



VIA EMAIL

June 13, 2022

Vanessa A. Countryman
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090
(rule-comments@sec.gov)

Re: Comments of Newpark Resources, Inc. on the Proposed Rule “The Enhancement and Standardization of Climate-Related Disclosures for Investors,” SEC File No. S7-10-22.

Dear Ms. Countryman:

Newpark Resources, Inc. (“Newpark”), a company incorporated in the State of Delaware and listed on the New York Stock Exchange (Ticker symbol: NR), respectfully submits these comments on the SEC’s proposed rule called, “The Enhancement and Standardization of Climate-Related Disclosures for Investors” (the “Proposal”).¹

At Newpark, we are driven to help our customers improve efficiencies and sustainability of their operations while delivering reliable and environmentally responsible solutions. This drive is the catalyst for innovation and development of next generation products and services across all our businesses. We provide products and services through two operating segments: Newpark Industrial Solutions and Newpark Fluids Systems. Newpark Industrial Solutions provides temporary worksite access solutions, including the rental of our manufactured recyclable composite matting systems, along with related site construction and services to customers in various markets including power transmission, oil and natural gas exploration and production (“E&P”), pipeline, renewable energy, petrochemical, construction and other industries, primarily in the United States and Europe. We also sell our manufactured recyclable composite mats to customers around the world, with power transmission being the primary end-market. Meanwhile, Newpark Fluids Systems provides customized drilling, completion, and stimulation fluids products and related technical services to E&P customers primarily in North America and Europe, the Middle East and Africa, as well as certain countries in Asia Pacific and Latin America.

¹ 87 Fed. Reg. 21,334 (April 11, 2022).

While we support timely and accurate climate change disclosures for the benefit of all interested stakeholders, particularly our shareholders, we do not support the Proposal as currently written. We believe that the Proposal will result in immaterial and unreliable information having to be included in our SEC filings. We do not believe that such information will assist our investors in understanding how climate change may impact our company, nor what steps we are taking to combat climate change. Additionally, we have spoken with many of our largest shareholders who are pleased with both the form and the substance of our current climate change disclosure and do not see the value in requiring us to expend costs to produce further disclosure that they do not believe will be of value to them or to the company.

As a small cap public company, we believe that the Proposal would be unduly expensive and costly, resulting in a significant increase in legal and auditing expenses, particularly given the absence of a coherent approach to materiality, the attestation requirements for Scope 1 and Scope 2 emissions and the potential need to adopt a completely new accounting system in order to track and disaggregate climate-related information down to the individual line item in our financial statements. We estimate that the total annual cost of satisfying the disclosure requirements set forth in the Proposal would be approximately \$500,000 to \$800,000, which would be significant for a company of our size.

It is also worth noting that we are already required by the SEC to disclose any material climate-related risks annually in our Form 10-K and update such disclosure at least quarterly in our Form 10-Q. Beyond these already mandated SEC disclosures, we voluntarily issue a Sustainability Accounting Standards Board (SASB) report each year which provides data and information regarding our global operations including, among other things, our emissions reductions services and fuel management, water management services, chemical management, ecological impact management, critical incident risk management and activity metrics. We also maintain a sustainability page on our public website (www.newpark.com/sustainability/) in which we provide further details regarding our commitment to sustainability, including our strategy to further diversify our revenue stream and provide long-term growth opportunities as the global energy transition progresses. As disclosed on our website and in our public filings, we have been successful in generating approximately \$150 million in annual revenues in recent years from the electrical utilities and other non-E&P markets. In furtherance of our strategy, we have recently added several members to our board who have relevant experience in non-E&P markets. We believe that the Proposal's requirement to include additional members with climate change expertise to our small board would not add value to the board and would result in further unnecessary costs for the company.

For the reasons stated above, we respectfully request that the Commission consider alternatives to the Proposal that would provide investors with more useful climate change information and would be less costly for small cap companies like Newpark, and that the Commission revise the Proposal accordingly and resubmit the modified proposal for further public evaluation and comment.

Respectfully submitted,



E. Chipman Earle
*Vice President, General Counsel,
Chief Administrative Officer, and
Corporate Secretary*