

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

**APPLICATION OF EMPIRE NEW MEXICO TO
REVOKE THE INJECTION AUTHORITY
+GRANTED UNDER ORDER NO. R22026 FOR
THE ANDRE DAWSON SWD #001, LEA COUNTY,
NEW MEXICO**

CASE NOS. 24018-24019 AND 24024-24027

**THE OIL CONSERVATION DIVISION’S MOTION TO VACATE AND RESCHEDULE
TO AUGUST 15, 2024 THE OIL CONSERVATION COMMISSION SETTING FOR
JULY 18, 2024**

COMES NOW the New Mexico Oil Conservation Division (“OCD”) and hereby requests that the Oil Conservation Commission (“OCC”) vacate the July 18, 2024 setting for the above-captioned cases and reset the matter for the August 15, 2024 OCC meeting. As grounds in support thereof, OCD states the following:

- (1) Counsel for the OCD, Jesse Tremaine and Chris Moander, are scheduled to attend the 70th Annual Natural Resources and Energy Law Institute Conference held by the Foundation for Natural Resources and Energy Law scheduled for July 18-20, 2024 in Santa Fe, NM.
- (2) OCD counsel confirmed their attendance for the FNREL Conference on April 26, 2024. *See* Exhibit 1 – email confirmation.
- (3) The OCC’s scheduling of Empire’s Expedited Motion for July 18, 2024 runs into direct conflict with the FNREL Conference dates.
 - a. OCD notes here that Empire’s Expedited Motion appears to request immediate relief for the exact issues about which it complains in its Applications for the above-captioned cases. *See* Applications in OCC Case Nos. 24018-24027; *see also* OCC Order No. R-23048. Therefore, the matters before the OCC are no more pressing than they were when Empire filed its original Applications.
- (4) OCD counsel intends to fulfill their CLE obligations to the State Bar of New Mexico by attending the FNREL Conference. Additionally, should OCD counsel need to cancel their

**OCD’S MOTOIN TO VACATE
AND CONTINUE JULY 18, 2024
SETTING FOR CASE NOS.
24018-24019 AND 24024-24027**

registrations with FNREL, New Mexico taxpayers would be obligated to cover the \$100 late cancellation fee, which would be an unnecessary cost to the public fisc.

- (5) Therefore, based on the above, OCD respectfully requests that the OCC vacate the current July 18, 2024 setting for the above-captioned cases and reset the matter for the August 15, 2024 regularly scheduled OCC meeting.
- (6) Empire objects to this Motion; Goodnight and Pilot do not oppose this Motion.

Respectfully submitted,

Christopher L. Moander
Assistant General Counsel
New Mexico Energy, Minerals and
Natural Resources Department
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Santa Fe, New Mexico 87505
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CERTIFICATE OF SERVICE

I certify that on July 8, 2024, 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 HINKLE SHANOR LLP P.O. Box 2068 Santa Fe, NM 87504-2068 (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com</p> <p>Sharon T. Shaheen Samantha H. Catalano Montgomery & Andrews, P.A. Post Office Box 2307 Santa Fe, NM 87504-2307 (505) 986-2678 sshaheen@montand.com scatalano@montand.com cc: wmcginnis@montand.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</p> <p><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>
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Christopher L. Moander

Moander, Chris, EMNRD

From: Gonzales, Ramona, EMNRD
Sent: Friday, April 26, 2024 8:34 AM
To: Fuge, Dylan, EMNRD; Shelton, Benjamin, EMNRD; Moander, Chris, EMNRD; Tremaine, Jesse, EMNRD; Chakalian, Gregory, EMNRD
Subject: 70th Annual Institute

Good Morning Everyone,

I just wanted to let you know that your registration for the 70th Annual Institute Event has been paid for. I did send the information to Beth, but she is out at an event this week. Please let me know if you need additional information.

Have a great Friday.

Ramona Gonzales

**Purchasing Agent/Fleet Coordinator
EMNRD – Oil Conservation Division
505-795-4599**

Ramona.gonzales@emnrd.nm.gov

<http://www.emnrd.state.nm.us/OCD>



From: Gonzales, Ramona, EMNRD
Sent: Wednesday, April 24, 2024 3:01 PM
To: Beth Kuzera <bkuzera@fnrel.org>
Subject: 70th Annual Institute

Good Afternoon Beth,

Below is the payment information for the 70th Annual Institute event here in Santa Fe NM for EMNRD employees. Please let me know if you have any questions and what are the next steps for the employees?

Thank you and I hope you are having a great Wednesday.

*Bank	WFB10	Pay Group		*Netting	Not Applicable
*Account	0003	*Handling	Regular Payments	L/C ID	
*Method	ACH	Hold Reason			
Message					INVOICE 0020528

Message will appear on remittance advice.

Immediate Payment

*Action	Schedule Payment	Payment Date	04/18/2024
Pay		Reference	3001603220

Immediate Payment Options

*Bank	WFB10	Pay Group		*Netting	Not Applicable
*Account	0003	*Handling	Regular Payments	L/C ID	
*Method	ACH	Hold Reason			
Message					INVOICE 0020046

Message will appear on remittance advice.

Immediate Payment

*Action	Schedule Payment	Payment Date	04/18/2024
Pay		Reference	3001603221

Ramona Gonzales

**Purchasing Agent/Fleet Coordinator
EMNRD – Oil Conservation Division
505-795-4599**

Ramona.gonzales@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD>



From: Beth Kuzera <bkuzera@fnrel.org>
Sent: Monday, April 8, 2024 12:20 PM
To: Gonzales, Ramona, EMNRD <Ramona.Gonzales@emnrd.nm.gov>
Subject: RE: [EXTERNAL] RE: Houston short course invoice

Ramona,

Please find the two updated invoice.

Let me know what else you need.

Thanks!

BETH KUZERA

Program & Member Service Specialist



Formerly Rocky Mountain Mineral Law Foundation

Please note our new address!

2095 W. 6th Ave., #109

Broomfield, CO 80020

Office: 303-321-8100 ex. 103

bkuzera@fnrel.org

www.fnrel.org

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