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To: [Rules Coordinator](#)
Subject: Draft Rules Informal Comment
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General Comment

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Comment

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3.8, 3.57 and Chapter 4

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Comments concerning draft rulemakings

Good evening, I am a health and safety director for a drilling company, and I have spent my career mitigate hazards that effect our employee's and the environment. The new rule would hurt oil & gas operations in conventional areas by driving up drilling and completion costs due to the use of closed loop mud systems. New Mexico instituted this rule 15 years ago and has decimated the smaller oil. we currently manage our drilling wastes, primarily water-based drilling mud and drill cuttings, by letting them settle in an earthen pit at the drill site, etc. I feel that our current process in how we manage our drilling waste is safe and effective and anything on the contrary is anecdotal rather than empirical evidence. The drilling business is very important to my family and our community. This rule would have a negative impact and the ripple effect would hurt many. Thank you.

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Origin

64.185.35.28