

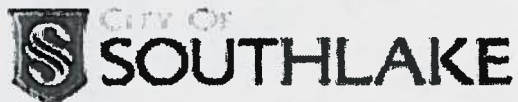
Kellie Martinec

From: Lori Payne <lpayne@ci.southlake.tx.us>
Sent: Friday, August 22, 2014 11:16 AM
To: rulescoordinator
Cc: Shana Yelverton
Subject: City of Southlake - Comments on proposed amendments - Docket No. 20-029095
Attachments: 2014-08-21 - RRC - pipeline industry.pdf

Good morning,

Please find the attached comments from the City of Southlake regarding Docket No. 20-029095, regarding proposed amendments related to seismic events for disposal wells.

Thank you,
Lori Payne, TRMC
City Secretary
City of Southlake
1400 Main Street, Suite 270
Southlake, TX 76092
817-748-8016 office
817-748-8270 fax



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Office of the Mayor

August 21, 2014

Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, TX 78711-2967

Dear Sir or Madam:

The City of Southlake City Council provides its thoughtful consideration to certain amendments to 16 Tex Admin. Code §3.9 relating to Disposal Wells, and §3.46, relating to Fluid Injection into Productive Reservoirs, as provided by the Railroad Commission of Texas Office of General Counsel in a memo to the Commissioners dated August 5, 2014.


It is our governing body opinion that the proposed amendments are indeed a step in the right direction, particularly in strengthening applicant requirements and enhancing industry monitoring, but that such amendments fall short in providing adequate means for public involvement and in protecting the public's right to appeal permit decisions enacted by the Commission under these Statutes. The proposed amendments will be bolstered by and are in need of those provisions that will:

- Provide for adequate public notice to elicit public comment and to engage public involvement throughout the permitting process
- Provide accompanying public hearing procedures
- Provide earnest appeal procedures for property owners who do not agree with or are who otherwise impacted by the Commission's permit determination in any case

The City of Southlake believes these additional provisions are of utmost importance, as it is known that the pipeline industry possesses the right of eminent domain in Texas through its common carrier status. Further, it is our intent that such additional provisions provided herein ought to be substantive and weighty on the public's behalf and not of any nature, perceived or actual, that skews toward the very industry these rules are designed to regulate.

Thank you for the opportunity to provide comment into these and future amendments, and please let me know if I can be of further service to you or to the Commission as it makes its final determination regarding this matter.

Sincerely,



John C. Terrell
Mayor