From:	Addison Guelker
To:	WasteRule, EMNRD, EMNRD
Subject:	[EXT] Fasken comments for EMNRD Waste Rule
Date:	Wednesday, September 16, 2020 2:03:21 PM
Attachments:	image001.png OCD_Fasken Cover Letter Comments on Draft Methane Rule.pdf

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Please find attached Fasken Oil and Ranch, Ltd.'s comments to the proposed Draft Methane Rule.

Appreciate it,

FASKEN | OIL AND RANCH
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Jimmy D. Carlile
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September 16, 2020

Ms. Tiffany Polak
New Mexico Oil Conservation Division
Energy, Minerals, and Natural Resources Department
1220 South St. Francis Dr.
Santa Fe, NM 87505

Deputy Director Polak,

Re: Comments on the New Mexico Energy, Minerals and Natural Resources Department
Draft Methane Rule at NMAC 19.15.7, 18, 19, 27, and 28

Fasken Oil and Ranch, Ltd. (Fasken) appreciates the opportunity to submit the following formal comments to the New Mexico Oil Conservation Division (OCD) on the proposed revisions to the Draft Methane Rule at NMAC 19.15.7, 18, 19, 27 and 28. We appreciate the willingness of the OCD and its staff to work with operators and industry associations on the proposed draft rules to reduce waste and still continue to encourage the development of New Mexico's resources.

Fasken is an active member of the Permian Basin Petroleum Association (PBPA). Our participation in the process with PBPA has resulted in countless hours of reviewing, commenting, and providing suggestions to the OCD that we feel best benefit industry and the Agency in reducing waste.

Fasken fully supports the comments and suggestions of the PBPA as submitted.

Yours truly,

Jimmy D. Carlile
Environment, Regulatory and
Government Affairs Supervisor