## RECEIVED

## STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT2 OIL CONSERVATION COMMISSION OUT 22 PM 4 04

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION FOR REPEAL OF EXISTING RULE 50 CONCERNING PITS AND BELOW GRADE TANKS AND ADOPTION OF A NEW RULE GOVERNING PITS, BELOW GRADE TANKS, CLOSED LOOP SYSTEMS AND OTHER ALTERNATIVE METHODS TO THE FOREGOING, AND AMENDING OTHER RULES TO MAKE CONFORMING CHANGES; STATEWIDE.

**CASE NO. 14015** 

## **ENTRY OF APPEARANCE**

COMES NOW HOLLAND & HART, LLP and hereby enters its appearance in the above referenced case on behalf of Benson-Montin-Greer Drilling Corporation; BP America Production Company, Inc.; Boling Enterprises, Ltd., Burlington Resources Oil & Gas Company, LP; Chesapeake Energy Corporation; Chevron USA, Inc.; ConocoPhillips Company; Devon Energy Production Corporation; D.J. Simmons, Inc.; Dugan Production Corporation; Energen Resources Corporation; Marathon Oil Company; Marbob Energy Corporation; Merrion Oil and Gas Corporation; OXY USA, Inc.; Occidental Permian, LTD; OXY USA WTP Limited Partnership; Samson Resources Company; Williams Production Company, LLC; XTO Energy, Inc.; and Yates Petroleum Corporation, hereinafter collectively referred to as "the Industry Committee,"

Respectfully submitted, HOLLAND & HART, LLP

William F. Carr

Ocean Munds-Dry, Esq. Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

Eric L. Hiser, Esq.

Jorden Bischoff & Hiser, P. L. C.

7272 East Indian School Road

Suite 360

Scottsdale, Arizona 85251

Telephone: (480) 505-3927

ATTORNEYS FOR THE INDUSTRY COMMITTEE

## CERTIFICATE OF SERVICE

I certify that on October 22, 2007 I served a copy of the foregoing document to the following by

U.S. Mail, postage prepaid
Hand Delivery
Fax
Electronic Service by LexisNexis File & Serve

David K. Brooks, Esq.
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Attorney for New Mexico Oil Conservation Division

Karin V. Foster, Esq. (By Facsimile) Independent Petroleum Association of New Mexico P.O. Box 462 Placitas, New Mexico 87043-0462

Alletta D. Belin, Esq.
Belin & Sugarman
618 Paseo de Peralta
Santa Fe, New Mexico 87501
Attorney for the New Mexico Citizens for Clean Air & Water, Inc.

Michael Moffett
Huffaker & Moffett LLC
P.O. Box 1868
Santa Fe, New Mexico 87502
Attorney for Controlled Recovery, Inc.

Eric D. Jantz
New Mexico Environmental Law Center
1405 Luisa St. #5
Santa Fe, New Mexico 87504-4074
Attorney for the New Mexico Oil & Gas Accountability Project

Ocean Munds-Dry