

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

MOTION TO STRIKE


American Energy Resources LLC ("American") hereby submits this motion to strike MRC Permian Company ("MRC") and their application from the record in its entirety.

Matador is an operator in violation with State law, NMAC, NMAS, the Oil and Gas Act, and has made no good faith efforts to correct their current 18 well violations, obtain adequate financial assurances, or correct their number of wells out of compliance with State law and Rules.

MRC to be allowed to proceed with compulsory pool hearings would be a violation of State law itself under Division obligated duties to protect human health and the environment.
NMAC 19.15.5.8

WHEREFORE, American respectfully requests that MRC application be denied by the Division.

Respectfully,



Jonathan Samaniego
(575)413-7330
P.O. Box 114 Hagerman, NM 88232
Energy.jrs@gmail.com
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 June 05, 2025:

Holland & Hart LLP

Michael H. Feldewert

Adam G. Rankin

Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR MRC PERMIAN COMPANY AND MATADOR PRODUCTION COMPANY