

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

**APPLICATIONS OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 25055-25057 &  
25059**

**ENTRY OF APPEARANCE AND NOTICE OF  
OBJECTION TO PRESENTATION BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett and Yarithza Peña), hereby enters its appearance on behalf of Avant Operating, LLC (“Avant”) in the above-referenced matters. Avant further provides notice that it objects to the above captioned cases proceeding by affidavit under Rule 19.15.4.12(A)(1)(b).

Respectfully submitted,

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

By: Deana M. Bennett

Deana M. Bennett  
Earl E. DeBrine, Jr.  
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](mailto:deana.bennett@modrall.com)  
[earl.debrine@modrall.com](mailto:earl.debrine@modrall.com)  
[Yarithza.Pena@modrall.com](mailto:Yarithza.Pena@modrall.com)  
*Attorneys for Avant Operating, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on January 2, 2025:

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com  
**ATTORNEYS FOR MEWBOURNE OIL COMPANY**

By: Deana M. Bennett  
Deana M. Bennett