

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

**Application of the New Mexico Oil Conservation Division, through the
Environmental Bureau Chief, for Adoption of an amendment to 19.15.39 NMAC
adding new sections to be codified at 19.15.39.9 and 19.15.39.10 NMAC addressing
special provisions for Santa Fe county and the Galisteo Basin; Santa Fe, Sandoval
and San Miguel Counties**

CASE NO. 14255

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted on behalf of the Independent Petroleum Association of New Mexico by Chatham Partners Inc., as required by Oil Conservation Division Rule 19.15.14.1204.B NMAC

APPEARANCE OF THE PARTIES

APPLICANT

New Mexico Oil Conservation Division

ATTORNEY

David K. Brooks

OPPOSITION

Independent Petroleum Association of New Mexico

ATTORNEY

Karin V. Foster, Esq.
Chatham Partners Inc.
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STATEMENT OF CASE

APPLICANT OIL CONSERVATION DIVISION

The hearing concerns an application of the New Mexico Oil Conservation Division, through the Environmental Bureau Chief to adopt an amendment to 19.15.39 NMAC. The Division also seeks to add new sections to be codified at 19.15.39.9 and 19.15.39.10 NMAC addressing special provisions for Santa Fe county and the Galisteo Basin; Santa Fe, Sandoval and San Miguel Counties.

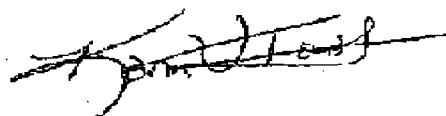
THE INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO

IPANM opposes the Division's proposed rule for they will impair the correlative rights, and cause waste of natural resources that member oil and gas operators are seeking to extract. Further, the proposed rule will not be more protective of human health or the environment.

PROPOSED EVIDENCE

None at this time based on the proposal submitted by the Oil Conservation Division.
However, IPANM will seek to cross examine all witnesses.

Respectfully submitted,
CHATHAM PARTNERS, INC.

A handwritten signature in black ink, appearing to read 'Karin Foster', written over a horizontal line.

Karin Foster
ATTORNEY FOR IPANM