

## Davidson, Florene, EMNRD

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**From:** Karin Foster <fosterassociates2005@yahoo.com>  
**Sent:** Thursday, January 03, 2013 12:46 AM  
**To:** Davidson, Florene, EMNRD; Gerholt, Gabrielle, EMNRD; Bill Carr;  
mfeldewert@hollandhart.com; Dangler Hugh; Patrick Fort; Don Neeper 2012; Eric Jantz;  
judycalman@yahoo.com; Smith, Mark A, EMNRD  
**Subject:** IPANM Pre hearing statement  
**Attachments:** IPANM PHearing statment II 1213.pdf

Counsel -  
Please find the prehearing statement attached.

**Karin V. Foster**  
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2

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

**APPLICATION OF THE INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO FOR THE AMENDMENT OF CERTAIN PROVISIONS OF TITLE 19, CHAPTER 15 OF THE NEW MEXICO ADMINISTRATIVE CODE CONCERNING PITS, CLOSED-LOOP SYSTEMS, BELOW GRADE TANKS AND SUMPS, AND AMENDING OTHER SPECIAL RULES RELATED TO THE FOREGOING MATTERS, STATEWIDE.**

**CASE NO:14785**

**SUPPLEMENTAL PREHEARING STATEMENT OF APPLICANT INDEPENDENT  
PETROLEUM ASSOCIATION OF NEW MEXICO'S PETITION FOR RULEMAKING  
TITLE 19, CHAPTER 15, PART 17**

I

The Independent Petroleum Association of New Mexico (IPANM), the applicant in the above captioned matter, hereby files this supplemental pre-hearing statement as instructed by the Oil Conservation Commission and pursuant to 19.15.3.11.B NMAC.

**APPEARANCES**

**APPLICANT**

Independent Petroleum Association  
of New Mexico

**ATTORNEY**

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*Counsel for the Independent  
Petroleum Association  
of New Mexico*

**PROPOSED ADDITIONAL EVIDENCE**

IPANM does not intend to present any additional direct evidence at this time. However, we reserve the right to call any necessary rebuttal witnesses.

Respectfully Submitted,

CHATHAM PARTNERS, INC.

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**ATTORNEY FOR THE INDEPENDENT PETROLEUM  
ASSOCIATION OF NEW MEXICO**

CERTIFICATE OF SERVICE

I hereby certify that on this 2<sup>nd</sup> day of January, 2013, I have caused a copy of this Applicants modifications to rulemaking submitted by the IPANM in the above-captioned case to be sent by email to the following:

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