

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

**APPLICATION OF WILDEARTH GUARDIANS AND THE NEW
MEXICO OIL CONSERVATION DIVISION TO CONSIDER
PROPOSED AMENDMENTS TO RULES 19.15.29.6, 19.15.29.8
AND 19.15.29.15 NMAC CONCERNING RELEASES.**

CASE NO. 21834

NMOGA's PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of the New Mexico Oil and Gas Association ("NMOGA"), through undersigned counsel, as required by NMAC 19.15.3.11.B and Procedural Order R-21674.

NMOGA does not oppose the rule amendments sought under this application and does not have any proposed modifications. NMOGA does not anticipate the need to present any technical witnesses or exhibits at the hearing but reserves the right to cross examine any witnesses presented, and to offer rebuttal witnesses or exhibits as needed.

Respectfully submitted:

HOLLAND & HART, LLP



Michael H. Feldewert
Adam G. Rankin
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile

**ATTORNEYS FOR
THE NEW MEXICO OIL AND GAS ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Daniel Timmons, Staff Attorney
WildEarth Guardians
301 N. Guadalupe Street, Suite 201
Santa Fe, NM 87501
(505) 570-7014
dtimmons@wildearthguardians.org

Attorney for WildEarth Guardians

Eric Ames
Jesse Tremaine
Assistant General Counsels
Energy Minerals and Natural
Resources Department
1220 S. St. Francis Drive
Santa Fe, New Mexico
87505
(575) 741-1231
(505) 231-9312
eric.ames@state.nm.us
jessek.tremaine@state.nm.us

Attorneys for Oil Conservation Division

Andrew J. Cloutier
HINKLE SHANOR LLP
P.O. Box 10
Roswell, NM 88202-0010
(575) 622-6510
(575) 623-9332 FAX
acloutier@hinklelawfirm.com

Attorney for Independent Petroleum Association of New Mexico



Adam G. Rankin