

From: Thomas West <twest@westfirmlaw.com>
To: Maglienti, Jennifer; Russo, Steven; Crocker, Alison
CC: Hennessey, Yvonne
Date: 8/17/2011 12:49:31 PM
Subject: RE: Draft Oil and Gas Regulations

Thanks for the update Steve. If everything the Division of Water is proposing will be in the GP, then we will do our best within the timeframe that you are proposing. If they are going to propose additional regulatory requirements in the regulations, which seemed evident from the discussion on Monday, then we will need an outline of those requirements, similar to what Minerals has provided, to get you a meaningful analysis. Of course, any information that we are able to submit will be subject to the caveat that the information is based upon the outline of proposals that was provided to us and our responses may change once we get to see the actual proposed rules and regulations.

Thomas S. West
The West Firm, PLLC
677 Broadway - 8th Floor
Albany, NY 12207
Direct Phone: 518-641-0501
Direct Fax: 518-615-1501
E-Mail: twest@westfirmlaw.com
Website: www.westfirmlaw.com

*This transmittal is subject to our standard e-mail legend.

From: Steven Russo [mailto:scrusso@gw.dec.state.ny.us]
Sent: Wednesday, August 17, 2011 12:43 PM
To: Alison Crocker; Jennifer Maglienti; Thomas West
Cc: Yvonne Hennessey
Subject: RE: Draft Oil and Gas Regulations

We are going to send you a DRAFT (with an emphasis on draft) of the GP for purpose of developing costs of compliance. As for other details, you have what we can provide at this time which I think should be sufficient to develop some cost information.

Not much more we can do beyond that and hopefully it will be sufficient. We need the information by a week from Monday. Please do your best.

Steven C. Russo
Deputy Commissioner and General Counsel
NYS Department of Environmental Conservation
625 Broadway
Albany, New York 12233-1010
Ph: 518-402-9401/Fax: 518-402-9016

>>> Thomas West <twest@westfirmlaw.com> 8/17/2011 12:38 PM >>>

Thanks Jen. We will also need to see a similar list of proposals from any other Divisions or Bureaus in the DEC that will be proposing regulations. We are particularly concerned about some of the proposals that are being developed in the Division of Water, which seem to overlap some of the functions at Minerals. Since the cost of implementing and overseeing this program will remain a significant issue in New York State, it will be important for the DEC to avoid unnecessary overlap.

Thomas S. West
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Albany, NY 12207
Direct Phone: 518-641-0501
Direct Fax: 518-615-1501
E-Mail: twest@westfirmlaw.com
Website: www.westfirmlaw.com

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-----Original Message-----

From: Jennifer Maglienti [mailto:jlmaglie@gw.dec.state.ny.us]
Sent: Wednesday, August 17, 2011 12:12 PM
To: Thomas West
Cc: Yvonne Hennessey
Subject: Draft Oil and Gas Regulations

Tom - as requested, attached is a more detailed summary of the proposed Part 560.

Jennifer
Jennifer