

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

**Ms. Florene Davidson  
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New Mexico Oil Conservation Division  
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**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**

**RESPONSE TO HILCORP'S FILING PROTESTING ENTITIES TO BE NOTICED**

**Intervenor's name:**  
San Juan Citizens Alliance

**Intervenor's address:**  
P.O. Box 6655  
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**Addresses of intervenor's attorneys:**

Western Environmental Law Center  
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San Juan Citizens Alliance (“SJCA”) hereby responds to Hilcorp Energy Company’s (“Hilcorp”) Response to “List of Navajo Nation Chapters to be Noticed” Filed by the San Juan Citizens Alliance.

In that Response, Hilcorp requests that it only be required to send notice to the Huerfano Chapter of the Navajo Nation, based on the overlap of boundaries between the Huerfano Chapter and the Blanco-Mesaverde Gas Pool. SJCA respectfully points out that the list of Navajo Nation Chapters to be Noticed filed by SJCA on January 22 was compiled, as requested by the OCC in its December 7 hearing, in cooperation with Navajo Nation Chapter representatives. While the Chapters do not all overlap with the Blanco-Mesaverde Gas Pool, cultural and ancestral ties of the Navajo Nation and its communities are not always adequately reflected in mapped boundaries, and members of the Chapters listed have cultural and economic interest in the lands encompassed by the Blanco-Mesaverde Gas Pool. This is similarly true for the tribes represented by the All Pueblo Council of Governors. Furthermore, the burden on Hilcorp to provide the requested notice is small, as it simply requires that they mail a few more of the same document, and providing such notice would be in the interest of an inclusive and transparent process that will ideally result in a decision the community could ultimately support.

Respectfully Submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2019, I served a copy of the foregoing documents to the following counsel of record via Electronic Mail:

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