

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

**APPLICATIONS OF EARTHSTONE OPERATING,  
LLC FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NOS. 22813 & 22814**

**APPLICATION OF MATADOR PRODUCTION  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 22584**

**RESPONSE TO/SUPPORT FOR MOTION FOR CONTINUANCE**

Avant Operating, LLC (“Avant”) provides this response in support of Earthstone Operating, LLC’s (“Earthstone”) Motion for Continuance. Avant supports Earthstone’s continuance motion because Avant is in negotiations with the other parties and additional time is necessary to complete those negotiations. Alternatively, if negotiations are not successful, Avant may file competing applications, which would compete with Earthstone’s cases. Because Avant’s applications would compete with Earthstone’s applications, including competing with Case No. 22813, which is currently set for a contested hearing on June 2, a continuance of the June 2 contested hearing date is warranted to allow the Avant/Earthstone competing cases to be heard together.

Respectfully submitted,

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

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**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 May 25, 2022:

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