

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

**OIL CONSERVATION DIVISION'S  
PRE-HEARING STATEMENT**

The New Mexico Oil Conservation Division ("OCD") submits this Pre-Hearing Statement pursuant to 19.15.4.13(B) NMAC.

**I. IDENTIFICATION OF PARTY AND COUNSEL**

OCD has intervened in this matter and is represented by undersigned counsel.

**II. STATEMENT OF THE CASE**

The OCD supports the Revised Petition to amend 19.15.2 NMAC – General Provisions of Oil and Gas Operations, 19.15.5 NMAC – Enforcement and Compliance, 19.15.8 NMAC – Financial Assurance, 19.15.9 NMAC – Well Operator Provisions, and 19.15.25 NMAC – Plugging and Abandonment of Wells, pursuant to authority in NMSA 1978 Sec. 70-2-6, 70-2-12(B)(1), 70-2-14(A), and 19.15.3.8.A NMAC. The Revised Petition, inclusive of Petitioner's Notice of Errata, serves two primary objectives of the Division: first, require the responsible and timely plugging and abandonment of wells and associated production facilities by operators, and secondly, to revise the requirements for financial assurance so that the state may recover meaningful amounts of financial assurance when OCD performs the necessary plugging and abandonment of orphan wells and associated production facilities.

### **III. PROPOSED EVIDENCE**

**WITNESSES:** All witnesses reserve the full 60-minutes for the summary of their direct testimony.

1. John Garcia

John Garcia is the Supervisor of OCD's Engineering Bureau Special Projects group. Mr. Garcia has served with OCD for more than five years, and holds a Bachelor of Science in Petroleum and Natural Gas Engineering and a Master of Engineering in Mechanical Engineering. Mr. Garcia provides his written direct testimony in support of the Revised Petition.

2. Justin Wrinkle, Engineering Bureau Chief

Mr. Wrinkle is the Engineering Bureau Chief, managing the OCD's Engineering Bureau, including the engineering group that reviews and approves sundries related to the plugging and abandonment of oil and gas production and injection wells. He has served with OCD since 2023. Prior to joining OCD, Mr. Wrinkle has 19 years of oil and gas experience in the roles of Production Supervisor and Lead Field Operator for oil and gas operators. Mr. Wrinkle provides his written direct testimony in support of the Revised Petition.

3. Loren Diede

Loren Diede is a Petroleum Specialist working with OCD's Engineering Special Projects group, specifically focused on reviewing and approving work plans related to the plugging of orphan wells. Mr. Diede brings more than 50 years of experience in the oil and gas industry, with a career focus on completions, drilling, workovers, and plugging and abandonment of wells. Mr. Diede provides his written direct testimony in support of the Revised Petition.

4. Rosa Romero, Environmental Bureau Chief

Ms. Romero is the Environmental Bureau Chief that oversees the environmental incidents program, including review and approval of site characterizations, remediation plans, and site closures. The Environmental Bureau includes the Environmental Special Projects Group which is responsible for the remediation and surface reclamation associated with orphaned wells and associated production facilities. Ms. Romero provides her written direct testimony in support of the Revised Petition.

5. Brandon Powell, Deputy Director

Mr. Powell is the Deputy Director that manages the OCD's Engineering and Environmental Bureaus. He has served with OCD in various positions for more than 18 years, including district supervisor, staff manager, inspection/enforcement supervisor, and environmental specialist. Prior to joining OCD, Mr. Powell was a facility manager and environmental technician for an environmental services company. Mr. Powell provides his written direct testimony in support of the Revised Petition.

**EXHIBITS:**

1. Direct Testimony of John Garcia
2. Resume of John Garcia
3. Visual Aid of John Garcia
4. Direct Testimony of Loren Diede
5. Curriculum Vitae of Loren Diede
6. Visual Aid of Loren Diede
7. Direct Testimony of Justin Wrinkle

8. Resume of Justin Wrinkle
9. Visual Aid of Justin Wrinkle
10. Direct Testimony of Rosa Romero
11. Resume of Rosa Romero
12. Visual Aid of Rosa Romero
13. Direct Testimony of Brandon Powell
14. Resume of Brandon Powell
15. Visual Aid of Brandon Powell
16. Active Well Production Report, Fiscal Year 2024
17. OCD Master Orphan Spreadsheet, July 2, 2025
18. New Mexico Legislative Finance Committee (“LFC”) Policy Spotlight: Orphaned Wells, June 24, 2025
19. Division Comparison of LFC Spotlight and Proposed Rule
20. Well Production and Incidents Data
21. Inactive Well Report, August 8, 2025
22. Inactive Well Report with Wells Under Agreed Compliance Orders, August 8, 2025
23. Inactive Well Report with Wells in Approved Temporary Abandonment, August 8, 2025
24. List of Agreed Compliance Orders for Inactive Wells
25. Plugging and Abandonment SR Report Calendar Year 2024
26. Revised Initial Grant Final Performance Technical Report, March 10, 2025

- 27. Notice: Implementation of Digital C-141 and Incident Statuses
- 28. Photographs of Remediation Projects, marked Ex. 28.A – G.
- 29. Financial Assurance Report

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

The OCD has not identified any procedural matters to be resolved prior to the hearing.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I certify that on August 8, 2025, I served this pleading by electronic mail only on:

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