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

IN THE MATTER OF PROPOSED AMENDMENT TO THE COMMISSION'S RULES TO ADDRESS CHEMICAL DISCLOSURE AND THE USE OF PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES AND IN OIL AND GAS EXTRACTION, 19.15.2, 19.15.7, 19.15.14, 19.15.16, AND 19.15.25 NMAC

Case No. 23580

## WILDEARTH GUARDIANS,

#### PETITIONER.

## **MAXWELL'S PRE-HEARING STATEMENT**

Pursuant to Rule 19.15.3.11(B), Mr. Maxwell submits his pre-hearing statement:

I. Name of Person.

The name of the person is Nicholas R. Maxwell.

- II. Witnesses.
- Mr. Maxwell does not intend to call any witnesses to testify at the hearing.
- III. Testimony.
- Mr. Maxwell does not intend to present technical testimony.
- IV. Exhibits.
- Mr. Maxwell has no exhibits to offer as evidence at the hearing.
- *V. Cross-Examination.*
- Mr. Maxwell reserves the right to cross-examine witnesses during the hearing.
- VI. Proposed Modifications.
- Mr. Maxwell does not propose any modifications to the proposed rule.

By: -s- Nicholas Maxwell
Mr. Nicholas R. Maxwell
P.O. Box 1064
Hobbs, New Mexico 88241
Telephone: (575) 441-3560
Email: inspector@sunshineaudit.com

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of my pre-hearing statement was served by email on October 19, 2024 to the persons listed below, with a hard copy mailed first class upon request:

NM Oil Conservation Commission Hearings occ.hearings@state.nm.us

Sheila Apodaca Oil Conservation Commission Clerk sheila.apodaca@emnrd.nm.gov

Tim Davis
Samantha Ruscavage-Barz
WildEarth Guardians
tdavis@wildearthguardians.org
sruscavagebarz@wildearthguardians.org
Attorneys for WildEarth Guardians

Daniel Rubin
Assistant Attorney General
NM Department of Justice
drubin@nmag.gov
Attorney for Oil Conservation Commission

Jesse Tremaine
Chris Moander
Assistants General Counsel
NM Energy, Minerals, and Natural Resources Department
jessek.tremaine@emnrd.nm.gov
chris.moander@emnrd.nm.gov
Attorneys for Oil Conservation Division

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Cristina A. Mulcahy
Holland & Hart, LLP
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com
camulcahy@hollandhart.com
Attorneys for NMOGA

Deana M. Bennett
Chandler R. Farnworth
Jordan L. Kessler
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
deana.bennett@modrall.com
cfarnworth@modrall.com
jordan\_kessler@eogresources.com
Attorneys for EOG Resources, Inc.

Mariel Nanasi, Esq. **New Energy Economy**mariel@seedsbeneaththesnow.com *Attorney for New Energy Economy* 

-s- *Nicholas Maxwell* Mr. Nicholas R. Maxwell