

Davidson, Florene, EMNRD

From: Karin Foster [fosterassociates2005@yahoo.com]
Sent: Friday, November 10, 2006 10:31 AM
To: Davidson, Florene, EMNRD
Subject: IPANM request for rehearing
Attachments: request for rehearing[2].pdf; IPANM comments 9-6-06.pdf

Dear Ms. Davidson,
Please find IPANM's request for a rehearing on Case No. 13,586 attached.
regards,
Karin

Karin Foster
Dir. Government Affairs
IPANM
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**INDEPENDENT PETROLEUM
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November 8, 2006

Ms. Florene Davidson
Division Clerk
Oil Conservation Commission
Energy, Minerals Natural Resources
Santa Fe, NM 87504-1148

Re: Application for rehearing on Case No. 13,586:
Application of the New Mexico Oil Conservation
Division for the Repeal of Existing rules 709, 710
and 711 concerning Surface Waste Management
and the Adoption of new rules 51, 52, and 53
governing Surface Waste Management

Dear Madam:

On behalf of the Independent Petroleum Association of New Mexico (IPANM), we are submitting this letter as a formal request for rehearing pursuant to 19.15.14.1223 NMAC. As to issues requiring reconsideration, IPANM resubmits its comments submitted Sept. 6, 2006, highlighting several areas of concern to small operators. In addition, IPANM adopts the positions and comments submitted by Mr. Bill Carr on behalf the Industry Committee on September 6, 2006, and November 8, 2006. Further, since IPANM did issue two separate written comments and participated in the hearing with an oral statement, we would respectfully request the Division clerk to mail us a copy of the formal division order in accordance with 19.15.14. 1205(E)(4) NMAC.

Should you have questions or need additional information regarding our request, I can be reached at the above listed number.

Sincerely,

Karin V. Foster
Director of Government Affairs

Attachment