

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

APPLICATIONS OF MRC PERMIAN COMPANY  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.

CASE NOS. 25247-25248,  
25250, & 25252-25254

RESPONSE TO THE RESPONSE TO MOTION TO STRIKE

American Energy Resources LLC (“American”) hereby submits this response to MRC Permian Company (“MRC”) response to motion to strike.

An operator that operates more than a thousand wells is out of compliance if the operator has more than ten wells that have not been properly plugged and abandoned in accordance with 19.15.25.8 NMAC. See 19.15.5.9(A)(4)(d) NMAC. The Division “makes available on its website, and update[s] daily, an ‘inactive well list.’” 19.15.5.9(B)(1) NMAC.

Matador Production Company (OGRID No. 228937) (“Matador”) is an affiliate of MRC and is the designated operator of its wells. The Division’s records show that Matador currently operates 1,749 total wells, 1,071 active wells, 652 APDs permits, and 18 wells in violations in New Mexico and Matador does show to have six wells listed on the Division’s Inactive Well List, Furthermore, American has provided a list of exhibits attached listed that are of MRC 18 wells that are in violation of State Law, NMAC, NMAS, Oil and Gas Act;

See (all the “Attachments”) regarding the 18 wells in violation.

American has provided by the burden of proof that MRC is in fact not in compliance with State Law, NMAC, NMAS, Oil and Gas Act, and the Division rules and therefore does not have standing to file its pooling applications.


Jessie Tremeine and Dean McClure acting through the Division as the Division enforcers should have been concerned about all these 18 wells in violation that MRC operates.

MRC has made no good faith efforts to get these 18 wells in violation back into compliance with State Law, NMAC, NMAS, Oil and Gas Act.

19.15.5.8 Enforcement of Statutes and Rules, for the Division to grant permits to MRC while MRC is in violation with State law, NMAC, NMAC, Oil and Gas Act would be a violation of State law itself, under Division duties to protect public health and environment.

WHEREFORE, American Energy Resources LLC respectfully requests that MRC Production Company filed pooling application by affidavit and cases be terminated, canceled, dismissed on the grounds of MRC not being in compliance with State Law, NMAC, NMAC, Oil and Gas Act and furthermore MRC be stricken from the record.

Respectfully

A handwritten signature in black ink, appearing to read "Jonathan S. Maniego", is written over a horizontal line.

Jonathan S. Maniego

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Representative of American Energy Resources LLC

### CERTIFICATE OF SERVICE

I hereby certify that a true a correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via Electronic mail on May 21, 2025:

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ATTORNEYS FOR MRC PERMIAN COMPANY

AND MATADOR PRODUCTION COMPANY