

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

**IN THE MATTER OF THE APPLICATION OF THE NEW MEXICO OIL AND GAS ASSOCIATION FOR AMENDMENT OF CERTAIN PROVISIONS OF TITLE 19, CHAPTER 15 OF THE NEW MEXICO ADMINISTRATIVE CODE CONCERNING PITS, BELOW GRADE TANKS, CLOSED LOOP SYSTEMS AND OTHER ALTERNATIVE METHODS TO THE FOREGOING, AND AMENDING OTHER RULES TO CONFORMING CHANGES STATEWIDE.**

**CASE NO. 14784**

**IN THE MATTER OF THE APPLICATION OF THE INDEPENDENT PETROLEUM ASSOCIATION FOR AMENDMENT OF CERTAIN PROVISIONS OF TITLE 19, CHAPTER 15 OF THE NEW MEXICO ADMINISTRATIVE CODE CONCERNING PITS, BELOW GRADE TANKS, CLOSED LOOP SYSTEMS AND OTHER ALTERNATIVE METHODS TO THE FOREGOING, AND AMENDING OTHER SPECIAL RULES RELATING TO THE FOREGOING MATTERS, STATEWIDE.**

**CASE NO. 14785**

**ENTRY OF APPEARANCE**

RECEIVED OGC  
2012 JAN 13 P 12:55

The New Mexico Environmental Law Center (Eric D. Jantz, R. Bruce Frederick) hereby enters its appearance in the above-captioned proceedings on behalf of Earthworks' Oil and Gas Accountability Project ("OGAP").

Respectfully submitted this 13<sup>th</sup> day of January, 2012.



Eric D. Jantz  
New Mexico Environmental Law Center  
1405 Luisa Street, Suite 5  
Santa Fe, New Mexico 87505  
Telephone: 505-989-9022  
Facsimile: 505-989-3769  
[ejantz@nmelc.org](mailto:ejantz@nmelc.org)  
[bfrederick@nmelc.org](mailto:bfrederick@nmelc.org)

## CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of January, 2012, I have delivered a copy of the foregoing pleading in the above-captioned case via electronic mail to the following:

Gabrielle Gerholt  
Assistant General Counsel  
Oil Conservation Division  
1220 St. Francis Drive  
Santa Fe, New Mexico 87505

Dr. Donald A. Neeper  
New Mexico Citizens for Clean Air & Water  
PO Box 5  
Los Alamos, New Mexico 87544

William H. Carr  
Adam G. Rankin  
Michael G. Felewert  
Bradford C. Berge  
Holland and Hart, LLP  
PO Box 2208  
Santa Fe, New Mexico 87504-2208

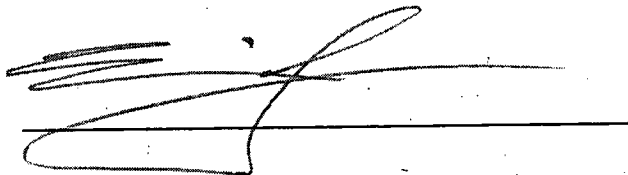
Judith B. Calman  
New Mexico Wilderness Alliance  
142 Truman Street NE, # B-1  
Albuquerque, New Mexico 87108

Eric L. Hiser  
Jorden, Bischoff & Hiser, PLC  
7272 Indian School Road  
Suite 360  
Scottsdale, Arizona 85251

Karin V. Foster  
Independent Petroleum Ass'n of New Mexico  
5805 Mariola Place NE  
Albuquerque, New Mexico 87111

Earl E. DeBrine, Jr.  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
PO Box 2168  
Albuquerque, New Mexico 87103-2168

By:

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned below the "By:" text.