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

APPLICATION OF CIMAREX ENERGY CO. OF COLORADO FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. 24579 & 24582-24584

## ENTRY OF APPEARANCE AND NOTICE OF OPPOSITION TO PRESENTATION BY AFFIDAVIT

James P. Parrot, Miguel A. Suazo, and Sophia A. Graham of Beatty & Wozniak, P.C., hereby enter their appearances on behalf of Avant Operating, LLC. ("Avant") in the above-referenced matters and further provides notice that it objects to presentation of this case by affidavit under Rule 19.15.4.12(A)(1)(b). Avant sent competing proposals to other interest owners for a portion of the subject lands and will be filing competing applications.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com

Attorneys for Avant Operating, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 4th day of June 2024, as follows:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
(970) 385-4901 Fax
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com
Attorneys for Cimarex Energy Co. of Colorado

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

Rachael Ketchledge