

Kellie Martinec

From: rrcwebcontact@gmail.com
Sent: Monday, August 18, 2014 10:02 AM
To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Monday, August 18, 2014 10:01:43 AM

Submitted By

William Feathergail Wilson

13505 FN 462
Bandera, TX 78003

Phone: 830-562-3680

Fax:

Email: [REDACTED]

I request my e-mail address remain confidential

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

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

Earthquakes from SWD injection wells are not common to all areas and injection intervals. Perhaps the RRC could form a new unit similar to the GAU (Groundwater Advisory Unit) to advise on the potential for historic earthquakes at the proposed SWC location via the new geophysical unit. The cost of seismic lines for each new location is prohibitive and will increase the cost of disposal considerably as well time delays. You may not know that production can also induce small earthquakes. The presence of nearby faults at the SWD location could also be part of the RRC responsibility by subscribing to the GeoMap mapping service on a statewide basis. Once again the cost to small individual SWD operators may be an impediment but not to the RRC.

Geologist PG 21