

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

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION FOR
ADOPTION OF AMENDMENTS TO RULE 19.15.17 (THE "PIT RULE"), STATEWIDE.**

CASE NO. 14292

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.
5805 Mariola Place, NE
Albuquerque, NM 87111

STATEMENT OF CASE

APPLICANT OIL CONSERVATION DIVISION

The hearing concerns an application of the New Mexico Oil Conservation Division for adoption of amendments to rule 19.15.17 (the "Pit Rule"), Statewide.

THE INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO

IPANM supports the Division's proposed rule for it will protect correlative rights, and prevent waste of natural resources that member oil and gas operators are seeking to extract.

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 and may seek to present a rebuttal witness.

Respectfully submitted,
CHATHAM PARTNERS, INC.



Karin Foster
ATTORNEY FOR IPANM