

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

**APPLICATIONS OF GOODNIGHT MIDSTREAM
PERMIAN, LLC FOR APPROVAL OF SALTWATER
DISPOSAL WELLS LEA COUNTY, NEW MEXICO**

CASE NOS. 23614-23617

**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN LLC TO AMEND ORDER NO. R-
22026/SWD-2403 TO INCREASE THE APPROVED
INJECTION RATE IN ITS ANDRE DAWSON SWD #1,
LEA COUNTY, NEW MEXICO**

CASE NO. 23775

**APPLICATIONS OF EMPIRE NEW MEXICO LLC TO
REVOKE INJECTION AUTHORITY,
LEA COUNTY, NEW MEXICO**

CASE NOS. 24018-24020, 24025

**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN, LLC FOR APPROVAL OF A
SALTWATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO**

**DIVISION CASE NO. 24123
ORDER NO. R-22869-A**

**OIL CONSERVATION DIVISION’S RESPONSE TO GOODNIGHT’S APPLICATION
FOR REHEARING AND EMPIRE’S MOTION FOR REHEARING**

The New Mexico Oil Conservation Division (“OCD”) hereby submits its Response to Goodnight Midstream Permian, LLC’s (“Goodnight”) Application for Rehearing (“Application”) and Empire’s Motion for Rehearing (“Motion”). While OCD does not object specifically to either Goodnight or Empire’s requested relief, the OCD proposes an alternative to either Party’s requested relief, namely that the New Mexico Oil Conservation Commission (“OCC”) reconvene the above-captioned cases for a hearing to clarify its September 12, 2025 Order R-24004 in the above-captioned matters:

I. Introduction.

On September 12, 2025, the OCC convened a Special Meeting, during which the OCC issued Order R-24004, which ordered the following:

“The Commission therefore will provide Empire the opportunity to establish a CO2 EOR pilot project within a period of 3 years to ascertain the recoverability of the ROZ and return to the Commission with further data/analysis. Based on the above summaries the Commission:

1. Denies Goodnight’s applications to drill new wells Case No. 23614 (Gooden), Case No. 23615 (Hernandez), Case No. 23616 (Hodges), Case No. 23617 (Seaver), Case No. 24123 (Piazza);
2. Denies Goodnight’s application to request existing increase in Case No. 23775 (Dawson); Received by OCD: 09/12/2025 12 of 13
3. Suspends existing Goodnight’s injection wells Case No. 24018 (Dawson), Case No. 24019 (Banks), Case No. 24020 (Sosa), Case No. 24025 (Ryno) in order to provide Empire with the opportunity to establish the CO2 EOR pilot project.”

Order R-24004, pp. 12-13. The OCC also ordered the OCD to “implement this Order.” *Id.* p. 13.

At the September 12, 2025 Special Meeting, Counsel for Goodnight posited questions to the OCC in what appeared to be an attempt to clarify the timing of events ordered in Order R-24004. The following is an excerpt from that exchange:

“MR. RANKIN: Thank you, Commissioner Ampomah. My understanding from Mr. Chandler's comments is that the order would become effective as of today's date. Is that correct?

MR. SCHANDLER: If I can get an electronic signature from one of the two commissioners, yes.

MR. RANKIN: Okay. And when does -- under the terms of the order, when does the suspension of injection of Goodnight's four wells take effect?

MR. SCHANDLER: I believe the order delegates the implementation of the order to the division.

MR. RANKIN: Okay. So under the language of the order, there's no firm deadline for when suspension of injection operations would take effect?

MR. SCHANDLER: It just delegates the implementation of the order to the division.

MR. RANKIN: As written, does the order incorporate the findings and conclusions that were presented orally by the commission on August 14th? Is that –

MR. SCHANDLER: Yes. That is the backbone of the order.

MR. RANKIN: Okay. Okay. And assuming you're able to get -- this is more directed toward Counsel, but assuming you're able to get one of the two commissioners' signatures, the order would be distributed to the parties today. Is that correct?

MR. SCHANDLER: Yes.

MR. RANKIN: Okay. I don't think I have any other questions. I believe that answers my questions. Thank you.

Transcript from September 12, 2025 OCC Special Meeting, 6:5 – 7:12.

On September 21, 2025, Goodnight filed its Emergency Motion to Partially Stay Commission Order No. R-24004 (“Motion to Stay”), arguing legal bases ranging from Constitutional concerns to public policy theories to justify a partial stay of Order R-24004. Two days later, Empire New Mexico LLC (“Empire”) filed its Emergency Motion to Enforce Order No. R-24004, for Order to Show Cause, and for Expedited Hearing (“Motion to Enforce”). The OCC Chair, *sua sponte*, issued an Order on Emergency Post-Hearing Motions on September 26, 2025, providing the above-noted procedural history, taking judicial notice of 19.15.4.25 NMAC (“Rehearings”), and ultimately ordering a briefing schedule for party responses to Goodnight’s Motion to Stay and holding Empire’s Motion to Enforce in abeyance until October 17, 2025.

On October 2, 2025, Goodnight filed its Application seeking a full rehearing of the above-captioned cases but also providing for alternative relief in the form of a hearing to determine an “orderly curtailment” of Goodnight’s injection wells at issue to be done “incrementally over time.”

See Application at p. 48, 1st Paragraph. Similarly, Empire’s Motion requests relief in the form of a “rehearing regarding the Commission’s decision to deny Empire’s request to permanently revoke Goodnight’s authorization to inject into Goodnight’s four existing SWD wells. . .” See Motion at p.2, final Paragraph. OCD considers both proposals as requesting, in one form or another, a limited scope rehearing of specific matters. OCD’s proposal is akin to either relief request.

OCD withdrew from the above-captioned cases on May 15, 2025 *via* a Notice of Dismissal and prior to final adjudication by the OCC. Upon receiving Order R-24004, OCD identified points of concern with Order 24004. Specifically, OCD has concerns about the nature of suspension of an SWD injection permit, proposing a staged approach of suspension for Goodnight’s permits, and a deadline framework for Empire to properly submit and perform its EOR project.

II. Relevant law

19.15.4.25 NMAC provides an avenue to request a rehearing of an adjudicated case by a “party of record whom the order adversely affects. . .” and requires the aggrieved party to set forth “the respect in which the party believes the order is erroneous.” Further, 19.15.4.25 permits the OCC to “enter a new order that after rehearing *as the circumstances may require*.” OCD proffers its Response to Goodnight’s Application through the lens of 19.15.4.25 NMAC and provides below its bases for why R-24004, while not erroneous, is deficient enough to hobble the OCD’s ability to enforce Order R-24004 as required by the OCC. In support of its request, OCD provides as **Exhibit A** the Self-Affirmed Statement of OCD Deputy Director Brandon Powell.

III. OCD’s requests that the OCC provide the OCD a deadline framework for suspension of Goodnight’s SWD injection permits per OCD’s suggestions.

As outlined in **Exhibit A**, OCD seeks clarification as to whether the OCC wishes for immediate suspension of Goodnight's relevant SWD injection permits or if the OCC intends for the wells to be suspended prior to Empire's commencement of its EOR project. **Exhibit A at ¶ 9.** OCD traditionally deals with SWD injection permit suspension through enforcement adjudication. *Id.* **at ¶ 5.** In so doing, OCD practice is to impose, as part of the permit suspension process, a schedule of required operator actions aimed at winding down the subject wells, a staged process that keeps in mind safety, among other factors. *Id.* OCD has required immediate shut-ins of SWD wells in the past, but in the case of Goodnight's wells, the volume of produced water injected daily leads the OCD to prefer such a staged approach rather than immediate shut-in. *Id.; see also ¶ 10.*

As clarified in **Exhibit A, ¶ 10**, in order for the OCD to comply with Order R-24004, OCD needs guidance from OCC as to the OCC intentions behind ¶ 3, page 13, which states "[s]uspends existing Goodnight's injection wells Case No. 24018 (Dawson), Case No. 24019 (Banks), Case No. 24020 (Sosa), Case No. 24025 (Ryno) in order to provide Empire with the opportunity to establish the CO2 EOR pilot project." To assist OCD, OCD needs clarification of a threshold issue, namely whether the OCC intended for immediate suspension of Goodnight's SWD injection permits or whether the OCC intended for Goodnight's permit suspension to occur at a later. *See Exhibit A, ¶ 10.* Once OCD understands which of the above the OCC intended or desires, OCD then respectfully requests the OCC consider setting performance deadlines for Goodnight that the OCD can enforce.

OCD adds to this the issue of how Empire is to plan, apply for, and ultimately execute the ordered EOR project, as noted in "Order" section of Order R-24004, second unnumbered

Paragraph. OCD below presents proposed deadlines with which Empire should comply to ensure Empire's EOR project is effectuated.

- a. If the OCC seeks immediate shut-in of Goodnight's wells, OCD suggests an abbreviated set of deadlines to not exceed 90 days from clarification of Order R-24004.**

As a practical matter, suspension of an SWD injection permit is as much as process as an event. As described by OCD Deputy Director Powell in **Exhibit A**, OCD needs to ensure the wind-down of injection wells is done in an orderly and safe fashion. One of the ways a rapid suspension may occur is through tied performance deadlines. Specifically, setting a timeframe of total compliance of ninety (90) days, with specific sub-compliance deadlines of thirty (30) and sixty (60) days. *Id.* at ¶ 10. OCD considers this framework reasonable and will best ensure no waste occurs as Goodnight winds-down its subject wells.

- b. If the OCC seeks a suspension date that is not immediate, OCD recommends tying the suspension to Empire's accomplishment of specific criteria tied to Empire's EOR project, such as date of first injection by Empire.**

Alternatively, should the OCC make clear that suspension of Goodnight's SWD Injection Wells is *not* immediate, OCD proposes that Goodnight's SWD injection permit suspension be tied, in some form, to Empire's EOR project. **Exhibit A, ¶ 10.** OCD's experience indicates that Empire's EOR project will take considerable time to plan, submit for OCD approval, and then ultimately execute. *Id.* One possible triggering event for Goodnight's suspension permit could be the estimated date of Empire's first injection under the EOR, an approach with which OCD could work and ultimately enforce. *Id.*

- IV. OCD requests that the OCC provide a framework of deadlines for Empire's EOR project to ensure that Empire does in fact advance its EOR project in a timely fashion.**

Finally, Order R-24004 permits Empire to proceed with an EOR project “within a period of 3 years to ascertain the recoverability of the ROZ and return to the Commission with further data/analysis.” Order R-24004, Section “Order,” second unnumbered Paragraph, p. 13. To ensure that Empire acts with proper diligence and thoroughness, OCD proposes the following deadlines for performance by Empire in complying with Order R-24004:

- i. Submittal of the EOR project to the OCD for preliminary review and, if proper, OCD approval (example: submittal of the EOR project application within 6 months of the Order date);
- ii. Assuming approval of the EOR project by OCD, submittal of
- iii. associated APDs within 90 days of approval;
- iv. Spud of associated well/s within 90 days of approval;
- v. EOR injection/production within 180 days of completion of drilling operations;
- vi. Should any of the deadlines be missed, whether such a failure is to be construed as terminating the EOR project. OCD considers this determination as important because, should Empire fail to avail itself of proceeding with the EOR, OCD assumes Goodnight’s suspended permits would be subject to re-activation and would signal a failure of the EOR project to both the OCC and the OCD.

OCD bases the above on its experience with EOR projects and the need to keep such projects moving forward. *See Exhibit A.*

V. Summary

Based on the above arguments, OCD requests that the OCC convene a rehearing of the above-captioned cases for the sole purpose of clarifying Order R-24004 such that OCD obtains clarity as to the OCC’s intentions regarding the suspension of Goodnight’s SWD injection permits and to provide guidance to both OCD and Empire as to implementation of Empire’s EOR project.

Respectfully submitted,

Christopher L. Moander
Assistant General Counsel
New Mexico Energy, Minerals and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Tel (505) 709-5687
chris.moander@emnrd.nm.gov

CERTIFICATE OF SERVICE

I certify that on October 10, 2025, this pleading was served by electronic mail on:

<p>Ernest L. Padilla Padilla Law Firm, P.A. Post Office Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalawnm@outlook.com</p> <p>Dana S. Hardy Jaclyn M. McLean HARDY MCLEAN LLC 125 Lincoln Ave., Suite 223 Santa Fe, NM 87505 (505) 230-4410 dhardy@hardymclean.com jmclean@hardymclean.com</p> <p>Sharon T. Shaheen Samantha H. Catalano Spencer Fane Post Office Box 2307 Santa Fe, NM 87504-2307 (505) 986-2678 sshhaheen@spencerfane.com cc: dortiz@spencerfane.com</p> <p>Corey F. Wehmeyer SANTOYO WEHMEYER P.C. IBC Highway 281 N. Centre Bldg. 12400 San Pedro Avenue, Suite 300 San Antonio, Texas 78216 cwehmeyer@swenergylaw.com</p> <p><i>Attorneys for Empire New Mexico, LLC</i></p>	<p>Michael H. Feldewert Adam G. Rankin Paula M. Vance HOLLAND & HART LLP 110 N. Guadalupe Street #1 Santa Fe, NM 87501 (505) 988-4421 mfeldewert@hollandhart.com agrarkin@hollandhart.com pmvance@hollandhart.com NRJurgensen@hollandhart.com <i>Attorneys for Goodnight Midstream Permian, LLC</i></p> <p>Miguel A. Suazo Sophia A. Graham Kaitlyn A. Luck 500 Don Gaspar Ave. Santa Fe, NM 87505 (505) 946-2090 msuazo@bwenergylaw.com sgraham@bwenergylaw.com kluck@bwenergylaw.com <i>Attorneys for Pilot Water Solutions SWD, LLC</i></p> <p>Matthew Beck Peifer Hanson Mullins & Baker, P.A. P.O. Box 25245 Albuquerque, NM 87125-5245 (505) 247-4800 mbeck@peiferlaw.com <i>Attorneys for Rice Operating Company and Permian Line Service, LLC</i></p>
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Christopher L. Moander

EXHIBIT A

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

**APPLICATIONS OF GOODNIGHT MIDSTREAM
PERMIAN, LLC FOR APPROVAL OF SALTWATER
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**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN LLC TO AMEND ORDER NO. R-
22026/SWD-2403 TO INCREASE THE APPROVED
INJECTION RATE IN ITS ANDRE DAWSON SWD #1,
LEA COUNTY, NEW MEXICO. CASE NO. 23775**

**APPLICATIONS OF EMPIRE NEW MEXICO LLC TO
REVOKE INJECTION AUTHORITY,
LEA COUNTY, NEW MEXICO. CASE NOS. 24018-24020, 24025**

**APPLICATION OF GOODNIGHT MIDSTREAM
PERMIAN, LLC FOR APPROVAL OF A
SALTWATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO. DIVISION CASE NO. 24123
ORDER NO. R-22869-A**

**SELF-AFFIRMED STATEMENT OF OIL CONSERVATION DIVISION DEPUTY
DIRECTOR BRANDON POWELL**

I, OCD Deputy Director Brandon Poweel, state as follows:

1. I am over eighteen years of age and have personal knowledge of the matters stated herein and at all times relevant to the above-captioned cases was and am an OCD Deputy Director managing the OCD Environmental and Engineering Bureaus, having served the OCD for more than nineteen years.
2. I have testified before the OCC on several occasions for a variety of matters and have been found to be an expert witness OCD rules and regulations by the OCC.

3. Attached to this Affidavit is my Curriculum Vitae that outlines my background, training, and experience with oil and gas operations, including saltwater injection practices and appurtenant OCD regulations.
4. I am familiar with the parties and subject matter at issue in the above-captioned cases.
5. When pursuing suspensions or revocations of SWD injection permits, OCD typically handles such administrative actions pursuant to 19.15.5.10 NMAC, usually through appropriate sanctions. When OCD pursues these types of sanctions a schedule of required operator actions to cease saltwater injection it does so *via* enforcement adjudication. For example, for immediate concerns, OCD may seek immediate shut-in of the SWDs, but for longer-term concerns, which OCD has in this case based on the volume of water injected by Goodnight on any given day, OCD seeks clarification from the OCC as to a longer-term shut-down framework for Goodnight's wells, one that will allow Goodnight to safely curtail injection while meeting the commissions intent.
6. OCD also seeks clarification from the OCC as to certain actions to be taken by Empire in the OCC's granting Empire the right to proceed with an EOR project. **Order R-24004, p.7, ¶ 40; p.10, ¶ 61; p. 12, second Paragraph in Section "Order"; p. 13, ¶ 3.** OCD provides more details below in ¶ 10 below.
7. OCC Order R-24004 ordered the Suspension of Goodnights injection wells Case No. 24018 (Dawson), Case No. 24019 (Banks), Case No. 24020 (Sosa), Case No. 24025 (Ryno). *See Order R-24004, p.13, ¶ 3.* Based on OCD's interpretation the suspension was in part for the following reasons.
 - a. "To provide Empire with the opportunity to establish the CO2 EOR pilot project." *Id.*

- b. "To perform a successful CO2 flood, the injection of CO2 and water must be monitored closely and adjustments made based upon design. Goodnight's SWD wells cannot dispose of water when an active CO2 flood is being performed. Empire's Ex. I. at 12." **Order R-24004, p.7, ¶ 40.**
- c. "Empire will then return to the Commission and present the further data/analysis." **Order R-24004, p.10, ¶ 63.**
- d. "The Commission's rationale is grounded in the exchange between Commissioner Ampomah and Empire's witness Mr. Wheeler. Wheeler TR. 4/9/25 at 52:7 to 53:2 (emphasis added).

Q. So if I flip that and then ask you -- and let's say if Empire will be willing to say that, okay, Commission should suspend, like you said, all the saltwater injection that is going on in the EMSU right now, give Empire time to prove that the oil, the ROZ, if it is there, is recoverable, will you be open to that?

A. That is the most fabulous suggestion I've heard this whole ten days of hearing.

Q. And how many years will Empire be open to that?"

"A. You know, you're getting me in more and more trouble with Mr. West. But I would think we could do it within a couple of years."

"Q. So within that couple of years, Empire will have the opportunity to drill the other wells?"

"A. Yes, sir."

"Q. And prove to see that if any of these claims -- you know, real evidence that the ROZ indeed exists and it's recoverable?"

“A. Yes, sir.” *Id.*

- e. “The Commission’s rationale is also grounded in the exchange between Commissioner Lamkin and Empire’s witness, Mr. Wheeler. Wheeler TR. 4/9/25 at 56:11-23 (emphasis added).”
 - f. “Q. I'm mainly speaking about if you -- if you guys had consent from the Commission to establish an EOR project and you had committed capital from your company, what do you think the timeline is in reference to Commissioner Ampomah's question about performing a pilot to verify that the ROZ is there and it's producible?”
 - g. “A. If you just do a small, small pilot project and the Commission requests it, I believe that we can get it and do it within that two-year period, where we're talking about drilling the wells and coring and then the analysis and everything of that to present to the Commission.”
8. Also included in R-24004 the OCC found the following (emphasis added)
- a. “C. However, the Commission concluded it is premature at present to grant Empire’s applications to permanently revoke the injection authority of the existing wells because the Commission found Empire DID NOT adduce substantial evidence that their correlative rights in the Grayburg are CURRENTLY impaired by Goodnight’s injection into the San Andres.”
 - b. “D. In addition, the Commission **concluded it is premature at present to grant Empire’s applications to permanently revoke the injection authority of the existing wells because the Commission found there was insufficient evidence presented at hearing to prove whether the ROZ is recoverable.**”

- c. “E. Therefore, it is premature at present to grant Empire’s applications to permanently revoke the injection authority of the existing wells. Instead, the Commission will suspend the injection authority to provide Empire with the opportunity to establish a pilot project.”
- 9. Based on the finding that OCC concluded that “Empire DID NOT adduce substantial evidence that their correlative rights in the Grayburg are currently impaired by Goodnight’s injection” the OCD is unable to ascertain if
 - a. The OCC wants the immediate suspension of the wells identified in order paragraph #3; or
 - b. if the commission intends for the wells to be suspended prior to Empires implementation to the water flood.
- 10. OCD is asking for clarification of OCCs intent.
 - a. If OCC is seeking immediate shut-in a short timeframe should be implemented, such as 30, 60 or 90 days, allowing Goodnight to take appropriate injection suspension actions?
 - b. If the OCC is seeking suspension at a later date, OCD recommends tying the suspension with Empires actions such as prior first injection by Empire. This is due to the considerable timeframe it will take Empire to permit an EOR project, permit the applicable well/s, drill the well/s, and then set up the well/s for injection and/or recovery?
 - c. For additional clarification it would be helpful for OCD to know the following from the OCC:

- i. Submittal of the EOR project to the OCD (example: submittal of the EOR project application within 6 months of the Order date);
- ii. Assuming approval of the EOR project by OCD, submittal of associated APD/s within 90 days of approval;
- iii. Spud of associated well/s within 90 days of approval;
- iv. EOR injection/production within 180 days of completion of drilling operations;
- v. Should any of the deadlines be missed, whether such a failure is to be construed as terminating the EOR project.

I understand this is a Self-Affirmed Statement to be used as evidence in the above-captioned cases, specifically in support of OCD's Response to Goodnight's Application for Rehearing and Empire's Motion for Rehearing. I affirm the above testimony is true and correct and is made under penalty of perjury under the laws of the State of New Mexico.

DATED: October 6, 2025



Brandon Powell
Deputy Director
Oil Conservation Division

CURRICULUM VITAE

BRANDON POWELL

SUMMARY

Mr. Powell is the Oil Conservation Division's (OCD) Deputy Director overseeing the Engineering and Environmental bureaus. He has served with OCD for more than eighteen years. He began his career in 2006 as an environmental specialist overseeing environmental releases and remediation. In 2011, he was promoted to inspection and enforcement supervisor for OCD's district office in Aztec. In that position, he supervised down-hole engineering and compliance with OCD rules. In 2019, he was promoted to District Supervisor, which involved oversight of day-to-day operations for the San Juan Basin. In 2020 he was promoted to the Engineering Bureau Chief and then in 2023 was promoted to Deputy Director. Mr. Powell has extensive experience applying OCD rules to all aspects of oil and gas development and has testified as an expert in OCC rulemakings, including the pit rule (19.15.17 NMAC), the produced water rule (19.15.34 NMAC), the release rule (19.15.29 NMAC) and the natural gas waste rules (19.15.27 and 19.15.28 NMAC).

EMPLOYMENT

May 2023- Current

New Mexico Oil Conservation Division

Deputy Director

- As Deputy Director, Mr. Powell provides oversight and management for the OCD's Engineering Bureau and Environmental Bureau. In his position he has 2 direct reports which are the Environmental Bureau Chief and Engineering Bureau Chief. He also has ~60 additional indirect reports in those groups.
 - The Engineering bureau is made up of 4 major groups Inspection Compliance Program, Underground Injection Control (UIC) Program, Administrative Permitting Program, Engineering Projects and Hearings group.
 - The environmental program contains 3 major groups, Permitting, Environmental Special Projects and Incident/Inspections.

November 2020 – May 2023

New Mexico Oil Conservation Division

Chief, Engineering Bureau

- Oversight and Management of the OCD's Engineering Bureau which includes
 - Administrative Compliance Program
 - Underground Injection Control (UIC) Program
 - Administrative Permitting Program.
- Ensures that OCD goals and objectives are met by assigning and directly supervising the work of the Administrative Compliance, UIC, and Administrative Permitting Programs.
- Conducts training and performance evaluations of personnel and acts upon leave requests. This position designs and develops programs to address new technical issues as they arise and as technical advances in the oil and gas industry are implemented.

May 2019- November 2020

New Mexico Oil Conservation Division

District Supervisor

- Managed operations for OCD's Northern District, ensuring the proper management of more than 24,000 oil and gas wells and associated facilities to protect public health and the environment.
- Managed relations with four tribes and allottees, federal agencies including Bureau of Land Management, Bureau of Reclamation, and Forest Service, and private landowners.
- Supervised seven staff members, including geologist, compliance officers, and environmental specialists.
- Managed office assignments, fleet repair and maintenance, and the District's Reclamation Fund (RFA) plugging program.
- Coordinated with the Engineering and Environmental Bureaus to ensure consistency in permitting and enforcement across the state.
- Supervised the District's UIC activities and coordinated with the UIC Program Manager to ensure consistency in testing and compliance.
- Conducted training for OCD and District staff.
- Assisted in the tasks described below when necessary for District operations, particularly in the absence of staff.
- Served as the District's representative on the New Mexico Oil and Gas Northwest Public Lands Committee.
- Assisted in development of standard operating procedures for wide range of OCD's business practices.
- Participated in strategic planning for OCD, including crisis management, electronic transition, enforcement, and rulemaking.

April 2011-May 2019

New Mexico Oil Conservation Division

Staff Manager & Inspection and Enforcement Supervisor

- Supervised four district compliance officers and their activities regarding oil, gas, injection, brine and non-hazardous waste wells to protect public health, fresh water and other natural resources, including the review and approval of applications the conduct of investigations, and the recommendation of engineering solutions.
- Supervised environmental specialists, geologists, and data managers when the District Supervisor was not available and after he retired.
- Substituted for the geologist and environmental specialists during their absence and position vacancy for two years, including reviewing pools, logs and formation tops.
- Reviewed drilling, production, and closure of wells and other oil and gas facilities to ensure compliance with OCD rules, including:
 - Scheduled and conducted field inspections;
 - Initiated enforcement actions;
 - Reviewed applications for well work-overs, completion and plugging; and
 - Observed field activities.
- Provided technical assistance to OCD staff and operators.
- Coordinated office activities, including the review and approval of personnel documents and the conduct of other supervisory duties on behalf of the District Supervisor.
- Assisted in the development of rules.
- Served as the District's representative for the New Mexico Oil and Gas Northwest Public Lands Committee.

April 2006 thru April 2011 New Mexico Oil Conservation Division

Environmental Specialist, Deputy Oil and Gas Inspector, and Loss Control Officer

- I Supervised industries operations to ensured proper remediation of releases.
- I would respond to urgent releases which endangered the environment or the public.
- Reviewed permits for work requested to be performed, and subsequent reports for work already performed.
- I would draft environmental compliance and enforcement documents
- Testify in environmental compliance and enforcement cases.
- Work with other governmental agencies to find solutions to problems that arise
- Prepare and give environmental training to industry and other agencies.
- Work with Companies to ensure their continual compliance.
- Track District internal injuries and incidents and prepare yearly OSHA forms.

- Respond to citizen complaints.

June 2004-April 2006 Envirotech, Inc.

Sr. Environmental Technician, Soil Remediation Facility Manager, and Mold Inspector.

- Prepared reports for various agencies for the on-site documentation for various types of releases.
- Managed the soil remediation facility and subsequent personnel which averaged 1-3 people. I categorized waste to determine if waste was acceptable pursuant to the facility permits.
- Performed hazardous waste characterization and disposal of oil field and non-oilfield waste.
- Project manager and field supervisor which included supervising multiple people.
- Prepared job quotes and project summaries.

TESTIMONY IN RULEMAKING PROCEEDINGS

19.15.17 NMAC – *Pits, Close-Loop Systems, Below-Grade Tanks and Sumps, 2008 and 2013*

19.15.34 NMAC – *Produced Water, Drilling Fluids, and Liquid Oil Field Waste, 2015*

19.15.29 NMAC – *Releases, 2018*

19.15.27 NMAC – *Venting and Flaring of Natural Gas, 2021*

19.15.28 NMAC – *Natural Gas Gathering Systems, 2021*

19.15.7 NMAC – *Forms and Reports, 2022*

CERTIFICATIONS AND TRAINING

Hazardous Waste Management Certification, Lion Technologies, September 2004

Hazmat Site Supervisor Training, High Desert Safety, 2005

Confined Space Certification, High Desert Safety, 2005

Hot Work Certification, High Desert Safety, 2005

OSHA Forty Hour Certification, 2005

Surveillance Detection Course for Commercial Operators, Department of Homeland Security, 2008