

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

**NOTICE OF VIOLATION ISSUED TO:
GRAND BANKS ENERGY CO., OGRID
#155471**

CASE NO. 25895

**GRAND BANKS ENERGY COMPANY'S
PRE-HEARING STATEMENT**

Grand Banks Energy Company ("GBEC") submits this Pre-Hearing Statement pursuant to NMAC 19.15.5.10 (E)(2)(e).

I. IDENTIFICATION OF PARTY AND COUNSEL

GBEC is represented by the undersigned counsel.

II. STATEMENT OF THE CASE

This matter arises from two alleged releases and venting or flaring of natural gas associated with the Anderson Ranch Units #4, #14, and associated tank battery. GBEC has cured some of the violations, including the filing of missing reports. There are other issues that have been raised by the OCD not included in this case for which GBEC lacks the financial resources to cure.

III. PROPOSED EVIDENCE

WITNESSES:

1. John Kimberly, President.

Mr. Kimberly is the President of GBEC and assumed that role upon the passing of his father. Mr. Kimberly will testify as to what remediation work has been performed and GBEC's finances.

IV. PROCEDURAL MATTERS

GBEC has not identified any procedural matters to be resolved prior to the hearing.

Respectfully submitted,
/s/ Frank B. Lyon
Frank B. Lyon
Law Office of Frank Lyon
Physical Address:
3800 N Lamar Blvd Ste 200
Austin, TX 78756
Mailing Address:
PO Box 50210
Austin, TX 78763
frank@franklyon.com

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing was served on February 19, 2026, via email to the following parties:

Jesse Tremaine
Legal Director, OCD
New Mexico Energy, Minerals and Natural Resources Dept.
JesseK.Tremaine@emnrd.nm.gov

Freya Tschantz
Oil Conservation Commission Clerk
Freya.Tschantz@emnrd.gov

/s/ Frank B. Lyon

Frank B. Lyon