

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION,
THROUGH THE ENVIRONMENTAL BUREAU CHIEF, FOR ADOPTION OF
AN AMENDMENT TO 19.15.39 NMAC ADDING NEW SECTIONS TO BE
CODIFIED AT 19.15.39.9 AND 19.15.39.10 NMAC ADDRESSING SPECIAL
PROVISIONS FOR SANTA FE COUNTY AND THE GALISTEO BASIN; SANTA
FE, SANDOVAL AND SAN MIGUEL COUNTIES.

CASE NO. 14255

RESPONSE OF THE OIL CONSERVATION DIVISION
TO ORDER NO. R-13096

Order No. R-13096, issued March 2, 2009, requires the Oil Conservation Division (OCD) to file a proposed real property description by section, township and range for that portion of the Galisteo Basin located within Santa Fe County. The OCD files the attached map and real property description in response to Order No. R-13096.

Maps of the Galisteo Basin.

The two maps attached to this pleading were used to create the proposed real property description.

The smaller map was generated by the State Engineer's Office by applying the outline of the Galisteo Basin watershed to a map showing township boundaries. The Galisteo Basin watershed includes both surveyed areas and un-surveyed areas. If a surveyed section, or a portion of a surveyed section, falls within the outline of the Galisteo Basin, that section is indicated, and the appropriate range is shown for that section.

The other map is an enlarged version of the map generated by the State Engineer's Office, with the sections hand-numbered.

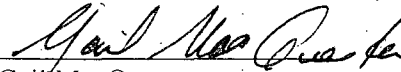
Proposed Real Property Description.

The proposed real property description describes all surveyed sections that appear on the map generated by the State Engineer's Office, no matter how small a portion of that section falls within the outline of the Galisteo Basin.

Un-surveyed areas within the Galisteo Basin are described by the surveyed sections that surround them. The surveyed sections are listed in the order they appear, moving clockwise around the un-surveyed area. In two places, the outline of the Galisteo Basin passes through un-surveyed areas. There, the description attempts to approximate the outline of the Galisteo Basin using surveyed sections as reference points.

The map generated by the State Engineer's Office shows the outline of the Galisteo Basin with more precision than the map used by the OCD in preparing the original legal description for the Galisteo Basin, and it includes surveyed sections even when only very small portions of those sections fall within the outline of the Galisteo Basin. In preparing this proposed real property description, the OCD included a surveyed section if State Engineer's Office map indicated that any part of that section, no matter how small, falls within the outline of the Galisteo Basin. Consequently, several sections appear in this proposed real property description that did not appear in the original description for San Miguel and Sandoval Counties. Those additional sections are typed in bold, and underlined, so the Commission can better compare the original and the revised descriptions.

Respectfully submitted
this 19th day of March 2009 by



Gail MacQuesten
Oil Conservation Division
Energy, Minerals and Natural
Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 476-3451

Attorney for the Oil Conservation Division

Certificate of Service

I hereby certify that I served a true copy of the forgoing pleading, with attachments, by first class mail to:

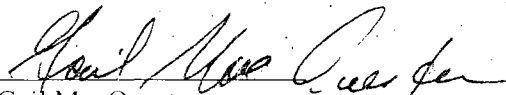
Karin V. Foster, Esq.
Chatham Partners Inc.
5805 Mariola Place, N.E.
Albuquerque, NM 87111

Attorney for Independent Petroleum Assn. Of New Mexico

Scott Hall, Esq.
Montgomery & Andrews
325 Paseo de Peralta
Santa Fe, NM 87501

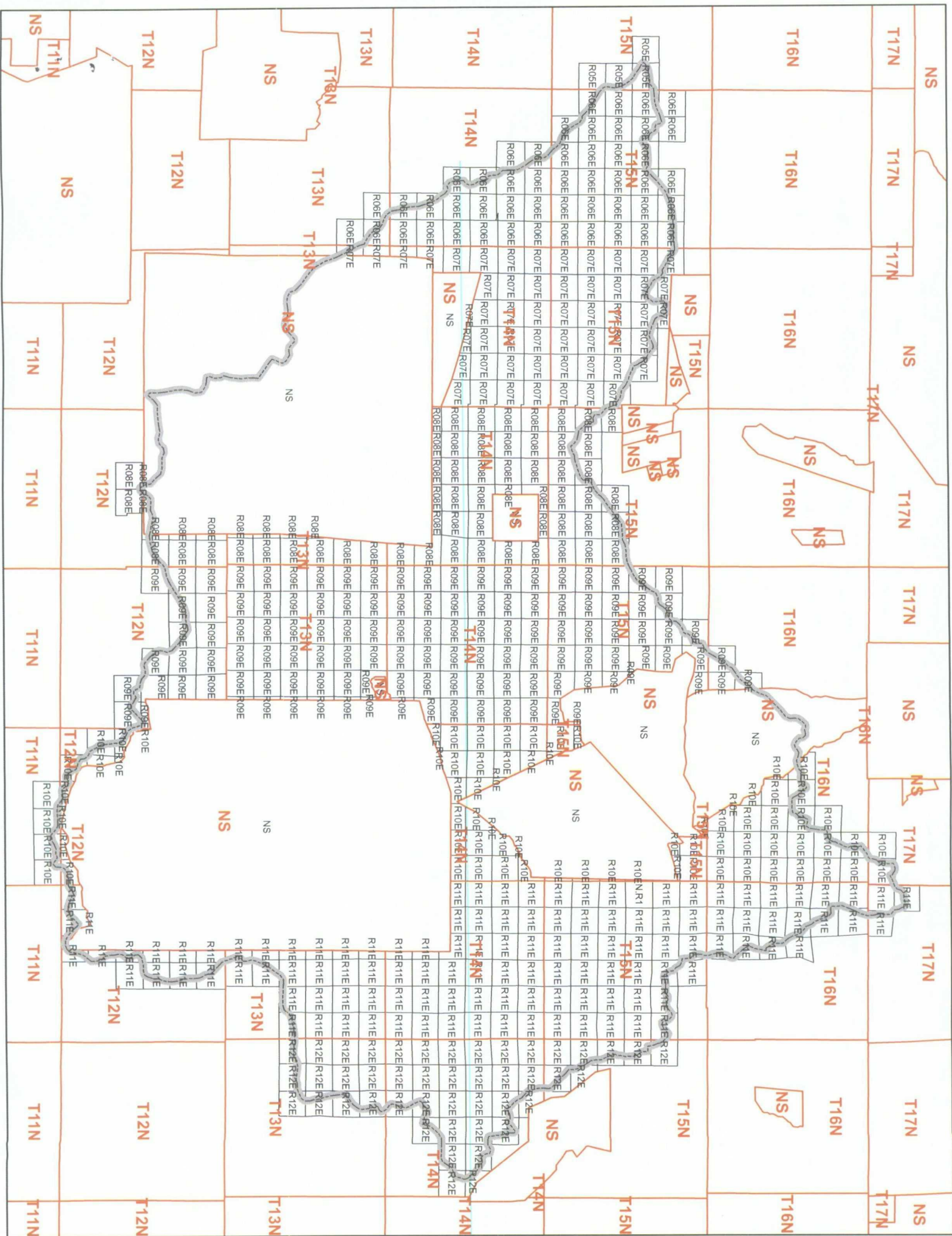
Attorney for Approach Operating LLC

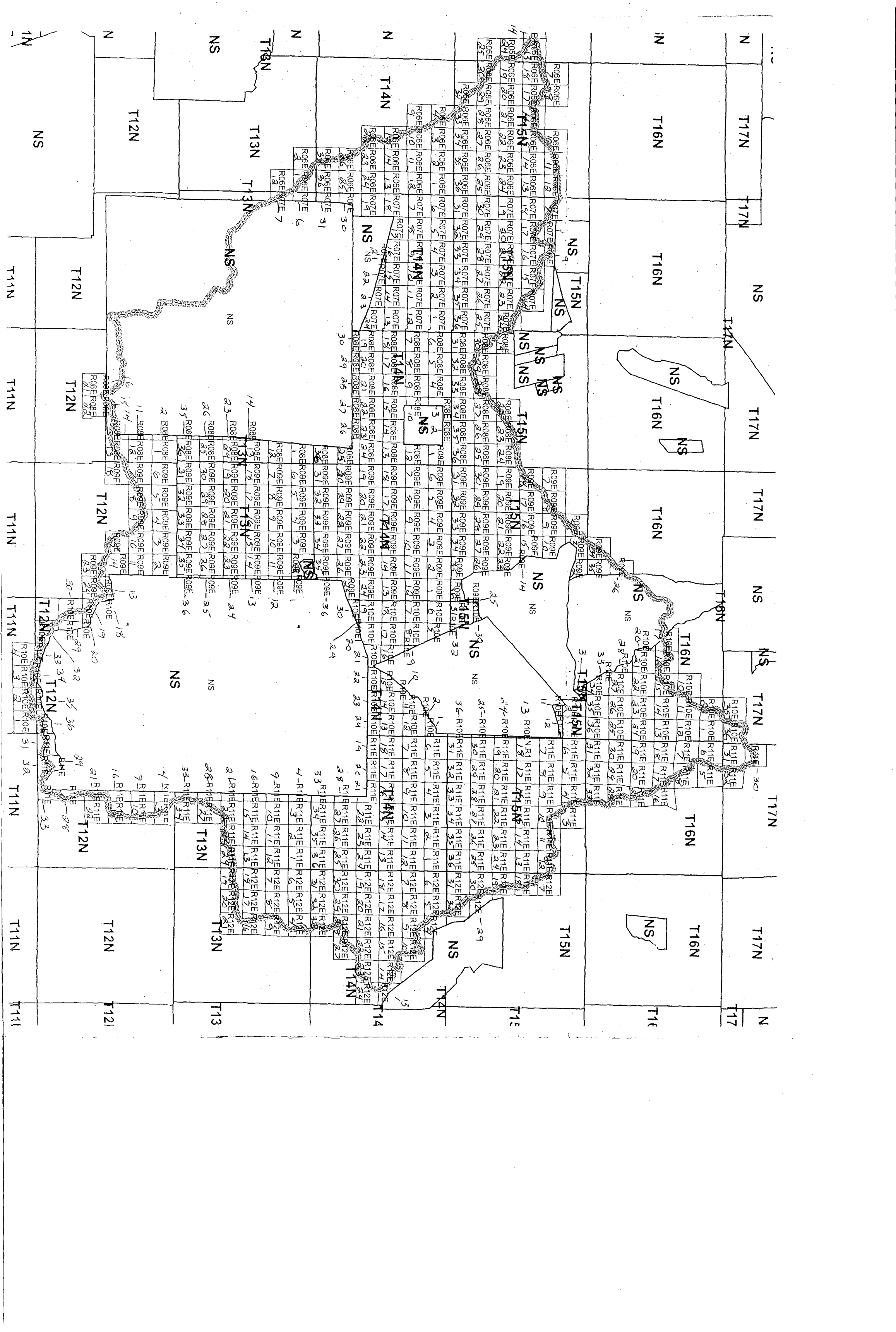
This 19th day of March 2009.



Gail MacQuesten

Case 14255
Response of the Oil Conservation Division
To Order No. R-13096
Page 2 of 2





- A. The Galisteo Basin includes
- (1) the surveyed portions of the following sections in Sandoval county:
 - (a) township 15 north, range 5 east, sections 13, 14, 24 and 25;
 - (b) township 15 north, range 6 east, sections 7, 8, 10-30 and 32-36;
 - (c) township 14 north, range 6 east, sections 1-4, 9-15, 22-26, 35 and 36;
 - (d) township 13 north, range 6 east, sections 1, 2 and 12;
 - (2) the surveyed portions of the following sections in San Miguel county:
 - (a) township 15 north, range 12 east, sections 7, 18, 19 and 29-32;
 - (b) township 14 north, range 12 east, sections 4-10, 13-24 and 27-33;
 - (c) township 13 north, range 12 east, sections 4-9 and 16-21;
 - (3) the surveyed portions of the following sections in Santa Fe county:
 - (a) township 17 north, range 10 east, sections 35 and 36;
 - (b) township 17 north, range 11 east, sections 30-32;
 - (c) township 16 north, range 9 east, sections 26, 34 and 35;
 - (d) township 16 north, range 10 east, sections 1, 2, 10-17, 20-28 and 33-36;
 - (e) township 16 north, range 11 east, sections 5-8, 16-21 and 28-33;
 - (f) township 15 north, range 7 east, sections 7-9, and 14-36;
 - (g) township 15 north, range 8 east, sections 19, and 22-36;
 - (h) township 15 north, range 9 east, sections 2-4, 7-10, 14-23, and 25-36;
 - (i) township 15 north, range 10 east, sections 1-3, 11-13, 24, 25, 30-32 and 36;
 - (j) township 15 north, range 11 east, sections 3-36;
 - (k) township 14 north, range 7 east, sections 1-19, 21-24, 30 and 31;
 - (l) township 14 north, range 8 east, sections 1-10, 12-30 and 36;
 - (m) township 14 north, range 9 east, all sections;
 - (n) township 14 north, range 10 east, sections 1, 2, 5-24, 29 and 30;
 - (o) township 14 north, range 11 east, sections 1-28 and 33-36;
 - (p) township 13 north, range 7 east, sections 6 and 7;
 - (q) township 13 north, range 8 east, sections 1, 12-14, 23-26, 35 and 36;
 - (r) township 13 north, range 9 east, all sections;
 - (s) township 13 north, range 11 east, sections 1-4, 9-16, 21-24, 27, 28, 33 and 34;
 - (t) township 12 north, range 8 east, sections 1, 2, 11-16, 21 and 22;
 - (u) township 12 north, range 9 east, sections 2-11, 13-15, 18, 23 and 24;
 - (v) township 12 north, range 10 east, sections 18-20, 29, 30 and 32-36;
 - (w) township 12 north, range 11 east, sections 3, 4, 9, 10, 15, 16, 21, 22, 28, 29 and 31-33;
 - (x) township 11 north, range 10 east, sections 1-4;
 - (4) the un-surveyed area in Santa Fe county bounded by the surveyed portions of sections 1-3, 10 and 12-15 of township 14 north, range 8 east;
 - (5) the un-surveyed area in Santa Fe county bounded by
 - (a) the surveyed portions of
 - (i) township 16 north, range 10 east, sections 17, 20, 21, 28, 33 and 34;
 - (ii) township 15 north, range 10 east, sections 3, 2, 11, 12, 13, 24, 25 and 36;
 - (iii) township 14 north, range 10 east, sections 1, 2, 11, 10, 15, 22, 21, 16, 9, 8 and 5;
 - (iv) township 15 north, range 10 east, sections 32, 31 and 30;
 - (v) township 15 north, range 9 east, sections 25, 36, 35, 26, 23, 14, 15, 10, 3 and 2;
 - (vi) township 16 north, range 9 east, sections 35 and 26;
 - (b) and then from the north eastern corner of the surveyed portion of township 16 north, range 9 east, section 26 to the northwestern corner of the surveyed portion of township 16 north, range 10 east, section 17;
 - (6) the un-surveyed area in Santa Fe county bounded by the surveyed portions of
 - (a) township 14 north, range 11 east, sections 19-21, 28 and 33;
 - (b) township 13 north, range 11 east, sections 4, 9, 16, 21, 28 and 33;
 - (c) township 12 north, range 11 east, sections 4, 9, 16, 21, 28, 33, 32, 29 and 31;
 - (d) township 12 north, range 10 east, sections 36, 35, 34, 33, 32, 29, 20, 19 and 18;
 - (e) township 12 north, range 9 east, sections 24, 13, 14, 11 and 2;
 - (f) township 13 north, range 9 east, sections 36, 25, 24, 13, 12, 1 and 2;

- (g) township 14 north, range 9 east, sections 35, 36, 25, 30, 29, 20-24; and
- (7) the un-surveyed area in Santa Fe county bounded by
 - (a) the surveyed portions of
 - (i) township 13 north, range 7 east, sections 7 and 6;
 - (ii) township 14 north, range 7 east, sections 31, 30, 19-16, 21, 22, 23 and 24;
 - (iii) township 14 north, range 8 east, sections 30, 29, 28, 27, 26, 25 and 36;
 - (iv) township 13 north, range 8 east, sections 1, 12, 13, 14, 23, 26, and 35;
 - (v) township 12 north, range 8 east, sections 2, 11, 14, 15 and 16;
 - (vi) township 12 north, range 8 east, sections 21 and 22;
 - (b) and then from the northwest corner of the surveyed portion of township 12 north, range 8 east, section 16 to the northeast corner of the survey portion of township 12 north, range 7 east, and then to the southeast corner of the surveyed portion of township 13 north, range 7 east, section 7.