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sanjuancitizens.org

May 21, 2018

Heather Riley  
Division Director  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Request for Continuance on Case 16193

Dear Director Riley,

As the Energy and Climate Program Manager at San Juan Citizens Alliance (SJCA), I am writing to request a continuance on Case 16193, currently scheduled to be heard at the New Mexico Oil Conservation Division (NMOCD) on May 31, 2018. Given the potential ramifications of Hilcorp Energy Company's application in Case 16193, SJCA strongly believes that a continuance is necessary so that members of the public and impacted citizens, including members of SJCA, may be better informed about the case and provide input and technical evidence accordingly for consideration by NMOCD.

Hilcorp Energy Company's application to amend the well density requirements and administrative exceptions of the special rules and regulations for the Blanco-Mesaverde Gas Pool has the potential to have a significant impact on spacing requirements of re-completed *and* new wells in northwestern New Mexico. Moreover, by eliminating the public hearing process in favor of an administrative process, this application would deprive the public of the opportunity to provide input on the crucial issue of spacing.

We first learned about Case 16193 in the May 15<sup>th</sup> issue of the *Farmington Daily Times* (Legal Notice 1247013). While we note that NMOCD has technically notified the public of Hilcorp Energy Company's application, we suggest that, 1) the notice does not transparently convey the parties who have an interest in this Case nor the geographic region impacted by it. The Legal Notice simply states: "All Interest Owners and Operators in the Blanco-Mesaverde Gas Pool (Pool Code 72319)", which does not adequately indicate to the public who has an interest in the Blanco-Mesaverde Gas Pool, nor where this Pool is located geographically. Further, 2) given the potential of Hilcorp Energy's Application to eliminate public involvement in decisions about spacing, there must be a greater process of public outreach and education about this case before it is decided.

If approved, Hilcorp Energy Company's application would represent a systemic change to how oil and gas development is conducted and managed in San Juan and Rio Arriba counties. San Juan Citizens Alliance respectfully requests that Case 16193 be postponed until NMOCD's June 14, 2018 meeting so that members of the public - including members of SJCA who reside within the counties and landscape impacted by Case 16193 - may have time to learn about the details of the case and provide input to NMOCD.

Thank you, and please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mike Eisenfeld". The signature is written in a cursive, slightly slanted style.

Mike Eisenfeld  
Energy and Climate Program Manager  
San Juan Citizens Alliance  
505-360-8994