

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

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

**CASE NO. 24963**

**OPPOSE MOTION TO STRIKE AND REQUEST FOR DISMISSAL**

American Energy Resources LLC ("AER") hereby submits this Oppose motion to strike and request for dismissal of the entirety of the applicants application and case 24963, submitted by Permian Resources Operating LLC for the following reasons:

1)Permian Resources Operating LLC, sworn statement was not notarized as required under 19.15.4.12(C). Permian Resources Operating LLC in fact failed to follow procedure.

AER's, thirty party landman at Maclind Land Services L.L.C., signed and had notarized a sworn statement within proper procedure requires of 19.15.4.12(C) that applicants shall provide with all submittals sworn and notarized statements,

2) Permian Resources Operating LLC, entered a sworn statement signed by an employee of Permian Resources Operating LLC as the senior landman, which greatly increases the risk of unfair and bias practices and perspectives.

AER ownership was provided by a third party.

3) Permian Resources Operating LLC, motion to strike AER from the record was unjustified.

Upon the Division requesting that Permian motion to strike AER from the record should been seen as unjustified tactics to speed up proceedings, regardless of the future damages to AER.

AER, has provided upon the division its burden of proof that in fact American Energy Resourcecs LLC and representative of AER Jonathan Samaniego in fact does own an interest in the subject lands Permian seeks to pool.

See Exhibit "A" sworn statement of Lindsey Sandoval, Mclind Land Services L.L.C.

A party may only enter an appearance to an adjudicatory proceeding if they are entitled to notice. 19.15.4.10. (B) NMAC.

4) Permian by its own statement in their filed motion to strike, admitted to not providing notice to American Energy Resources, LLC, nor its representative Jonathan Samaniego.

The applicant must provide notice to each owner of an interest in the mineral estate 19.15.4.12 (1)(A) NMAC.

Permian failed at procedural obligations to notify interest owners in the said mineral estate, with total disregard for the future damages to AER.

5. Permian motion to strike and statements that AER nor Jonathan Samaniego does not own an interest in the mineral estate.

A party may only enter an appearance to an adjudicatory proceeding if they are entitled to notice. 19.15.4.10.(B) NMAC. Notice is provided to each owner of an interest in the mineral estate that an applicant seeks to pool.

AER upon the burden of proof, provided its ownership in the mineral estate, and the burden of proof required to Deny the Motion to Strike AER from the record.

WHEREFORE, AER respectfully requests that Permian Resources Operating, LLC's motion to strike AER from the record be Denied.

AER, motions to Strike the Ownership breakdown and Sworn statement that Collin Christian provided and entered as evidence in this case, to be denied and removed from the record, for being improper with procedure requirements.

AER, furthermore, motions to strike the entirety of Permian application and case for being grossly negligent in their application.

Respectfully submitted,



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Jonathan Samaniego

P.O. Box 114 Hagerman, NM 88232

**Representative for American Energy Resources LLC**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true a correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via Electronic mail on December 2, 2024:

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