

October 9, 2023

Submitted Electronically

North American Energy Standards Board
WGQ Executive Committee
1415 Louisiana Street, Suite 3460
Houston, TX 77002

Re: R23001 Comments

WGQ Executive Committee:

The undersigned producers are opposed to R23001 as it unfavorably and disproportionately shifts force majeure risk to sellers, upsetting the balance that currently exists in the NAESB Base Contract, which has been supported by participants with varying interests in natural gas markets since its adoption in 2002. The current language outlines an intentional and thoughtful balance to force majeure events, resulting in fair and reasonable outcomes. Given its balanced approach, many producers have utilized the NAESB Base Contract as both buyers and sellers of natural gas. Significant changes to force majeure language in the NAESB Base Contract could have unexpected consequences. In addition, as with all provisions within the NASEB Base Contract, the current language does not preclude parties from agreeing to alternative language for their unique situations.

Respectfully,

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