

# Public Comments



*New Mexico State Senate*  
*State Capitol*  
*Santa Fe 87501*

TELEPHONE:  
(505) 986-4714

November 14, 2018

Bill Brancard, General Counsel  
Energy, Minerals & Natural Resources Dept.  
1220 South St. Francis Drive  
Santa Fe, NM 87505

RE: Case No. 16403

Dear Mr. Brancard,

As state senators, concerned citizens and New Mexico residents, we wish to add our collective voices to the serious concerns raised by our recently elected Commissioner of Public Lands, Stephanie Garcia Richard, regarding well density spacing changes in San Juan and Rio Arriba counties. This issue, referred to as Case No. 16403, will be addressed in a special hearing before the New Mexico Oil Conservation Commission (OCC) on November 19, 2018.

We ask that this hearing be delayed until both Land Commissioner elect Garcia Richard's office and Governor Elect Michelle Lujan Grisham's office may fully address the critical concerns surrounding the highly contested proposal to double the drilling of the Blanco-Mesa Verde pool in San Juan and Rio Arriba counties.

The issues at stake here should be of great concern not only to state legislators and local residents, but to every New Mexican that expects decisions of this magnitude to be made in a transparent way, to be informed by all available facts, and to be done in concert with similarly affected state and federal agencies. Furthermore, we expect a proper and orderly transition of Oil Conservation Commission and Division business between the outgoing administration of Governor Susana Martinez and the incoming administration of Governor elect Lujan Grisham. The OCC is prepared to rule on a downspacing change that has the potential for tremendous environmental impact at an inopportune and transitional time, as one administration is coming to a close and another is preparing to take on the challenges of the next four years.

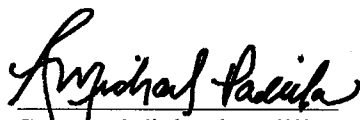
There are a number of outstanding answers regarding Environmental Protection Agency rules and applicant Hilcorp Energy Company's practice of "re-completing" wells in the subject area. Additionally, both EPA and the Bureau of Land Management have either failed to respond to many unanswered questions, or have required FOIA filings, making it impossible to obtain critical information prior to the November 19 OCC hearing. These concerns were addressed in joint delegation letters to both EPA and BLM, signed by Senators Tom Udall and Martin Heinrich and Congressman Ben Ray Luján on October 5, with a deadline for reply of November 1. EPA replied by requiring FOIAs, which were filed, and denying a request for expediting the processing of those FOIA requests. BLM, to date, has not responded. On October 25, the Rio Arriba County Commission issued a resolution supporting our delegation's call for information.

Hilcorp will suffer no harm in the delay that we, state senators, are calling for. Since January 2018, Hilcorp has applied to OCC for exceptions to the current drilling limit for the Blanco-Mesa Verde pool more than 70 times and has never been denied a request. The company may simply continue to do that.

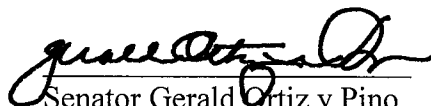
An examination of the testimony and evidence presented by Hilcorp at the previous hearing of Case No. 16403 shows that Hilcorp is looking far beyond a doubling of wells in San Juan and Rio Arriba counties by allowing wells at 40 acres spacing, citing the "10 acre" and "5 acre" spacing allowed in the Piceance Basin and Green River Basin. Even at the proposed 40-acre spacing, the multi-use nature of these affected lands in the San Juan Basin will be lost and a door closed forever on the outdoor recreation, cultural heritage appreciation and economic diversity that the incoming administration has made a cornerstone of its economic development plans.

We ask that the scheduled November 19 special hearing of OCC Case No. 16403 be delayed until all relevant and necessary facts are in, and that the incoming administration be allowed to assess this proposal for increased well density that will affect New Mexico's citizens for the next four years, and far beyond.

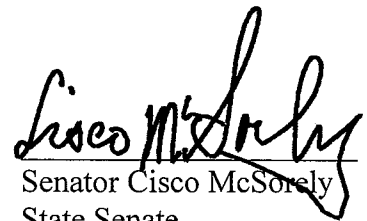
Sincerely,



Senator Michael Padilla  
State Senate



Senator Gerald Ortiz y Pino  
State Senate



Senator Cisco McSorely  
State Senate

**Margaret McDaniel**  
Chairman

**Jack L. Fortner**  
Chairman Pro Tem

**John T. Beckstead**  
Member

**Wallace Charley**  
Member

**Jim Crowley**  
Member



100 South Oliver Drive  
Aztec, New Mexico 87410-2432  
Phone: (505) 334-9481 Fax: (505) 334-3168  
www.sjcounty.net

**Mr. Kim J. Carpenter**  
County Executive Officer

**SAN JUAN COUNTY, NEW MEXICO  
RESOLUTION NO. 18-19-30**

**SUPPORTING THE UPDATING OF THE BLANCO  
MESAVERDE POOL RULE**

**WHEREAS**, pool rules exist to ensure that reserves of oil and gas are effectively developed; and

**WHEREAS**, pool rules apply to operators' development of resources below the ground; and

**WHEREAS**, all operators, regardless of density requirements in a pool rule, must gain proper environmental and archeological approvals prior to drilling any new wells; and

**WHEREAS**, oil and gas production is an important source of revenue and pride to San Juan County and the State of New Mexico; and

**WHEREAS**, the current Blanco-Mesaverde Pool Rule has not been amended in nearly twenty years; and

**WHEREAS**, over sixty exceptions to the pool rule have already been granted; and

**WHEREAS**, developments in technology and a greater understanding of the geology in the San Juan Basin warrant the updating of the existing pool rule; and

**WHEREAS**, the New Mexico Oil Conservation Commission will consider an application to increase the well density of the Blanco Mesaverde pool to ensure the resources are developed; and

**WHEREAS**, the San Juan County Board of County Commissioners is appreciative of the efforts and measures taken by the operators in San Juan County to cleanly and efficiently produce oil and gas; and

**WHEREAS**, the application will lead to greater investment in the San Juan Basin, an area of New Mexico where greater investment is needed; and

**WHEREAS**, the strategy to use as many existing wells as possible to simultaneously develop resources from multiple pools is in the benefit of the general public.



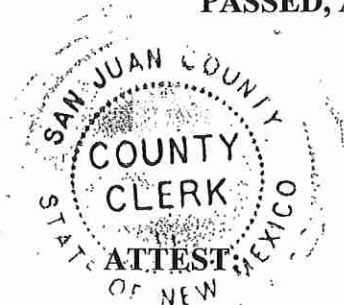
**NOW, THEREFORE**, be it resolved by the San Juan County Board of County Commissioners that the Board declares its support for Case Number 16403 currently before the New Mexico Oil Conservation Commission and directs that a copy of this Resolution be provided to the New Mexico Oil Conservation Commission prior to their hearing of the application.

**PASSED, APPROVED, AND ADOPTED** this 8th day of November, 2018.

**BOARD OF COUNTY COMMISSIONERS  
OF SAN JUAN COUNTY, NEW MEXICO**

By: \_\_\_\_\_

*Margaret McDaniel*  
Margaret McDaniel, Chairman



*Tanya Shelby*  
Tanya Shelby, County Clerk



State of New Mexico  
**House of Representatives**  
Santa Fe

**STEPHANIE GARCIA RICHARD**  
D - Los Alamos, Rio Arriba, Sandoval & Santa Fe  
District 43

30 Glenview Court  
Los Alamos, NM 87544  
Home Phone: (505) 500-4343  
E-mail: stephanie.garciarichard@nmlegis.gov

November 12, 2018

Bill Brancard,  
General Counsel Energy, Minerals, & Natural Resources Dept.  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Brancard;

As the recently elected Commissioner of Public Lands, it will soon be my responsibility to protect our State Trust Lands and the constituents of our beautiful state.

It has come to my attention that on November 19, 2018, the New Mexico Oil Conservation Commission will hold a Special Hearing regarding well density spacing changes, potentially doubling the number of natural gas wells in the San Juan and Rio Arriba County Blanco-Mesaverde pool. This hearing requires an understanding of the technical mineral and reservoir management issues that will clearly impact my office as the largest mineral interest owner in the State.

This issue is highly contested, it has already been delayed since September, and will clearly affect my administration. I am respectfully asking that this proceeding be delayed until my office as well as our new Governor's representatives may address the magnitude of this very important issue.

In addition, I have been made aware that Hilcorp Energy Company, the applicant in this case, has refused to respond to a U.S. Environmental Protection Agency 114 request for material information regarding the venting and flaring of natural gas from the recompletion of their wells in the Blanco-Mesaverde pool. Both Senators Udall and Heinrich and Congressman Lujan have made inquiries of the Bureau of Land Management regarding whether the impacts of the increased number of wells in the pool would exceed the limits of the current Federal Resource Management Plan. The environmental issues surrounding venting and flaring are especially important to my office, and our mutual constituency, and **MUST** be part of the record of this case.

I would also point out that Hilcorp will lose nothing in the delay of this case. But the impact of doubling, or even tripling the number of wells in the San Juan Basin will certainly affect the citizens of our state. Hilcorp cited the use of "10 acre spacing in the Piceance Basin" and "5 acre spacing in the Green River Basin" as examples of why they need to reduce the current spacing rules in New Mexico. Without adequate time to evaluate the critical missing EPA and BLM environmental information and without input and analysis from the officials elected last week to guide the state for the next four years, it would be highly irresponsible for your agency to move forward on this far-reaching proposal.

Sincerely,



Stephanie Garcia Richard  
New Mexico House of Representatives, District 43  
New Mexico Commissioner of Public Lands-Elect

Cc: Heather Riley, Director NMOCD, Chair of NMOCC  
Robert Balch, Governor Martinez Representative to the NMOCC  
Ed Martin, State Land Office Representative to the NMOCC  
Bill Brancard, General Counsel

Hector Balderas, Attorney General  
Senator Michael Padilla  
Senator Cisco McSorley  
Senator Jerry Ortiz y Pino



# CHECK WITH **DIMMICK** REALTY

November 13, 2018

New Mexico Oil Conservation Commission

Heather.riley@state.nm.us

3555 E. MAIN, SUITE A • FARMINGTON, NM 87402

PHONES (505) 325-8863 • (505) 327-9827

FAX: (505) 327-9820

[www.FarmingtonNM.com](http://www.FarmingtonNM.com)

Dear Ms. Riley,

I am writing to express my support of the application of Hilcorp Energy 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.

NGO's that have no vested interest in our community continue to dictate and champion opinions that have not basis in the reality of our region and its economic plight. They have falsely claimed that energy companies seek to "double drill" in the San Juan Basin. The irony is that what is being proposed is a plan to use existing wells currently devoted to other pools to tap into the Mesaverde pool. This reduces the number of new wells needed to effectively tap the resources here in the northwest. Hilcorp is bringing forth a responsible, balanced plan. Outside NGO's seek to shut down oil and gas completely, proving that this isn't about having responsible operators, but none at all.

The northwest part of this state cannot afford these ideologies that refuse to seek collaborative solutions to responsible land and resource management.

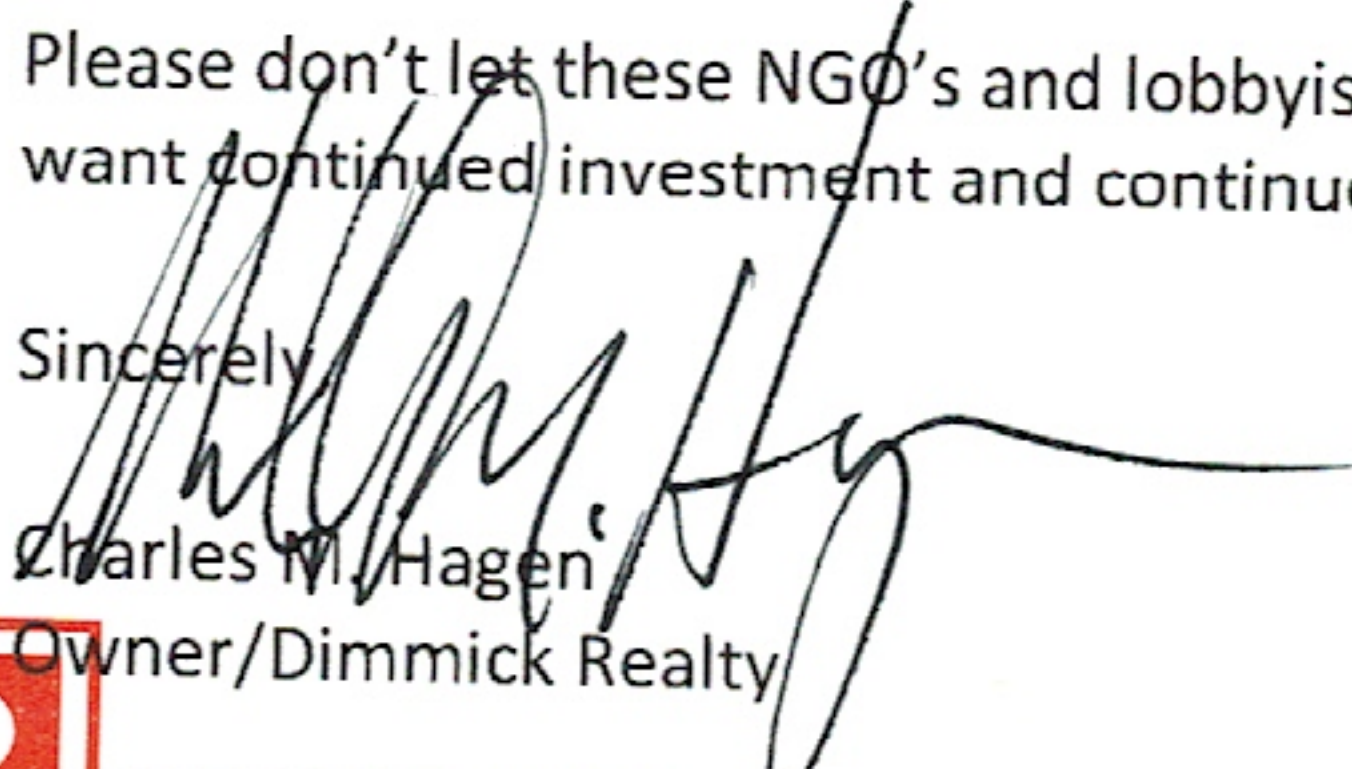
Hilcorp has taken over one of the oldest oil fields in the country and they are breathing new life into it. By the end of 2018, they will have invested \$100 million dollars into the field, supporting jobs and pumping money into our economy. \$100 million might not seem like a lot in Santa Fe, but it is nearly three times what previous operators combined spent on expansion in the basin over the last three years.

Please help businesses who are trying to get things done and create productivity in the basin. If not for them, please help the thousands of residents either employed or indirectly supported by the oil and gas industry.

I urge the Commission to approve the application. The Hilcorp approach is one that is technically sound, but, more importantly, it will continue the investment into our region.

Please don't let these NGO's and lobbyist groups tell you what is good for us in the San Juan Basin. We want continued investment and continued development of the Blanco-Mesaverde Gas Pool.

Sincerely,

  
Charles M. Hagen  
Owner/Dimmick Realty





## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 7:45 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Rio Arriba County and double drilling

-----Original Message-----

From: Barbara Turner <barbaraturner9@yahoo.com>  
Sent: Sunday, November 11, 2018 11:53 AM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Rio Arriba County and double drilling

Hello,

I am a resident and own property in Rio Arriba County. I am writing to register with you that I am very disturbed about the prospect of doubling up on oil and gas wells here in Rio Arriba. We have an Oil and Gas Ordinance on the books in this County which should be considered in any decision making around this issue.

As residents of Rio Arriba, we are fortunate to be the gate keepers of the Rio Chama Watershed, a vital water source for much of New Mexico. Because you are relying on a 2003, outdated RMP, when making this decision to double up on oil and gas wells in this county, you are essentially doubling the chance that we will have an unintended toxic spill or contamination issue from fracking. What is the safety record of the drilling company that would be involved in this expansion? Please put our health and safety first when making decisions that affect the people that live here. Where is a detailed study of the geology of the eastern San Juan Basin so we know that no cross watershed contamination will happen?

I am also very concerned about the large methane cloud over the Four Corners area. With currently no rule in place to capture flared methane, it seems unethical to contribute further to releasing this toxic greenhouse gas into an atmosphere we all must live with into the future.

Have you determined the social and health costs regarding climate change? Please study this issue as it is important that the next generation has a livable planet, both locally here in Rio Arriba, and elsewhere. Temporary profits for the oil and gas industry is not a good enough justification for endangering my health.

I have concerns also about the value of my property. I invested in my property years ago when oil and gas development was not so prevalent. With more oil and gas coming our way here in Rio Arriba County, I am concerned about the value of my property decreasing as we go from a world renown, scenic byway to an oil and gas play.

Please consider my concerns as a resident of Rio Arriba Co.

Thank you,

Barbara Turner  
PO Box 261  
El Rito, NM 87530



## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Saturday, November 10, 2018 11:09 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Request to double well density in Rio Arriba and San Juan Counties

**From:** lattad@yahoo.com <lattad@yahoo.com>  
**Sent:** Friday, November 9, 2018 10:00 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Request to double well density in Rio Arriba and San Juan Counties

I am adamantly opposed to this proposal. Please do NOT let this go through!

Dale Latta  
31 RD 2795  
Aztec, NM

[Sent from Yahoo Mail on Android](#)

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 8:03 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Fw: Comment to NM OCC for Nov 19 hearing

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**From:** justin friedman <jflama6470@yahoo.com>  
**Sent:** Monday, November 12, 2018 9:30 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Fw: Comment to NM OCC for Nov 19 hearing

----- Forwarded Message -----

**From:** justin friedman <jflama6470@yahoo.com>  
**To:** "florene.davisdson@state.nm.us" <florene.davisdson@state.nm.us>  
**Sent:** Monday, November 12, 2018 9:20 AM  
**Subject:** Comment to NM OCC for Nov 19 hearing

Hello OCC,

The New Mexico Oil Conservation Commission (OCC) must not approve Hilcorp's application on November 19 to double the number of their wells. It is essential that this flagrant disregard for the health, air and water quality of New Mexico residents as well as the extreme effects of methane on climate warming be stopped.

Facts about Methane:

- Methane traps 25 times more heat than carbon dioxide.
- New Mexico produces as much climate pollution in the Four Corners as 12 coal fired power plants.
- In recent years NM increased methane pollution 38% as opposed to Colorado which has strict rules and has reduced this figure by 30%.
- Methane damages the immune, neurological, reproductive, developmental, and respiratory systems.

I am ashamed that our state has maintained a polluter friendly environment and excused this behavior in the name of job creation and profit. There are better ways to live for our residents.

Justin Friedman  
Lama NM

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 8:09 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Objection to Hilcorp well extension application

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**From:** Chris Wilkins <chris\_wilkins@bresnan.net>  
**Sent:** Monday, November 12, 2018 11:22 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Objection to Hilcorp well extension application

Ms. Davidson:

I am writing to express my objection to Hilcorp's recent application to double the density of allowable wells in the Blanco-Mesaverde Gas Pool in San Juan and Rio Arriba Counties.

I currently live in Santa Fe, but I am a long-time Four Corners resident and am very familiar with the negative impacts of oil and gas development on that region. I am VERY concerned that this application would have additional negative effects on public health and the environment. In particular, I am concerned about impacts to water resources, to creating additional surface disturbance and landscape fragmentation, and to negatively affecting air quality and contributing to climate change.

San Juan County is already close to exceeding safe ozone levels, and oil and gas development is a major contributor to the methane hot spot. I feel that this proposal should be subject to a new process of environmental review and public consultation to analyze impacts to affected communities, property values, the environment, and cultural resources. This is particularly relevant given Hilcorp's history of violations in other states.

The recent election in New Mexico has clearly shown that citizens in our state want to rein in out of control oil and gas development, and balance it with environmental, social, and other considerations. I urge you to honor the will of the people, and to reject Hilcorp's request until a complete and thorough environmental study and impact analysis has been completed.

Sincerely,  
Paul Wilkins

## Murphy, Kathleen A, EMNRD

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**From:** Riley, Heather, EMNRD  
**Sent:** Tuesday, November 13, 2018 8:20 AM  
**To:** Davidson, Florene, EMNRD; Murphy, Kathleen A, EMNRD  
**Subject:** FW: Pool Rule Amendment Support RE: Case No. 16403

Heather Riley  
Director  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
(505) 476-3468

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**From:** Shantel Cooper <shantel@cooperfirepro.com>  
**Sent:** Monday, November 12, 2018 3:45 PM  
**To:** Riley, Heather, EMNRD <Heather.Riley@state.nm.us>  
**Subject:** [EXT] Pool Rule Amendment Support RE: Case No. 16403

Please accept my comments regarding the Pool Rule Amendment being proposed by Hilcorp:

Dear Ms. Riley,

I am writing to express my support of the application of Hilcorp Energy 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.

NGO's that have no vested interest in our community continue to dictate and champion opinions that have no basis in the reality of our region and its economic plight. They have falsely claimed that energy companies seek to "double drill" in the San Juan Basin. The irony is that what is being proposed is a plan to use existing wells currently devoted to other pools to tap into the Mesaverde pool. This reduces the number of new wells needed to effectively tap the resources here in the northwest. Hilcorp is bringing forth a responsible, balanced plan. Outside NGO's seek to shut down oil and gas completely, proving that this isn't about having responsible operators, but none at all.

The northwest part of this state cannot afford these ideologies that refuse to seek collaborative solutions to responsible land and resource management.

Hilcorp has taken over one of the oldest oil fields in the country and they are breathing new life into it. By the end of 2018, they will have invested \$100 million dollars into the field, supporting jobs and pumping money into our economy. \$100 million might not seem like a lot in Santa Fe, but it is nearly three times what previous operators combined spent on expansion in the basin over the last three years.

Please help businesses who are trying to get things done and create productivity in the basin. If not for them, please help the thousands of residents either employed or indirectly supported by the oil and gas industry.

I urge the Commission to approve the application. The Hilcorp approach is one that is technically sound, but, more importantly, it will continue the investment into our region.

Please don't let these NGO's and lobbyist groups tell you what is good for us in the San Juan Basin. We want continued investment and continued development of the Blanco-Mesaverde Gas Pool.

Sincerely,

Shantel Cooper, Chairman

Four Corners Economic Development, Inc.



Dear Ms. Riley,

November 12, 2018

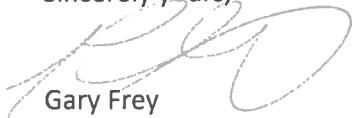
I am writing to express my support of the application of Hilcorp Energy to amend the well density and location requirements and administrative exceptions of the special rules for the Blanco-Mesaverde Gas pool, Rio Arriba and San Juan Counties, New Mexico.

You have likely received some letters created from a boiler plate template that outline the technical aspects of the proposal (some of which I am including here). I cannot speak to the veracity of the content of someone else's input in an area where I have no expertise, but I can speak to the visible impact to the community of a declining industry. The effect of the reduction of the two power plants in our region is palpable and the prospect of their total closure is nothing short of dire. The economic development agencies in this area are trying numerous approaches to mollifying the effects of a declining industrial base to include an increase in the marketing and accessibility of recreational activities and the creation of a Maker's Space among others. The ability for the area to tap into and enhance an existing revenue stream sure seems to make logical sense, especially in an area without an obvious large-scale industrial economic alternative.

Please help businesses who are trying to get things done and create productivity in the basin. If not for them, please help the thousands of residents either employed or indirectly supported by the oil and gas industry.

I urge the Commission to approve the application. The Hilcorp approach is one that appears to be technically sound, but, more importantly, it will continue the investment into our region.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Gary Frey', with a large, stylized flourish extending from the end of the signature.

Gary Frey  
3606 N Carlton Ave  
Farmington, NM 87401

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 5:06 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Please deny Hilcorp's application: Case No. 16403

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**From:** SUSAN PEIRCE <speirce@prodigy.net>  
**Sent:** Tuesday, November 13, 2018 4:50 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Please deny Hilcorp's application: Case No. 16403

To Florene Davidson

As a public agency, the New Mexico Oil Conservation Commission has both the regulatory authority and the duty to consider the concerns of the public about applications brought forth before the commission.

Hilcorp's application: Case No. 16403 could impact water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

Under current rules, operators can drill eight wells per 640 acres of land. If Hilcorp is granted its exemption, up to 8,000 new wells will be drilled in San Juan and Rio Arriba counties in northwest New Mexico. It also means the public will no longer have the opportunity to comment on well-density issues in the Blanco-Mesaverde gas pool. Hilcorp's proposal would circumvent the need to analyze the impacts of more oil and gas development on public health, water resources, air quality, and the environment.

Before the commission makes any decision, Hilcorp's proposal should take into consideration concerns from the public and impacted communities and include stringent and thorough analysis of environmental, social, and cultural impacts double drilling will have. There are more than 40,000 oil and gas wells in northwestern New Mexico and over 91% of publicly managed lands are leased for oil and gas development. The region is also home to the nation's largest methane cloud. More wells will mean more reckless venting, leaking, and flaring of methane, threatening the air we breath and water we drink and exacerbating climate disruption.

-- San Juan County is already on the cusp of exceeding safe ozone levels, and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. Will Hilcorp take adequate steps to capture methane while drilling new wells or doing recompletions? Doubling drilling will certainly result

in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma.

-- The Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is out of sync with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

-- Hilcorp is a bad-faith actor with a history of violations in other states. We are deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

-- The Oil Conservation Commission did not provide sufficient notice for those members of the public who are affected to know about and be able to attend this hearing or the Sept. 13 hearing. Since then, Hilcorp has made misleading and confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

Please do not allow double-drilling in NW NM and continue to allow the public to have unout.

thank you for the opportunity to comment,

Susan and Roger Peirce  
Santa Fe, NM 87506

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Re: Case No. 16403

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**From:** Rebecca Sobel <info@sg.actionnetwork.org>  
**Sent:** Thursday, November 15, 2018 12:35 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Re: Case No. 16403

Florene Davidson,

Commission Clerk Florene Davidson:

I write to express my opposition of Hilcorp's proposal to increase well-density Case No. 16403 and request the New Mexico Oil Conservation Commission (NMOCC) deny the request. As a public agency, NMOCC has both the regulatory authority and the duty to consider public concerns over oil and gas applications.

This proposal would create serious risks to water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

Furthermore, the Oil Conservation Commission has not provided enough public notice related to the November 19 or September 13 hearings on this matter.

Thank you for your consideration of this important matter.

New Mexico deserves a frack free future, and New Mexicans deserve clean air and water.

Rebecca Sobel  
sobel.rebecca@gmail.com

729 Baca St.

Santa Fe, New Mexico 87505

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## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Re: Case No. 16403

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**From:** Jennifer Siri <info@sg.actionnetwork.org>  
**Sent:** Thursday, November 15, 2018 12:26 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Re: Case No. 16403

Florene Davidson,

Commission Clerk Florene Davidson:

I write to express my opposition of Hilcorp's proposal to increase well-density Case No. 16403 and request the New Mexico Oil Conservation Commission (NMOCC) deny the request. As a public agency, NMOCC has both the regulatory authority and the duty to consider public concerns over oil and gas applications.

This proposal would create serious risks to water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

San Juan County is already on the cusp of exceeding safe ozone levels and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. I am concerned about whether Hilcorp is taking adequate steps to capture methane while drilling new wells or doing recompletions. Doubling drilling will certainly result in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma.

The Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is incongruous with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and

public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

Hilcorp is a bad-faith actor with a history of violations in other states. I am deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

Furthermore, the Oil Conservation Commission has not provided enough public notice related to the November 19 or September 13 hearings on this matter.

Thank you,  
Jenni Siri

Jennifer Siri  
jennisiri999@gmail.com  
133 Damon St., Unit 5  
Belen, New Mexico 87002-6142

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Comment to NM OCC for Nov 19 hearing

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**From:** Daniel Hutchison <latirhutch@yahoo.com>  
**Sent:** Wednesday, November 14, 2018 9:08 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Comment to NM OCC for Nov 19 hearing

**Subject:** Comment to NM OCC for Nov 19 hearing

Hello OCC,

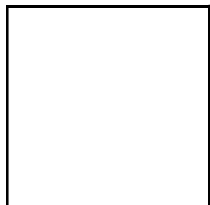
The New Mexico Oil Conservation Commission (OCC) must not approve Hilcorp's application on November 19 to double the number of their wells. It is essential that this flagrant disregard for the health, air and water quality of New Mexico residents as well as the extreme effects of methane on climate warming be stopped.

Facts about Methane:

- Methane traps 25 times more heat than carbon dioxide.
- New Mexico produces as much climate pollution in the Four Corners as 12 coal fired power plants.
- In recent years NM increased methane pollution 38% as opposed to Colorado which has strict rules and has reduced this figure by 30%.
- Methane damages the immune, neurological, reproductive, developmental, and respiratory systems.

I am ashamed that our state has maintained a polluter friendly environment and excused this behavior in the name of job creation and profit. These wells need to be capped, the methane metered, and the fees used to benefit our state.

Sincerely,



## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:54 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Support the Hilcorp Pool rule application

**From:** ehausman@rockridge.biz <ehausman@rockridge.biz>  
**Sent:** Wednesday, November 14, 2018 6:26 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Support the Hilcorp Pool rule application

Dear Commissioners,

I'm writing to encourage your approval of Hilcorp's application for an amendment to the 'pool rule'. It is the responsibility of the Oil Conservation Commission to ensure that the resources of our great state are being developed and this change is instrumental to accomplishing that effectively. The change will improve the rule in regards to the well density, location requirements, and administrative exceptions of the special rules for the Blanco-Mesaverde Gas pool, Rio Arriba and San Juan Counties, NM (Case 16403).

Environmental groups have opposed this rule revision based on fictitious claims that Hilcorp is proposing thousands of new wells, that they intend to pollute, and that they are using fresh drinking water to frack. NONE of these things are true.

In fact, this change will create new jobs and revenue streams for the state without requiring new wells to be drilled. All new wells will go through the standard permitting process.

We are asking that you not allow emotional and false claims of these activists to affect your decision. Please disregard the distorted political rhetoric and approve an application that is in the best interest of the state and the development of our plentiful resources.

Sincerely,  
Elaine Hausman  
Elaine Hausman

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:53 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

-----Original Message-----

From: Peggy Blackburn <yanespeg@swcp.com>  
Sent: Wednesday, November 14, 2018 5:15 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

Absolutely we don't need this especially for the Methane that will be produced and other health related issues but especially in regard for the children that will be affected.

Peggy Blackburn



## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 9:35 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] San Juan Basin and drilling

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**From:** Deborah Dennard <d.dennard@sbcglobal.net>  
**Sent:** Tuesday, November 13, 2018 8:55 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] San Juan Basin and drilling

Dear Ms. Davidson,

I am unable to make the public comments meeting on November 19 in regards to the proposed increase in drilling in San Juan County. However, this issue is so important to me that I am writing instead.

I am a New Mexico resident and I am deeply concerned about how the application would harm the environment and public health. Water is also a huge issue here in a land where every drop is important. Not only that, but precious archaeological sites will be destroyed, water and air quality worsened even more and the fragile landscape fragmented to an extremely dangerous level.

Hilltop Corporation seems to have no concern for the residents and history and environment of San Juan and Rio Arriba counties. Doubling their number of wells will bring untold suffering to the people, land, water and environment of New Mexico. 13,000 people in the affected counties now suffer from asthma, the air quality is already so poor.

PLEASE do not allow double drilling in the San Juan Basin by NMOCC will add even more to the methane cloud the size of the state of Delaware that now hangs over the Four Corners.

Thank you

Deborah and Robert Dennard  
4 Taylor Mountain  
Santa Fe, NM 87508

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 8:25 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hillcorp Application for unregulated wells

**From:** Rita Hall <marghhxx@gmail.com>  
**Sent:** Monday, November 12, 2018 3:20 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hillcorp Application for unregulated wells

Climate change will cost this planet dearly in the foreseeable future, and it is not the fossil fuel industry that will pay the price. Please do not approve Hillcorp's application to drill more unregulated wells. I can see the polluted 4 corners air from where I live, and I have seen the effects of climate change in my area - drought and forest fire.

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:12 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

**From:** Lynn Anner-Bolieu <juniper12hills@gmail.com>  
**Sent:** Tuesday, November 13, 2018 1:30 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

I agree that we can not have any more new wells drilled in NW NM. I have seen first hand the huge yellow methane cloud from my many times camping and cleaning trails in Chaco Heritage Park. That cloud is so large it can be seen well over 50 miles away up in the Farmington area. Asthma is a serious disease, which can be fatal. I myself have a mild asthma, which could become much worse if exposed to more methane gas from drilling. I live north of the Gallup area in NW NM and adamantly oppose any more new drilled wells than the ones currently in use. Our health is much more important than corporate profits anyday! I am a member of the Plateau Sciences Society, which studies the geography and culture of the NW Plateau, and the McKinley County Recycling Council, for the past 20 years, and both entities will fight every step of the way to prevent more drilling. Lynn R. Anner-Bolieu, Dcn.(Ret.), B.Sc., M.Div. (Yale).

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:10 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: Case No. 16403: Hilcorp application

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**From:** thomasine montoya <TOMMIPM@msn.com>  
**Sent:** Tuesday, November 13, 2018 1:06 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

PLEASE, please protect our environment. No double drilling  
Sent from [Mail](#) for Windows 10

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:10 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

**From:** Stef W <soma.sema@gmail.com>  
**Sent:** Tuesday, November 13, 2018 1:04 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

11/13/2018

Dear Commission Clerk Florene Davidson

I am writing regarding Hilcorp's application: Case No. 16403, the application to the New Mexico Oil Conservation Commission for a rule change to double the number of natural-gas wells allowed in the Blanco-Mesaverde gas pool across San Juan and Rio Arriba counties.

I am deeply concerned about this potential increase in number of wells, and am strongly opposed to it. This proposal could impact water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

San Juan County is already on the cusp of exceeding safe ozone levels, and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. Will Hilcorp take adequate steps to capture methane while drilling new wells or doing recompletions? Doubling drilling will certainly result in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma. Because I am a mother and a teacher, and also married to a nurse, this is extra alarming to me personally.

I am also concerned because the Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is out of sync with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

Additionally, Hilcorp has proven itself to be a bad-faith actor with a history of violations in other states. I am deeply anxious about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

Lastly, I'd like to highlight the fact that the Oil Conservation Commission did not provide sufficient notice for those members of the public who are affected to know about and be able to attend this hearing or the Sept. 13 hearing. Since then, Hilcorp has made misleading and confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

I trust that you will take comments like mine under consideration.

Sincerely and with appreciation,  
Stefanie Watkins  
238 State Road 76  
Santa Cruz NM  
87567

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[soma.sema@gmail.com](mailto:soma.sema@gmail.com)

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 1:43 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

-----Original Message-----

From: Valerie Levine <valerielevine22@gmail.com>  
Sent: Tuesday, November 13, 2018 12:56 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

No double drilling in NM. Protect our environment!

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 1:43 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Wells in San Juan county. Case No. 16403.

**From:** Doyne Loyd <dwlj102@gmail.com>  
**Sent:** Tuesday, November 13, 2018 12:51 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Wells in San Juan county. Case No. 16403.

My wife works in Bloomfield. The air in that area can get quite nasty at times and never seems OK compared to where we have property in Catron County. We had a house near the gas plants. I was not able to go outside in our yard at times.

Unfortunately, the gas and oil companies do not have a good reputation. 5 or so years ago, before we sold our house, there was a leak at a dog leg about 1/2 mile from our house. They did not fix it the first visit and did not return to check it. I finally complained enough that they went out and fixed a high pressure leak. This was not Hilcorp. I am not at home and am blank on the gas company name.

Bottom line, we don't need more well problems in San Juan county. I have to spend most of my time away. We need to clean up the gas cloud not make it worse. We need regulation of leaks and enforcement. Do not grant more wells. We have problems enough as it is.

Doyne Loyd, MD  
retired



## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 1:42 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp's application: Case No. 16403.

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**From:** Lydia Davis <lydiashana@centurylink.net>  
**Sent:** Tuesday, November 13, 2018 12:44 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hilcorp's application: Case No. 16403.

Hello Florence,

I ask you to reconsider this proposal for the following reasons:

This proposal could impact water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change. Hilcorp is a bad-faith actor with a history of violations in other states. We are deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

The Oil Conservation Commission did not provide sufficient notice for those members of the public who are affected to know about and be able to attend this hearing or the Sept. 13 hearing. Since then, Hilcorp has made misleading and confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

*Lydia Davis*  
*PO Box 850*  
*Arroyo Seco, NM 87514*  
*575.776.2783*  
[lydiashana@centurylink.net](mailto:lydiashana@centurylink.net)  
[dlydia15@gmail.com](mailto:dlydia15@gmail.com)  
[www.designsld.com](http://www.designsld.com)

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 1:40 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp proposal

**From:** Diane Forsdale <dforsdale109@gmail.com>  
**Sent:** Tuesday, November 13, 2018 11:24 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hilcorp proposal

Hi Ms. Davidson-

I am writing to urge you to reject the proposal by Hilcorp which would allow doubling the current density of wells in San Juan and Rio Arriba counties. I am concerned about environmental effects, as we already have a huge methane plume in this area. I believe all current wells and any new ones should be required to capture methane emissions. Studies should be done to assess the environmental impacts of this proposal at the bare minimum.

Basically, in a state that should be leading the way to cleaner renewable energy, I feel that continuing to get every last bit of oil and natural gas out of the ground is a short sighted goal and one that will ultimately contribute greatly to global climate change.

Please JUST SAY NO.

Thank you.

Diane Forsdale  
Santa Fe

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:14 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp's application: Case No. 16403

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**From:** smithm@igc.org <smithm@igc.org>  
**Sent:** Tuesday, November 13, 2018 1:56 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hilcorp's application: Case No. 16403

November 13, 2018

Dear Commission Clerk Florene Davidson:

Please convey this letter to the NM Oil Conservation Commission.

I am writing to strongly oppose Hilcorp's application to the New Mexico Oil Conservation Commission for a rule change to double the number of natural-gas wells allowed in the Blanco-Mesaverde gas pool across San Juan and Rio Arriba counties. My concerns are as follows:

1. CLIMATE CHANGE. I am extremely concerned about the threats of climate change and this move would be disastrous to our air, water, and public health. This proposal could impact water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality, all contributing climate change.
2. PUBLIC INPUT. As a public agency, the Commission has both the regulatory authority and the duty to consider the concerns of the public about applications brought forth before the commission. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.
3. OZONE LEVELS AND METHANE. San Juan County is already on the cusp of exceeding safe ozone levels, and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. Will Hilcorp take adequate steps to capture methane while drilling new wells or doing recompletions? Doubling drilling will certainly result in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma.
4. ENVIRONMENTAL REVIEW. Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is out of sync with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.
5. BAD ACTOR. Hilcorp is a bad-faith actor with a history of violations in other states. I am deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane. Hilcorp has made misleading and confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

Thank you for your consideration of this input.

Melinda Smith

1835 Tierra Vida NW  
Albuquerque, NM 87107  
505-515-7284

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:19 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: Case No. 16403: Hilcorp application

-----Original Message-----

From: Sarah <sa1321@msn.com>  
Sent: Tuesday, November 13, 2018 2:16 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

No double drilling. Please protect our air and water!

Sarah Andrews  
Concerned New Mexico resident

Sent from my iPad

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:40 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

**From:** Barbara Duncan <duncan46ba@gmail.com>  
**Sent:** Tuesday, November 13, 2018 2:31 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

No ! No! No! There is already too much air, water and land pollutin with the existing wells.

Barbara Duncan  
Ramah, Nm  
87321

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 2:43 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

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**From:** Rebecca Walding <studio50@swcp.com>  
**Sent:** Tuesday, November 13, 2018 2:38 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

Commission Clerk Florene Davidson,  
This proposal should not be approved as is.

Doubling the drilling is a huge difference to those living nearby and those of us who love New Mexico and its natural beauty.  
Making a huge decision like this should require comprehensive environmental review and public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

Thank you for listening,  
Rebecca Walding  
50 Main Street, Cerrillos, NM 87010  
505-474-4931

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 3:00 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: Case No. 16403: Hilcorp application

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**From:** B Ferguson <gblhat@hotmail.com>  
**Sent:** Tuesday, November 13, 2018 2:47 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

To the New Mexico Oil Conservation Commision,

The dependency on fossil fuels is transitioning into clean energy sources. The need for more wells is unfounded. Conservation is a word not used with excess. The hydrocarbons that are inhaled are detrimental to the health of people. Not just a few people, many people. The medical cost is enormous, babies and children are primarily affected. It's called child abuse. If I hit my child to a point that he/she needed constant medical attention, I would be in jail. The studies are there. We aren't ignoring them anymore. The money is in rebuilding infrastructure which can be built with new clean energy. Our water clean and drinkable. Fracking ruined the New York State Watershed, it's services many communities in many states. The disease rate continues rise due to hydrocarbons in any form. Let's converse fossil fuel and go green.

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 3:07 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp's application. Case number 16403

-----Original Message-----

From: CAROLYN HUFF <carolynkhuff@comcast.net>  
Sent: Tuesday, November 13, 2018 3:02 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Hilcorp's application. Case number 16403

In considering this proposal, public input must be considered on issues that directly impact the health and safety of New Mexicans. In this case, decisions made by those who will then move on should be at least balanced by input from the people most affected. Methane clouds, cultural impact, breathing difficulties are some of the issues to be considered. Too many times in New Mexico's past, outsiders and greed have shaped our state and it's people. Now is the time to have the courage and vision to make decisions based on people, not profits.

Sent from Xfinity Connect Application



## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 3:51 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp's application: Case No. 16403

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**From:** David Fieldson <david\_505\_smile@yahoo.com>  
**Sent:** Tuesday, November 13, 2018 3:44 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hilcorp's application: Case No. 16403

Comments from public citizen of NM.

Present exemption as written means the public will no longer have the opportunity to comment on well-density issues in the Blanco-Mesaverde gas pool. Hilcorp's proposal would circumvent the need to analyze the impacts of more oil and gas development on public health, water resources, air quality, and the environment.

- Quantity of wells indicates unbalanced economy

Under current rules, operators can drill eight wells per 640 acres of land. If Hilcorp is granted its exemption, up to 8,000 new wells will be drilled in San Juan and Rio Arriba counties in northwest New Mexico. Vast number of oil wells in region indicates unbalanced concentration of education, jobs and services in the oil sector. Cyclical crash of oil price would lead to cyclical poverty of the region. Permanent crash of oil such as by global warming regulation would lead to long term impoverishment similar to coal areas in the SE U.S. The Commission should be staggering oil well numbers over time to alleviate NM's oil and gas splurge/ bust economy.

- This proposal would impact water access.

Drought has been increasing in NM for about a decade and a Duke University study shows fracking removes water access to other users up to forever. Access to water in the proposed area is decreasing. Hilcorp presently decreases water availability at its drill sites due to pollution and internment into the bedrock. To approve Hilcorp drilling exemption, the Commission would need to demonstrate that Hilcorp is increasing water availability long term.

- Hilcorp would increase methane

The methane cloud around the 4 corners area is seen from space. Methane is a worse contributor to global warming than CO2. Methane is a toxin. California is in the process of tracking and removing all methane sources at gigantic cost. The Oil Conservation Commission needs to be shutting down all methane sources in its jurisdiction. Exemption is a breaking of standard policy- The current standard policy is to increase the amount of methane in atmosphere. Breaking standard policy would to have Hilcorp decrease methane leaks in current operations by 99% by methane capture before undergoing a hearing for exempting additional well drilling. The Commission should at present be progressively shutting down all methane drilling well sources until the present methane cloud has decreased by 90% before considering any new drilling.

- Hilcorp is a bad-faith actor with a history of violations in other states. The Commission should require an insurance bond from Hilcorp to be relinquished proportionately to increases of ozone, methane, asthma cases, as well as decreases in water quality/ quantity.

- The Oil Conservation Commission did not provide sufficient notice for those members of the public who are affected to know about and be able to attend this hearing or the Sept. 13 hearing. Since then, Hilcorp has made misleading and

confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

- Hilcorp is an out of state employer. The Commission needs to demonstrate that local oil drilling employers have been first reviewed for access to exemption before review/ hearing of out of state firms. The same applies to employees.

Considerately, David Morrison, Albuquerque, NM

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 4:23 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] doubling the well density in the Blanco-MesaVerde formation across San Juan and Rio Arriba counties

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**From:** Chrysa Wikstrom <hands\_on@cybermesa.com>  
**Sent:** Tuesday, November 13, 2018 4:18 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] doubling the well density in the Blanco-MesaVerde formation across San Juan and Rio Arriba counties

To who it may concern,

I am a resident of Santa Fe county. However, I am very concerned about the proposed doubling of well density in San Juan & Rio Arriba counties.

It is reported that San Juan and Rio Arriba counties are home to more than 40,000 oil and gas wells as well as ancillary compressors, processing plants and pipelines. No analysis has been done on the impacts of doubling this well density. How will it affect public health and the environment?

Especially in Rio Arriba county, the impacts of this will affect me and my family. Shepherds Lamb is located in Tierra Amarilla. This is the lamb that my family eats. We purchase this meat from the Farmer's Market here in Santa Fe, as well as many other products that come from that area. Are you willing to risk tainting our food supply?

The hot springs in Ojo Caliente is a vacation spot my family enjoys. If the waters are spoiled as a result of further oil & gas drilling, many people will lose their livelihoods and favorite recreation spots.

And what of the air quality? It is reported that San Juan County is already on the cusp of exceeding safe ozone levels. Additionally, oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. Asthma is already at higher levels in San Juan county that it is in the state as a whole.

Please, require that Hilcorp take adequate steps to protect the health and environment of New Mexicans by requiring an independent analysis of the impacts of doubling the well density in these counties.

Thank you.

Chrysa Wikstrom  
1830 Kiva Road  
Santa Fe, NM  
87505

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:09 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Hilcorp's application - Case No. 16403

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**From:** Stephen Schmidt <ssdog@me.com>  
**Sent:** Tuesday, November 13, 2018 7:02 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Hilcorp's application - Case No. 16403

To whom it may concern:

I would like to urge to postponing of Hilcorp's request to increase the number of wells from 8 to 16 until the new Land Commissioner, who represents the latest public desires, to take her position and be involved it this process.

Stephen Schmidt  
21 Calle Debra  
Santa Fe, NM 87507  
[ssdog@me.com](mailto:ssdog@me.com)  
505-557-9731

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:08 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: DOUBLING the well density in the Blanco-MesaVerde formation

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**From:** Crawford John MacCallum <mccallum@unm.edu>  
**Sent:** Tuesday, November 13, 2018 6:47 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] DOUBLING the well density in the Blanco-MesaVerde formation

I am concerned about the potential of this proposal to impact water resources, to create additional surface disturbance and landscape fragmentation, and to negatively affect to air quality and contribute to climate change. Disregarding the concerns of San Juan and Rio Arriba county citizens by NMOCC concerning the magnitude of Hilcorp's well density change application would be extremely troubling.

Crawford MacCallum

144 Sedillo Hill Rd

Tijeras, NM 87059

505-281-1534

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:08 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403

-----Original Message-----

From: Eduardo Santiago <emnrd@edsantiago.com>  
Sent: Tuesday, November 13, 2018 6:42 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403

Dear commissioners,

I'm writing with regard to Case 16403, the 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.

The proposal seems disturbing, especially given current concerns about air quality in the region. I urge the commission to act with care and deliberation, to listen to concerns from the communities affected, to conduct studies on the environmental and public health impact from an action as potentially huge as this.

Thank you for your consideration.

Eduardo Santiago  
Los Alamos

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:11 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: Case No. 16403: Hilcorp application

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**From:** Lucy Smith <drlucy7@mac.com>  
**Sent:** Tuesday, November 13, 2018 7:25 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

Dear Commission Clerk Florence Davidson,

I was very concerned to read of the application by Hilcorp Energy for a rule change allowing double the number of natural gas wells in Northern NM. As a physician and lover of the natural environment I am very opposed to this. We already have a huge methane hot spot in NM that is accelerating global warming, leading to more fires, drought and climate change. It is crazy that these methane leaks are not captured. Apparently ozone levels are also high and this aggravates asthma and respiratory illness in vulnerable people that live in the area. There are an estimated 13,000 people with asthma already in San Juan County and that number would grow as a direct result of increased drilling.

Another concern is the water needed to frack for these additional wells. That water is then contaminated, we have no way to clean it so it is pumped into the ground and lost. An article in The New Mexican said 83 billion gallons of water is used in the fracking along the Texas, NM border. That seems like a vast quantity in a dry place like NM- can we really afford to keep using more water this way? It doesn't seem sensible.

Climate change is on our doorstep- the fires in California, the encroaching insect pests wreaking havoc in the Santa Fe and Carson National forest- I don't think we should be hurrying to release more fossil fuels into the environment. Let Hilcorp energy diversify their portfolio into climate neutral activities, we want to leave fossil fuels in the ground for the future generations of New Mexicans.

Thank you,

Lucy Smith, ND  
Santa Fe, NM

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:11 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

-----Original Message-----

From: Diane MacInnes <storyscapes@cybermesa.com>  
Sent: Tuesday, November 13, 2018 8:22 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

My husband and I are against any change in regulations which would increase the number of gas wells in any areas in New Mexico. We are appalled that the present administration would consider such a backward looking policy. We have enough problems as a result of drilling in our state. Do not consider such an irresponsible action which will burden taxpayers with more costs as a result of damage to our health, our water, and our air.

Sincerely,  
Diane MacInnes  
Santa Fe NM 87505

Sent from my iPhone



## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:11 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

-----Original Message-----

From: Rosalie D'Angelo <ciaobella1@mac.com>  
Sent: Wednesday, November 14, 2018 7:54 AM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

Please stop Hilcorp from obtaining any permits to permit double-drilling in NM. Protect our environment for all of us, including the children of NM and future generations, and take action to keep our rivers and drinking water safe.

Thank you.  
Rosalie D'Angelo

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:24 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

**From:** Linda Finkelstein <lobolinda2634@gmail.com>  
**Sent:** Wednesday, November 14, 2018 9:17 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

Please stop 16403 as double-digit will hurt New Mexicans. It is already creating a methane cloud that we have no way to correct & the damages will only become worse. This is public land, not Hilcorp's private profit pool & we get stuck with the aftereffects as well as current effects. Thank you.

## Murphy, Kathleen A, EMNRD

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**From:** Riley, Heather, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:34 AM  
**To:** Murphy, Kathleen A, EMNRD; Davidson, Florene, EMNRD  
**Subject:** FW: Pool Rule Amendment Support RE: Case No. 16403  
**Attachments:** HILCORP LETTER OF SUPPORT20181113\_20581009.pdf

Heather Riley  
Director  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
(505) 476-3468

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**From:** Perry Webb <[pmwebb@webbauto.net](mailto:pmwebb@webbauto.net)>  
**Sent:** Tuesday, November 13, 2018 9:01 PM  
**To:** Riley, Heather, EMNRD <[Heather.Riley@state.nm.us](mailto:Heather.Riley@state.nm.us)>  
**Subject:** [EXT] FW: Pool Rule Amendment Support RE: Case No. 16403

Oops, forgot the attachment

Perry M. Webb  
Webb Automotive Group, Inc.  
PO Box 5550  
Farmington, NM 87499  
505-325-1911

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**From:** Perry Webb <[pmwebb@webbauto.net](mailto:pmwebb@webbauto.net)>  
**Date:** Tuesday, November 13, 2018 at 8:59 PM  
**To:** "[heather.riley@state.nm.us](mailto:heather.riley@state.nm.us)" <[heather.riley@state.nm.us](mailto:heather.riley@state.nm.us)>  
**Subject:** Pool Rule Amendment Support RE: Case No. 16403

Please accept my comments regarding the Pool Rule Amendment being proposed by Hilcorp: Please see the attached letter that is signed.

13 November 2018

Dear Ms. Riley,

As an employer of over 115 people in San Juan County, I am writing to express my support of the application of Hilcorp Energy 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.

Many voices such as NGO's have no vested interest in our community yet they continue to dictate and champion opinions that have no basis in the reality of our region and its economic plight. They have falsely claimed that energy companies seek to "double drill" in the San Juan Basin. The irony is that what is being proposed is a plan to use existing wells currently devoted to other pools to tap into the Mesaverde pool. This reduces the number of new wells needed to effectively tap the resources here in the northwest. Hilcorp is bringing forth a responsible, balanced plan. Outside NGO's seek to shut down oil and gas completely, proving that this isn't about having responsible operators, but none at all.

The northwest part of this state cannot afford these ideologies that refuse to seek collaborative solutions to responsible land and resource management.

Hilcorp has taken over one of the oldest oil fields in the country and they are breathing new life into it. By the end of 2018, they will have invested \$100 million dollars into the field, supporting jobs and pumping money into our economy. \$100 million might not seem like a lot in Santa Fe, but it is nearly three times what previous operators combined spent on expansion in the basin over the last three years.

Please help businesses who are trying to get things done and create productivity in the basin. If not for them, please help the thousands of residents either employed or indirectly supported by the oil and gas industry.

I urge the Commission to approve the application. The Hilcorp approach is one that is technically sound, but, more importantly, it will continue the investment into our region.

Please don't let these NGO's and lobbyist groups tell you what is good for us in the San Juan Basin. We want continued investment and continued development of the Blanco-Mesaverde Gas Pool.

Sincerely,

Perry M. Webb  
President  
Webb Automotive Group, Inc.  
PO Box 5550  
Farmington, NM 87499

Perry M. Webb  
Webb Automotive Group, Inc.  
PO Box 5550  
Farmington, NM 87499  
505-325-1911

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 9:35 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case 16403

**From:** isabel trujillo <iwt777@yahoo.com>  
**Sent:** Wednesday, November 14, 2018 9:32 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case 16403

I am against Hilcorp drilling in a greedy way, if my vote counts for anything anymore!

[Sent from Yahoo Mail on Android](#)

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Tuesday, November 13, 2018 5:06 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Please deny Hilcorp's application: Case No. 16403

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**From:** SUSAN PEIRCE <speirce@prodigy.net>  
**Sent:** Tuesday, November 13, 2018 4:50 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Please deny Hilcorp's application: Case No. 16403

To Florene Davidson

As a public agency, the New Mexico Oil Conservation Commission has both the regulatory authority and the duty to consider the concerns of the public about applications brought forth before the commission.

Hilcorp's application: Case No. 16403 could impact water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

Under current rules, operators can drill eight wells per 640 acres of land. If Hilcorp is granted its exemption, up to 8,000 new wells will be drilled in San Juan and Rio Arriba counties in northwest New Mexico. It also means the public will no longer have the opportunity to comment on well-density issues in the Blanco-Mesaverde gas pool. Hilcorp's proposal would circumvent the need to analyze the impacts of more oil and gas development on public health, water resources, air quality, and the environment.

Before the commission makes any decision, Hilcorp's proposal should take into consideration concerns from the public and impacted communities and include stringent and thorough analysis of environmental, social, and cultural impacts double drilling will have. There are more than 40,000 oil and gas wells in northwestern New Mexico and over 91% of publicly managed lands are leased for oil and gas development. The region is also home to the nation's largest methane cloud. More wells will mean more reckless venting, leaking, and flaring of methane, threatening the air we breath and water we drink and exacerbating climate disruption.

-- San Juan County is already on the cusp of exceeding safe ozone levels, and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. Will Hilcorp take adequate steps to capture methane while drilling new wells or doing recompletions? Doubling drilling will certainly result

in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma.

-- The Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is out of sync with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

-- Hilcorp is a bad-faith actor with a history of violations in other states. We are deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

-- The Oil Conservation Commission did not provide sufficient notice for those members of the public who are affected to know about and be able to attend this hearing or the Sept. 13 hearing. Since then, Hilcorp has made misleading and confusing statements in the media about the scope of this application. Hilcorp has suggested that this application is only about re-completions, but there is nothing in the application that limits Hilcorp or other operators to recompletions. We know that new wells could be drilled as a result of this proposal, and Hilcorp's attempt to conceal this from the public is troubling.

Please do not allow double-drilling in NW NM and continue to allow the public to have unout.

thank you for the opportunity to comment,

Susan and Roger Peirce  
Santa Fe, NM 87506

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Re: Case No. 16403

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**From:** Rebecca Sobel <info@sg.actionnetwork.org>  
**Sent:** Thursday, November 15, 2018 12:35 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Re: Case No. 16403

Florene Davidson,

Commission Clerk Florene Davidson:

I write to express my opposition of Hilcorp's proposal to increase well-density Case No. 16403 and request the New Mexico Oil Conservation Commission (NMOCC) deny the request. As a public agency, NMOCC has both the regulatory authority and the duty to consider public concerns over oil and gas applications.

This proposal would create serious risks to water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

Furthermore, the Oil Conservation Commission has not provided enough public notice related to the November 19 or September 13 hearings on this matter.

Thank you for your consideration of this important matter.

New Mexico deserves a frack free future, and New Mexicans deserve clean air and water.

Rebecca Sobel  
sobel.rebecca@gmail.com



729 Baca St.

Santa Fe, New Mexico 87505

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## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Re: Case No. 16403

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**From:** Jennifer Siri <info@sg.actionnetwork.org>  
**Sent:** Thursday, November 15, 2018 12:26 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Re: Case No. 16403

Florene Davidson,

Commission Clerk Florene Davidson:

I write to express my opposition of Hilcorp's proposal to increase well-density Case No. 16403 and request the New Mexico Oil Conservation Commission (NMOCC) deny the request. As a public agency, NMOCC has both the regulatory authority and the duty to consider public concerns over oil and gas applications.

This proposal would create serious risks to water resources, create additional surface disturbance and landscape fragmentation, negatively affect air quality and contribute to climate change. It would be deeply troubling if the Oil Conservation Commission disregarded the concerns of San Juan and Rio Arriba County citizens concerning the magnitude of Hilcorp's application for well-density change.

San Juan County is already on the cusp of exceeding safe ozone levels and oil and gas development is a major contributor to the Delaware-sized methane hot spot that is a black eye on New Mexico, the oil and gas industry, and the nation as a whole. I am concerned about whether Hilcorp is taking adequate steps to capture methane while drilling new wells or doing recompletions. Doubling drilling will certainly result in declining air quality that will affect 13,000 kids and adults in San Juan County who struggle with asthma.

The Bureau of Land Management's 2003 Resource Management Plan for the Farmington Field Office is incongruous with this proposal for double drilling in the Blanco-Mesaverde gas pool. This proposal warrants a new process of comprehensive environmental review and

public consultation to ensure that any negative impacts to communities, correlative rights, environmental and cultural resources are mitigated.

Hilcorp is a bad-faith actor with a history of violations in other states. I am deeply concerned about whether Hilcorp's recompletions in the Blanco-Mesaverde are in compliance with EPA rules that require green completions to capture methane.

Furthermore, the Oil Conservation Commission has not provided enough public notice related to the November 19 or September 13 hearings on this matter.

Thank you,  
Jenni Siri

Jennifer Siri  
jennisiri999@gmail.com  
133 Damon St., Unit 5  
Belen, New Mexico 87002-6142

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:55 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Comment to NM OCC for Nov 19 hearing

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**From:** Daniel Hutchison <latirhutch@yahoo.com>  
**Sent:** Wednesday, November 14, 2018 9:08 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Comment to NM OCC for Nov 19 hearing

**Subject:** Comment to NM OCC for Nov 19 hearing

Hello OCC,

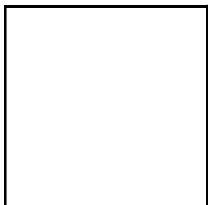
The New Mexico Oil Conservation Commission (OCC) must not approve Hilcorp's application on November 19 to double the number of their wells. It is essential that this flagrant disregard for the health, air and water quality of New Mexico residents as well as the extreme effects of methane on climate warming be stopped.

Facts about Methane:

- Methane traps 25 times more heat than carbon dioxide.
- New Mexico produces as much climate pollution in the Four Corners as 12 coal fired power plants.
- In recent years NM increased methane pollution 38% as opposed to Colorado which has strict rules and has reduced this figure by 30%.
- Methane damages the immune, neurological, reproductive, developmental, and respiratory systems.

I am ashamed that our state has maintained a polluter friendly environment and excused this behavior in the name of job creation and profit. These wells need to be capped, the methane metered, and the fees used to benefit our state.

Sincerely,



## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:54 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Support the Hilcorp Pool rule application

**From:** ehausman@rockridge.biz <ehausman@rockridge.biz>  
**Sent:** Wednesday, November 14, 2018 6:26 PM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Support the Hilcorp Pool rule application

Dear Commissioners,

I'm writing to encourage your approval of Hilcorp's application for an amendment to the 'pool rule'. It is the responsibility of the Oil Conservation Commission to ensure that the resources of our great state are being developed and this change is instrumental to accomplishing that effectively. The change will improve the rule in regards to the well density, location requirements, and administrative exceptions of the special rules for the Blanco-Mesaverde Gas pool, Rio Arriba and San Juan Counties, NM (Case 16403).

Environmental groups have opposed this rule revision based on fictitious claims that Hilcorp is proposing thousands of new wells, that they intend to pollute, and that they are using fresh drinking water to frack. NONE of these things are true.

In fact, this change will create new jobs and revenue streams for the state without requiring new wells to be drilled. All new wells will go through the standard permitting process.

We are asking that you not allow emotional and false claims of these activists to affect your decision. Please disregard the distorted political rhetoric and approve an application that is in the best interest of the state and the development of our plentiful resources.

Sincerely,  
Elaine Hausman  
Elaine Hausman

## **Murphy, Kathleen A, EMNRD**

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 7:53 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

-----Original Message-----

From: Peggy Blackburn <yanespeg@swcp.com>  
Sent: Wednesday, November 14, 2018 5:15 PM  
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
Subject: [EXT] Case No. 16403: Hilcorp application

Absolutely we don't need this especially for the Methane that will be produced and other health related issues but especially in regard for the children that will be affected.

Peggy Blackburn

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Thursday, November 15, 2018 10:16 AM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: Case No. 16403: Hilcorp application

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**From:** Edward Mosimann <ed@creativegeckos.com>  
**Sent:** Thursday, November 15, 2018 8:35 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

Dear Commission Clerk and rule makers,

I am against the doubling of gas wells in San Juan County.

My wife and I live just outside Farmington, NM. We would like to think that there is still hope for this area, but the endless heavy handedness of the extraction industries and free range attitudes that faithfully ride its coattails has us wondering why we remain. Our great joy is mountain biking. While the trails are good, the air quality is often unsafe. Knowing what a wind sock means, hydrogen sulfide, helps you to know when to hold your breath, were not to stop. BLM calling these places Multiple Use, is possibly irresponsible. You get the overall feeling of living where people are as expendable as the surrounding wildlife and plant life. Life is second to extraction. Remove the methane rule ...vulnerable again. Too bad, it really was a beautiful place, a place to live. I wonder if folks in Huston understand any of this.

Sincerely,  
Edward Mosimann  
308 Hwy 170  
Farmington, NM 87401  
505-360-3223  
[ed@creativegeckos.com](mailto:ed@creativegeckos.com)

Sent from my Samsung Galaxy smartphone.

## Murphy, Kathleen A, EMNRD

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**From:** Davidson, Florene, EMNRD  
**Sent:** Wednesday, November 14, 2018 1:04 PM  
**To:** Murphy, Kathleen A, EMNRD  
**Subject:** FW: [EXT] Case No. 16403: Hilcorp application

**From:** Nick Davidson <nickgdavidson@gmail.com>  
**Sent:** Wednesday, November 14, 2018 10:58 AM  
**To:** Davidson, Florene, EMNRD <florene.davidson@state.nm.us>  
**Subject:** [EXT] Case No. 16403: Hilcorp application

Hi Ms. Davidson,

I'm writing to you with concerns about the Hilcorp application, Case No. 16403.

As you know, Houston-based Hilcorp Energy currently has applied to the New Mexico Oil Conservation Commission for a rule change to double the number of natural-gas wells allowed in the Blanco-Mesaverde gas pool across San Juan and Rio Arriba counties. That's bad news for the air quality of 13,000 children and adults in San Juan County who already struggle with asthma.

Under current rules, operators can drill eight wells per 640 acres of land. If Hilcorp is granted its exemption, up to 8,000 new wells will be drilled in San Juan and Rio Arriba counties in northwest New Mexico. It also means the public will no longer have the opportunity to comment on well-density issues in the Blanco-Mesaverde gas pool. Hilcorp's proposal would circumvent the need to analyze the impacts of more oil and gas development on public health, water resources, air quality, and the environment.

Before the commission makes any decision, Hilcorp's proposal should take into consideration concerns from the public and impacted communities and include stringent and thorough analysis of environmental, social, and cultural impacts double drilling will have. There are more than 40,000 oil and gas wells in northwestern New Mexico and over 91% of publicly managed lands are leased for oil and gas development. The region is also home to the nation's largest methane cloud. More wells will mean more reckless venting, leaking, and flaring of methane, threatening the air we breath and water we drink and exacerbating climate disruption.

Please consider the longterm effects on our beautiful, enchanting landscape and its people and deny Hilcorp's application for double drilling.

Thank you.

--

Nick Davidson

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Writer | Fact Checker  
Editor | Radio Producer  
Santa Fe, NM  
@NickGDavidson  
[nickgdavidson.com](http://nickgdavidson.com)