

**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

MAXWELL'S PRE-HEARING STATEMENT

Pursuant to Rule 19.15.3.11(B), Mr. Maxwell submits his pre-hearing statement:

I. Name of Person.

The name of the person is Nicholas R. Maxwell.

II. Witnesses.

Mr. Maxwell does not intend to call any witnesses to testify at the hearing.

III. Testimony.

Mr. Maxwell does not intend to present technical testimony.

IV. Exhibits.

Mr. Maxwell has no exhibits to offer as evidence at the hearing.

V. Cross-Examination.

Mr. Maxwell reserves the right to cross-examine witnesses during the hearing.

VI. Proposed Modifications.

Mr. Maxwell does not propose any modifications to the proposed rule.

By: -s- *Nicholas Maxwell*
Mr. Nicholas R. Maxwell
P.O. Box 1064
Hobbs, New Mexico 88241
Telephone: (575) 441-3560
Email: inspector@sunshineaudit.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of my pre-hearing statement was served by email on July 2, 2025 to the persons listed below, with a hard copy mailed upon request:

NM OCC Hearings
occ.hearings@state.nm.us

Sheila Apodaca
OCC Clerk
sheila.apodaca@emnrd.nm.gov

Matthew Nykiel
Kyle Tisdell
Morgan O'Grady
Tannis Fox
Western Environmental Law Center
nykiel@westernlaw.org
tisdell@westernlaw.org
ogrady@westernlaw.org
fox@westernlaw.org
*Attorneys for Applicants Western
Environmental Law Center, et. al.*

Jesse Tremaine
Chris Moander
Assistants General Counsel
**NM Energy, Minerals, and Natural
Resources Department**
jessek.tremaine@emnrd.nm.gov
chris.moander@emnrd.nm.gov
Attorneys for Oil Conservation Division

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for OXY USA Inc.

Felicia L. Orth
OCC Hearing Examiner
felicia.l.orth@gmail.com

Zachary Shandler
Assistant Attorney General
NM Department of Justice
zshandler@nmag.gov
Attorney for Oil Conservation Commission

Miguel A. Suazo
James P. Parrot
James Martin
Jacob L. Everhart
Beatty and Wozniak, P.C.
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jmartin@bwenergylaw.com
jeverhart@bwenergylaw.com
*Attorneys for New Mexico oil and Gas
Association*

Andrew J. Cloutier
Ann Cox Tripp
Hinkle Shanor LLP
acloutier@hinklelawfirm.com
atripp@hinklelawfirm.com
*Attorneys for Independent Petroleum
Association of New Mexico*

Jennifer L. Bradfute
Matthias L. Sayer
Bradfute Sayer P.C.
jennifer@bradfutelaw.com
matthias@bradfutelaw.com
Jordan L. Kessler
EOG Resources, Inc.
jordan_kessler@eogresources.com
Attorneys for EOG Resources, Inc.

Mariel Nanasi, Esq.
New Energy Economy
mariel@seedsbeneaththesnow.com
Attorney for New Energy Economy

-s- *Nicholas Maxwell*
Mr. Nicholas R. Maxwell