

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

FOR THE CONSIDERATION OF:

APPLICATION OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 24674
ORDER NO. R-21104-F

APPLICATION OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 25137
AMENDED CASE NO. 24837
OCDER NO. R-23748

APPLICATION OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 22536
ORDER NO. R-21123-C

APPLICATION OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 24963
AMENDED CASE NO. 25233
ORDER NO. R-21096-F

APPLICATION OF PERMIAN RESOURCES
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

CASE NO. 26060

MOTION FOR SANCTIONS AND PENALTIES AND DISCIPLINARY ACTION

American Energy Resources LLC (“American”) hereby submits this motion for sanctions and penalties and disciplinary action pursuant to the rules of the Oil Conservation Division (“Division”) against Permian Resources Operating LLC counsel Paula Vance for the following reasons:

Permian Resources Operating LLC counsel Paula Vance claims were intentionally fraudulent with intent, where four elements exist, and can be proven, and are as follows:

- 1) False Representation: The person made a false statement, misrepresents a material fact, or conceals vital information.
- 2) Knowledge of Falsity: The person making the statement knows it is untrue or acts with reckless disregard for the truth.
- 3) Intent to Induce Reliance: The deception is deliberately designed to manipulate you into taking a specific action.
- 4) Reliance and harm: The person relied on mis information so that you would believe the lie.

Therefore, because of the reasons and elements that evidently exist in the subject matter and the fact that the deception, misinformation, and manipulation was witnessed by most of the Division members and Examiner that in fact relied on the deception, mis information, and manipulation in its ruling as orders causing an erroneous chain of events that ultimately lead to the unjust and unethical frivolous dismissal of four of American cases before the process of hearing, cases that in fact were very relevant to the subject matter as an owner of interest as American has provided as burden of proof by providing evidence with standing and merits that over rule Permian counsel willfully frivolous claims.

Under New Mexico law, the obligation to report Attorney misconduct is outlined in **Rule 16-803(A) NMRA** of Rules of Professional Conduct.

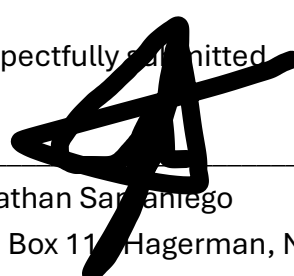
This rule states that an attorney who knows another lawyer has committed an ethical violation that raises a substantial question about their honesty, trustworthiness, or fitness to practice must inform the appropriate professional authority.

Which any reasonable person would agree that Permian counsel Paula Vance frivolous claims resulted in the frivolous dismissal of cases CASE NO. 24674, CASE NO. 22536, CASE NO. 24963 and AMENDED CASE NO. 25233 that were in fact relevant to the case subject matter, and such unjust and unethical acts would be considered dishonest, untrustworthy, and not fit to continue this case matter in its entirety due to already witnessed unprofessionalism of Paula Vance that raises further concerns to ethics, standards, and her professionalism that all should be in severe question.

CONCLUSION

Under the code of conduct the necessary action is more than appropriate and the Division and its attorneys or members whom are licensed attorneys must all issue necessary sanctions and penalties and disciplinary actions against Permian and Paula Vance, simultaneously, given the willful acts of deception, misinformation, and manipulation that took place so early in these subject matter cases by Permian and Paula Vance, and under **Rule 16-803(A) NMRA** of Rules of Professional Conduct all licensed attorneys are obligated to professional conduct and **“must”** report misconduct which American is requesting with standing and merits as further relief.

Respectfully submitted,



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CERTIFICATE OF SERVICE I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico New Mexico Oil Conservation Commission and was served on counsel of record via electronic mail on June 14, 2026:

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