

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

**APPLICATION OF AVANT OPERATING, LLC
FOR APPROVAL OF A NON-STANDARD UNIT,
COMPULSORY POOLING AND, TO THE
EXTENT NECESSARY, APPROVAL OF AN
OVERLAPPING SPACING UNIT,
LEA COUNTY, NEW MEXICO**

CASE NO. 24774

**APPLICATIONS OF MEWBOURNE OIL COMPANY
FOR APPROVAL OF AN OVERLAPPING HORIZONTAL
WELL SPACING UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 24892-24893

AVANT OPERATING, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Avant Operating, LLC ("Avant") submits this Consolidated Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Avant Operating, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

OTHER PARTIES

Mewbourne Oil Company

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

STATEMENT OF CASES

The above captioned cases involve competing development plans for the S/2 of Sections 29 and 30, Township 18 South, Range 32 East, Lea County, New Mexico. Coterra Energy (“Coterra”) only recently acquired Avant Operating, LLC (“Avant”), which includes Avant’s interest in the acreage at issue in these competing cases in a transaction which closed on January 17, 2025. Avant and Coterra are collectively referred to herein as Coterra. Coterra currently opposes the competing cases filed by Mewbourne Oil Company (“Mewbourne”). Shortly after acquiring Avant, Coterra reached out to Mewbourne to engage in discussions and good faith negotiations to resolve the issue(s) in these competing cases; these discussions and negotiations between the parties continue to this day. As part of its discussions with Mewbourne, Coterra discussed a continuance of these cases to allow additional time for further discussions with Mewbourne. Coterra also needed additional time to prepare for a contested hearing, including preparing testimony and exhibits. As a result of only recently acquiring the acreage at issue in these cases, along with other Avant acreage, Coterra is in the process of gathering information, integrating Avant’s data, evaluating this acreage and the other acreage acquired by Coterra, and this evaluation and data integration requires additional time. Coterra desires to operate and develop the acreage and units at issue in these competing cases.

Mewbourne did not agree to Coterra’s request to continue these cases. As a result, and given timing constraints, Coterra is not submitting testimony or exhibits. Coterra continues to object to Mewbourne’s applications and Coterra reserves the right to cross-examine all Mewbourne witnesses at the February 18, 2025 contested hearing. Coterra also preserves its right to seek de novo review.

The issue to be resolved at the contested hearing in these matters is whether Mewbourne should be designated operator of the acreage and units at issue.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: 

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
Deana.bennett@modrall.com
Earl.debrine@modrall.com
Yarithza.pena@modrall.com

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

By: 
Deana M. Bennett

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 431070

QUESTIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 431070
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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>