

STATE OF NEW MEXICO
OFFICE OF THE ATTORNEY GENERAL



HECTOR H. BALDERAS
ATTORNEY GENERAL

September 10, 2018

Bill Brancard, General Counsel
Energy, Minerals, & Natural Resources Dept.
1220 South St. Francis Drive
Santa Fe, NM 87505
Email: bill.brancard@state.nm.us

Dear Mr. Brancard,

The Office of the New Mexico Attorney General, Consumer and Environmental Protection Division is dedicated to protecting New Mexico's consumers, our environment and our economy. Based on multiple constituent inquiries, it has come to our attention that the Oil Conservation Commission (OCC) will be considering Case 16403 at its meeting on Thursday, September 13, 2018. It appears that this application seeks to amend the Well Density Requirements of the Special Rules for the Blanco-Mesverde Gas Pool for the purposes of increasing the well density for Mesaverde wells, Rio Arriba and San Juan Counties.

Our understanding is that this would result in doubling the number of natural gas wells in San Juan and Rio Arriba counties, potentially adding up to 7,500 additional wells.

The Office of the Attorney General is committed to ensuring public processes are fully transparent. As such, we respectfully request your compliance in this matter. We understand that the notice of this hearing was published in local newspapers on Thursday, August 23, 2018, however, we were unable to locate the notice of hearing on the OCC website as required by NMAC 19.15.4.9(B)(1). Also, a cursory review of the documents provided on your public website appears incomplete.

Bill Brancard, General Counsel

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Because protecting our environment and ensuring fair and transparent processes is of the utmost importance, please provide us with a complete copy of the record, as well as, the link to the website on which the hearing notice was provided.

I look forward to hearing from you.

Sincerely,



P. Cholla Khoury
New Mexico Office of the Attorney General
Director, Consumer and Environmental Protection