, LLC, (“Avant”) by and through its undersigned counsel, hereby moves to modify the briefing date for the Proposed Findings of Facts and Conclusions of Law and the Closing Statement from December 23, 2024, to **February 1, 2025**.

After setting the briefing date, Coterra Energy, parent company of Magnum Hunter Production, Inc., agreed to acquire Avant’s working interest in the relevant lands. The sale is expected to close in January 2025. This acquisition would rebalance ownership in the proposed horizontal spacing units, creating a chance for an agreement. Extending the briefing deadline allows parties to negotiate under the new circumstances.

Counsel for Magnum Hunter Production, Inc. and MRC Permian Company were contacted and concur with this modification.

Respectfully submitted,

HOLLIDAY ENERGY LAW GROUP

/s/ Benjamin B. Holliday

Benjamin B. Holliday

107 Katherine Court

San Antonio, Texas 78209

Phone: (210) 469-3187

Email: ben@helg.law

*Counsel for Avant Operating, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2024, I have caused a true and correct copy of the foregoing pleading to be sent to the following counsel by electronic means:

Jennifer L. Bradfute  
jennifer@bradfutelaw.com  
Bradfute Consulting & Legal Services  
d/b/a Bradfute Sayer P.C.  
P.O. Box 90233  
Albuquerque, NM 87199

Michael H. Feldewert  
mfeldewert@hollandhart.com  
Adam G. Rankin  
agrarkin@hollandhart.com  
Paula M. Vance  
pmvance@hollandhart.com  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, NM 87504

/s/ Benjamin B. Holliday  
Benjamin B. Holliday