



Southall, Armand <armand.southall@onrr.gov>

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## Fwd: I am working on comments to public comment period

1 message

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**Christnacht, Peter** <peter.christnacht@onrr.gov>  
To: Armand Southall <armand.southall@onrr.gov>

Mon, Jan 26, 2015 at 4:45 PM

Armand,

Tom Vessels of Vessels coal gas just sent this to us. Please include it in the comments for the Valuation rule making. I told requested that Tom send any further comments directly to you.

*-Peter A Christnacht-*

Supervisor, Royalty Valuation, Team B  
Office of Natural Resource Revenue  
303 231-3651 Desk  
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----- Forwarded message -----

From: **Tom Vessels** <tvessels@vesselscoalgas.com>  
Date: Mon, Jan 26, 2015 at 4:25 PM  
Subject: I am working on comments to public comment period  
To: "Black, Herb" <herb.black@onrr.gov>  
Cc: Peter Christnacht <peter.christnacht@onrr.gov>

Gentlemen, in summary there is an assumption that all "unprocessed gas" will be sold as gas which is not the case. Small projects accessing methane seeps, from mines, outcrops, CBM dewatering, natural faults being fed by methane during droughts etc. could be captured and generate electricity. I think a door number 2 for unprocessed gas to be sold arms length as electricity under new improved streamlined geothermal netback formula is the best way forward because however you arrived at those ratios you got there and I think that is practical way to go.

I have a board meeting Wednesday which is holding me up but I have a draft for public

comments that I want to go back and wordsmith.

Tom