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From: rrcwebcontact@gmail.com
Sent: Thursday, August 14, 2014 9:35 AM
To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Thursday, August 14, 2014 9:34:59 AM

Submitted By

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I request my e-mail address remain confidential

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

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Re Docket # 20-029095

Commission Members,

I am in favor of the additional data collection and authority to approve, change or deny permits for disposal wells. I am an oilfield professional with 30 years experience as a Well Site Supervisor and have long considered waste disposal one of the largest and most critical phases in oil and gas operations.

I have experienced a seismic event in Wilson County and believe it to be related to disposal rather than fracing operations. I have also seen and witnessed some of the public controversy regarding these seismic events.

I also agree with the commission that the rules change should have minimal negative economic impact on disposal well operators. Many existing disposal well operators are small business with few employees but the gross income should support the added permit expense.

I further believe that an existing or start-up company that cannot absorb this cost is so under capitalized that its success is problematic.

Approval of this rule change will go a long way to re-assuring the public that the State of Texas and the Texas Railroad Commission is being proactive in addressing an issue that is becoming a public concern.

Thank you for providing a quick and convenient method for submitting comments..

Carl Alexander

Well Site Supervisor (Company Man)

member of Society of Petroleum Engineers

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