

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

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION COMMISSION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF DELAWARE ENERGY, LLC CASE NO. 15855
TO REVOKE THE INJECTION AUTHORITY (De novo)
GRANTED UNDER SWD-1680 FOR THE ALPHA
SWD NO. 1 WELL OPERATED BY ALPHA SWD
OPERATING, LLC, EDDY COUNTY, NEW MEXICO.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

COMMISSIONER HEARING

August 20, 2018

Santa Fe, New Mexico

BEFORE: HEATHER RILEY, CHAIRWOMAN
ED MARTIN, COMMISSIONER
DR. ROBERT S. BALCH, COMMISSIONER
BILL BRANCARD, ESQ.

This matter came on for hearing before the
New Mexico Oil Conservation Commission on Monday, August
20, 2018, at the New Mexico Energy, Minerals and Natural
Resources Department, Wendell Chino Building, 1220 South
St. Francis Drive, Porter Hall, Room 102, Santa Fe,
New Mexico.

REPORTED BY: Mary C. Hankins, CCR, RPR
New Mexico CCR #20
Paul Baca Professional Court Reporters
500 4th Street, Northwest, Suite 105
Albuquerque, New Mexico 87102

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APPEARANCES

FOR APPLICANT ALPHA SWD OPERATING, LLC:

GARY W. LARSON, ESQ.
HINKLE SHANOR, LLP
218 Montezuma Avenue
Santa Fe, New Mexico 87501
(505) 982-4554
glarson@hinklelawfirm.com

FOR DE NOVO APPLICANT DELAWARE ENERGY, LLC:

MICHAEL H. FELDEWERT, ESQ.
HOLLAND & HART, LLP
110 North Guadalupe, Suite 1
Santa Fe, New Mexico 87501
(505) 988-4421
mfeldewert@hollandhart.com

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EXHIBITS OFFERED AND ADMITTED

(No exhibits.)

1 (9:11 a.m.)

2 CHAIRWOMAN RILEY: Moving on to number
3 five: Final action may be taken on Case Number 15855,
4 de novo, which was continued from the July 19th
5 Commission meeting, application of Delaware Energy, LLC
6 to revoke the injection authority granted under SWD-1680
7 for the Alpha SWD Number 1 well operated by Alpha SWD
8 Operating, LLC, Eddy County, New Mexico.

9 The Commission may also deliberate on a
10 Motion to Stay Injection Authority granted under
11 SWD-1680, filed by counsel for Delaware Energy, LLC in
12 the case.

13 So who do I have here representing this
14 matter?

15 MR. FELDEWERT: Madam Chair, members of the
16 Commission, Michael Feldewert, with the Santa Fe office
17 of Holland & Hart, appearing on behalf of Delaware
18 Energy, LLC.

19 CHAIRWOMAN RILEY: Good morning.

20 MR. LARSON: Good morning, Madam Chair,
21 Commissioners.

22 Gary Larson, with the Santa Fe office of
23 Hinkle Shanor, on behalf of the Applicant, Alpha SWD
24 Operating.

25 CHAIRWOMAN RILEY: Good morning, gentlemen.

1 Let me get the appropriate paperwork on
2 this one.

3 So let's start with the Motion to Stay
4 Injection Authority.

5 Do you want to go ahead and start?

6 MR. FELDEWERT: Sure.

7 Madam Chair, members of the Commission, we
8 filed a motion requesting to continue the stay that was
9 granted at the July 20th hearing until there's been a
10 final determination of an appeal or a remand of the
11 Commission's decision announced at the last hearing to
12 vacate division Order R-14484-A, which you'll recall
13 revoked Alpha's injection authority following a hearing
14 before division examiners where they found that the
15 administrative order granting that authority had been
16 improperly issued because it violated the procedures for
17 approval of administrative orders. And I point out that
18 there is absolutely no debate that that administrative
19 order was improperly issued in violation of the 15-day
20 waiting period required by the division rules. And
21 rather than vacate that administrative order and remand
22 to the division for further discussion, the Commission
23 apparently intends to issue an order stating that the
24 division examiners did not have jurisdiction to review
25 whether an administrative order was properly issued.

1 Now, Alpha never made that suggestion at
2 the division level. The examiners certainly didn't feel
3 that they lacked jurisdiction when they entered that
4 decision. This was something that the Commission raised
5 sua sponte. And as you know, I strongly believe that's
6 wrong. I think division examiners do have the authority
7 to review administrative orders and determine whether
8 they have been properly issued. And so we intend to ask
9 for a reconsideration of that decision and, if
10 necessary, to seek an appeal to the district court on
11 this legal issue.

12 So at the last hearing, upon hearing that,
13 you orally granted our stay -- request for a stay of the
14 injection authority. You recognized the gross negative
15 consequences to Delaware, which had a prior-filed
16 application in the division, and we asked that you stay
17 that while we now wrestle with this legal jurisdictional
18 issue.

19 I looked at their response, and they say a
20 couple of things. First they say, "Well, don't grant
21 the stay because we'll be prevented from drilling our
22 proposed injection well." Well, the main reason they've
23 been prevented up to now is because that administrative
24 order was improperly issued, as found by the examiners.

25 Secondly, they offer no evidence of any

1 drilling rig under contract, no evidence of a
2 surface-use agreement. They offer no evidence
3 whatsoever of an actual economic harm if this stay is
4 continued while the courts or yourselves, on a motion
5 for rehearing, address this jurisdictional issue that
6 was raised for the first time before this body.

7 Secondly, they suggest that it's improper
8 for the Commission to address a motion for a stay, and
9 they suggest that we should wait and have it addressed
10 by the district court. That's wrong for three reasons.

11 First, there is not going to be an appeal
12 to district court until a request for rehearing is
13 addressed by this Commission. So there is not going to
14 be any filing in the district court for at least another
15 month.

16 Secondly, the Commission rules provide for
17 stays of division or Commission orders, 19.15.4.23B set
18 forth the authority to grant stays. It's a clear intent
19 expressed by the Commission -- the prior Commissions to
20 have the Commission or the division request stays of
21 agency orders because they're familiar with the record;
22 they understand the issues.

23 Third, the Rules of Civil Procedure, in
24 fact, the very rule that's cited by Alpha, requires that
25 a party seek a stay first before the agency. And I'm

1 looking at Rule 74Q1A, "You must seek a stay before the
2 agency that issued the order or," as it says, "explain
3 to the Court why it was impracticable to seek a stay
4 before the agency." So you have to come before the
5 agency first. It makes sense, re-issue new orders. So
6 it is not improper to bring a request for a stay before
7 this Commission, and, in fact, it's required by the
8 Commission rules and the district court rules.

9 So if I look at this record, the division
10 Director Catanach, at the very beginning when this case
11 was filed, issued an emergency stay order. Okay? He
12 recognized the need for and the appropriateness of a
13 stay in this particular matter. The Commission
14 recognized, at this last hearing, that nothing has
15 changed since that point. We're now going to have to go
16 address this jurisdictional issue, and so we ask that
17 the stay issued by the Commission in July continue while
18 the parties deal with this jurisdictional issue first in
19 a motion for rehearing and then, if necessary, with an
20 appeal to the district court.

21 CHAIRWOMAN RILEY: Mr. Larson.

22 MR. LARSON: Madam Chair, Commissioners, I
23 filed a written response to the motion to stay on Friday
24 afternoon. I don't know if the commissioners have had
25 an opportunity to look at it. I can certainly hit the

1 points I made in the response.

2 Alpha is not arguing that it's improper to
3 come to the Commission for a stay. What Alpha is
4 arguing is Mr. Feldewert is asking what effect is an
5 open-ended stay. If he appeals to the district court,
6 we're looking at at least a year. If he chooses to
7 appeal it further, we're talking another year or two.
8 And it's our position that the district court is better
9 situated and then potentially appellate court to enter a
10 stay of the duration that he's asking for.

11 Now, the Commission standard for a stay, as
12 applied to this case, includes two issues. The first
13 is: Are there correlative rights that need to be
14 protected? Mr. Feldewert's motion argues that it does.
15 This morning, he has not said that, and that's
16 appropriate because there are no correlative rights that
17 Delaware Energy has at risk.

18 The second issue is: Are there grave
19 economic consequences potentially inuring to Delaware?
20 My position is there are not and dispute, as the
21 Commission is aware of, as to whether that application
22 Mr. Feldewert refers to was canceled or suspended. And,
23 of course, it's Alpha's position, as reflected in the
24 division's records, that that application was canceled.

25 Again, the appropriate jurisdiction to

1 enter a stay of the length requested by Mr. Feldewert is
2 the district court for two reasons.

3 One, there is a more stringent legal
4 standard he will have to meet to get a stay, including
5 showing no harm to Alpha SWD.

6 The second is the Court can enter a --
7 require a bond or financial assurance as a prerequisite
8 for the stay. And up to this point, Delaware has had no
9 economic skin in the game.

10 And I have to disagree with Mr. Feldewert
11 that there is no economic harm to Alpha. It has had
12 injection authority initially granted 14 months ago. It
13 has not been able to take any action on its well.
14 Obviously, financial risk is at stake until these issues
15 are resolved.

16 So our bottom-line position is if there is
17 going to be a stay, it's more appropriately entered by
18 the district court, and, therefore, Alpha SWD asks the
19 motion to stay be denied.

20 CHAIRWOMAN RILEY: Can we start asking
21 questions?

22 MR. BRANCARD: Yes.

23 CHAIRWOMAN RILEY: Is there an APD filed on
24 that well?

25 MR. LARSON: Not that I'm aware of. And,

1 again, the case is still pending, so it would be to
2 their detriment to develop a well given the uncertainty
3 presented by this case.

4 COMMISSIONER BALCH: Could you go into a
5 little more detail of the harm that's being done to
6 Alpha? They don't have an APD. They haven't spud the
7 well.

8 MR. LARSON: Well, they've been prevented
9 from doing so. That's the economic harm. If this case
10 were finally concluded, they could take action the next
11 day. So they have a thing of value, which is a
12 division-approved injection authority. They just
13 haven't been able to act on it.

14 CHAIRWOMAN RILEY: But they could still
15 file their APD. There is nothing precluding them from
16 filing an APD.

17 MR. LARSON: That is true.

18 CHAIRWOMAN RILEY: Pending resolution of
19 all of this, they could still have an APD.

20 MR. LARSON: That is true.

21 CHAIRWOMAN RILEY: Mr. Martin?

22 COMMISSIONER MARTIN: I don't have any
23 questions.

24 MR. FELDEWERT: The only other thing I'd
25 point out is this. The division record would reflect --

1 and they don't deny it -- they wanted to sell this
2 authority to Delaware. That's how we found out about
3 this.

4 CHAIRWOMAN RILEY: Mr. Brancard, do you
5 want to --

6 MR. BRANCARD: Yeah. I would just -- I
7 would just ask Mr. Feldewert to lay out how his client
8 meets the standard in 23B on the motion to stay.

9 MR. FELDEWERT: On the motion for a stay?

10 MR. BRANCARD: Yes. It's your motion.

11 MR. FELDEWERT: Sure.

12 Well, first off, gross negative
13 consequences -- if they drill -- this was -- Delaware
14 had a prior-filed application pending before the
15 division for a disposal well in the same area, in the
16 same zone. The division is not going to grant two
17 disposal wells in the same area, in the same zone. So
18 if Alpha is authorized to go out now and file their APD
19 and drill their well and then commence injection, then
20 our application becomes moot and will not be considered
21 by the division. I'm not aware of any more gross
22 negative consequences than having a prior-filed
23 application than having somebody permit over top of it
24 without notice to you and take away your ability to
25 inject in an area where you had planned to inject under

1 a circumstance where it is undisputed that the authority
2 was granted improperly to Alpha.

3 MR. BRANCARD: What's the distance between
4 the two proposed wells?

5 MR. FELDEWERT: I don't remember. Very
6 close.

7 COMMISSIONER BALCH: Hundreds of feet?

8 MR. FELDEWERT: I'd have to look at the
9 record, the transcript.

10 COMMISSIONER BALCH: Not thousands of feet?

11 MR. FELDEWERT: I'd have to look at the
12 transcript. I know it was close enough they're not
13 going to grant both. That's why they --

14 MR. BRANCARD: Which is why Delaware has
15 not been able to continue to pursue its application?

16 MR. FELDEWERT: Correct, because there
17 is -- there is an order issued, which is then under
18 appeal. Because the objections have been withdrawn, but
19 the division by that time -- or, actually, the
20 objections to Delaware's application were withdrawn and
21 notice sent to the division of that withdrawal the day
22 before the order was prematurely issued by the division.
23 But once that order was issued, then Delaware's
24 application could no longer move forward because it's in
25 the same area, same zone.

1 MR. BRANCARD: And the division informed
2 you of that?

3 MR. FELDEWERT: Yes.

4 MR. BRANCARD: In writing?

5 MR. FELDEWERT: Not in writing. I don't
6 think it's in writing. I'd have to check. We had a
7 hearing -- division hearing on these issues.

8 MR. BRANCARD: One option for the
9 Commission is to grant a stay for a long enough period
10 of time if this case were to go to district court.

11 COMMISSIONER MARTIN: How do we determine
12 that?

13 MR. BRANCARD: Well, you have 30 days -- if
14 you issue the order today -- really the motion is only
15 relevant if you issue the order, by the way.

16 MR. FELDEWERT: Good point.

17 MR. BRANCARD: We've done this sort of
18 backwards here. If you issue the order, they have 20
19 days to request a rehearing, ten days for the Commission
20 to consider it. That's 30 days. And after that, then
21 comes a 30-day period for an appeal. So I think if you
22 were to grant the motion for a stay, you would grant it
23 for at least 60 days. You may want to add some time on
24 there to allow for people to take proper action in
25 district court. Just grant it for a period of time or

1 until district court takes jurisdiction over the issue.

2 CHAIRWOMAN RILEY: That seems like it would
3 be appropriate, that we stay -- do a stay until all of
4 those time frames have exhausted, and then if it's in
5 district court, then they can issue another stay,
6 right --

7 MR. BRANCARD: Yes.

8 CHAIRWOMAN RILEY: -- pending the outcome
9 of their decision?

10 COMMISSIONER MARTIN: Should things not
11 happen timewise, do we have the ability to come in and
12 extend that stay?

13 MR. BRANCARD: Well, at some point -- I
14 mean, if they file an appeal with the district court,
15 the Commission essentially loses jurisdiction.

16 COMMISSIONER MARTIN: Oh, I see what you're
17 saying.

18 MR. BRANCARD: So they could file for an
19 emergency stay and then a longer stay with district
20 court, but you can give a period of time.

21 COMMISSIONER MARTIN: I prefer that to an
22 open-ended stay.

23 COMMISSIONER BALCH: Well, I'm actually of
24 the other mind. I prefer the open-ended stay. The crux
25 of the issue is that Alpha was given a permit

1 improperly. It shouldn't have happened. So I don't see
2 that they should be able to continue pursuing until the
3 entire issue is resolved one way or the other.

4 COMMISSIONER MARTIN: I agree with that,
5 but I think there should be a time limit.

6 COMMISSIONER BALCH: Sure, two years.

7 COMMISSIONER MARTIN: I think something
8 less than that.

9 CHAIRWOMAN RILEY: So I have a third
10 opinion. I think that the stay should be tied to the
11 district court, it being moved jurisdictionwise to the
12 district court, because if they fail to timely file
13 their appeal, then they won't get to file it. So there
14 is already a time frame because of that.

15 COMMISSIONER MARTIN: And I think we should
16 grant it based on that time frame.

17 COMMISSIONER BALCH: Let me ask you a
18 question, Mr. Brancard. If we give an open-ended stay
19 and it is appealed to district court and district court
20 takes over jurisdiction, couldn't they then modify the
21 stay as they so choose? Does it restrict them from
22 their bonding and other abilities?

23 MR. BRANCARD: One of the parties would
24 have to go to the district court to request some sort of
25 relief.

1 COMMISSIONER BALCH: That party could be
2 Alpha.

3 MR. BRANCARD: Could be Alpha, from the
4 district court, or basically try to get some sort of
5 preliminary decision from the district court about the
6 stay that's been issued.

7 I don't know that a district court is
8 necessarily going to easily overrule an agency making
9 that decision. I would think they would uphold the
10 agency's decision. The timing of it, that would be an
11 issue, but -- and if you wanted to go that way, you
12 would issue -- I think Mr. Feldewert's request was for
13 the pendency of the district court action.

14 Is that correct?

15 MR. FELDEWERT: Yeah. And one of the
16 reasons I asked that is when I look at the state
17 proceedings, the Rules of Civil Procedure, 74Q --
18 okay? And you read it and it says, "Upon motion, a
19 district court may stay enforcement of an order for
20 decision under review." Okay? It says, "A motion for a
21 stay pending an appeal must state that a request for
22 stay was previously made to the agency and was denied or
23 explain why seeking a stay from the agency in the first
24 instance would be impracticable. So as I read this, it
25 contemplates that you go before the agency, and they

1 determine whether the stay is appropriate while you're
2 on appeal to the district court, and you only raise the
3 issue in the district court if the agency says no.

4 MR. BRANCARD: Well -- yes. Go ahead,
5 Mr. Larson.

6 MR. LARSON: In the scenario you're
7 discussing, I would have to go to the district court or
8 he would have to go to the district court and ask that
9 the Commission stay be commuted, or if you enter an
10 open-ended stay, there would be no reason for him to
11 seek a stay. He's already got it. And if I have to go
12 to the district court and ask them to commute it as,
13 Mr. Brancard noted, it's difficult to overturn an
14 administrative decision.

15 MR. BRANCARD: Well, I mean, I don't want
16 to give you-all ideas, but you could have two opposing
17 appeals in front of the district court. I mean, if the
18 Commission grants the -- that's the big if. Delaware
19 could appeal the order, and if the Commission grants
20 this stay, Alpha could appeal that decision.

21 MR. LARSON: As a cross-appeal.

22 MR. BRANCARD: As a cross-appeal.

23 MR. FELDEWERT: So we requested -- and I've
24 done this before. We've requested a stay pending the
25 outcome of the appeal or remand from the district court

1 back to the Commission. And my understanding -- as I
2 customarily understand it, it's been dealt with by the
3 agency because they have knowledge of the record; they
4 have knowledge of the issues.

5 COMMISSIONER MARTIN: I think that's
6 essentially what I'm saying, if you want -- if it can be
7 worded that way.

8 COMMISSIONER BALCH: Yeah. I'm comfortable
9 with that wording as well.

10 MR. BRANCARD: Well, that's fine, but my
11 suggestion is that the Commission first address the
12 order, decide if you want to go ahead with this
13 decision, because until you've made this decision, there
14 is nothing to stay. And you're still in deliberation on
15 this case. You can still consider the evidence in the
16 case. This was a tough decision, and so it's still open
17 for further deliberation.

18 So that would be my suggestion, that you
19 consider the order first. I mean, if you go ahead with
20 the order as written, seems then you have a path forward
21 with the motion to stay after that. And I guess I would
22 word the stay as "to the conclusion of any district
23 court proceedings," unless, of course, there is no
24 appeal filed.

25 CHAIRWOMAN RILEY: And then it expires.

1 COMMISSIONER BALCH: Then given --
2 something like that.

3 CHAIRWOMAN RILEY: So we need to talk about
4 the order then next. Have you-all had a chance to look
5 through the proposed order?

6 COMMISSIONER MARTIN: I have.

7 COMMISSIONER BALCH: I have.

8 CHAIRWOMAN RILEY: Do any you have
9 comments?

10 COMMISSIONER MARTIN: No good ones.

11 CHAIRWOMAN RILEY: I know.

12 COMMISSIONER MARTIN: I don't have any
13 comments. I guess I'm okay with the order. I do
14 applaud Mr. Brancard for the expertise on this. So I'd
15 have to go -- I defer to him and the accuracy of the
16 dates, and I think it accomplishes what Bill wanted to
17 accomplish.

18 MR. BRANCARD: But does it accomplish what
19 you want to accomplish?

20 COMMISSIONER MARTIN: Yes. Yes, it does.

21 MR. BRANCARD: I mean, if you have
22 significant heartburn with this, we can go back into
23 deliberation about it.

24 COMMISSIONER BALCH: There's plenty of
25 heartburn with this.

1 CHAIRWOMAN RILEY: Yeah.

2 COMMISSIONER MARTIN: But is it -- is it
3 sufficient?

4 MR. BRANCARD: Is it significant?

5 COMMISSIONER BALCH: I don't see my mind
6 changing on the issue. The main problem we have is the
7 Commission is setting a bad precedent, so it's
8 unfortunate that this issue occurred. Hopefully we'll
9 get it resolved appropriately at some point in time by
10 the appropriate authority.

11 CHAIRWOMAN RILEY: I agree. I mean, I
12 think we can go back into deliberation, but we'll
13 probably just talk through all the same issue we did
14 before. I don't see it having a different outcome.

15 COMMISSIONER MARTIN: I agree.

16 CHAIRWOMAN RILEY: It was a tough -- this
17 was a really tough decision to make, and I don't think
18 any of us made it lightly. It's just untenable, no
19 matter how you look at it.

20 MR. BRANCARD: Well, true. I mean, I tried
21 to -- as I was drafting the order, going back through
22 the statutes, I was trying to come up with different
23 ways of looking at this. And there are. But the
24 solutions either way adversely affect one party or the
25 other in a way that they didn't intend to be impacted.

1 CHAIRWOMAN RILEY: Based on that, we need
2 to make a decision on this order. Do you want to take
3 an oral vote on the order?

4 COMMISSIONER MARTIN: I move it be adopted.

5 CHAIRWOMAN RILEY: Okay.

6 COMMISSIONER BALCH: I'll second the
7 motion.

8 CHAIRWOMAN RILEY: That was appropriate.
9 Thank you.

10 We have a second.

11 So moved.

12 So let's do an oral vote.

13 Signify by saying aye if you approve of
14 adopting this order.

15 COMMISSIONER BALCH: Aye.

16 COMMISSIONER MARTIN: Aye.

17 CHAIRWOMAN RILEY: Aye.

18 (Ayes are unanimous.)

19 CHAIRWOMAN RILEY: Will you please sign,
20 Mr. Balch -- Dr. Balch?

21 COMMISSIONER BALCH: Sure.

22 Thank you, Bill, for writing that.

23 MR. BRANCARD: Mr. Larson got me started,
24 and I kept going.

25 CHAIRWOMAN RILEY: This one is not fun,

1 just for the record.

2 MR. BRANCARD: You should look at the
3 order, Mr. Larson, because I added significantly to it.

4 So then we have a motion to stay. So if I
5 understand, the proposal would be to grant the motion to
6 a period of 60 days, and then it will automatically be
7 extended if an appeal is filed in district court or
8 through the pendency of that appeal in district court.

9 COMMISSIONER MARTIN: I move the stay be
10 granted under those terms.

11 COMMISSIONER BALCH: I second that motion.

12 CHAIRWOMAN RILEY: Okay. So moved.

13 MR. BRANCARD: Okay. I can draft a
14 separate order for the Chair to sign.

15 COMMISSIONER MARTIN: Okay.

16 (Case Number 15855 concludes, 9:39 a.m.)

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1 STATE OF NEW MEXICO
2 COUNTY OF BERNALILLO

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4 CERTIFICATE OF COURT REPORTER

5 I, MARY C. HANKINS, Certified Court
6 Reporter, New Mexico Certified Court Reporter No. 20,
7 and Registered Professional Reporter, do hereby certify
8 that I reported the foregoing proceedings in
9 stenographic shorthand and that the foregoing pages are
10 a true and correct transcript of those proceedings that
11 were reduced to printed form by me to the best of my
12 ability.

13 I FURTHER CERTIFY that the Reporter's
14 Record of the proceedings truly and accurately reflects
15 the exhibits, if any, offered by the respective parties.

16 I FURTHER CERTIFY that I am neither
17 employed by nor related to any of the parties or
18 attorneys in this case and that I have no interest in
19 the final disposition of this case.

20 DATED THIS 10th day of September 2018.

21

22

23 MARY C. HANKINS, CCR, RPR
24 Certified Court Reporter
New Mexico CCR No. 20
Date of CCR Expiration: 12/31/2018
Paul Baca Professional Court Reporters

25