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

APPLICATION OF EMPIRE NEW MEXICO TO REVOKE THE INJECTION AUTHORITY +GRANTED UNDER ORDER NO. R22026 FOR THE ANDRE DAWSON SWD #001, LEA COUNTY, NEW MEXICO

CASE NOS. 24018-24019 AND 24024-24027

THE OIL CONSERVATION DIVISION'S MOTION TO VACATE AND RESCHEDULE TO AUGUST 15, 2024 THE OIL CONSERVATION COMMISSION SETTING FOR JULY 18, 2024

COMES NOW the New Mexico Oil Conservation Division ("OCD") and hereby requests that the Oil Conservation Commission ("OCC") vacate the July 18, 2024 setting for the above-captioned cases and reset the matter for the August 15, 2024 OCC meeting. As grounds in support thereof, OCD states the following:

- (1) Counsel for the OCD, Jesse Tremaine and Chris Moander, are scheduled to attend the 70th Annual Natural Resources and Energy Law Institute Conference held by the Foundation for Natural Resources and Energy Law scheduled for July 18-20, 2024 in Santa Fe, NM.
- (2) OCD counsel confirmed their attendance for the FNREL Conference on April 26, 2024. *See* Exhibit 1 email confirmation.
- (3) The OCC's scheduling of Empire's Expedited Motion for July 18, 2024 runs into direct conflict with the FNREL Conference dates.
 - a. OCD notes here that Empire's Expedited Motion appears to request immediate relief for the exact issues about which it complains in its Applications for the above-captioned cases. *See* Applications in OCC Case Nos. 24018-24027; *see also* OCC Order No. R-23048. Therefore, the matters before the OCC are no more pressing than they were when Empire filed its original Applications.
- (4) OCD counsel intends to fulfill their CLE obligations to the State Bar of New Mexico by attending the FNREL Conference. Additionally, should OCD counsel need to cancel their

OCD'S MOTOIN TO VACATE AND CONTINUE JULY 18, 2024 SETTING FOR CASE NOS. 24018-24019 AND 24024-24027

- registrations with FNREL, New Mexico taxpayers would be obligated to cover the \$100 late cancellation fee, which would be an unnecessary cost to the public fisc.
- (5) Therefore, based on the above, OCD respectfully requests that the OCC vacate the current July 18, 2024 setting for the above-captioned cases and reset the matter for the August 15, 2024 regularly scheduled OCC meeting.
- (6) Empire objects to this Motion; Goodnight and Pilot do not oppose this Motion.

Respectfully submitted,

Christopher L. Moander Assistant General Counsel New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505 Tel (505) 709-5687 chris.moander@emnrd.nm.gov

CERTIFICATE OF SERVICE

I certify that on July 8, 2024, this pleading was served by electronic mail on:

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OCD'S MOTOIN TO VACATE AND CONTINUE JULY 18, 2024 SETTING FOR CASE NOS. 24018-24019 AND 24024-24027

Moander, Chris, EMNRD

From: Gonzales, Ramona, EMNRD **Sent:** Friday, April 26, 2024 8:34 AM

To: Fuge, Dylan, EMNRD; Shelton, Benjamin, EMNRD; Moander, Chris, EMNRD; Tremaine,

Jesse, EMNRD; Chakalian, Gregory, EMNRD

Subject: 70th Annual Institute

Good Morning Everyone,

I just wanted to let you know that your registration for the 70th Annual Institute Event has been paid for. I did send the information to Beth, but she is out at an event this week. Please let me know if you need additional information.

Have a great Friday.

Ramona Gonzales

Purchasing Agent/Fleet Coordinator EMNRD – Oil Conservation Division 505-795-4599

Ramona.gonzales@emnrd.nm.gov http://www.emnrd.state.nm.us/OCD



From: Gonzales, Ramona, EMNRD

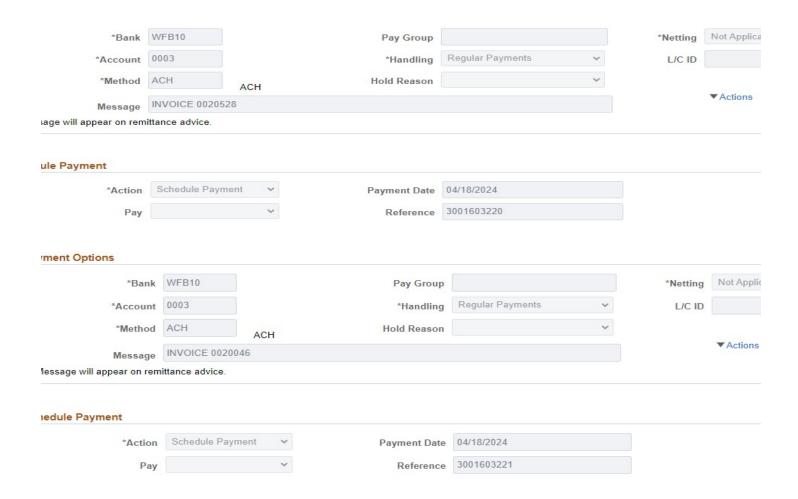
Sent: Wednesday, April 24, 2024 3:01 PM **To:** Beth Kuzera
bkuzera@fnrel.org>

Subject: 70th Annual Institute

Good Afternoon Beth,

Below is the payment information for the 70th Annual Institute event here in Santa Fe NM for EMNRD employees. Please let me know if you have any questions and what are the next steps for the employees?

Thank you and I hope you are having a great Wednesday.



Ramona Gonzales

Purchasing Agent/Fleet Coordinator EMNRD – Oil Conservation Division 505-795-4599

Ramona.gonzales@emnrd.nm.gov http://www.emnrd.state.nm.us/OCD



From: Beth Kuzera < bkuzera@fnrel.org Sent: Monday, April 8, 2024 12:20 PM

To: Gonzales, Ramona, EMNRD < Ramona.Gonzales@emnrd.nm.gov >

Subject: RE: [EXTERNAL] RE: Houston short course invoice

Ramona,

Please find the two updated invoice.

Let me know what else you need.

Thanks!

BETH KUZERA

Program & Member Service Specialist





Formerly Rocky Mountain Mineral Law Foundation Please note our new address!

2095 W. 6th Ave., #109 Broomfield, CO 80020 Office: 303-321-8100 ex. 103

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