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**Independent Petroleum Association of New Mexico**

January 30, 2017

Tom Mullins  
President

Representative Steve Pearce

RE: Congressional Review Act (CRA)  
Subject to Royalties & Resource  
Conservation

Claire Chase  
SE Vice President

Dear Representative Pearce:

John Thomas  
NW Vice President

The Independent Petroleum Association of New Mexico (IPANM) represents several hundred small oil and gas operators responsibly developing and producing Federal minerals in New Mexico.

Francisco Olvera  
Treasurer

Mitch Krakauskas  
Past President

We write you today, urging Congress utilize its authority to repeal these unnecessary regulations being imposed, which will negatively impact marginal producing wells. New Mexico has over 44,000 producing marginal oil and gas formations (< 15 boepd), which cannot afford the cost burden of this regulation. In fact, New Mexico is uniquely and unfairly targeted by this burdensome regulation because of the historic development of Federal minerals.

Karin Foster  
Executive Director

Pam Garlinger  
Director of Operations

Independent producers have a self-interest to economically recover all methane possible, but implementing a regulation that combusts two molecules of methane to recover one molecule of methane is clearly wasteful. Energy is required to run equipment to collect and compress deminimus methane to a marketable sales condition. There is no free lunch regarding energy, but responsible New Mexico oil and gas operators are already voluntarily utilizing technological improvements to eliminate waste where applicable.

IPANM has previously supplied specific commentary on why this burdensome regulation should not be implemented, and we respectfully urge Congress timely act to repeal this BLM rule.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Mullins', is written over a light blue horizontal line.

Thomas E. Mullins  
IPANM President