

Heltman, Elaine G.

From: Adam Rankin <AGRankin@hollandhart.com>
Sent: Tuesday, May 26, 2026 6:49 PM
To: Info; Felicia Orth
Cc: Biernoff, Ari; Robert J. Sutphin, Jr.; Olga M. Serafimova; Kari D. Perez; Amy J. Gross
Subject: [EXTERNAL] NMOGA - SLO Bonding Rule Comments
Attachments: NMOGA_State Land Office_Bonding Rule Comment - 2026-05-26.pdf

Dear Hearing Officer,

Attached are NMOGA's written comments submitted in advance of the NMSLO's rulemaking hearing on proposed revisions to [19.2.100.23](#) NMAC. NMOGA appreciates NMSLO's engagement with industry in its development of the proposed rule, acknowledges the modifications and changes incorporated into the final proposed rule made in response to NMOGA's early comments, and is grateful for the opportunity to submit its comments on the final proposed rule today and to participate in the hearing process this week.

While we ultimately have a very different view than the NMSLO on the limits imposed by the governing legal authorities, as articulated in our cover comment letter and proposed alternative rule, NMOGA nevertheless provides what we expect will be received as constructive comments addressing each provision of the proposed rule, submitted with the purpose of making a better final rule to the extent the NMSLO and Commissioner reject our legal position.

We appreciate the careful consideration of our submission and anticipate continued and fruitful discussions.

Please let me know if there are any problems opening the attachment.

Sincerely,
Adam



Adam Rankin
Partner

HOLLAND & HART LLP
110 North Guadalupe Street, Suite 1, Santa Fe, NM 87501
agrankin@hollandhart.com | **T:** (505) 954-7294 | **M:** (505) 570-0377

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