

Kellie Martinec

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



Comments Form for Proposed Rulemakings

Date Submitted

Monday, August 25, 2014 11:31:55 AM

Submitted By

Joselyn Fenstermacher

PO Box 94
Alpine, TX 79831

Phone:

Fax:

Email: [REDACTED]

I request my e-mail address remain confidential

§3.70: Amend T-4 pipeline permit procedures

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The Texas Railroad Commission should not delegate authority for rule making, oversight, or any sort of review or consent related to rules that it establishes.

Approval for common carrier status should include independently-conducted environmental and safety reviews before granting a permit: if eminent domain is used to take property and/or access for the common good, then the common good should be served in a safe manner for both future environmental health (plant/animal/habitat protection; ecosystem services; etc) as well as human health and safety (air quality related to off-gassing of pipelines; drinking water safety related to spills, leaks, etc from pipeline and pipeline-related vehicular transport; etc).

Some sort of independent verification of the veracity of pipeline operator claims should be included, in addition to a structure of fines/penalties as a way to ensure honesty and compliance with regulations rather than just having to do more paperwork to get an automatic rubber stamp for permanent approval. This could include charging an application fee to cover this independent verification, but the process should be detailed specifically in the rules to

ensure implementation and compliance. This fee would increase the cost of the rules but this should not be considered as an "undue burden" to the applicant since they stand to make much more off of the deal than a simple application fee.

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