

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

**IN THE MATTER OF THE HEARINGS
CALLED BY THE OIL CONSERVATION
DIVISION TO CONSIDER:**

REVISING RULE 116 CONCERNING
RELEASE NOTIFICATION AND
CORRECTIVE ACTION

CASE NO. 11352

ENACTING A NEW RULE 19 FOR
PREVENTION AND ABATEMENT OF
WATER POLLUTION ASSOCIATED WITH
OPERATIONS OF THE OIL AND GAS
INDUSTRY IN NEW MEXICO

CASE NO. 11635

NOTICE OF INTENT TO TESTIFY

Chris Shuey, on behalf of himself and appearing *pro se*, hereby notifies the Oil Conservation Commission of his intent to give technical testimony in the above-captioned proceedings on November 14, 1996. For the Commission's convenience, Mr. Shuey provides the following additional information:

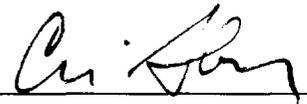
PURPOSE OF THE TESTIMONY: To address the importance of corrective action requirements and water pollution abatement standards for protection of public health; to discuss why amended Rule 116 and new Rule 19 are needed to carry out the Oil Conservation Division's and Commission's statutory mandates; to highlight aspects of the rules that reflect recommendations of the EPA-IOGCC New Mexico State Review in 1994; and otherwise to support, with only limited concerns, Commission adoption of the recommended revisions to Rule 116 and new Rule 19.

WITNESS'S QUALIFICATIONS: Mr. Shuey was a member of the OCD Rule 116 Change Committee, having represented Southwest

Research and Information Center, a not-for-profit, community-oriented educational and scientific organization, based in Albuquerque, New Mexico. Mr. Shuey directs the Community Water, Wastes and Toxics Program at SRIC, where he has been employed for more than 15 years. He has extensive experience in oil-field waste regulatory matters, having participated in OCD and OCC rulemakings related to production pits and commercial facilities; having represented national environmental interests on the EPA-IOGCC New Mexico Peer Review Panel; and having worked with and for community groups affected by oil-field activities. Mr. Shuey has a bachelor's degree from the University of New Mexico and is currently working on a master's degree in public health at UNM's Health Services Center. His *vitae* is available upon request.

ESTIMATED LENGTH OF TESTIMONY: No more than 1 hour.

Respectfully submitted, by facsimile and first class mail,
this 28th day of October, 1996.



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