

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

**APPLICATION OF AMERICAN**  
**ENERGY RESOURCES LLC,**  
**FOR DE NOVO HEARING,**  
**EDDY COUNTY, NEW MEXICO**

**WRITTEN APPLICATION FOR DE NOVO HEARING**

American Energy Resources LLC (American) hereby submits this written application for de novo hearing before the commission, involving case no 24517            19.15.4.23 (A) NMAC

American is an effected party and believes the Hearing Examiner Gregory Chakilian order in Case No 24517 to be erroneous.

Applicants did not notify an effected party such as American.

American by the burden of proof, has provided to the Division the chain of title of American ownership in the Champlin lease and lands that are all recorded at the Eddy Couty Clerk's Office.

American ownership through chain of title are all filed and recorded documents, recorded in good faith efforts by all Assignees that acquitted this ownership.

Wildcats Energy mailing address is in fact on the assignment obtained by Texoma dated May 3, 2000, Bk:384 Page: 209.

The Plaintiffs requesting the quiet title had an obligational duty with respect to the quiet title process and courts to do a proper title search of the lands in which they were quiet titling.

The Applicant to make such determinations of what the Plaintiffs intentions were in their quiet title is without standing or merit.

Plaintiffs had good intent to quiet title what interests Plaintiffs sought in their quiet title and for the Applicant to use such quiet title to overreach with intent to expand the quiet title to gain more interests is unethical and without standing.

The Plaintiffs did have intentions to quiet title the lease interests they sought, though it is also clear that through their title search efforts and quiet title filing had no intentions on quiet title any interests owned by Wildcat Energy.

American has lease ownership in the Champlin lease and lands and with American ownership in the Champlin lease and lands it operates the (API: 30-015- 23801) Rio Penasco KD Com #003.

Therefore, to aggressively mute American and to silence American right to speak from presenting its defense or to protect its correlative rights, is erroneous, that will in fact cause great irreversible future harm to an effected party such as American.

American is an effected party and has provided a lot of evidence through the burden of proof withstanding for a hearing before the commission.

Respectfully Submitted,

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Jonathan Samaniego

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**Representative for 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 February 17, 2025:

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