

**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

REQUEST FOR WRITTEN RECOMMENDED DECISION

COMES NOW New Mexico Oil and Gas Association (“NMOGA”) and Independent Petroleum Association of New Mexico (“IPANM”), by and through its counsel listed below, hereby requests the Hearing Officer, pursuant to NMSA 1978, § 70-2-13 and NMAC 19.15.3.8, and files this request for written recommendation to the Oil Conservation Commission on NMOGA’s and IPANM’s *Joint Motion to Dismiss* portions of Applicant’s Proposed Rules, specifically NMAC 19.15.8.9(A), 19.15.8.9(D), (E) & (F), and NMAC 19.15.2.7(M)(2), prior to the commencement of the Rulemaking Hearing on October 20, 2025.

NMOGA and IPANM respectfully submit this request for a written recommendations based on the existing filings but remain willing to present oral argument should the Hearing Officer so prefer.

Respectfully submitted,

DATED: October 10, 2025.

BEATTY & WOZNIAK, P.C.

By: /s/ Miguel A. Suazo
Miguel A. Suazo
James P. Parrot
James Martin
Jacob L. Everhart

500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090

msuazo@bwenergylaw.com

jparrot@bwenergylaw.com

jmartin@bwenergylaw.com

jeverhart@bwenergylaw.com

*Attorneys for New Mexico Oil and Gas
Association*

HINKLE SHANOR LLP

By: /s/ Ann Cox Tripp

Andrew J. Cloutier

Ann Cox Tripp

P.O. Box 10

Roswell, NM 88202-0010

acloutier@hinklelawfirm.com

atripp@hinklelawfirm.com

*Attorneys for Independent Petroleum
Association of New Mexico*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 10th day of October, 2025, as follows:

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
fox@westernlaw.org
ogradey@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

Matt Nykiel
Staff Attorney
Western Environmental Law Center
224 West Rainbow Boulevard, #247
Salida, Colorado 81201
720.778.1902
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,
and Sierra Club.*

Jesse Tremaine
Chris Moander
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
chris.moander@emnrd.nm.gov
Attorneys for Oil Conservation Division

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, New Mexico 87504
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

Aaron B. Tucker
555 17th Street, Suite 3200,
Denver, CO 80202
(303) 295-8369
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
acloutier@hinklelawfirm.com
atripp@hinklelawfirm.com
*Attorneys for Independent Petroleum
Association of New Mexico*

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
*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
Oil Conservation Commission Counsel

Mariel Nanasi
Lead Attorney and Executive Director
New Energy Economy
422 Old Santa Fe Trail
Santa Fe, NM 87501
mnanasi@newenergyeconomy.org
Attorney for New Energy Economy

Bradfute Sayer P.C.
P.O. Box 90233
Jennifer L. Bradfute
Matthias Sayer
Albuquerque, New Mexico 87199
jennifer@bradfutelaw.com
matthias@bradfutelaw.com

Jordan L. Kessler
EOG Resources, Inc.
125 Lincoln Avenue, Suite 213
Santa Fe, New Mexico 87501
Jordan_kessler@eogresources.com
Attorneys for EOG Resources, Inc.

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
Oil Conservation Commission Clerk

/s/ - Ann Cox Tripp
Ann Cox Tripp