

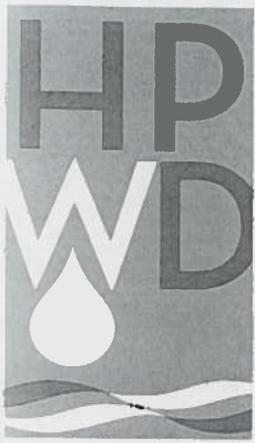
Kellie Martinec

From: Kathryn CdeBaca <kathryn.cdebaca@hpwd.com>
Sent: Monday, April 01, 2013 8:59 AM
To: rulescoordinator
Subject: Comments to Rule 3.13 RCT Proposed Rules
Attachments: RRC ltr.pdf

Attention Rules Coordinator:

Attached for submission are comments to proposed Commission Rule 3.13 on behalf of the High Plains Underground Water Conservation District No. 1.

Jim Conkwright
General Manager
High Plains UWCD No. 1
2930 Avenue Q
Lubbock, TX 79411-2499
806-762-0181
jimc@hpwd.com



High Plains
Underground Water
Conservation District

BOARD OF DIRECTORS

PRESIDENT
Robert Meyer
Canyon, TX

VICE-PRESIDENT
Carroll Cook
Ft.ona, TX

SECRETARY-TREASURER
James Powell
Lubbock, TX

MEMBER
Bruce Rigler
Plainview, TX

MEMBER
Jim Copeland
Anton, TX

GENERAL MANAGER
Jim Conkwright

806.762.0181

FAX: 806.762.1834

2930 Avenue Q

Lubbock, TX 79411-2499

www.hpwd.com

March 29, 2013

Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, Texas 78711-2967

Re: Comments on Railroad Commission of Texas Rule § 3.13 – “Casing, Cementing, Drilling, and Completion Requirements”

Dear Rules Coordinator:

The High Plains Underground Water Conservation District (“District”) appreciates the opportunity to comment on the proposed amendments to Railroad Commission of Texas (“Commission”) Rule 3.13, which were published in the Texas Register on February 15, 2013. According to the Texas Register, the Staff initially proposed under various circumstances that a minimum of 600 feet of cement be placed upward from the top of intermediate casing. Unfortunately, this minimum cementing requirement has been subsequently removed. Of particular importance to the District are oil and gas waste disposal wells. In order to better protect underground sources of drinking water, the District urges the Commission to consider making the following changes to the proposed rules:

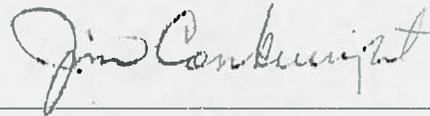
- The District requests that Commission Rule 3.13(a)(2)(B)(ii) to read as follows: “... the bottom 20% of the casing string but not less than 300 500 feet above the casing shoe or proposed productive zone.”
- The District suggests revising Commission Rule 3.13(a)(4)(C) to read as follows: “Casing shall be cemented across and extending at least 600 feet above all formations permitted for injection under Section 3.9 of this title (relating to Disposal Wells), or Section 3.46 of this title (relating to Fluid Injection into Productive Reservoirs), within one-quarter mile of the proposed well location in the following manner:”
- The District suggests modifying Commission Rule 3.13(a)(4)(C)(ii) to read as follows: “If the top of cement is determined through the performance of a temperature survey, across and extending 250 500 feet (measured depth) above the permitted formation(s).”

- The District suggests modifying Commission Rule 3.13(a)(4)(C)(iii) to read as follows:

“... if the top of cement is determined through the performance of a cement evaluation log, across and extending ~~100~~ 500 feet (measured depth) above the permitted formation(s).”

Thank you again for the opportunity to provide these comments.

Sincerely,



Jim Conkwright
General Manager

JC/kc