

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

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION
FOR ADOPTION OF AMENDMENTS TO RULE 19.15.17 (THE PIT RULE);
STATEWIDE.**

CASE NO. 14292

**THE NEW MEXICO OIL CONSERVATION DIVISION'S
PRE-HEARING STATEMENT**

1. This Pre-Hearing Statement is filed by the New Mexico Oil Conservation Division (the Division).

2. The Division's attorney is:

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3. Witnesses:

The names of the witnesses that the Division expects to call at the hearing, a concise statement of each witness's testimony, the estimated time needed for each witness's direct testimony and the estimated total time for the Division's presentation is as follows:

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	Direct Testimony	Cross Examination	Total
Theresa Duran-Saenz	.25 hrs	0	.25 hrs
Brad Jones	2.0 hrs	1.0 hrs	3.0 hrs
Edward J. Hansen	<u>0.5 hrs</u>	<u>0.5 hrs</u>	<u>1.0 hrs</u>
Total	<u>2.75 hrs</u>	<u>1.5 hrs</u>	<u>4.25 hrs</u>

Ms. Duran-Saenz will testify concerning notices.

Mr. Jones will explain the changes that the proposed amendment makes in the provisions of the existing Pit Rule concerning replacing or retrofitting existing below-grade tanks to comply with certain requirements, compliance timeframes relating to existing below-grade tank and lined, permanent-pit application submittals and chloride limits for closure of temporary pits or drying pads by on-site trench burial.

Mr. Hansen will testify, based on modeling using the HELP and MULTIMED models, to the probable time and extent of chloride contamination to groundwater that can be expected from on-site trench burial of wastes containing the maximum chloride contamination allowed by the proposed amendments.

4. Expert Witnesses' Qualifications are shown in the following exhibits which are being filed herewith:

<u>Witness</u>	<u>Exhibit</u>
Brad Jones	5
Edward J. Hansen	7

5. Copies of all exhibits that the Division will offer are filed herewith.

RESPECTFULLY SUBMITTED,



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