



NEW MEXICO OIL AND GAS ASSOCIATION

NMED Ozone Rulemaking Hearing

*Direct and Rebuttal Testimony of John R. Smitherman
Senior Advisor*

Topic 35DR

20.2.50.124 Well Workovers



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20.2.50.124 Well Workovers

- NMOGA and IPANM align
 - Operators should be allowed modern techniques to notify nearby residents (not just certified mail)
 - Planned workovers should require 3-day notification
 - More extensive work
 - More opportunity for emissions
 - Routine workovers (e.g. rod repairs, tubing leaks, plunger downhole repair) should require 24-hour notification
 - Short duration
 - Little to no emissions

Topic 36DR

20.2.50.126 Produced Water Management Units



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20.2.50.126 Produced Water Mgmt Units

- NMOGA appreciates NMED's recognition that their original requirements could reverse the progress in reducing freshwater use
 - 2012 freshwater use for completions (hydraulic fracture stimulation) was likely near 100%
 - According to OCD data, freshwater use is below 10% of all water used for completions