

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

**IN THE MATTER OF THE PROPOSED  
AMENDMENTS TO THE COMMISSION'S  
RULES ON RELEASES,  
19.15.29.6 AND 19.15.29.8, AND 19.15.29.15 NMAC**

**CASE NO.: 21834**

**INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO'S  
PRE-HEARING STATEMENT**

Independent Petroleum Association of New Mexico ("IPANM") submits its Pre-Hearing Statement in accordance with Rule 19.15.3.11(B) NMAC.

**I. STATEMENT OF THE CASE**

IPANM is participating in the rule making proceeding in which the New Mexico Oil Conservation Division ("OCD") proposes to revise three sections of Rule 19.15.29 NMAC, those being Sections 6, 8(A) and 15.

**II. PROPOSED MODIFICATIONS**

IPANM is informed that OCD proposes to modify the changes to the rule making initially noticed to add the phrase "Except as provided in Parts 27 or 28" to new Section 8(A). IPANM supports this modification. IPANM does not propose any additional modifications but, if any other modification is proposed, reserves the right to comment, present evidence and argument upon, or propose modifications to any other suggested modifications that may be suggested.

**III. TESTIMONY AND EXHIBITS**

In consulting with the parties who have appeared in these proceedings prior to the submission of this Pre-Hearing Statement (OCD, WildEarth Guardians and the New

Mexico Oil and Gas Association), IPANM understands that the only testimony and exhibits proposed are those disclosed in OCD's Pre-Hearing Statement. Accordingly, IPANM does not presently anticipate any witness testimony or additional exhibits. IPANM reserves the right to call additional witnesses to testify and offer exhibits regarding the modifications proposed by any other parties and in the event that other testimony or modifications are proposed.

#### **IV. PROCEDURAL MATTERS**

At this time, IPANM is not aware of any procedural matters to be resolved prior to the hearing.

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Pre-Hearing Statement of the Independent Petroleum Association of New Mexico* was e-mailed to the following on this 26<sup>th</sup> day of May, 2021:

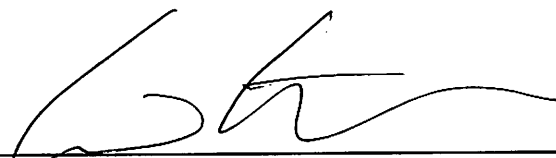
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