

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

**INTERVENOR IPANM'S PROPOSED CHANGES AND AMENDMENTS
TO APPLICANTS' PROPOSED NOTICE OF HEARING**

Intervenor, Independent Petroleum Association of New Mexico ("IPANM"), makes the following suggested changes and/or amendments to the Proposed Notice of Hearing submitted by Applicants on August 12, 2024:

1. IPANM limits this filing to its suggested changes. Arguments and reasoning for these suggested changes will be presented at the Commission's August 15, 2024 hearing in this case.
2. The public hearing date should be set no earlier than May 2025. All other deadlines in Applicants' Proposed Notice of Hearing ("Proposed Notice") should be adjusted commensurately with the new hearing date.
3. The following paragraph should be added to any Notice of Public Hearing issued by the Commission:

Motions. Motions directed at legal issues to be considered by the Commission should be filed no later than _____, 2025. Any person who has filed a Pre-Hearing Statement may file a response to any motion no later than _____, 2025. If any response is filed to a motion, the movant may file a reply no later than _____, 2025.

IPANM suggests that the blanks in the paragraph above be dates calculated from the public hearing date with the first 75 days prior to the hearing date, responses 45 days

prior to the public hearing date and any replies 25 days prior to the date of public hearing date.

4. The Legal Authority paragraph in the Proposed Notice should be begin with the words "Applicants contend that the proposed amendments..." rather than the Applicants' proposal of the paragraph beginning "The proposed rule..."

5. All references to "technical testimony" should be amended to read "technical and expert testimony."

6. The paragraph entitled "Proposed Modifications..." should conclude with the following sentence "Any person presenting written testimony may, upon good cause shown, provide revised, supplemental and/or new testimony with any motion for leave to offer such testimony to be filed no later than _____, 2025." For the blank, IAPNM suggests a date 30 days prior to the scheduled public hearing.

7. IPANM suggests that the paragraph "Oral Comments" be replaced with the following: "Any person who did not file a Pre-Hearing Statement may sign up on or before Noon on _____, 2025 to make an unsworn statement at the hearing. The Commission reserves the right to limit the time of each unsworn statement." For the blank, IPANM suggests the date of Public Hearing.

Respectfully submitted,

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By: 

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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2024, I served a copy of the foregoing to the following via electronic mail:

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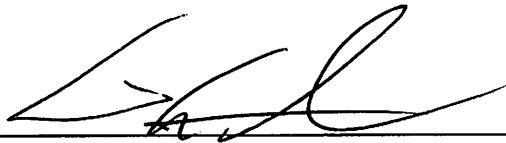
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