

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

**APPLICATION OF AVANT OPERATING II,  
LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

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

**APPLICATION**

Avant Operating II, LLC (“Avant”) (OGRID No. 332947), through its undersigned attorney, hereby files this application with the Oil Conservation Division (“Division”) pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all uncommitted interests within a standard 480-acre, more or less, Wolfcamp horizontal spacing unit comprised of the S/2 of Section 2 and the SE/4 of Section 3, Township 24 South, Range 26 East, N.M.P.M., Eddy County, New Mexico (the “Unit”). In support of this application, Avant states as follows:

1. Avant has an interest in the subject lands and has a right to drill and operate a well thereon.
2. Avant seeks to dedicate the Unit to the following wells:
  - the Casino Queen 2 3 State Com #701H well, the Casino Queen 2 3 State Com #751H well, and the Casino Queen 2 3 State Com #752H well with proposed surface hole locations in the SE/4 SE/4 (Unit P) of Section 2, and proposed last take points in the SW/4 SE/4 (Unit O) of Section 3;
  - the Casino Queen 2 3 State Com #702H well, with a proposed surface hole location in the NE/4 SE/4 (Unit I) of Section 2, and a proposed last take point in the SW/4 SE/4 (Unit O) of Section 3; and
  - the Casino Queen 2 3 State Com #703H well, and the Casino Queen 2 3 State Com #753H well, with proposed surface hole locations in the NE/4 SE/4 (Unit I) of Section 2, and proposed last take points in the NW/4 SE/4 (Unit J) of Section 3.

3. The wells will be horizontally drilled. The Unit spacing complies with the Special Pool Rules for the Purple Sage Wolfcamp Pool. Setbacks for the wells will require approval of non-standard locations.

4. Avant sought, but has been unable to obtain, a voluntary agreement from all interest owners in the Wolfcamp formation underlying the proposed Unit to participate in the drilling of the wells or to otherwise commit their interests to the wells.

5. The pooling of all interests in the Wolfcamp formation underlying the proposed Unit will prevent the drilling of unnecessary wells, prevent waste and protect correlative rights.

WHEREFORE, Avant requests this application be set for a hearing before an Examiner of the Oil Conservation Division, to be consolidated with Case Nos. 25610, 25753, and 25754, and after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in Wolfcamp formation underlying a horizontal spacing unit within the S/2 of Section 2 and the SE/4 of Section 3, Township 24 South, Range 26 East, N.M.P.M., Eddy County, New Mexico;
- B. Designating Avant as operator of this unit and the wells to be drilled thereon;
- C. Authorizing Avant to recover its costs of drilling, equipping and completing the Wells;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. 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,

A handwritten signature in blue ink, appearing to read "Kaitlyn Luck", written over a horizontal line.

Kaitlyn A. Luck

P.O. Box 483

Taos, New Mexico 87571

(361) 648-1973

kaitlyn.luck@outlook.com

***Attorney for Avant Operating II, LLC***

**CERTIFICATE OF SERVICE**

I certify that on this 17th of December 2025, the foregoing pleading was electronically filed with the New Mexico Oil Conservation Division Clerk and served on all parties of record through counsel as follows:

Freya Tschantz  
Freya.Tschantz@emnrd.nm.gov  
OCD.Hearings@emnrd.nm.gov

*EMNRD-Oil Conservation Division, Law  
Clerk*

Miguel A. Suazo  
James P. Parrot  
Jacob L. Everhart  
Ryan McKee  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
msuazo@bwenergylaw.com  
jparrot@bwenergylaw.com  
jeverhart@bwenergylaw.com  
rmckee@bwenergylaw.com

*Attorneys for Coterra Energy Operating  
Company, Magnum Hunter Production,  
Inc., and Cimarex Energy Co. of Colorado*

Deana M. Bennett  
Earl E. DeBrine, Jr.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
deana.bennett@modrall.com  
earl.debrine@modrall.com

*Withdrawing Attorneys for Avant Operating  
II, LLC*

Benjamin B. Holiday  
107 Katherine Court, Suite 100  
San Antonio, TX 78209  
ben@helg.law

*Counsel for Powderhorn Operating, LLC*

Dana S. Hardy  
Jaclyn M. McEddyn  
Yarithza Peña  
125 Lincoln Ave., Suite 223  
Santa Fe, NM 87501  
505-230-4410  
dhardy@hardymcEddyn.com  
jmcEddyn@hardymcEddyn.com  
ypena@hardymcEddyn.com

*Attorneys for Permian Resources Operating  
LLC*

**/s/ Kaitlyn A. Luck**

**CASE NO. \_\_\_\_\_: Application of Avant Operating II, LLC for compulsory pooling, Eddy County, New Mexico.** Applicant seeks an order from the Division pooling all uncommitted interests within a standard 480-acre, more or less, Wolfcamp horizontal spacing unit comprised of the S/2 of Section 2 and the SE/4 of Section 3, Township 24 South, Range 26 East, N.M.P.M., Eddy County, New Mexico. This spacing unit will be dedicated to the following wells: the Casino Queen 2 3 State Com #701H well, the Casino Queen 2 3 State Com #751H well, and the Casino Queen 2 3 State Com #752H well with proposed surface hole locations in the SE/4 SE/4 (Unit P) of Section 2, and proposed last take points in the SW/4 SE/4 (Unit O) of Section 3; the Casino Queen 2 3 State Com #702H well, with a proposed surface hole location in the NE/4 SE/4 (Unit I) of Section 2, and a proposed last take point in the SW/4 SE/4 (Unit O) of Section 3; and the Casino Queen 2 3 State Com #703H well, and the Casino Queen 2 3 State Com #753H well, with proposed surface hole locations in the NE/4 SE/4 (Unit I) of Section 2, and proposed last take points in the NW/4 SE/4 (Unit J) of Section 3. The wells will be drilled at orthodox locations. The well spacing complies with the Special Rules for the Purple Sage Wolfcamp Pool. 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 15 miles southwest of Carlsbad, New Mexico.