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

APPLICATION OF THE NEW MEXICO OIL AND GAS ASSOCIATION TO REPEAL AND REPLACE TITLE 19, CHAPTER 15 PART 34 ADDRESSING PRODUCED WATER, DRILLING FLUIDS AND OTHER LIQUID OIL FIELD WASTE; AND TO AMEND THE DEFINITION OF PRODUCED WATER IN TITLE 19, CHAPTER 15, PART 2, OF THE NEW MEXICO ADMINISTRATIVE CODE.

CASE NO:15239

PREHEARING STATEMENT OF THE INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO'S FOR RULEMAKING TITLE 19, CHAPTER 15, PART 34

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

APPEARANCES

<u>APPLICANT</u>

Independent Petroleum Association of New Mexico

ATTORNEY

Karin V Foster Chatham Partners, Inc. 5805 Mariola Place, NE Albuquerque, NM 87111 (505) 238-8385 Counsel for the Independent Petroleum Association of New Mexico

PROPOSED EVIDENCE

IPANM fully supports the petition filed by the New Mexico Oil and Gas Association. We do not intend to present any additional direct evidence at this time. However, we reserve the right to cross examine all witnesses as we feel necessary. We also reserve the right to present evidence and 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 12nd day of November, 2014, 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:

Florene Davidson Oil Conservation Commission 1220 S. St. Francis Drive Santa Fe, NM 87505 Florene.Davidson@state.nm.us

Micheal Feldewert Holland & Hart, LLP P.O. Box 2208 Santa Fe, NM 87504-2208 Attorney for the New Mexico Oil and Gas Association

CHATHAM PARTNERS, INC.

By:

Karin V. Foster