

**Kellie Martinec**

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**From:** rrcwebcontact@gmail.com  
**Sent:** Wednesday, August 13, 2014 4:12 PM  
**To:** rulescoordinator  
**Subject:** Comment Form for Proposed Rulemakings



## Comments Form for Proposed Rulemakings

### Date Submitted

Wednesday, August 13, 2014 4:11:59 PM

### Submitted By

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### §§3.9 and 3.46: Amend to incorporate requirements related to seismic events for disposal wells

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While the Commission should have been far earlier to address the well understood connection between O&G waste disposal and induced seismicity, the proposed rule presents a good step forward in creating a process to avoid such events in the future. Allowing the events to go unchecked since they began in 2008-09 in the Barnett has created unnecessary apprehension by the public about the entire production process. These scenarios can be addressed technically, but should not be ignored.

The current rule proposal lacks and methodology to catalogue quakes and relate them in proximity to existing wells. Operators are not required to report quake events in proximity to their wells. The forward approach leaves it only to the public to call attention to earthquakes that are occurring. Failing to adopt a meaningful and robust procedure in this area risks having the public assume that they proposed rule is only a new set of hollow paperwork. Most importantly, failing to do so risks more earthquake and even more negative publicity for an otherwise thriving industry.

Thank you,

Jim D. Bradbury

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