

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

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

**CASE NO. \_\_\_\_\_**

**APPLICATION**

Avant Operating II, LLC (“AO II”), OGRID Number 332947, through its undersigned attorneys, hereby files this application with the Oil Conservation Division (“Division”) pursuant to the provisions of NMSA 1978, § 70-2-17, for an order (1) approving a non-standard unit to the extent necessary, and (2) pooling all uncommitted interests within a non-standard 960-acre, more or less Wolfcamp horizontal spacing unit comprised of all of Section 23 and the N/2 of Section 26, Township 20 South, Range 32 East, N.M.P.M., Lea County, New Mexico. In support of this application, AO II states as follows:

1. AO II has an interest in the subject lands and has a right to drill and operate a well thereon.
2. AO II seeks to dedicate all of Section 23 and the N/2 of Section 26, Township 20 South, Range 32 East, Lea County, New Mexico to form a 960-acre, more or less, Wolfcamp horizontal spacing unit in the Salt Lake; Wolfcamp pool (Pool code 53570) (the “Unit”).
3. AO II seeks approval of the 960-acre non-standard spacing unit because approval of this application will allow AO II to efficiently locate surface facilities, reduce surface disturbance, consolidate roads, tanks, and pipelines, and promote effective well spacing.
4. AO II seeks to dedicate the Unit to the following wells:
  - **Spicy Chicken 23-26 Fed Com #751H, Spicy Chicken 23-26 Fed Com #801H** wells with proposed surface hole locations in the NE/4 NW/4 (Unit C)

of Section 23, and proposed last take points in the SW/4 NW/4 (Unit E) of Section 26;

- **Spicy Chicken 23-26 Fed Com #701H, Spicy Chicken 23-26 Fed Com #752H, Spicy Chicken 23-26 Fed Com #802H** wells with proposed surface hole locations in the NE/4 NW/4 (Unit C) of Section 23, and proposed last take points in the SE/4 NW/4 (Unit F) of Section 26;
- **Spicy Chicken 23-26 Fed Com #702H, Spicy Chicken 23-26 Fed Com #753H, Spicy Chicken 23-26 Fed Com #803H** wells with a proposed surface hole location in the NW/4 NE/4 (Unit B) of Section 23, and a proposed last take points in the SW/4 NE/4 (Unit G) of Section 26; and
- **Spicy Chicken 23-26 Fed Com #754H, Spicy Chicken 23-26 Fed Com #804H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit B) of Section 23, and proposed last take points in the SE/4 NE/4 (Unit H) of Section 26.

5. The wells will be horizontally drilled, and the producing areas for the wells are expected to be orthodox.

6. AO II sought, but has been unable to obtain, a voluntary agreement from all interest owners in the Unit to participate in the drilling of the wells or to otherwise commit their interests to the wells.

7. The pooling of all interests in the Unit will prevent the drilling of unnecessary wells, prevent waste and protect correlative rights.

8. Approval of a non-standard spacing unit will allow AO II to efficiently locate surface facilities for the recovery of oil and gas underlying the subject lands and reduce surface disturbance.

WHEREFORE, AO II requests this application be set for hearing before an Examiner of the Oil Conservation Division on January 8, 2026, and after notice and hearing as required by law, the Division enter its order:

- A. Approving the non-standard spacing Unit;
- B. Pooling all uncommitted interests in the Unit;
- C. Designating AO II as operator of the Unit and the wells to be drilled thereon;
- D. Authorizing AO II to recover its costs of drilling, equipping and completing the wells;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

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

By: /s/ Deana M. Bennett

Earl E. DeBrine, Jr.

Deana M. Bennett

Jeff H. Goodwin

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

deana.bennett@modrall.com

jeff.goodwin@modrall.com

*Attorneys for Avant Operating II, LLC*

**CASE NO. \_\_\_\_\_ : Application of Avant Operating II, LLC for approval of a non-standard spacing unit, compulsory pooling, and, to the extent necessary, approval of an overlapping spacing unit, Lea County, New Mexico.** Applicant seeks an order from the Division approving a non-standard 960-acre, more or less, Wolfcamp horizontal spacing unit and pooling all uncommitted interests in all of Section 23 and the N/2 of Section 26, Township 20 South, Range 32 East, N.M.P.M., Lea County, New Mexico, in the Salt Lake; Wolfcamp pool (Pool code 53570). This spacing unit will be dedicated to the following wells: **Spicy Chicken 23-26 Fed Com #751H, Spicy Chicken 23-26 Fed Com #801H** wells with proposed surface hole locations in the NE/4 NW/4 (Unit C) of Section 23, and proposed last take points in the SW/4 NW/4 (Unit E) of Section 26; **Spicy Chicken 23-26 Fed Com #701H, Spicy Chicken 23-26 Fed Com #752H, Spicy Chicken 23-26 Fed Com #802H** wells with proposed surface hole locations in the NE/4 NW/4 (Unit C) of Section 23, and proposed last take points in the SE/4 NW/4 (Unit F) of Section 26; **Spicy Chicken 23-26 Fed Com #702H, Spicy Chicken 23-26 Fed Com #753H, Spicy Chicken 23-26 Fed Com #803H** wells with a proposed surface hole location in the NW/4 NE/4 (Unit B) of Section 23, and a proposed last take points in the SW/4 NE/4 (Unit G) of Section 26; and **Spicy Chicken 23-26 Fed Com #754H, Spicy Chicken 23-26 Fed Com #804H** wells with proposed surface hole locations in the NE/4 NE/4 (Unit B) of Section 23, and proposed last take points in the SE/4 NE/4 (Unit H) of Section 26. The wells will be drilled at orthodox locations. 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 II, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 36 miles southwest of Hobbs, New Mexico.