

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

**APPLICATION OF WATERLOO RESOURCES LLC  
FOR APPROVAL OF A 1,276.76 ACRE OVERLAPPING  
NON-STANDARD HORIZONTAL WELL SPACING UNIT  
AND COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 25602**

**SUBSTITUTION OF COUNSEL AND NOTICE OF OBJECTION TO  
PROCEEDING BY AFFIDAVIT**

EOG Resources, Inc. hereby provides notice that Jordan Kessler withdraws as counsel for EOG and Matthias Sayer enters his appearance on behalf of EOG in this matter and further provides notice of its objection to the presentation of this case by affidavit.

Respectfully submitted,

/s/ Matthias Sayer  
Matthias Sayer

Bradfute Sayer P.C.  
P.O. Box 90233  
Albuquerque, NM 87199  
Phone 307-365-1814  
[matthias@bradfutelaw.com](mailto:matthias@bradfutelaw.com)

Attorney for EOG Resources, Inc.

Certificate of Service

I certify that on October 2, 2025, I served a copy of the foregoing document to the following counsel of record via email:

Kaitlyn A. Luck  
PO Box 483  
Taos, NM 87571  
[Kaitlyn.luck@outlook.com](mailto:Kaitlyn.luck@outlook.com)

*Counsel for Waterloo Resources, LLC*

Miguel A. Suazo  
James P. Parrot  
Jacob L. Everhart  
Ryan McKee  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)  
[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)  
[jeverhart@bwenergylaw.com](mailto:jeverhart@bwenergylaw.com)  
[mckee@bwenergylaw.com](mailto:mckee@bwenergylaw.com)

*Counsel for Riley Permian Operating Company, LLC*

Deana M. Bennett  
Earl E. DeBrine, Jr.  
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)

*Attorneys for Avant Operating II, LLC*

Dana Hardy  
Jaclyn McClean  
Yarithza Peña  
125 Lincoln Ave, Ste. 223  
Santa Fe, NM 87501  
Phone: (505) 230-4410  
[dhardy@hardymclean.com](mailto:dhardy@hardymclean.com)  
[jmclean@hardymclean.com](mailto:jmclean@hardymclean.com)  
[ypena@hardymclean.com](mailto:ypena@hardymclean.com)

*Attorneys for Perry R. Bass and Sid R. Bass  
and Lee M. Bass as Co-Trustees of the Bass  
Management Trust*

/s/ Matthias Sayer  
Matthias Sayer