

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

CASE No. 16403

**APPLICATION OF HILCORP ENERGY COMPANY TO AMEND THE WELL
DENSITY AND LOCATION REQUIREMENTS AND ADMINISTRATIVE
EXCEPTIONS OF THE SPECIAL RULES FOR THE BLANCO-MESAVERDE GAS
POOL, RIO ARRIBA AND SAN JUAN COUNTIES, NEW MEXICO**

ENTRY OF APPEARANCE AND NOTICE OF INTERVENTION

David K. Brooks hereby enters his appearance on behalf of the Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Department ("the Division") as an intervening party.

1. The Division has standing to intervene as the agency responsible for reviewing applications for formulating and amending special pool rules, including spacing and well density.
2. The Division is still studying the issues in this case, and is unable to state, at this time, to what extent, if any, it will oppose granting of the application.

Respectfully submitted

David K. Brooks

David K. Brooks
Assistant General Counsel
Energy, Minerals and Natural Resources
Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
Phone (505)-476-3415
FAX (505)-476-3462
davidk.brooks@state.nm.us

Attorney for the Oil Conservation Division

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by email or U.S. mail, upon each of the following parties on March __, 2019.

James Bruce
Past Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com
Attorney for Hilcorp Energy Company

Michael H. Feldewert
mfeldewert@hollandhart.com
Adam G. Rankin
agrankin@hollandhart.com
Post Office Box 2208
Julia Broggi
jbroggi@hollandhart.com
Santa Fe, NM
Attorneys for Hilcorp Energy Company and
Enduring Resources

Jon Anderson, clinical law student
Sabina Gaynor, clinical law student
Sabina.Gaynor.clinic.law.unm.edu
Natural Resources Environment Law Clinic
Working under supervision of
Prof. Gabriel Paycyniak, supervising attorney
117 Stanford Dr.
Albuquerque, NM 87131
Attorney for San Juan Citizens' Alliance

Ana M. Gutierrez
ana.gutierrez@hoganlovells.com
Markley F. Schlegel
marklev.schlegel@hoganlovells.com
Hogan Lovells US LLP
1601 Wewatta Street, Suite 900
Denver, CO 80202

Carla Sontag, President
New Mexico Business Coalition
P.O. Box 95375
Albuquerque, NM

Andrea Antillon
Associate General Counsel
New Mexico State Land Office
P.O. Box 1148
Santa Fe, NM 87504-114
aa Dillon@state.nm.us

Western Environmental Law Center
Julia Guarino, Staff Attorney
Erik Schlenker-Goodrich, Executive Director
208 Paseo del Pueblo Sur, #602
Taos, NM 87571
eriksg@westenlaw.org
Attorney for San Juan CitizensAlliance