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State of New Mexico
Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Commission

Subject: NMOGA Application to NMOCC to Revise Title 19, Chapter 15, Part 34

The New Mexico Oil and Gas Association has applied to the New Mexico Oil Conservation Commission for an order repealing Title 19, Chapter 15, Part 34 of the New Mexico Administration Code and replacing it with a proposed rule. This proposed change is Exhibit A under Case No. 15239.

The proposed change includes Section 6.e "Upon closure US EPA Method 8015M shall be used to test for TPH rather than Method 418.1 and US EPA Method 8260B shall be used to test for benzene rather than Method 8015M."

This letter is to document the recommendation that the language be revised to include: "Upon closure, US EPA Method 8015M shall be used to test for TPH rather than Method 418.1 and US EPA Method 8260B or later updated versions within SW-846, shall be used to test for benzene rather than Method 8015M." The revision is underlined.

This revision to the language is recommended due to the continuous updates to SW-846 methods. This language will allow the use of the cited methods, and newer methods as they are codified by the US EPA.

Further, the language to remove the use of 418.1 for TPH, and 8015M for benzene are clearly warranted and supported.

Regards,

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