## **Kellie Martinec**

From:

Veronica Larson

Sent:

Wednesday, September 11, 2013 3:59 PM

To:

Leslie Savage

Subject:

FW: Informal comments: 16TAC Amended notice requirements

Importance:

High

**FYI** 

From: Pat Nault

Sent: Wednesday, September 11, 2013 3:58 PM

To: Veronica Larson

Subject: Informal comments: 16TAC Amended notice requirements

Ms. Larson,

The main obstacle I see in the changes would be the addition of notifying within ½ mile radius the owners of record of unleased mineral interests. For the East Texas field, this would be overly burdensome to locate those owners. I feel the newspaper clipping has worked very well in the past and should suffice for the future. If there were a mineral interest owner that would protest, what is the likelihood they would be successful? Probably not very likely however, we would have to go through the time and expense to fight the protest process anyway. Also, I noticed the document indicated reservoirs not productive of oil and gas. Does that apply to the East Texas field since it is productive of oil and gas? I think our field is a unique situation that has mistakenly allowed commercial injection.

Thank you,

P. J. (Pat) Nault

East Texas Salt Water Disposal Co.

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