

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

**APPLICATION OF PERMIAN RESOURCES  
OPERATING, LLC FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24963**

**PERMIAN RESOURCES OPERATING, LLC'S REVISED PRE-HEARING  
STATEMENT**

Permian Resources Operating, LLC ("Permian" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Permian Resources Operating, LLC  
("Permian")

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
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**OTHER PARTIES**

American Energy Resources, LLC  
("AER")

Jonathan Samaniego  
P.O. BOX 114  
Hagerman, NM 88232

**APPLICANT'S STATEMENT OF THE CASE**

Under **Case No. 24963**, Permian seeks an order pooling a portion of the Bone Spring formation (Laguna Salado; Bone Spring [96721]), underlying a standard 633.57-acre, more or less, horizontal well spacing unit comprised of the S/2 of Section 12, Township 22 South, Range 26 East, and Lots 3-4, E/2 SW/4 and SE/4 (S/2 equivalent) of irregular Section 7, Township 22 South,

Range 27 East, NMPM, Eddy County, New Mexico, and initially dedicate the unit to the proposed **Caveman 134H** well, to be horizontally drilled from a surface location in the NW/4 SW/4 (Unit L) of Section 8, T22S-R27E, with a first take point in the SE/4 SE/4 (Unit P) of irregular Section 7, T22S-R27E, and a last take point in the SW/4 SW/4 (Unit M) of Section 12, T22S-R26E.

The completed interval of the **Caveman 134H** is expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit under 19.15.16.15.B(1)(b) NMAC.

The completed interval for the well will comply with statewide setbacks for oil wells. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing unit.

American Energy Resources, LLC ("AER") has filed an entry of appearance and objection to Permian's application. AER claims that it filed a competing application, but Permian has not received a proposal or notice of any competing application filed by AER or Jonathan Samaniego for the subject acreage. Further, based on a review of the Division's docket, it does not appear that any competing application has been filed by AER or Jonathan Samaniego for the subject acreage.

Permian is pooling AER and Jonathan Samaniego out of an abundance of caution; however, based on a recent title opinion by Permian regarding AER and Jonathan Samaniego's alleged interest, it appears that neither owns an interest in Permian's proposed spacing unit because the Quitclaim Deed from which AER/Jonathan Samaniego claim an interest is void and of no effect.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Collin Christian, Landman	Self-Affirmed Statement	Approx. 4

Tyler Chesworth, Geologist

Self-Affirmed Statement

Approx. 4

**PROCEDURAL MATTERS**

Permian reserves the right to call these or other witnesses to address issues that arise with the filing of additional information or at the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: \_\_\_\_\_

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**ATTORNEYS FOR PERMIAN RESOURCES  
OPERATING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 26, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Jonathan Samaniego  
P.O. Box 114  
Hagerman, NM 88232  
*energy.jrs@gmail.com*

***Representative of American Energy Resources, LLC***



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Paula M. Vance

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

QUESTIONS

Action 435430

QUESTIONS

Operator: Permian Resources Operating, LLC 300 N. Marienfeld St Ste 1000 Midland, TX 79701	OGRID: 372165
	Action Number: 435430
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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