

**Kellie Martinec**

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**From:** Kelley Perrin <kelley@texasenergylaw.com>  
**Sent:** Monday, April 01, 2013 11:39 AM  
**To:** rulescoordinator  
**Cc:** 'Ana Maria'  
**Subject:** FW: Rule 13 supplemental comments  
**Attachments:** 0501\_001.pdf

Please see attached letter filed on behalf of Anadarko Petroleum Corporation. If you have any trouble with this email, please do not hesitate to let me know. Thank you.

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**From:** scan@texasenergylaw.com [mailto:scan@texasenergylaw.com]  
**Sent:** Monday, April 01, 2013 11:34 AM  
**To:** Kelley  
**Subject:** Rule 13 supplemental comments

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(1907-1987)  
PHILIP F. PATMAN  
(1937-2005)

April 1, 2013

VIA EMAIL  
[rulescoordinator@rrc.state.tx.us](mailto:rulescoordinator@rrc.state.tx.us)

Rules Coordinator  
Office of General Counsel  
Railroad Commission of Texas  
1701 North Congress Avenue  
Austin, Texas 78711-2967  
Attn: Ms. Christina Self

Re: Docket No. 20-0277738; Proposed Amendment to 16 Tex. Admin. Code §3.13.

Dear Ms. Self:

Anadarko Petroleum Corporation ("Anadarko") respectfully offers the following supplemental comments in response to most recently circulated draft modifications to Rule 13.

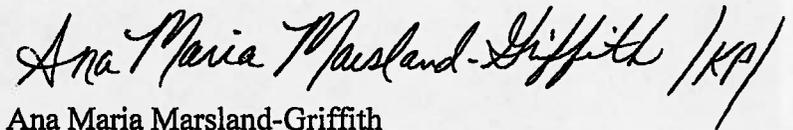
**Supplemental Comment 1.** Previous comments submitted by Anadarko and others requested deletion of proposed Rule 13(a)(7)(B). The current proposed rule retains this provision. Anadarko would respectfully re-urge its request for modified language and a clarification in the preamble that would allow an operator to request an individual well exception or a special field rule to allow exceptions for certain types of completion methods that are not amendable to the testing protocol set out in this provision. Anadarko proposes the following modification, shown in italics, for the Commission's consideration:

(proposed) Rule 13(a)(7)(B) The operator shall pressure test the casing (or fracture tubing) in which pressure will be exerted during hydraulic fracturing treatments to at least the anticipated pressure. *The casing required to be pressure tested shall be from the wellhead to the depth of the surface casing being tested, or the top of the calculated cement of the casing being tested, whichever is deeper. Casing strings, including pressure actuated valve or sleeve shall be tested to eighty percent (80%) of valve actuation pressure for a minimum of five (5) minutes. A surface pressure loss of greater than ten percent (10%) of the initial test pressure will be considered a failed test.*

Rules Coordinator  
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Again, Anadarko appreciates the opportunity to provide the Commission additional input and comments. If you have any questions or require additional information, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Ana Maria Marsland-Griffith /kp/". The signature is written in black ink and is positioned to the right of the typed name.

Ana Maria Marsland-Griffith

AMMG/kp

cc: Ms. Leslie Savage, Geologist  
Railroad Commission of Texas