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From: rrcwebcontact@gmail.com
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To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Friday, August 08, 2014 1:51:07 PM

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§3.70: Amend T-4 pipeline permit procedures

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Regarding the proposed rule change to 16 TAC 3.70 Docket No. 10366 "Pipeline Permits Required."

I am generally pleased to see that this rule is being clarified and being made more specific via the T-4 Form so that operators must specify that they are a "common carrier, gas utility or private line operator." This change should have been made years ago and when unconventional fossil fuel development was in its infancy. But better late than never.

Background: The massive amount of private gas gathering pipeline infrastructure that has been put in place under the urban and suburban centers in North Texas in recent years has been a shock to our infrastructure, to say the least. It appears to many private citizens in North Texas that the Railroad Commissioners have not been made fully aware of these drastic changes. In addition, our municipalities have seemingly treated these changes as no different than the laying of new "sewer lines," as one mayor in North Texas was heard to say as an explanation to a resident. As the commission knows, unodorized gas gathering pipelines are VERY different than sewer lines. They are NEW and potentially very dangerous infrastructure. Unfortunately, our cities have allowed the private pipeline

industry to operate inside our neighborhoods with very little oversight much like the local "gas distribution line" companies. The simple reason for this has been that these companies have paid out fees totaling millions of dollars to our cities for the complete control of this process. Most citizens are totally unaware of what is going on simply because our cities do not explain it in any detail. Home owners often see it as simply "Construction Activity."

Regarding this Rule Change: After reading the proposed change on Pages 8-9, I am disappointed that Item 16 (g) states, "Commission may delegate the authority to administratively issue pipeline permits."

This is recommended: "Commission may NOT delegate the authority to issue pipeline permits, administratively."

With so much that has already happened in the Barnett Shale, it is imperative that the Railroad Commissioners provide Open Hearings for all future permitting of pipeline infrastructure for private corporations conducting gas processing inside our neighborhoods. Our communities do not provide these hearings and have told us that ALL pipeline infrastructure is beyond their jurisdiction since it is a "Public Utility," for the "Public Good." As an egregious example, these companies have operated with very little "regulation," and have drilled 50 FT Dee[Holes during Pipeline Boring operations within a few feet of homes and without any type of protective fencing. Our community filed a complaint in December 2012 regarding this matter and after meeting with RRC personnel. The pipeline operator seemed to think that since money had been provided to the city, the citizens should be happy with their presence. This is a problem.

Thank you for the opportunity to provide comments regarding this proposed rule change.

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