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February 13, 2015

Office of Natural Resources Revenue
P.O. Box 25265
MS 61030A
Denver, CO 80225

Attn: Armand Southall

Re:
Proposed Rule Making
30 CFR Parts 1202 and 1206
Docket: ONRR-2013-0004
RIN 1012-AA13

The Independent Petroleum Association of New Mexico (IPANM) makes the following requests of the Office of Natural Resources Revenue (ONRR) in relation to the proposed rule making at 30 CFR Parts 1202 and 1206, Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform.

- The comment period be extended by 90-days, moving the final date for comments being taken from March 9, 2015 until June 8, 2015.
- A meeting of the stakeholders to held in either Albuquerque or Santa Fe, New Mexico prior to March 20, 2015.

Our membership believes that the ONRR's interpretation of how oil and gas is to be valued has changed significantly since 2011, when ONRR published Advance Notices of Proposed Rulemaking (ANPRs) and held public workshops soliciting responses for the valuation of oil and gas. Therefore, we believe that the comments that were received in 2011 do not accurately reflect the frame of mind of industry.

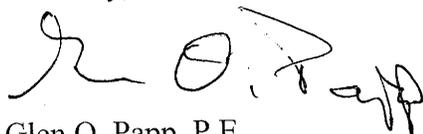
The Secretary has the responsibility to require the development of flexible and alternative valuation methods for oil and gas production from federal leases. ONRR states that the intent of the rulemaking is to provide regulations that (1) offer greater simplicity, certainty, clarity, and consistency in production valuation, (2) are more understandable, (3) decrease industry's cost of compliance and ONRR's cost to ensure industry's compliance and (4) provide early certainty to industry and ONRR that companies have paid every dollar due.

We concur with the stated goals of this rulemaking. A stakeholder meeting between the ONRR and industry representatives will allow the parties to understand whether this rulemaking can achieve its stated objectives.

The proper valuation of oil and gas is critical to New Mexico's economy and our member companies want to ensure that they remain in full compliance of the law.

Should you have any questions, please contact me at (505) 599-4908 or via email at gpapp@synergyoperating.com.

Sincerely,



Glen O. Papp, P.E.
President



Thomas E. Mullins, P.E.
Vice-President, NW NM

The Honorable Tom Udall, U.S. Senate
The Honorable Martin Heinrich, U.S. Senate
The Honorable Steve Pearce, U.S. House of Representatives
The Honorable Ben Ray Lujan, U.S. House of Representatives
The Honorable Michelle Lujan Grisham, U.S. House of Representatives

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