



INDUSTRIAL COMMISSION OF NORTH DAKOTA

Jack Dalrymple
Governor

Wayne Stenehjem
Attorney General

Doug Goehring
Agriculture Commissioner

To be presented on May 9, 2014 at the Bureau of Land Management Hearing
to be held in Dickinson, North Dakota
Comments adopted on April 27, 2014

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The North Dakota Industrial Commission appreciates this opportunity to provide input on options the Bureau of Land Management is considering for addressing the venting and flaring of gas and the loss of gas through fugitive emissions from onshore Federal and Indian oil and gas leases.

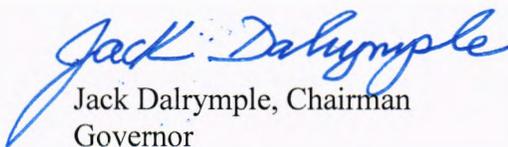
The Commission has worked with numerous stakeholders on processes to reduce venting and flaring across North Dakota and has developed the following action plan:

- 1) Require Gas Capture Plans (GCP) for all future increased density, temporary spacing, and proper spacing cases.
- 2) Require Gas Capture Plans for all applications for permits to drill (APD) after June 1, 2014.
- 3) Require an affidavit that the GCP has been provided to listed gathering companies in the area.
- 4) Meet semi-annually with gathering companies to gauge effect of Gas Capture Plans, production curtailments, contracts, and service interruptions.
- 5) Dedicate information technology resources to develop a web based pipeline incident report form.
- 6) Direct the North Dakota Pipeline Authority to track flaring on and off the Fort Berthold Reservation and to track and report gas capture status vs GCP goals.
- 7) Docket for hearing a motion to review and revise all Bakken and Three Forks field rules governing production curtailment for flaring reduction.

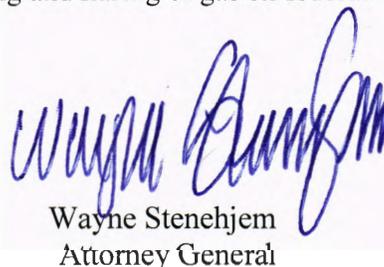
The North Dakota Industrial Commission urges the Bureau of Land management to consider utilizing similar requirements to addressing venting and flaring of gas on federal lands in North Dakota.

Sincerely,

North Dakota Industrial Commission



Jack Dalrymple, Chairman
Governor



Wayne Stenehjem
Attorney General



Doug Goehring
Agriculture Commissioner