HUDSON OIL COMPANT OF TEXAS

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May 3,/2012/AY -3 ₱ 2: 36

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Florene Davidson Oil Conservation Commission 1220 South St. Francis Drive Santa Fe, NM 87505

Via fax to: 505.476.3462

RE: Case #14785 Pit Rule Hearing

Dear Commissioners,

As both the president of an independent operating company with wells located in SE New Mexico, and a board member of the IPANM, please know that with respect to the upcoming hearings on the referenced case, I strongly support a 'no testing' policy in areas where groundwater is 100' or deeper from the surface of the earth. At the hearing, Tom Mullins will present volumes of scientific evidence and modeling further supporting my position.

In addition, I am strongly against any expansion of the OCD's statutory authority in order to protect livestock, as is being proposed by other parties to the referenced case.

Sincerely,

E. Randall Hudson III