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From: rrcwebcontact@gmail.com
Sent: Monday, September 29, 2014 9:08 AM
To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Monday, September 29, 2014 9:08:26 AM

Submitted By

Texas Alliance of Energy Producers

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

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September 29, 2014

Rule Coordinator
Railroad Commission of Texas
PO Box 12967
Austin, Texas 78711-2967
Submitted to: rulescoordinator@rrc.state.tx.us

Re: Proposed Amendments 16 Texas Administrative Code - §3.9 Relating to Disposal Wells & §3.46 Relating to Fluid Injection into Productive Reservoirs Gas Utilities Docket No. 20-0290951

The role of safe oil field waste disposal is critical to the Texas Oil and Gas industry. Texas is fortunate to have a

State Regulator, the Railroad Commission (RRC), with an exemplary history of regulating the UIC program . The Texas Alliance of Energy Producers (the Alliance) supports the ongoing induced seismicity rulemaking effort by the RRC and provides the following comments

The Alliance believes that objective observers of induced seismicity will readily recognize that significant earthquakes as a result of oil field waste injection is quite rare in Texas. In addition, many experts would also say that studies of oil field induced seismicity are far from mature and additional investigative work remains to be completed.

Because of this, we recommend the RRC consider the basic roles of injection pressure, depth of injection, and volume of injected fluid in any Induced seismicity rule. This triumvirate of engineering standards that have always played a significant role in injection permitting. That role remains important when considering the regulation of induced seismicity.

Lower injection well pressure generally results in lower volumes of fluids being disposed. These lower-volume, lower-pressure wells will consistently have a smaller zone of influence on subsurface pore pressure over time. This smaller zone of influence means less risk of induced seismicity.

Therefore, the Alliance recommends the proposed rule exempt from the regulation applications that request disposal permits of 5000 barrels of fluid per day or less. Unless the well falls within 20 circular square miles (2.5 miles radius) of the Radius Survey Area of a historic seismic event (as delineated by USGS mapping) and is a magnitude of 2.5 or higher, the well shall be exempt for induced seismicity permit requirements.

Wells that are requesting disposal application approval of greater than 5,000 barrels per day should have a seismic area of review of 40 circular square miles (approximately 4 mile radius).

This will address the lower risk posed by injection of smaller volumes and pressures in a regulatory framework that is being designed to focus on the already rare induced seismicity event.

Please note that the Alliance is also a signatory to comments posted by the Industry Seismicity Workgroup. The Alliance supports those comments but has provided the above references to help delineate the magnitudes that we believe are appropriate.

Your consideration of this request is greatly appreciated. Should you have questions, please contact Bill Stevens (512-656-2209).

Respectfully submitted,

George Rogers, Chairman
Texas Alliance of Energy Producers

**cc: Chairman Christi Craddick
Commissioner David Porter
Commissioner Barry Smitherman
Executive Director Milton Rister
Dr. Craig Pearson, Seismologist
Chief Geologist Leslie Savage
Alex Mills, President, Texas Alliance**

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