

# COMMITTEE REPORTS

## REGULATORY COMMITTEE CONTINUED

Mark Henkhaus, P.E. Apache Corporation

### Texas

- PBPA RPC has voted to support the proposed changes to Statewide Rule 40 as proposed by the multi-trade group working with Railroad Commission staff. Rule 40 prohibits multiple assignment of acreage within a regulatory field. The consensus draft was presented to the Commission, and the Commission unilaterally decided to publish a much-different version for “informal comment” on their web site. The published version has significant changes from the consensus version, and PBPA is involved with the trades group in discussing these changes with the Commission. As it stands, it will be difficult to support the Commission’s version of the revised rule.

- The RPC is supporting changes proposed by TXOGA to modify Statewide Rules 25-26-27 regarding commingling. Additionally, TXOGA is proposing to modify the notice requirements in SWR 37-38. These changes should streamline the commingling and permitting of wells in the horizontal environment.

- In its efforts to modernize the handling of data and approvals, the Commission announced a new on-line W-3A is available. This will allow paperless processing of requests to plug and abandon wells. Additionally, the Commission has announced it will no longer accept printed, hard copy logs, but will only accept logs in .tif or .las format.

- Commission personnel changes:

- o Danny Sorrells, the Kilgore district director, was named as permanent replacement for Lori Wrottenberg as Oil and Gas Division Director.

- o Santos Gonzalez, Director of Field Operations for the RRC in Austin, has announced his retirement at the end of September.

- PBPA is supporting the distribution of a MOTRAN road survey, to provide state planners accurate data regarding highway usage by industry. The RPC has asked members to respond to the survey to aid funding of badly needed road projects in the Permian and Delaware Basin areas.

### New Mexico

- New Spill Rule. The new spill rule 19.15.29 went into effect August 14. This rule follows the pit rule in determining clean up goals by depth and distance to fresh water sources. Most importantly, it sets standards by rule, not by fiat, for cleanup of produced water spills in New Mexico.

### Bureau of Land Management

- BLM issued IMs on 3173-3174-3175 compliance, finally. The 39 pages of IMs are attached. The letters detail the phase in period for FMP numbers, and outline approved procedures for things like tank gauging, Coriolis meters, gas testing, etc. I recommend providing this information to those in your organization working Federal lands in New Mexico.

- The Carlsbad RMP has been released, and is in its comment period. This is a 1000 page document with many supporting documents, and is very complex in nature. Due to the complexity of the RMP, the RPC has had discussions with NMOGA’s RMP group to assist NMOGA in their comments. In a great example of cooperation, NMOGA and PBPA will work together so that PBPA can support NMOGA’s recommendations, and reinforce PBPA specific viewpoints on the RMP.

### Endangered Species Act

- At each RPC meeting, Stephen Robertson updates the RPC on PBPA’s ESA efforts and changes in the status of ESAs in our area. These updates include the lesser prairie chicken, dune sagebrush lizard, and the Texas hornshell mussel. The RPC does not want to duplicate the PBPA SHOC (ESA) committee but feels it is important to bring RPC members into the discussion since many RPC members deal with ESA activities.