

Kellie Martinec

From: Fernando De Leon <[REDACTED]>
Sent: Thursday, September 12, 2013 10:44 AM
To: Leslie Savage
Subject: an unofficial rule change comment ...

Leslie, I think the proposed packer setting depth ... language 46 (i)(1) (on page 55) will lead to greater confusion ...

As I read the revised language on Rule 46 packer setting depths, an operator performing an H-5 pressure test on a 2,000' injection zone, with a 1,000 psi injection permit, single string completion (cemented back to ground surface), and in Wilbarger County (60' groundwater depth) could (neglecting to file the failed H-5 test report) simply mis-interpret the rule and move the packer uphole to 210' (150' below groundwater depth) and resume injection.

This situation isn't as far-fetched as you may expect. Ask Walter Gwyn about Texaco's breakouts in the KMA area in the early 1980's ... it actually happened many times.

Also, moving the packer setting depth requirement up to "within 100' of top of cement" overlooks the fact that the cement at the top of the column is the most mud-contaminated cement, and most likely to be channeled.

My concern is that this could increase EPA oversight.

If you think this comment should be "official", put me down as anonymous or as just a concerned citizen, rather than representing any company. I'm ok with my name being there, just not as a representative of anyone but myself ... your call ...

I hope all is well with you and your doggies ...

Fernando De Leon, P.E.

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