

Kellie Martinec

From: Marilu Hastings <mhastings@cgmf.org>
Sent: Thursday, April 11, 2013 3:19 PM
To: rulescoordinator
Subject: Withdrawal of comments

Rules Coordinator,

The Cynthia and George Mitchell Foundation requests to withdraw their comment on Rule 13 dated April 1, 2013.

Sincerely,

Marilu Hastings
Environment Program Director
Cynthia and George Mitchell Foundation
www.cgmf.org

Kellie Martinec

From: Marilu Hastings <mhastings@cgmf.org>
Sent: Monday, April 01, 2013 10:58 AM
To: rulescoordinator
Subject: Re: Cynthia and George Mitchell Foundation Rule 13 comments
Attachments: April 1 Mitchell Foundation Rule 13 comments[1].pdf; Dec 31 Mitchell Foundation Rule 13 comments.pdf

Greetings.

Please accept the attached comments from the Cynthia and George Mitchell Foundation on the Commission's draft "Rule 13". The Foundation appreciates the opportunity to provide these comments and looks forward to seeing the final rule. Also attached are the foundation's comments on the first draft of the rule dated December 31, 2012.

Cheers,
Marilu Hastings

Marilu Hastings
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THE CYNTHIA AND GEORGE MITCHELL FOUNDATION

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April 1, 2013

Via Electronic Mail to the Railroad Commission of Texas

**Railroad Commission of Texas
Attn: Rules Coordinator
1701 N. Congress Ave.
Austin, Texas 78701**

Dear Rules Coordinator:

On behalf of the Cynthia and George Mitchell Foundation, I am again pleased to see the Railroad Commission continue its efforts to take incremental steps to respond to the rapid technological advances in oil and gas exploration and production. The Foundation appreciates the hard work and time commitment of the commissioners and staff to seek the proper balance between the interests of the oil and gas industry and the general public. In response to its review of the latest draft, the Foundation has two recommendations for the Commission's consideration:

1. Sec. 3.13 (a)(3)(A) & (B) Wellbore diameters.

The Foundation recommends that the Commission adopt a wellbore casing diameter minimum requirement of two (2) inches for both surface casing and for each subsequent casing string for which casing will be cemented. In the Foundation's opinion, a one (1) inch annular clearance will increase the likelihood of proper cement circulation and placement, and result in proper mud removal. Of course, the Commission should continue to allow for exceptions to these requirements under the appropriate circumstances and according to adequate performance standards.

2. Sec. 3.13 (a)(4)(C) & (D) Casing and cementing.

The Foundation recommends that the Commission clarify: (1) the point in time in which the appropriate cement top measurement is to be conducted, and (2) that any measurement that fails to meet the rule's minimum



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requirements be reported to the Commission's district director for evaluation and resolution.

The first recommendation is the Foundation's priority in these comments. We hope the Commission will agree that the one (1) inch annular clearance is appropriate to achieve the ultimate goal of this rulemaking. Again, as indicated in the Foundation's previous set of comments on the first draft of the proposed rule (attached), we appreciate the thought and effort of the Commission in assuring appropriate oversight of the use of advanced drilling technologies.

Sincerely,

**Marilyn Hastings
Environment Program Director**