

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

**APPLICATION OF AVANT OPERATING II, LLC
FOR APPROVAL OF A NON-STANDARD UNIT
AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 25956-25957

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by the Avant Operating II, LLC (“Avant”) (OGRID No. 332947), the applicant in Case Nos. 25956-25957, as required by Division rules.

APPEARANCES

APPLICANT

Avant Operating II, LLC

ATTORNEY

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OPPONENT

Phillip White

ATTORNEY

Pro Se

STATEMENT OF THE CASE

In Case No. **25956**, Avant requests an order from the Division: (1) approving a non-standard unit, and (2) pooling all uncommitted interests within a non-standard 960-acre, more or less, Wolfcamp horizontal spacing unit comprised of all of Section 21 and the N/2 of Section 28, Township 20 South, Range 34 East, N.M.P.M., Lea County, New Mexico.

Avant seeks to dedicate the Unit to the following wells, to be horizontally drilled:

- **Paloma 28 21 Fed Com #751H** well with a proposed surface hole location in the SE/4 NW/4 (Unit F) of Section 28, and a proposed last take point in the NW/4 NW/4 (Unit D) of Section 21;
- **Paloma 28 21 Fed Com #752H and Paloma 28 21 Fed Com #753H** wells with a proposed surface hole location in the SE/4 NW/4 (Unit F) of Section 28, and a proposed last take point in the NE/4 NW/4 (Unit C) of Section 21;
- **Paloma 28 21 Fed Com #754H** well with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 28, and a proposed last take point in the NW/4 NE/4 (Unit B) of Section 21; and
- **Paloma 28 21 Fed Com #755H** well with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 28, and a proposed last take point in the NE/4 NE/4 (Unit A) of Section 21.

The wells will be horizontally drilled, and the producing areas for the wells are expected to be orthodox. within the WC-025-G-09 S203435D; Wolfcamp pool (Pool code 98247).

In Case No. 25957, Avant seeks an order from the Division (1) approving a non-standard unit, and (2) pooling all uncommitted interests within a non-standard 960-acre, more or less, Wolfcamp horizontal spacing unit comprised of all of Section 21 and the N/2 of Section 28, Township 20 South, Range 34 East, N.M.P.M., Lea County, New Mexico.

- **Paloma 28 21 Fed Com #801H** well with a proposed surface hole location in the SE/4 NW/4 (Unit F) of Section 28, and a proposed last take point in the NW/4 NW/4 (Unit D) of Section 21;
- **Paloma 28 21 Fed Com #802H and Paloma 28 21 Fed Com #803H** wells with a proposed surface hole location in the SE/4 NW/4 (Unit F) of Section 28, and a proposed last take point in the NE/4 NW/4 (Unit C) of Section 21;
- **Paloma 28 21 Fed Com #804H** well with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 28, and a proposed last take point in the NW/4 NE/4 (Unit B) of Section 21; and
- **Paloma 28 21 Fed Com #805H** well with a proposed surface hole location in the SE/4 NE/4 (Unit H) of Section 28, and a proposed last take point in the NE/4 NE/4 (Unit A) of Section 21.

The Lea; Penn (Gas) pool (Pool code 80040) is a gas pool which requires 330' setbacks for first and last take points, and 660' setbacks for the completed interval. AOII will request non-standard location approval to the extent necessary.


PROPOSED EVIDENCE

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|--------------------------|------------------|-----------------|
| Tiffany Sarantinos, Land | Affidavit | 4 |
| Josh Payne, Geology | Affidavit | 3 |

PROCEDURAL MATTERS

Avant requests that the Division issue orders granting the pooling applications to Avant in Case Nos. 25956-25957.

Respectfully,



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Attorney for Avant Operating II, LLC

CERTIFICATE OF SERVICE

I certify that on this 22nd of April 2026, 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:

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QUESTIONS

Action 578020

QUESTIONS

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| Operator: Avant Operating II, LLC 1515 Wynkoop Street Denver, CO 80202 | OGRID: 332947 |
| | Action Number: 578020 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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| Testimony | |
| <i>Please assist us by provide the following information about your testimony.</i> | |
| Number of witnesses | <i>Not answered.</i> |
| Testimony time (in minutes) | <i>Not answered.</i> |