

Kellie Martinec

From: Jarod Love <[REDACTED]>
Sent: Monday, September 29, 2014 11:42 AM
To: rulescoordinator
Subject: Comments Regarding Proposed Amendments to Rules 3.46 and 3.9
Attachments: TESC Rule Comments 3.46 and 3.9.pdf; ATT00001.htm

The Texas Energy Services Coalition respectfully submits the following comments on the proposed amendments to §3.9 and §3.46, relating to Disposal Wells, and Fluid Injection into Productive Reservoirs, to incorporate requirements related to seismic events for disposal wells.

Sincerely,

**Jarod Love
Executive Director,
Texas Energy Services Coalition
512-536-1331**



September 29, 2014

Rules Coordinator
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**Railroad Commission of Texas
Oil and Gas Division**

Comments of the Texas Energy Services Coalition on proposed amendments to §3.9 and §3.46, relating to Disposal Wells, and Fluid Injection into Productive Reservoirs, to incorporate requirements related to seismic events for disposal wells

The Texas Energy Services Coalition ("TESC") appreciates the opportunity to submit comments to the Railroad Commission of Texas ("Commission") on proposed amendments to 16 TEX. ADMIN. CODE, Section 3.9 and 3.46, relating to Disposal Wells, and Fluid Injection into Productive Reservoirs, to incorporate requirements related to seismic events for disposal wells.

TESC is a statewide organization of environmental service companies dedicated to the responsible management of waste and water produced from energy production. TESC member companies provide essential services for the continued expansion and exploration of oil and gas that maintains Texas as the number one energy-producing state in the nation. These services include the transportation, treatment, disposal and recycling of produced fluids generated from the upstream, midstream and downstream oil and gas industries.

TESC members share a commitment to use the most advanced technologies and environmentally friendly practices to protect the environment and the communities in which they operate. For a list of our members you can visit, www.SupportingEnergy.com.



TESC respectfully submits the following comments to the proposed amendments to rules §3.9 and §3.46:

The Commission has proposed the following amendment to §3.9(3) to add new subparagraph (b) and §3.46(b)(1) to add new subparagraph (c) that states:

The applicant for a disposal well permit under this section shall include with the permit application the results of a review of information from the United States Geological Survey (USGS) regarding the locations of any historical seismic events within the estimated radius of the 10-year, five pounds per square inch (psi) pressure front boundary of the proposed disposal well location. The pressure front is the zone of elevated pressure that is created by the injection of fluids into the subsurface.

TESC is concerned that accurately determining a pressure front boundary could prove to be difficult, especially in areas with multiple injectors, and could potentially be cost prohibitive. TESC would like to ask the Commission to consider requiring a review of information from United States Geological Service using a determined area of review surrounding a proposed well instead of a pressure front boundary. TESC recommends a review of a circular area of 20 square miles based around the center of a proposed well.

TESC appreciates the opportunity to participate in the process and thanks the Commission for the opportunity to submit comments. TESC staff is available to answer any addition questions the Commission may have. Thank you for your time.

Sincerely,

Jarod Love
Executive Director,
Texas Energy Services Coalition