

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

**APPLICATIONS OF READ & STEVENS, INC.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NOS. 24941-24942**

**APPLICATION OF READ & STEVENS, INC.  
FOR APPROVAL OF AN OVERLAPPING  
HORIZONTAL WELL SPACING UNIT AND  
COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 25145**

**APPLICATIONS OF READ & STEVENS, INC.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NOS. 25146-25148**

**APPLICATIONS OF V-F PETROLEUM INC.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NOS. 24994-24995 & 25116**

**APPLICATIONS OF V-F PETROLEUM INC.  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO**

**CASE NOS. 25115 & 25117**

**RESPONSE TO V-F PETROLEUM INC. MOTION TO LIMIT**

Read & Stevens, Inc. and Permian Resources Operating, LLC (collectively “Permian”), hereby submits this response to V-F Petroleum Inc.’s (“V-F”) motion to limit.

First, it is unclear why V-F continues to argue on behalf of Carolyn Beall (“Ms. Beall”) when she has her own representation. *See* Tr. 2/27/25, page 174, lines 17-22. Second, all the parties agree the Division does not have jurisdiction to adjudicate title; however, the examiner

“may admit relevant evidence, unless it is immaterial, repetitious or otherwise unreliable.”

19.15.4.17.A NMAC. Both V-F and Ms. Beall filed title instruments to support their cases, and the Division used its discretion to admit those documents into the record. Permian is merely asking that the same discretion be extended to its own filings. *See* V-F Consolidated Hearing Packet, pages 475-484 (Rebuttal Exhibit 1A and 1B); *see also*, Beall Hearing Exhibits and Notice Ownership Interest. Third, there is no depth severance in the S/2 N/2 of Section 14. If V-F believes so vehemently that there is a depth severance in this acreage, then it can provide its own evidence to support this claim. Lastly, there is only one party taking a “second run” at anything in these cases and that is Ms. Beall, who has flip flopped on what her interest might be in Case No. 25146. *See* Permian Response to Beall Motion to Limit.

Permian did not turn this into a title dispute—Ms. Beall did. V-F is using Ms. Beall’s confusion over her own interest<sup>1</sup> to drag out the proceedings by filing additional, unnecessary motions and briefs. This is simply another orchestrated delay tactic by V-F and Ms. Beall, and it should not be tolerated by the Division. Permian completed title. It knows the interests involved in its cases, and those specifically in Section 14. V-F does not and apparently Ms. Beall does not either. *Id.*

For the above stated reasons, Permian respectfully requests that the Division deny V-F’s motion, and further requests that its motion to strike be granted and Ms. Beall’s notice of intervention and opposition to presentation by affidavit in Case No. 25146 be excluded from consideration by the Division.

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<sup>1</sup> Ms. Beall has made multiple conflicting arguments on what her interest is in Case No. 25146. *See* Permian Response to Beall Motion to Limit.

Respectfully submitted,

**HOLLAND & HART, LLP**



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**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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