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David Catanach
Director, Oil Conservation Division
Energy, Minerals and Natural Resources Department
1200 South Saint Francis Drive,
Santa Fe, New Mexico 87505

Dear Mr. Catanach:

I am writing this letter to express Devon's support to replace Title 19, Chapter 15, Part 34 of the New Mexico Administrative Code addressing produced water, drilling fluids, and other liquid oil field waste and to amend the definition of produced water in Title 19, Chapter 15, Part 2 of the New Mexico Administrative code.

As you know, water is essential to the oil and natural gas industry, and for long-term success, we must be good stewards of our water. Devon has an extensive history of managing water and minimizing fresh water demand when we see opportunities. It includes pioneering development of water recycling technologies in 2004, over a decade of experience recycling and reusing produced water around the country and today's recycling efforts currently underway in southeastern New Mexico.

Devon is testing and helping to develop emerging technology that might be adapted to challenges within the energy industry, even assessing technology that was originally developed for other industries, such as biomedical and aviation. Recycling can reduce fresh water consumption and perhaps open new areas of exploration that are now constrained by water issues.

The proposed rule will allow Devon to expand its water recycling activities in New Mexico by reducing administrative requirements and reducing permitting uncertainty while continuing to meet the critical need to protect the environment.

Water stewardship is part of being a good neighbor, which is one of Devon's core values. Responsibly managing our water resources is good for our neighbors and the environment and for the state of New Mexico.

Sincerely,

Kenneth Nichols
Water Management Coordinator
Devon Energy Corporation