

**STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION**

**IN THE MATTER OF PROPOSED  
AMENDMENTS TO 19.15.2, 19.15.5,  
19.15.8, 19.15.9, AND 19.15.25 NMAC**

**CASE NO. 24683**

**APPLICANTS' NOTICE OF FILING [PROPOSED] POST-HEARING PROCEDURAL  
ORDER**

Applicants file the attached [Proposed] Post-hearing Procedural Order to govern filing post-hearing briefs and the Oil Conservation Commission ("Commission") deliberations. The proposed order contemplates that the parties will briefs and Commission deliberations will conclude by January 16, 2026, as requested by the Commission. The proposed order contemplates that Commission would begin deliberations January 14, 2026, but the parties recognize that the Commission will determine the date/s of deliberations.

Applicants' counsel sought concurrence of all parties prior to filing the proposed order. Independent Producers Association of New Mexico, New Mexico Oil and Gas Association, Oil Conservation Division, OXY USA, Inc., and the State Land Office/Land Commissioner concur in the proposed order. EOG Resources, Inc. and New Energy Economy have not responded. Nick Maxwell offered revisions.

Respectfully submitted,

/s/ Tannis Fox

Tannis Fox, Senior Attorney  
Morgan O'Grady, Staff Attorney  
Western Environmental Law Center  
409 East Palace Avenue, #2  
Santa Fe, New Mexico 87501  
505.629.0732  
[ogrady@westernlaw.org](mailto:ogrady@westernlaw.org)  
[fox@westernlaw.org](mailto:fox@westernlaw.org)

Kyle Tisdell, Managing Attorney  
Western Environmental Law Center  
208 Paseo del Pueblo Sur, #602  
Taos, New Mexico 87571  
575.613.8050  
[tisdell@westernlaw.org](mailto:tisdell@westernlaw.org)

Matt Nykiel, Staff Attorney  
Western Environmental Law Center  
224 West Rainbow Boulevard, #247  
Salida, Colorado 81201  
720.778.1902  
[nykiel@westernlaw.org](mailto:nykiel@westernlaw.org)

*Attorneys for Applicants Western  
Environmental Law Center, Citizens Caring  
for the Future, Conservation Voters New  
Mexico Education Fund, Diné C.A.R.E.,  
Earthworks, Naeva, New Mexico Interfaith  
Power and Light, San Juan Citizens  
Alliance, Sierra Club, and WildEarth  
Guardians*

### Certificate of Service

I certify that on January 24, 2026, I served by a copy of this pleading to the following via email:

Jesse Tremaine  
Chris Moander  
Michael Hall  
Assistant General Counsels  
New Mexico Energy, Minerals, and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
[jessek.tremaine@emnrd.nm.gov](mailto:jessek.tremaine@emnrd.nm.gov)  
[chris.moander@emnrd.nm.gov](mailto:chris.moander@emnrd.nm.gov)  
[michael.hall@emnrd.nm.gov](mailto:michael.hall@emnrd.nm.gov)

Attorneys for Oil Conservation Division

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Holland & Hart, LLP

P.O. Box 2208  
Santa Fe, New Mexico 87504  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrankin@hollandhart.com](mailto:agrankin@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

Aaron B. Tucker  
Holland & Hart, LLP  
555 17th Street, Suite 3200,  
Denver, Colorado 80202  
[abtucker@hollandhart.com](mailto:abtucker@hollandhart.com)

Attorneys for OXY USA Inc.

Andrew J. Cloutier  
Ann Cox Tripp  
Hinkle Shanor LLP  
P.O. Box 10

Roswell, New Mexico 88202-0010  
[accloutier@hinklelawfirm.com](mailto:accloutier@hinklelawfirm.com)  
[atripp@hinklelawfirm.com](mailto:atripp@hinklelawfirm.com)

Attorneys for Independent Petroleum  
Association of New Mexico

Miguel A. Suazo  
James Martin  
James Parrot  
Jacob L. Everhart  
Beatty and Wozniak, P.C.  
500 Don Gaspar Avenue  
Santa Fe, New Mexico 87505  
[msuazo@bwenergylaw.com](mailto:msuazo@bwenergylaw.com)  
[jmartin@bwenergylaw.com](mailto:jmartin@bwenergylaw.com)  
[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)  
[jeverhart@bwenergylaw.com](mailto:jeverhart@bwenergylaw.com)

Attorneys for New Mexico Oil and  
Gas Association

Jennifer L. Bradfute  
Matthias Sayer  
Bradfute Sayer P.C.  
P.O. Box 90233  
Albuquerque, New Mexico 87199  
[jennifer@bradfutelaw.com](mailto:jennifer@bradfutelaw.com)  
[matthias@bradfutelaw.com](mailto:matthias@bradfutelaw.com)

Jordan L. Kessler  
EOG Resources, Inc.  
125 Lincoln Avenue, Suite 213  
Santa Fe, New Mexico 87501  
[Jordan\\_kessler@eogresources.com](mailto:Jordan_kessler@eogresources.com)

Attorneys for EOG Resources, Inc.

Mariel Nanasi  
422 Old Santa Fe Trail  
Santa Fe, New Mexico 87501  
[mnanasi@newenergyeconomy.org](mailto:mnanasi@newenergyeconomy.org)

Attorney for New Energy Economy

Nicholas R. Maxwell

P.O. Box 1064  
Hobbs, New Mexico 88241  
[inspector@sunshineaudit.com](mailto:inspector@sunshineaudit.com)

Air Biernoff  
General Counsel  
Christopher Graeser  
Richard H. Moore  
Associate Counsel  
New Mexico State Land Office  
P.O. Box 1148  
Santa Fe, New Mexico 87504-1148  
[abiernoff@nmslo.gov](mailto:abiernoff@nmslo.gov)  
[cgraeser@nmslo.gov](mailto:cgraeser@nmslo.gov)  
[rmoore@nmslo.gov](mailto:rmoore@nmslo.gov)

Attorneys for Commissioner of Public  
Lands and New Mexico State Land Office

Felicia Orth  
Hearing Officer  
New Mexico Energy, Minerals, and  
Natural Resources Department  
Wendell Chino Building  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
[Felicia.l.orth@gmail.com](mailto:Felicia.l.orth@gmail.com)

Oil Conservation Commission Hearing  
Officer

Zachary A. Shandler  
Assistant Attorney General  
New Mexico Department of Justice  
P.O. Box 1508  
Santa Fe, New Mexico 87504  
[zshandler@nmdoj.gov](mailto:zshandler@nmdoj.gov)

Oil Conservation Commission Counsel

Sheila Apodaca  
New Mexico Energy, Minerals, and  
Natural Resources Department  
Wendell Chino Building  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

[occ.hearings@emnrd.nm.gov](mailto:occ.hearings@emnrd.nm.gov)

Oil Conservation Commission Clerk

/s/ Tannis Fox  
Tannis Fox

**STATE OF NEW MEXICO  
OIL CONSERVATION COMMISSION**

**IN THE MATTER OF PROPOSED  
AMENDMENTS TO 19.15.2, 19.15.5,  
19.15.8, 19.15.9, AND 19.15.25 NMAC**

**CASE NO. 24683**

**[PROPOSED] POST-HEARING PROCEDURAL ORDER**

The hearing in this matter was held before the Oil Conservation Commission (“Commission”) October 20-24 and 27-31, 2025 and November 3-6, 2025. This order governs post-hearing proceedings.

1. Post-hearing submittals. All parties to this proceeding may submit post-hearing submittals, which may include, at the discretion of each party, closing argument addressing the law and evidence, proposed findings and conclusions for the Commission’s consideration, and a final proposed draft of the rules recommended for adoption by the Commission. Any post-hearing submittals by a party may not exceed 75 pages (exclusive of a final proposed draft of the rules). All post-hearing submittals shall be filed no later than January 8, 2026, 5:00 pm MST.

2. Commission deliberations. The Commission shall hold deliberations on the proposed amendments in this proceeding beginning January 14, 2026 and continuing thereafter as necessary.

---

Felicia Orth  
Hearing Officer

---

Date