

**From:** [Biercevicz, Jessica](#)  
**To:** "Jim Adelson"  
**Subject:** RE: Proposed Changes to Form EIA-914 reporting  
**Date:** Thursday, May 04, 2017 1:42:35 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image004.png](#)

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Good afternoon Mr. Adelson,

Unfortunately, if we told you what the production thresholds are, you would know who is in the sample, and we cannot tell anyone who is in the sample due to CIPSEA rules. Our current sampling methodology can be found here:

<https://www.eia.gov/petroleum/production/pdf/eia914methodology.pdf>. If an operator is selected for oil or gas production in any state, then they are required to report their oil and gas production in every state where they operate.

By collecting the sales volumes by API gravity category and combining these data with import data, we can know the volumes of various grades of crude oil being refined in the U.S.

Please let me know if you have any further questions. Thank you.

Sincerely,

**Jessica Biercevicz** | Survey Statistician  
Office of Oil, Gas, and Coal Supply Statistics  
U.S. Energy Information Administration  
O: 202-586-4299

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**From:** Jim Adelson [mailto:[jadelson@naguss.com](mailto:jadelson@naguss.com)]  
**Sent:** Wednesday, May 03, 2017 11:37 AM  
**To:** Biercevicz, Jessica <[Jessica.Biercevicz@eia.gov](mailto:Jessica.Biercevicz@eia.gov)>  
**Subject:** RE: Proposed Changes to Form EIA-914 reporting

I understand Jessica. Can you let us know what the minimum threshold for reporting is currently?

If an operator produces 100 bbls of oil per day in Oklahoma and 1,000 bbls of oil per day in New Mexico, do they just report New Mexico?

Also, what is the purpose of the gravity specification? Why such a narrow band? What is the EIA looking for on this data?

I am trying to figure out how to make this report more efficient if there are minimum changes month over month. If we are making 200 bopd per day in OK, the gravity does not change. There needs to be a method to use the data if within a 10% allowance of the month before to use that same report.

I am trying to get our people more efficient. In reality if you look at Nadel and Gussman's past reports, production has continued to decline and will continue to decline until and if we start growing in the Mid-Continent again and we should be released from the requirement to continue to file these reports.

Who would we approach for this request for the release or by chance can you help?

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**From:** Biercevicz, Jessica [<mailto:Jessica.Biercevicz@eia.gov>]  
**Sent:** Wednesday, May 03, 2017 6:26 AM  
**To:** Jim Adelson  
**Subject:** RE: Proposed Changes to Form EIA-914 reporting

Hi Mr. Adelson,

Thank you for your suggestion. We have considered this in the past. This would require a different sample for each state which would be very difficult to track and maintain instead of a single sample for the U.S. It would also require us to sample more companies (smaller companies) to make up for the volumes that we would not get, adding more burden to the industry via smaller companies. The sampling method we employ now is the least burdensome on the industry. Please let me know if you have and further questions or feedback.

Thank you,

**Jessica Biercevicz** | Survey Statistician  
Office of Oil, Gas, and Coal Supply Statistics  
U.S. Energy Information Administration  
O: 202-586-4299

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**From:** Jim Adelson [<mailto:jadelson@naguss.com>]  
**Sent:** Thursday, April 27, 2017 2:48 PM  
**To:** Biercevicz, Jessica <[Jessica.Biercevicz@eia.gov](mailto:Jessica.Biercevicz@eia.gov)>  
**Cc:** Lacy McIntosh <[lmcintosh@naguss.com](mailto:lmcintosh@naguss.com)>  
**Subject:** Proposed Changes to Form EIA-914 reporting

Jessica,

We just received notice of some changes from the EIA-914 with a protest date of April 18<sup>th</sup>. For Nadel and Gussman, our main concern is having a minimum threshold to require reporting. We are growing in another state aggressively and filing the reports for both this state and for a couple other states where are not active at all and have minimal production.

This is a time and economic burden on my staff who are focused on the growing state. How do we get a minimum daily volume threshold per state implemented into these EIA regs?

**James F. Adelson**  
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