

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

**APPLICATION OF HILCORP ENERGY COMPANY TO AMEND  
THE WELL DENSITY AND LOCATION REQUIREMENTS AND  
ADMINISTRATIVE EXCEPTIONS OF THE SPECIAL RULES  
FOR THE BLANCO-MESAVERDE GAS POOL, RIO ARRIBA  
AND SAN JUAN COUNTIES, NEW MEXICO.**

**CASE NO. 16403**

**HILCORP'S RESPONSE TO "LIST OF NAVAJO NATION CHAPTERS TO BE  
NOTICED" FILED BY THE SAN JUAN CITIZENS ALLIANCE**

Hilcorp Energy Company ("Hilcorp") files this response to the extensive hearing notice list filed by the San Juan Citizen's Alliance (SJCA).

As reflected on Attachment 1 hereto, the only Navajo Nation Chapter boundary that intersects with the geographic extent of the Blanco-Mesaverde Gas Pool is the Huerfano Chapter. All remaining Chapters on the list provided by the SJCA have boundaries miles to the southwest of the Blanco-Mesaverde Gas Pool, with some existing in the State of Arizona. Nothing in the Commission rules, prior Commission Orders or the transcript from the January 8th Commission hearing supports notice to Navajo Chapters miles outside the subject pool's boundary or that exist in neighboring states. *See* Tr. 1/8/19 at p.12, lines 19-22 (Mr. Brancard stating: "I believe the Nation has maps of what chapter boundaries are, so it should be pretty easy to figure out the overlap of the chapter boundaries with the pool area.").

Further, nothing in the Commission rules, prior Commission Orders or the transcript from the January 8th Commission hearing supports the request by the SJCA for "notice to the All Pueblo Council of Governors."

WHEREFORE, Hilcorp respectfully requests that the Commission (a) issue the written order contemplated at the end of the January 8th Commission hearing (*see* Tr. at p. 27), and (b) clarify the notice requirements for the scheduled May 9th Commission hearing in this matter.

Respectfully submitted,

**HOLLAND & HART, LLP**

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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