

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

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APPLICATION OF THE INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO FOR THE AMENDMENT OF CERTAIN PROVISIONS OF TITLE 19, CHAPTER 15 OF THE NEW MEXICO ADMINISTRATIVE CODE CONCERNING PITS, CLOSED-LOOP SYSTEMS, BELOW GRADE TANKS AND SUMPS, AND AMENDING OTHER SPECIAL RULES RELATED TO THE FOREGOING MATTERS, STATEWIDE.

CASE NO:14785

NOTICE OF APPLICANT INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO'S MODIFICATIONS TO THEIR PETITION FOR RULEMAKING TITLE 19, CHAPTER 15, PART 17

I

The Independent Petroleum Association of New Mexico (IPANM), the applicant in the above captioned matter, hereby files the attached proposed modifications to our application for consideration by the New Mexico Conservation Commission (Commission) pursuant to 19.15.3.11(C) NMRA. These modifications replace the proposed amendments filed with IPANM's application for rulemaking in this matter. IPANM has provided both a red line format (Exhibit A) and clean version (Exhibit b) for your review. IPANM submits these proposed modifications for the following reasons:

- A. To adopt many of the modifications filed by the New Mexico Oil Conservation Division; and
- B. To adopt many of the modifications filed by the New Mexico Oil and Gas Association.

IPANM believes the proposed modifications to Title 19, Chapter 15, Part 17 will clarify our petition, will assist the Oil Conservation Commission in the statutory mandates of protection of correlative rights and prevention of waste while protecting public health and the environment.

Respectfully Submitted,

CHATHAM PARTNERS, INC.

By: _____

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**ATTORNEY FOR THE INDEPENDENT PETROLEUM
ASSOCIATION OF NEW MEXICO**

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**ATTORNEY FOR THE INDEPENDENT PETROLEUM
ASSOCIATION OF NEW MEXICO**

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2012, I have caused a copy of this Applicants modifications to rulemaking submitted by the IPANM in the above-captioned case to be sent by email to the following:

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