

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

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

**CASE NO. 14292**

**THE NEW MEXICO OIL CONSERVATION DIVISION'S  
PRE-HEARING STATEMENT**

1. This Pre-Hearing Statement is filed by the New Mexico Oil Conservation Division (the Division).

2. The Division's attorney is:

David K. Brooks  
Energy, Minerals and  
Natural Resources Department  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505  
Phone (505)-476-3450  
FAX (505)-476-3462  
david.brooks@state.nm.us

3. Witnesses:

The names of the witnesses that the Division expects to call at the hearing, a concise statement of each witness's testimony, the estimated time needed for each witness's direct testimony and the estimated total time for the Division's presentation is as follows:

	Direct Testimony	Cross Examination	Total
Theresa Duran-Saenz	.25 hrs	0	.25 hrs
Brad Jones	2.0 hrs	1.0 hrs	3.0 hrs
Edward J. Hansen	0.5 hrs	0.5 hrs	1.0 hrs
Total	2.75 hrs	1.5 hrs	4.25 hrs

Ms. Duran-Saenz will testify concerning notices.

Mr. Jones will explain the changes that the proposed amendment makes in the provisions of the existing Pit Rule concerning replacing or retrofitting existing below-grade tanks to comply with certain requirements, compliance timeframes relating to existing below-grade tank and lined, permanent-pit application submittals and chloride limits for closure of temporary pits or drying pads by on-site trench burial.

Mr. Hansen will testify, based on modeling using the HELP and MULTIMED models, to the probable time and extent of chloride contamination to groundwater that can be expected from on-site trench burial of wastes containing the maximum chloride contamination allowed by the proposed amendments.

4. Expert Witnesses' Qualifications are shown in the following exhibits which are being filed herewith:

<u>Witness</u>	<u>Exhibit</u>
Brad Jones	5
Edward J. Hansen	7

5. Copies of all exhibits that the Division will offer are filed herewith.

RESPECTFULLY SUBMITTED,



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David K. Brooks  
Assistant General Counsel  
Energy, Minerals and Natural Resources  
Department of the State of New Mexico  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
david.brooks@state.nm.us  
Phone: (505)-476-3450  
FAX: (505)-476-3462

Attorney for The New Mexico Oil  
Conservation Division