Kellie Martinec

From: James Tart <JTart@sjoc.net>
Sent: Thursday, February 21, 2013 7:13 PM
To: rulescoordinator
Subject: Amend 3.13, 3.99 & 3.100; O&G Docket 20-0277738
Attachments: Stephens Engineering Comments.pdf

Please see the attachment.

Yes, I consent to allow the RRC to release my e-mail address.

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February 21, 2013

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

Re: Reconsideration of the pending proposed amendment to the 16 Tex. Admin. Code §§3.13, Relating to Casing, Cementing, Drilling and Completion Requirements; 3.99, relating to Cathodic Protection Wells; and 3.100, Relating to Seismic Holes and Core Holes; O&G Docket No. 20-0277738

Dear Rules Coordinator,

A few remarks before my comments:

1. It was startling that the original proposed rules were released. Some of the proposed changes were simply unacceptable and there had obviously been no collaboration with the oil and gas industry.

2. The RRC quickly realized this and did an outstanding job of travelling across Texas for workshops to listen to the industry and allowed extra time to comment.

3. These most recent proposed rules reflect that the RRC carefully listened to the industry.

4. Even though this process got off to a rough start, the RRC made the effort to make things right which is much appreciated.

Comments:

1. Regarding the *top of cement by calculation*. "If the top of cement is determined through calculation, across and extending at least 600 feet (measured depth) above the permitted formations."

   How is the calculation to be calculated? I can calculate the annulus volume by using the drilled hole size, i.e. 7 7/8", or I can assume a wash out, i.e. 9.45" (20% wash out on a 7 7/8" hole). Also, modern logs can measure the actual hole size/wash out from the caliper and the hole volume/annulus volume can easily be figured. My point is, there are multiple ways to calculate the annulus volume (this means cubic feet and not "sacks") to reach a "calculated TOC" of 600' above the zone.

2. "Zones with corrosive formation fluids"

   The "or" in the definition should be an "and." An argument could be made, probably without much merit, that *any* saltwater zone has a possibility (though minute) of negatively impacting the integrity of the casing. So under that interpretation, if an operator doesn't set cement across every SW zone, they are potentially in violation of Rule 13, especially if a future casing leak develops. I don't believe this the intent of the current RRC administration, but the current commissioners, directors and staff might not be there in a few years so we need a clear definition in place. Putting the word "reasonably" before "capable" could also help.

   "Any zone <u>designated by the director or identified by the operator using available data</u> containing formation fluids that are <u>reasonably</u> capable of negatively impacting the integrity of the casing and/or cement ~~or~~ <u>and</u> have a demonstrated <u>a</u> trend of failure for similar casing and cement design in the field."

   There should also be a requirement that the RRC provides a list that is readily available to operators of the "potential flow zones" and "zones with corrosive formation fluids." Operators should be allowed to challenge the zones on the list in a hearing. Also, cementing is not always the only answer in protecting casing from corrosion. There are coatings that can be applied and even fu-

ture technology that could protect the casing. This could be addressed in paragraph (d) as shown in the comments of Legacy Reserves, L.P. I also support the other comments of Legacy Reserved, L.P.

Thank you again for the opportunity to comment and your hard work on amending this rule.

Yours very truly,

STEPHENS ENGINEERING

James D. Tart, P.E.