

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

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

Case Nos. 23970-23971

**APPLICATION OF E.G.L. RESOURCES, INC.
FOR COMPULSORY POOLING AND APPROVAL
OF AN OVERLAPPING WELL UNIT,
LEA COUNTY, NEW MEXICO.**

Case No. 24043

**APPLICATIONS OF E.G.L. RESOURCES, INC.
FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO.**

Case Nos. 24044, 24152-24153

UNOPPOSED JOINT MOTION TO AMEND PRE-HEARING ORDERS

MRC Permian Company (MRC) and E.G.L. Resources, Inc. (EGL) jointly move to amend the prehearing orders issued in EGL Cases 24043-44 and 24152-53, and the Avant Cases 23970-23971. Each of the prehearing orders set a contested hearing on April 18, 2024. MRC and EGL jointly request that the Division consolidate those pre-hearing orders and add recently filed MRC cases to the consolidated hearing on April 18, 2024. In support, MRC and EGL state:

1. The applications filed by Avant under Cases 23970-71 seek to pool the Bone Spring and Wolfcamp formations under the E2 of Sections 15 & 22, T18S, R34E, for the proposed Explorer wells.
2. The applications filed by EGL under Cases 24043-44 and 24152-53 seek to pool the Bone Spring and Wolfcamp formations under all of Sections 27 & 34, T18S, R34E, for the proposed Skyfall wells.
3. MRC has filed pooling applications under Cases 24304-24313 (Jim Rolfe wells) that seek to pool the Bone Spring and Wolfcamp formations under all of Sections 22 & 27, thereby

overlapping the Avant Explorer applications in E2 of Section 22 and the EGL Skyfall applications in all of Section 27.

4. MRC has also filed pooling applications under Cases 24287-24297 (Art Smith wells) that seek to pool the Bone Spring and Wolfcamp formations under Section 34, T18S, R34E, and adjacent Section 3, T19S, R34E, thereby overlapping the EGL Skyfall applications in all of Section 34.

5. At the February 1st status conference in these matters, the Examiner was apprised of the competing, interrelated cases and instructed the parties to amend the prehearing orders once the competing MRC cases were filed with the Division. Tr. 58-60 (2/1/24).

6. The attached plat shows how the filed applications in these cases overlap and are interrelated:

- Avant's proposed Explorer spacing units covering the E2 of Sections 15 and 22 are outlined in red on the attached plat.
- MRC's proposed Jim Rolfe spacing units covering all of Sections 22 & 27 are outlined and shaded with green.
- MRC's proposed Art Smith spacing units covering all of Sections 34 & 3 are outlined and shaded with orange.
- EGL's proposed Skyfall spacing units covering all of Sections 27 & 34 are outlined in purple and overlap both of MRC's proposed spacing units.

7. MRC and EGL wish to avoid duplicative hearings and believe it is in the best interests of the applicants and the Division to consolidate these matters for a single hearing. Indeed, MRC and EGL will be negatively impacted by bifurcating these related cases and conducting duplicative hearings:

- Bifurcating the Avant E2 cases from the remaining matters will affect EGL's applications since Section 27 is involved in both the Avant v. MRC and the MRC v. EGL cases.
 - Bifurcating the Avant E2 cases from the remaining matters will require MRC to present the same evidence on the joint development of Sections 22 and 27 twice in two separate proceedings.
8. Avant has been contacted and takes no position on this motion.
9. COG has appeared in these related matters and does not oppose these cases being heard in a consolidated fashion on April 18, 2024.

WHEREFORE MRC and EGL request that the Division modify the existing pre-hearing orders to add the recently filed MRC Cases 24304-24313 (Jim Rolfe wells) and MRC Cases 24287-24297 (Art Smith wells), and to consolidate these related cases for a contested hearing on the scheduled April 18, 2024.

Respectfully submitted,

HOLLAND & HART LLP



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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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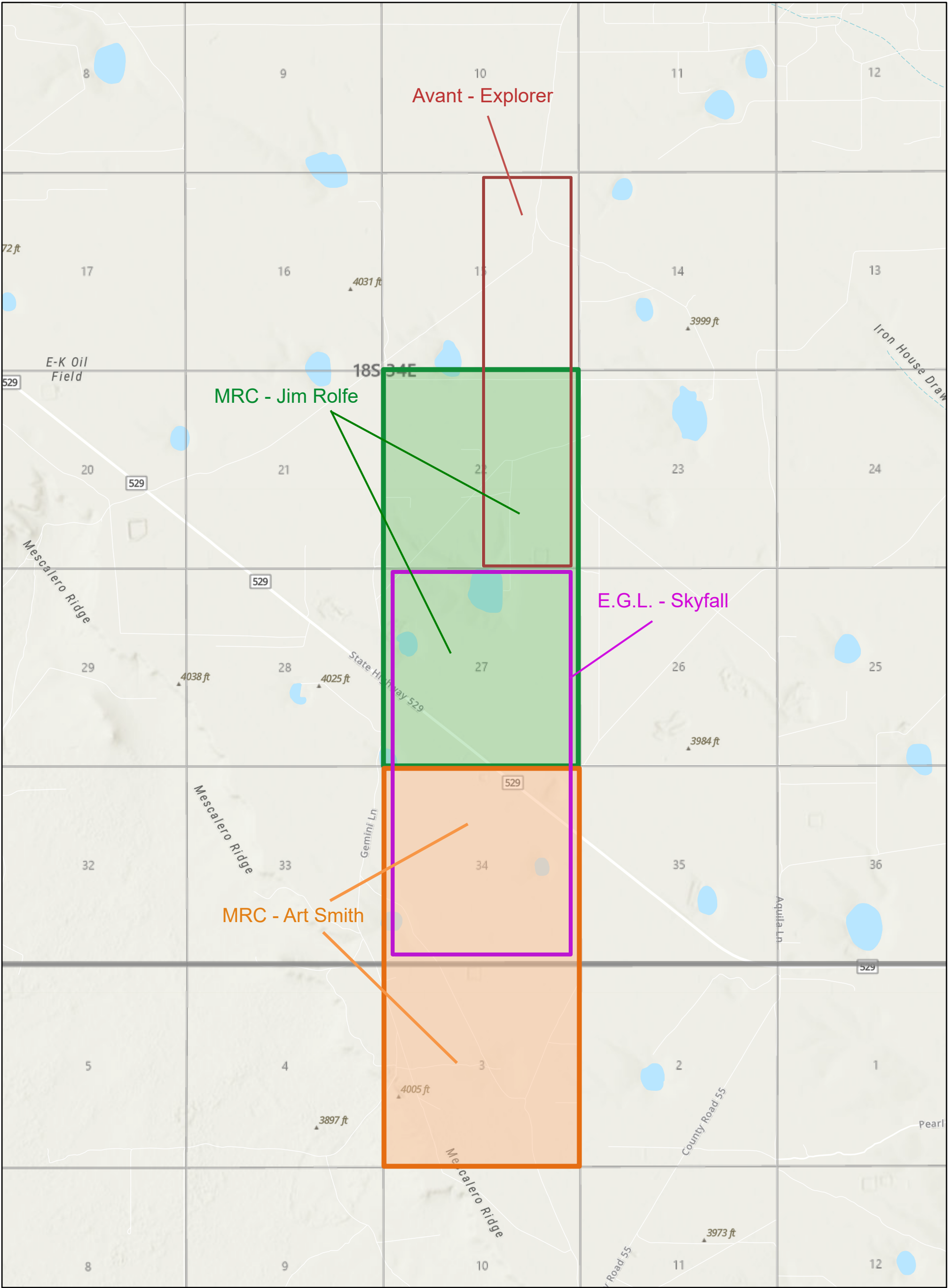
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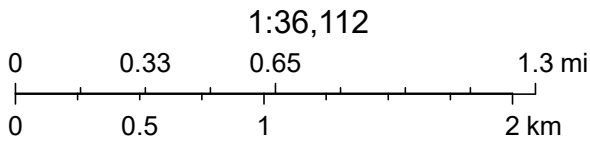
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ArcGIS Web Map



3/27/2024, 6:21:22 PM

- Matador Prospect Areas
- State
- County
- PLSSSection
- PLSSTownship



MATADOR, thudgins
Esri, NASA, NGA, USGS, FEMA
BLM, MATADOR, thudgins
IHS, MATADOR, thudgins
Texas Parks & Wildlife, Esri, TomTom, Garmin, SafeGraph,

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