

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

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**APPLICATION OF HILCORP ENERGY
COMPANY TO AMEND THE WELL
DENSITY AND LOCATION
REQUIREMENTS AND ADMINISTRATIVE
EXCEPTIONS OF THE SPECIAL RULES
FOR THE BLANCO-MESAVERDE GAS
POOL, RIO ARriba AND SAN JUAN
COUNTIES, NEW MEXICO**

Case No: 16403

NOTICE OF INTERVENTION

Intervenor's name:

San Juan Citizens Alliance

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NATURE OF INTERVENOR'S INTEREST IN THE APPLICATION:

San Juan Citizens Alliance ("SJCA"), through its undersigned counsel, respectfully moves to intervene in this action pursuant to NMAC 19.15.4.11(A) Adjudicatory Proceeding Intervention.

Under NMAC 19.15.4.11(A), SJCA has standing with respect to the subject matter of the application. Under the New Mexico doctrine of standing articulated in case law, which is applied by the OCD, SJCA members and SJCA as an organization have standing because they face a real risk of future injury to their surface property and health, to the environment, and to their due process rights that would result from the approval of this application. SJCA's standing relates to the subject matter of Hilcorp's application because Oil and Gas Act authorizes the Commission to consider surface, environment, and public health impacts along with the prevention of waste and correlative rights, and the Commission did so in the prior hearing on this matter.

In the event that the Commission denies standing under NMAC 19.15.11(A), the Commission should alternatively grant intervention to SJCA on that grounds that it will substantially contribute to the protection of the public health and the environment under NMAC 19.15.4.11(C). This Commission promulgated this provision to broaden public participation where an intervenor can inform the Commission on matters relating to its "mandate" to protect public health and the environment. This is a matter of tremendous impact and great public interest, and the SJCA is the only organization dedicated to advocating for public health and the environment related to oil and gas development in the San Juan Basin, something it has been doing for over 30 years. To deny intervention in this matter would raise the question of what community organization could ever meet the criteria of this provision intended to broaden public participation.

I. SJCA HAS STANDING TO INTERVENE IN ADJUDICATORY PROCEEDING

Pursuant to NMAC 19.15.4.11(A), a person may intervene if they have standing and the intervention is related to the subject matter of the application. NMAC 19.15.4.11(A).

The OCD does not provide a definition for standing to be applied under its intervention regulation, but instead applies the general doctrine of standing as interpreted by New Mexico courts. [SJCA Ex. G 2]. SJCA members meet all three requirements of standing under New Mexico law. First, SJCA members have standing to intervene because its members have a real risk of future injury to their surface property and health, to the environment, and to their due process rights that would result from the approval of this application. Second, these injuries would be caused by the increase in new drilling and recompletions that would result from the Commission's approval of the application. Finally, these injuries can be redressed by denying or modifying Hilcorp's application.

SJCA as an organization has standing because its members have standing, the interests it seeks to protect are germane to the organization's purpose, and the relief requested does not require SJCA members to intervene.

SJCA's standing relates to the subject matter of Hilcorp's application because Oil and Gas Act authorizes the Commission to consider surface, environment, and public health impacts along with the prevention of waste and correlative rights, and the Commission did so in the prior hearing on this matter.

A. Motion to intervene is timely filed.

To intervene, the Adjudication Proceeding Intervention regulation requires filing of a written notice of intervention one business day before the pre-hearing statement is filed. NMAC 19.11.4.11(A). SJCA has met its deadline in filing its notice of intervention.

B. Individual SJCA members have standing

1. If the Commission grants Hilcorp's application, SJCA members will face real risks of future injury.

While the central purpose of the Oil and Gas Act is to prevent waste and protect correlative rights, NMSA 1978, § 70-2-11 (A) (1935), the Commission is also explicitly authorized to prevent injuries resulting from oil production, including protecting neighboring properties from injury, regulating waste from “exploration, development, production, or storage of crude oil” and/or logistic relating to oil production with the purpose of “protect[ing] public health and the environment.” NMSA 1978, § 70-2-12 (B)(7), (21), and (22) (1935, as amended through 2018). Here, SJCA’s members face a real risk of future injury to their surface property and health, to the environment, and to their due process rights if this application is approved.

To show injury in fact, the first element of standing, claimants must be injured or threatened in a “concrete and direct way.” *ACLU v. City of Albuquerque*, 144 N.M. 471, ¶ 19, 2008-NMSC-045. However, claimants need not suffer from the actions they challenge to show injury in fact but only must show that they are “imminently threatened with injury, or, [... be] faced with a real risk of future injury, as a result of the challenged action or statute.” *Id.*, ¶ 11 (quoting *De Vargas and Loan Ass’n of Santa Fe v. Campbell*, 87 N.M. 469, ¶ 9, 1975-NMSC-026). Being “aggrieved and directly affected” by the challenged action is sufficient to show injury. *De Vargas and Loan Ass’n of Santa Fe v. Campbell*, 1975-NMSC-026, ¶ 13, 535 P.2d 1320 (finding that plaintiff loan officers’ faced a real risk of future harm in the form of insolvency of their businesses because there was not enough demand to accommodate additional competing loan businesses in the same town). “A hypothetical possibility of injury” is not sufficient. *ACLU*, ¶ 29, 2008-NMSC-045 (holding that the possibility that a member of the ACLU could be arrested for a DWI and subject to the challenged ordinance injuries was not an “imminent” injury or “real risk of future injury”). After

showing injury under the above terms, even “slight” injury is sufficient to establish injury in fact. *De Vargas*, 1975-NMSC-026, ¶ 12.

Here, SJCA members face a real risk of future injury in expecting that the same direct harm they suffered as a result of past drilling will only worsen with an increase in well-density. These harms are not hypothetical or a mere possibility, but are based on the experiences of SJCA members living amongst continuous drilling.

In the attached affidavits, SJCA members Don Schreiber, Mike Eisenfeld, and Jack Scott attest to direct harms that they have already experienced—surface damage, water loss, contamination, ranching interferences, and health problems—and fear that if the application is granted, the resulting new wells and recompletions will cause further harms and exacerbate existing ones. **See generally** [SJCA Ex. A, B, C, and D].

First, SJCA members are threatened by a real risk of future injury to their surface property interest. For example, SJCA member, Don Schreiber, a ranch owner in Rio Arriba County, described harm to soil and “sub-surface contamination through leaking equipment and spills” as a result from previous oil production and continues to fear for his ability to ranch. [SJCA’s Ex. A 2]. Schreiber relates that his “greatest fears” in Hilcorp’s proposed recompletions of the wells to his land that is already stressed by oil production. In his view, new well pads and recompletions of wells will re-disturb and double the impacts of drilling and production waste. *Id.*

Second, SJCA members are threatened by a real risk of future injury to their health. SJCA member Mike Eisenfeld fears that the requested doubling of well-density will “dramatically increase BTEX and VOC exposure,” which is linked with “increased risk of cancer, heart disease, strokes, and asthma.” [SJCA’s Ex. B 2]. Jack Scott, who served as a city commissioner in Aztec for eight years and is one of the founding members of SJCA, has long witnessed the leaking of

emissions and pollutants around his property and the Blanco-Mesaverde Gas pool. [SJCA Ex. D 1]. Scott fears that his exposure to these emissions will increase if the OCD grants Hilcorp's application. [SJCA Ex. D 1].

Third, SJCA members are threatened by a real risk of future injury to the environment. Eisenfeld adds the Blanco-Mesaverde well is within a "methane hotspot" where the primary polluters are oil producers. [SJCA's Ex. B 3]. As related to Hilcorp's application, Eisenfeld fears that the requested well density increase perpetuate damage to land surrounding the well pads, stating that "[e]ven recompletions could still be significant to air, land, water and public health." [SJCA's Ex. B, pg. 3]. Scott fears that additional pipelines and doubling of the well pad size will diminish his ability to farm and ranch as these actions disturb land and destroy his irrigation practices. [SJCA Ex. D 2].

Here, SJCA members assert a real risk of future injury. Like the plaintiffs in *De Vargas* who feared for the solvency of their business as they faced the risk of new competitors, SJCA members are similarly "aggrieved and directly affected" from future risks to their property, health, and the environment will be harmed as a result of the increased well density. The fear that the plaintiffs in *De Vargas* faced was in response to the lack of demand for business in the area and the risk that new businesses would result in the plaintiffs' businesses insolvency. Here, SJCA members' fears are based on decades of direct experience with surface harms resulting from oil production in San Juan and Rio Arriba counties, and are even more well-founded than those of the *De Vargas* plaintiffs.

It cannot be said that these likely injuries are merely "hypothetical." In *ACLU*, the court found that the injury alleged by the plaintiffs was hypothetical because they were never actually harmed by the ordinance they challenged, and could not show that they would ever be subject to

the ordinance. Here, SJCA members *have* suffered injury to their property as a result of oil drilling and production in the area surrounding the Blanco-Mesaverde oil pools. Schreiber's account of oil leaks and harms to his ranching business illustrate more than a hypothetical harm resulting from oil production.

Moreover, granting this application would explicitly authorize the doubling of well density where there property is located. At the September 13, 2018, hearing on this application, Hilcorp stated that it did not plan to drill new wells right away, but planned to do so in the future. Sept. 13, 2018, Hearing Transcript, Case No. 16403, at 53:17-21 (Hereafter "[HT]") (Hilcorp stating that once it exhausted the "Dakota wells that are available" it plans on returning to drill new wells). While it is unknown specifically whether new drilling or recompletions would immediately take place near members property, the whole point of this application is to provide blanket authorization for doubling well density and deny an opportunity for a hearing on GPU-by-GPU basis

After showing a real risk of injury, even a "slight" injury is sufficient for purposes of standing. *De Vargas*, 1975-NMSC-026, ¶ 12. Here SJCA members clearly meet and exceed this standard. As just one example, the injuries feared by Schreiber, namely his ranching and grazing abilities, have been affected by drilling and would be further exacerbated by a grant of this application. [SJCA Ex. A 2]. Scott expresses similar fears of injury to his ranching abilities, as drilling at the Blanco-Mesaverde pool has already interfered with his farming practices. [SJCA Ex. D 2].

Additionally, SJCA members suffer direct injury to their due process rights if the OCD fails to find standing and fails to grant SJCA's motion for intervention. The New Mexico Constitution guarantees that no person shall be deprived of property without due process of law, N.M. Const. Art. II, § 18. Due process requires that interested parties have an opportunity to be

heard in administrative proceedings. *Rayallen Res., Inc. v. N.M. Cultural Props. Review Comm.*, 2014-NMSC-006, ¶ 28.

Here, SJCA members will suffer further injury absent the Commission's grant of intervention because if this application is granted, SJCA members will no longer have the opportunity to seek intervention when a producer seeks to increase density on a GPU that would specifically harm their property. See generally [SJCA Ex. H 53] (Hilcorp stating that once it exhausted the "Dakota wells that are available" it plans on returning to drill new wells). The Special Rules for the Blanco-Mesaverde Gas Pool allow up to four wells to be drilled into a standard GPU, and does not allow for more than two wells to be located in any quarter section in a GPU. Order No. R-10987-A(1). The Special Rules further provide that exceptions may be granted to the well density and spacing requirements on a GPU-by-GPU basis by special order after a hearing. *Id.*

In its application, Hilcorp requests an amendment to the Blanco-Mesaverde pool rules to double well density in the entire Blanco-Mesaverde Gas Pool. Hilcorp Application, Case No. 16403 at ¶ 13. This change would strip potential intervenors of their right to challenge an increase to well density in a specific GPU. As the attached affidavits affirm, SJCA members have specific, reasonable fears about how a doubling of well density in the Blanco-Mesaverde Gas Pool will harm their property, health, and surrounding environment. Approving this application would strip them of their existing right to intervene and contest an application to double well-density on a GPU directly affecting their property, and constitutes a harm in and of itself sufficient for standing.

2. SJCA members can show a causal connection between a grant of Hilcorp's application and the threat of future injury.

As a second element of standing, New Mexico courts requires the claimant to "show a causal connection between the injury alleged and the conduct of which they complain." *Forest Guardians v. Powell*, 130 N.M. 368, ¶ 25, 2001-NMCA-028. "[T]he injury has to be fairly ... trace[able] to the challenged action of the defendant, and not ... th[e] result [of] the independent action of some third party not before the court." *Id.*, ¶ 25 (citing *Lujan v. Defenders of Wildlife*, 112 S. Ct. 2130, 2136 (1992)).

Here, SJCA members can show a causal connection between the OCD's grant of Hilcorp's application and an increase in drilling under the purposed amendments to the Blanco-Mesaverde Special Pool Rules. If the Commission grants the application, Hilcorp and other drillers will be able to double wells or recompletions, and in fact Hilcorp's experts testified that the company is likely to do so on a major scale. [SJCA Ex. H 53]. As described above, new wells and recompletions are very likely to further and exacerbate the injuries suffered by SJCA members, and by its own terms the application would deny SJCA members from seeking to challenge increases in density in specific GPU's that would be even more clearly result in harms to their specific property, health, or surrounding environment. Clearly, SJCA members causally connect their injuries with the introduction of new wells.

3. SJCA members' real risk of future injury is redressable by OCC action.

Last, SJCA member's potential injury is redressable by the denial of Hilcorp's permit. The injury alleged by the claimant must be "likely" to be redressed by a decision in the claimant's favor; it is not enough that injury alleged would be "speculatively" redressed. *Forest Guardians v. Powell*, 130 N.M. 368, ¶ 25, 2001-NMCA-028.

Here, OCC action would redress the potential harms as the OCC has the power to deny the application or approve it in a more limited way. If the Commission denies the application, as SJCA would request if granted standing, then there will be no by-right doubling of wells throughout the entire gas pool. The likely and feared further injuries to SJCA members' property, health, and surrounding environment because of the oil and gas development that would be triggered by the grant of application would not take place absent some further Commission action.

If the application were to be denied, and subsequently mineral rights holders were to seek a well density exception to double density in particular GPUs that would cause harm to SJCA members' property under the existing Special Rules, then SJCA members could seek intervention in those specific applications, exercising their due process rights. The harm would still be redressed barring a further, separate OCD action.

In *Forest Guardians*, the Court of Appeals of New Mexico found that redressability was speculative in circumstances that require a long and convoluted chain of events. There parents of school children argued that the policies and practices of the New Mexico Land Office had violated the New Mexico Constitution and other laws, and had also violated the trust obligation with regards to leasing of school trust lands. *Forest Guardians v. Powell*, 130 N.M. 368, ¶ 3, 2001-NMCA-028. The court found that the schoolchildren did not have standing because "income generated by the

leasing of school trust lands does not go directly to individual schools or districts, but is deposited in a series of funds before being disbursed pursuant to a complicated school budgeting process.” *Id.* at ¶ 6. In contrast, here a denial by the Commission would directly mitigate the harm that would reasonably be caused by a by-right doubling of wells.

In short, redressability in this circumstance is more than likely, and not at all speculative.

C. SJCA has organizational standing.

SJCA has standing as an organization and can intervene on behalf of members. “An organization’s standing to sue is premised on the standing of its individual members.” “Thus, an association has standing to bring suit on behalf of its members when: “(a) Its members would otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization’s purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit.” *Forest Guardians v. Powell*, 130 N.M. 368, ¶ 21, 2001-NMCA-028.

Here, SJCA’s members individually have standing, see infra at II.B, meeting the first element.

The interests SJCA seeks to protect—the public health and the environment in San Juan and Rio Arriba counties—are “germane to the organization’s purpose.” SJCA was founded to protect citizens of San Juan County from “the impacts of unchecked oil and gas development.” SJCA’s mission is “to advocate for clean air, pure water and healthy lands – the foundations of resilient communities, ecosystems and economies in the San Juan Basin.” [SJCA Ex. B]. SJCA has a history of addressing oil and gas issues and the effects these issues have on the environment. [SJCA Ex. B]. Thus, SJCA has organizational standing because it is acting to further the purpose

of protecting the public and environment from harm resulting from oil production. See *Forest Guardians v. Powell*, 2001-NMCA-028, ¶ 22, 24 P.3d 803 (limiting standing of an organization to organizations acting to further its purpose).

Last, SJCA's request that the Commission deny Hilcorp's application does not require SJCA members to participate in this matter. SJCA has a history of advocating for the protection of public health and environmental concerns on behalf of its members. [SJCA Ex. C 1]. SJCA will pursue this action with similar "adversarial vigor necessary to sharpen the presentation of issues." See *Does I through III v. Roman Catholic Church Archdiocese of Santa Fe, Inc.*, 1996-NMCA-094, ¶ 37, 924 P.2d 237 (identifying an organizations potential for "adversarial vigor" as a reason for individual members of an organization not bringing their own claims). SJCA's history of advocating for public health and the environment on behalf of its members is extensive, including participating in rule-making in "Environmental Protection Agency (EPA) and Bureau of Land Management (BLM) methane rules" and commenting on other well density cases, among many other environmental issues. [SJCA Ex. B]. Additionally, SJCA documents "the impacts of living in the San Juan Gas Field...where exposure to toxic air emissions from the proliferation of oil and gas facilities is common." [SJCA Ex. B]. Clearly, SJCA is well-versed in the impacts of oil and gas production in San Juan county. SJCA's history of advocating for the public and desire to continue in this matter eliminates the necessity for SJCA members to participate individually.

D. SJCA's standing is "with respect to the subject matter."

Under the Oil and Gas Act, the commission has the power to make orders and regulations that go beyond the prevention of waste and protection of correlative rights. This includes "to require wells to be drilled, operated and produced in such manner as to prevent injury to neighboring leases or properties, NMSA 1978, § 70-2-12 (B)(7), and to regulate non-domestic wastes and transportation to of crude oil to "to protect public health and the environment," NMSA 1978, § 70-2-12 (B)(21)-(22). SJCA's request for intervention is "with respect to the subject matter of the application," because SJCA members can show a real risk of future injury on issues the Commission is authorized to consider in this application.

The Court of Appeals of New Mexico confirmed that the Commission is authorized by the Oil and Gas Act to take into account considerations to "protect the environment and public health," including considerations to reduce surface impacts. *Earthworks' Oil & Gas Accountability Project v. N.M. Oil Conservation Comm'n*, 2016-NMCA-055 (When facing a challenge to a rule change, the OCC argued that the rule required changing in order to, among other things, "reduce surface impacts" of oil and gas operations and that these considerations were implemented to "protect the environment and public health in accordance with the Oil and Gas Act.").

Moreover, as the Court of Appeals did in *Earthworks*, the Commission recognized that it considered such impacts to public health and the environment in the first hearing on Hilcorp's application. [HT 135:19-23].

II. IF THE COMMISSION FINDS THAT SJCA DOES NOT HAVE STANDING, INTERVENTION SHOULD BE GRANTED BECAUSE SJCA CAN MAKE A SUBSTANTIAL CONTRIBUTION TO PUBLIC HEALTH AND THE ENVIRONMENT

The rules regarding invention also authorize the Commission Chair to allow a party to intervene when the intervenor shows that they can “contribute substantially to the...protection of public health or the environment.” 19.15.4.11(C).

The Commission’s order promulgating this regulation noted that in order to be granted intervention under this provision, the person would need to “show they had special expertise or interest the Commission determines would be helpful to its decision-making process,” and that this decision would be discretionary. OCD Order No. R-12327-A 13482 at 2.

In the 2005 hearing that the Commission held to adopt this provision and other procedural rules, the Commission recognized that its responsibilities were “the prevention of waste, protection of correlative rights, *and the protection of public health and the environment.*” [SJCA’s Ex. E, 207 (emphasis added)]. The subsequent order referenced above characterized these factors as the “mandates” of the Commission. OCD Order No. R-12327-A 13482 at 2. The Commission adopted the regulatory provision in order to allow a party without standing, but who can “add substance to the case,” to help the Commission “come to a better decision.” [SJCA’s Ex. E, 206].

The Chair of the Commission at the time reasoned that although he believed “that the concept of standing is broad enough to provide meaningful public participation from most of the citizens of New Mexico” that this provision would go further allow people to “meaningfully participate in the process” who had a “a reason based in the mandates that the Legislature had given to the Oil Conservation Division” [SJCA’s Ex. E, 216] (emphasis adding, referring to were

“the prevention of waste, protection of correlative rights, *and the protection of public health and the environment.*”).

SJCA has expertise and experience to inform the Commission on issues the Commission is authorized to consider, and is uniquely positioned to “substantially contribute” to the Commission’s considerations on how to protect public health and the environment while preventing waste in this matter.

A. The OCD has adopted a broad definition of “the environment”

The OCD previously adopted a broad definition of what it means to protect the environment, and this broad definition should be considered when evaluating the impact that SJCA can have on the Commission’s understanding of Hilcorp’s application. [SJCA’s Ex. F]. In 2006, the Commission included in an order related to changes to surface waste management rules that “protection of the environment is not limited to protection of fresh water and prevention of human exposure to toxic agents, but also includes protection of soil stability and productivity, agriculture, wildlife, biodiversity, and, in appropriate circumstances, the aesthetic quality of the physical environment.” [SJCA’s Ex. F, ¶ 22]. This definition is appropriately broad, and should inform the Commission’s consideration of whether to grant intervention by SJCA in this matter.

B. SJCA is uniquely positioned to better inform the OCC on public health and environmental impacts of Hilcorp’s application

SJCA has a clear history of contributing substantially to the protection of public health and the environment. SJCA was established more than 30 years ago to “advocate for clean air, pure water, and healthy lands...in the San Juan Basin.” [SJCA’s Ex. D, ¶ 3]. SJCA has a well-documented history of substantial contributions to public health and the environment, including by participating in stakeholder and public hearing processes (e.g., the Four Corners Air Quality

Working Group designed to reduce VOC emissions and methane, as well in the regional haze ozone hearings); commenting on Environmental Impact Statements (EIS) (e.g., the BLM Farmington's Mancos Shale Gallup Formation EIS); submitting detailed technical comments related to oil and gas impacts; presenting technical comments before the Department of the Interior, BLM, Environmental Protection Agency (EPA), NMOCD and the State of New Mexico legislature; and litigating numerous oil and gas lease sales in northwestern New Mexico. [SJCA's Ex. D, ¶¶ 5-7].

SJCA members have also contributed to New Mexico Pit Rule and Surface Owner Protection Act through participation in the public processes outlined in the New Mexico Rules Act. [SJCA's Ex. D, ¶ 6].

C. The Commission should grant SJCA intervention given there is great public concern about the public health environment impacts of this action and SJCA is uniquely positioned to inform its deliberations

As described above, the Oil and Gas Act authorizes the Commission to consider public health and environment impacts in its adjudications. See infra at I.D. This application is one of great public interest, demonstrated by the large number of public comments the Commission received in its first hearing. The federal Congressional Delegation for northern New Mexico has also sent a letter to federal agencies asking those agencies to consider how a grant of this application will negatively affect the environment in the region. [SJCA's Ex. H] The Rio Arriba County Commission has passed a resolution supporting the Delegation's request. [SJCA's Ex. I].

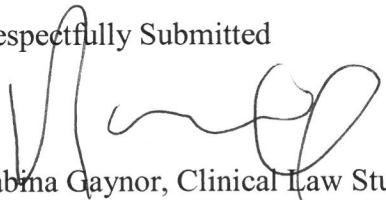
The Commission created this exception because it wanted to create opportunities for broader public involvement in OCD proceedings, and because it recognized that the protection of the public health and environment was one of its "mandates" along with the protection of the public health.

The SJCA has a 30 year history of advocating for the protection of public health and the environment when it comes to oil and gas development in the San Juan Basin. To deny it intervention on a matter that has the potential for such tremendous impact in the region, and where there is such public interest, would raise the question of what community organization could ever meet the criteria of this provision intended to broaden public participation.

III. Conclusion

San Juan Citizens Alliance ("SJCA"), respectfully moves to intervene in this action because its members face a real risk of injuries that would result from this action on issues the Commission is authorized to address by the Oil and Gas Act. Alternatively, the SJCA requests the Commission grant intervention on the grounds that the SJCA can substantially contribute to the protection of the public health and environment.

Respectfully Submitted



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