

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

**APPLICATION OF CHEVRON U.S.A. INC.
TO REOPEN CASE NO. 24185 (ORDER NO.
R-23684 (E.G.L. RESOURCES, INC.) AND
CASE NO. 24186 (ORDER NO. R-23685
PBEX, LLC) TO REQUIRE SUBMISSION
OF A PROPER STATEMENTS OF WELL
COSTS BY OPERATOR AND RECOGNIZE
THE CONSENTING STATUS OF CHEVRON**

CASE NO. 25878

NOTICE OF PROPOSED SUBPOENA DUCES TECUM

Pursuant to the direction of the hearing officer at the March 10, 2025 status conference, Chevron U.S.A. Inc. submits a proposed subpoena to be issued by the Division attached hereto as Exhibit "A".

The parties were unable to reach agreement concerning the scope of discovery for the hearing of this case, given that: (1) PBEX, LLC and E.G.L. Resources, Inc. (collectively "PBEX") are seeking (1) information concerning well proposal in pooling cases extending back to January 1, 2022 that is burdensome and irrelevant; (2) information that is publicly available on the Division's website and is equally accessible to both parties; and (3) the deposition of Chevron representatives that are not authorized Division rules which only authorize the issuance of a subpoena "for attendance at a hearing" (not depositions) or for the "production of books, papers, records, other tangible things or electronic data in advance of the hearing." 19.15.4.16(A) NMAC.).

In the event the Division is inclined to allow the expansive, litigation-style discovery sought by PBEX, Chevron reserves the right to seek correlatively broad documents requests and depositions.

Respectfully submitted,
MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: /s/ Earl E. DeBrine, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel by electronic mail on March 13, 2026:

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