

**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**

**NOTICE OF REBUTTAL EXHIBIT**

Permian Resources Operating, LLC ("Permian"), applicant in the above-referenced case, gives notice that it is filing the attached rebuttal exhibit for acceptance into the record.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
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**ATTORNEYS FOR PERMIAN RESOURCES  
OPERATING, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 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***

A handwritten signature in blue ink, appearing to read "Paula M. Vance", is written over a horizontal line.

Paula M. Vance

**SELF-AFFIRMED STATEMENT OF JAMES H. DUPUIS, JR.**

1. My name is James H. Dupuis, Jr. I am a title attorney and the founder of Dupuis Law Firm, PLLC.

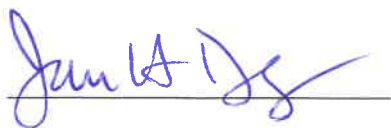
2. I have not previously testified before the New Mexico Oil Conservation Division ("Division") as an expert witness in petroleum land matters. Attached to my statement is a copy of my biography from my firm website. I respectfully request that my credentials be accepted as a matter of record, and I be tendered as an expert in land matters.

3. I am familiar with the application filed by Permian Resources, Operating, LLC in Case No. 24963, and I am familiar with the status of the lands in the subject area.

4. I have reviewed the Quitclaim Deed dated April 6, 1994 from Bradley T. Light, to Cavern City Cinemas, Inc., recorded in Book 184, Page 1069, of the Official Public Records of Eddy County, New Mexico.

5. Based on my title examination, it is my opinion that the Quitclaim Deed is void and of no effect. *See Permian Rebuttal Exhibit 1.*

6. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.



James H. Dupuis, Jr.



Date



## Jimmy Dupuis

### Jimmy Dupuis



Jimmy Dupuis is the founder of Dupuis Law Firm, PLLC. He has more than 20 years of experience representing energy clients in Colorado, Louisiana, New Mexico, Oklahoma, and Texas.

His oil and gas work includes advising and assisting operators and non-operators in all phases of exploration and production, including land and title issues, and operational and regulatory issues. He has extensive experience preparing title opinions, negotiating and drafting contracts, and performing due diligence in connection with the acquisition and divestiture of oil and gas assets.

His renewable energy work includes negotiating and drafting solar leases, and advising on surface and oil gas issues. He performs due diligence, negotiates and drafts contracts, resolves issues presented by severed estates, and works to cure title and survey issues.

He also has experience in real estate, including purchase, sale, financing, and leasing transactions involving commercial properties, and in business matters, including entity selection and formation, and negotiating and drafting contracts.

Jimmy is a frequent speaker and panelist at industry events, including the Rocky Mountain Mineral Law Foundation, Kuntz Conference on Natural Resources Law and Policy, Louisiana Mineral Law Institute, AAPL, HAPL, NHAPL, NALTA, ATX-ALTA, LAPL, DAPL, BRAPL, ALTAPL, DFW-ALTA, and the Southwest Land Institute. He also frequently gives in-house educational presentations to land and legal departments in upstream oil and gas companies.

**Education:**

- B.S. from University of Louisiana at Lafayette in 1994
- M.S. from University of Memphis in 1998
- J.D. from LSU Law Center in 2001, where he was a member of the Order of the Coif and the Louisiana Law Review

**Admissions:**

- Colorado
- Louisiana
- New Mexico
- Oklahoma
- Texas

**Professional and Community Involvement:**

- Texas Bar Association, Oil, Gas & Energy Resources Section and Real Estate, Probate, and Trust Law Section
- Houston Bar Association, Oil, Gas & Mineral Law Section and Real Estate Section
- The Woodlands Bar Association
- Colorado Bar Association
- Louisiana Bar Association
- New Mexico Bar Association
- Oklahoma Bar Association, Energy and Natural Resources Section
- Rocky Mountain Mineral Law Foundation
- American Association of Professional Landmen (AAPL)
- Houston Association of Professional Landmen (HAPL)
- North Houston Association of Professional Landmen (NHAPL)
- West Houston Association of Professional Landmen (WHAPL)
- Permian Basin Landmen's Association (PBLA)
- Oklahoma City Association of Professional Landmen (OCAPL)
- The Woodlands Area Economic Development Partnership
- The Woodlands Area Chamber of Commerce



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2170 Buckthorne Pl., Suite 220  
The Woodlands, TX 77380

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The Woodlands, TX 77380

December 19, 2024

Permian Resources Operating, LLC  
300 N. Marienfeld St., Ste. 1000  
Midland, TX 79701

Attn: Collin Christian

RE: 0.10 acres in the SE/4 of SE/4 of Section 7, T22S-R27E, N.M.P.M.,  
Eddy County, New Mexico

Dear Collin:

You have asked for our opinion on the effect of a Quitclaim Deed dated April 6, 1994 from Bradley T. Light, said to be a married man, to Cavern City Cinemas, Inc., recorded in Book 184, Page 1069, of the Official Public Records of Eddy County, New Mexico (the "Quitclaim Deed"). Jonathan R. Samaniego claims to own an interest in the 0.10 acre tract described in the Quitclaim Deed (the "Property"), and his title derives from said deed. For the reasons discussed below, it is our opinion that the Quitclaim Deed is likely void and of no effect because it was signed only by Bradley T. Light, and not by his spouse.

The grantor in the Quitclaim Deed, Bradley T. Light, acquired his interest by seven (7) Quitclaim Deeds in October 1993<sup>1</sup>, at a time when he was apparently married to Misty G.E. Light.<sup>2</sup> As such, the Property is presumed to be community property.<sup>3</sup> This presumption can be rebutted by several

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<sup>1</sup> Recorded in Book 171, Page 843; Book 171, Page 844; Book 171, Page 845; Book 171, Page 846; Book 171, Page 847; Book 171, Page 848; and Book 171, Page 849, of the Official Public Records of Eddy County, New Mexico.

<sup>2</sup> There is a Warranty Deed dated January 6, 1993 that conveys unrelated property, wherein Bradley T. Light states that he was married to Misty G.E. Light, recorded in Book 144, Page 874, of the Official Public Records of Eddy County, New Mexico.

<sup>3</sup> N.M. Stat. Ann. § 40-3-8.

December 19, 2024

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circumstances, none of which appear to be present in this case.<sup>4</sup> According to New Mexico law<sup>5</sup>, a conveyance of community property made by only one spouse without the joinder of the other is void and of no effect. Therefore, because Misty G.E. Light did not join in the Quitclaim Deed, it would appear to be void and of no effect, and, thus, Jonathan R. Samaniego, cannot claim any interest through such deed.

We trust that the foregoing is helpful and addresses your concerns. If you have any questions or need anything else, please notify the undersigned.

Sincerely,

**DUPUIS LAW FIRM, PLLC**

/s/ James H. Dupuis, Jr. \_\_\_\_\_

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<sup>4</sup> The Property was not acquired by gift, bequest, devise or descent, and we find no evidence of a written agreement by Bradley T. Light and Misty G.E. Light designating the Property as separate.

<sup>5</sup> N.M. Stat. Ann. § 40-3-13.