

**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. 24886 (ORDER NO. R-23685  
PBEX, LLC) TO REQUIRE SUBMISSION  
OF PROPER STATEMENTS OF WELL  
COSTS BY OPERATOR AND RECOGNIZE  
THE CONSENTING STATUS OF CHEVRON.**

**CASE NO. 25878**

**PBEX, LLC AND E.G.L. RESOURCES, INC.'S  
PRELIMINARY WITNESS DISCLOSURE**

Pursuant to an agreement with Chevron U.S.A., Inc. ("Chevron"), PBEX, LLC and E.G.L. Resources, Inc., an affiliate of PBEX, LLC (collectively, "PBEX"), submit their Preliminary Witness Disclosure. At this time, PBEX intends to present testimony of the following witnesses at hearing.

1. Ruth Pelzel  
c/o Hardy McLean LLC  
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Santa Fe, NM 87501  
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Ms. Pelzel is a Senior Landman with PBEX and will testify regarding land matters raised by Chevron in its application. Her testimony will address PBEX's activities both leading up to and following issuance of Order Nos. R-23684 and R-23685 ("Orders"), including, but not limited to, communications and discussions with Chevron, post-order well proposals, Chevron's elections under the Orders, information provided to Chevron, operatorship under the Orders, and compliance with the Orders.

2. Brianna Aylesworth  
c/o Hardy McLean LLC  
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Ms. Aylesworth is the Lead Reservoir Engineer for PBEX and will testify regarding PBEX's permitting, well planning, and drilling of the Bond Wells in Lea County, New Mexico, and will explain the basis for PBEX's well proposals under the Orders. Her testimony will describe PBEX's pooling applications and the wells authorized by the Division (including designated proximity wells) and subsequently drilled by PBEX. Ms. Aylesworth will address Chevron's allegations that PBEX proposed or drilled wells different from those approved and will explain why the proposed and drilled wells comply with the Orders. She will also testify regarding the timing of drilling operations, confirming that the Bond Wells were drilled in accordance with regulatory approvals.

3. Ashley Roush  
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Ms. Roush is Director of Land with PBEX and has worked for various operators, including COG Operating LLC, over the past 13 years. She will testify regarding the industry standards and

practices that apply to post-order well proposals and will explain that PBEX's actions regarding the Bond Wells complied with those standards and practices.

4. Keith B. Hall  
LSU Law Center, Rm. 406B  
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Baton Rouge, LA 70803-1000  
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Mr. Hall is the Nesser Family Chair in Energy Law, Campanile Charities Professor of Energy Law, and John P. Laborde Endowed Professorship in Energy Law 3 and 4 at Louisiana State University. He is also Director of the John P. Laborde Energy Law Center and Director of the Mineral Law Institute and teaches Mineral Rights, International Petroleum Transactions, Energy Law & Regulation, and Civil Law Property. Mr. Hall is expected to testify regarding oil and gas regulatory policy and practice, including that allowing a non-operator who executed an election letter to later challenge that election in order to reopen or undermine a pooling order would constitute poor regulatory policy. He will explain that election letters are relied upon by operators, non-operators, and regulatory agencies to promote finality, certainty, and orderly development, and that permitting post hoc challenges would destabilize pooling orders, discourage reliance on elections, invite strategic behavior, and undermine the efficient administration of oil and gas regulation.

5. PBEX reserves the right to identify and call any witnesses identified by Chevron.
6. PBEX reserves the right to identify and call additional witnesses for purposes of rebuttal.
7. PBEX reserves the right to modify, amend, or supplement this witness disclosure as additional information becomes available or as otherwise appropriate.

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon the following counsel of record by electronic mail on May 1, 2026.

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