This proposed requirement is not arbitrary; it is keyed to the existing pit reclamation requirements of the current regulations in 6NYCRR Part 554.1(3), and as stated, extensions can be granted by the Regional Minerals Manager for reasonable cause. Reasonable proposed alternatives will be considered during the rulemaking process.

The term "Christmas Tree" is defined as the assembly of valves, pipes and fittings used to control the flow of oil and gas from the casing head (Manual of Oil and Gas Terms 6th edition, Williams and Meyers).

See Topical Response Number 2 on Visual Resources and Assessment Requirement.

This is a listing of the most important visual resources in New York. This listing would not be complete without items 1 through 4.

The requirements concerning State Parks, historic sites, etc. are guided by SEQR regulation Part 617.12.

This is not a drawing but an actual photograph. This well did not have a brine tank; most wells do, but there are many gas wells that produce negligible amounts of brine. Wells with brine tanks are more common now that blowdown pits have been prohibited. We agree that we should have chosen a well with a brine tank to represent a typical gas well.

More is inferred from the cited paragraph than was intended. The special circumstances referred to are circumstances listed under current regulation.

Comment noted.

"Surface water body" refers to public lakes, streams, rivers, canals, creeks, etc. It does not refer to surface water supply wells.

This reasonable counterproposal to the recommended setback restriction will be considered during the rulemaking process.

Variances from the 660' setback requirement cannot be granted administratively to private parties. Public hearings are required as stated in 6NYCRR Part 553.4. Municipalities are the only entities that can receive administrative variances.

Support for setback restrictions for domestic springs is noted.
8-16, 3, last sentence, AGREE that government bodies should compensate full market value of any resource rendered unproduceable by the creation of a buffer zone.

8-17, line 3, DEFINE "other sources of pollution" as used in this context.

8-17, line 6, ADD "new" before "wells" and "current" before "surface," so the sentence reads, "It is recommended the minimum siting restriction on the proximity of new wells and associated production facilities to current surface municipal water supplies be increased to 150 feet." A waiver of this spacing restriction should be allowed. There should also be a reimbursement clause for access to mineral rights that might be lost if the recommendation is enacted. DEFINE "surface municipal water supplies" as used in this context.

8-17, b, line 7, CHANGE "2,640" to "1,000-2,000".

8-19, 1st full para., AGREE with casing and cementing permit conditions in aquifers, but believe protection would be improved if any casing below surface casing having contact with the aquifer formations would be cemented with 25% excess cement, rather than being cemented to surface. A sentence could be ADDED to read, "All formation open hole sections shall be cemented." REASON: This change would allow for better abandonment procedures.

8-19, 1st full para., line 7, COMMENT: The DEC's policy for grouting down from the surface if circulation is not achieved may not accomplish the DEC's intent. Technical problems associated with grouting may cause more harm than good. Also, DEC needs to develop a better aquifer map on a scale of 1' to 2,000.

8-19, 4, line 1, CLARIFY first sentence in this context. What is the difference between a community water system and public water system?

8-21, 4th para., line 7, ADD phrase, "under which oil and gas operators must operate," after sentence ending with "drilling permit conditions," so that the sentence will read, "All water wells are protected by the drilling, casing and cementing guidelines and the aquifer permit conditions under which oil and gas operators must operate." IOGA recommends that water well drillers and any other party or operation penetrating aquifers be subject to the same regulations.

8-22, 1st full para., line 8, CHANGE to read, "For these reasons, a 100 foot setback from private water wells is recommended unless the water well owner approves a smaller setback. Additionally, the plat accompanying the drilling application should show the location of all private water wells within 1,000 feet of the wellsite as shown on tax maps. If a setback is necessary,
compensating variances from boundary lines should be automatically allowed. The DEC will have the authority to grant such setback waivers."

8-22, 1st full para., line 16 beginning with, "It is recommended..." This sentence should be included with the recommendation listed beginning on line 8 (addressed above). The sentence should be CHANGED to read, "It is recommended that DEC approval be required for a waiver of the restrictions proposed for private water wells and springs used as a current domestic water supply."

8-24, 2, 2nd para., last line, DELETE "future" and ADD "existing" before "land" so that sentence reads, "However, in many instances access roads can be planned according to existing land use needs."

8-25, 3, 2nd para., line 5, AGREE with recommendation that landowner approval be obtained to bury either trash or the drilling pit liner.

8-25, 3, 3rd para., line 2. AGREE with the recommendation, but request information on where the safe buffer depth of 4 feet is now specified.

8-26, line 5, DEFINE technical data used to substantiate Seneca County Soil and Water Conservation District claim concerning crop yields. (See Attachment 1 entitled, "Impact of One-Time Dormant Season Application of Gas Well Brine to Forest Land.")

8-26, line 8, DELETE the proposed recommendation. REASON: This recommendation constitutes inappropriate interference in private contractual matters between landowner and operator.

8-26, 1st full para., line 2, sentence beginning with "Brine and oil..." DELETE this sentence. REASON: Courts have ruled that damage to crops apply to one year’s growing season and not to future crops. Further, brine and gas would not affect crop yield for more than one year, and oil would be stripped from the soil by bacterial action.

8-26, 1st para., 1st line, DELETE first paragraph. REASON: The use of the word "suspected" in line 3 makes this a leading statement. Proof should be provided or the whole paragraph deleted.

8-27, 5, AGREE completely with this entire section.

8-28, 6, DELETE this entire section. REASON: DEC can only intervene as noted in section 5. All statements given in 6 are covered by contract.

8-29, COMMENT: Streams should be defined by solid blue lines on USGS survey maps.

This is not a reasonable alternative. County tax maps do not usually include water wells.

This sentence is a clarification of the above proposal stating that the landowner waiver of the surface restriction should be in writing. The DEC would not waive a setback requirement of this kind without landowner approval.

The sentence as written is more appropriate.

Support for requiring landowner approval for pitliner or trash burial is noted.

A safe buffer depth of four feet was recommended by the Department of Agriculture and Markets, and it is being recommended in the GEIS that four feet be specified as the safe buffer depth. Support for the recommendation is noted.

The Seneca County SWCD should be contacted for detailed information on their technical data. The effects of brine application on crop productivity cannot be compared to topsoil loss or burial.

See Topical Response Number 7 on Soil as a Public Natural Resource.

The information in this paragraph was provided by the Department of Agriculture and Markets. We know that gas would have no adverse impacts, but the associated brine and/or oil can cause serious damage to many crops.

The reason for using the word "suspected" is detailed in the paragraph.

Comment noted.

The DEC can intervene and attach permit conditions only under special circumstances to safeguard specified protected resources (e.g. floodplains, Agricultural Districts, wetlands, etc.) or to avoid or mitigate impacts to significant resources which are not otherwise protected but have been identified during review under SEQR.

Many protected streams are depicted as broken blue lines on USGS survey maps.
We agree that "major" is too strong a modifier.

The example given is relevant to the issues discussed in this sentence.

There is no reference to regulation for this requirement. It is sometimes imposed as a permit condition by the Division of Regulatory Affairs under the Stream Disturbance Permit Program.

This is a Stream Disturbance Permit condition which requires that fill be obtained from permitted sand and gravel mines. The State requires that sand and gravel mining be done under permit.

This section addresses the potential impacts of soil erosion and sedimentation.

See Topical Response Number 3 on EAF and Special Site-Specific Permit Conditions. Their occurrence at every site is unlikely.

This sentence means that distance alone is not an adequate indication of the potential for sedimentation problems.

The discussion on page 8-15 includes the effect of topography and vegetation on the adequacy of buffer zones. The sentence addressed by this comment is an appropriate conclusion to the discussion of sedimentation problems.

The Regional Permit Administrator in each DEC regional office has a list of areas eligible for inclusion on the State and Federal Historic Site Lists.

This illustration of possible permit conditions in historic sites is appropriate in this section.
8-36, 2, 4th para., COMMENT: The DEC area minerals managers should have an archaeological map [scale: 1" to 2,000] that will accurately determine location of archeological sites in order to reduce the costs to oil and gas operators by decreasing the number of archeological studies required to be performed by consultants. IDGA conducted a survey of members after this archeological survey requirement took effect in 1983 which showed that almost $100,000 had been spent on archeological surveys that uncovered four significant "artifacts".

8-37, J. Significant Habitats, GENERAL COMMENT on § through 3 of this section: If relocation of the wellsite is required and results in loss of mineral recovery, then the operator should be compensated by the State at full market value.

8-39, K. Floodplain. GENERAL COMMENT on the introduction to this Section: We believe that floodplain permit conditions are inappropriately applied to oil and gas operations and that mitigation conditions would be pointless if a flood actually occurred. Floodplain conditions are intended to reduce property damage by excluding housing and other building developments.

8-40, 1, Mud or Reserve Pits and 2, Brine and Oil Tanks, GENERAL COMMENT on these sections: (See comment immediately above).

8-42, para 2, line 3 & 4, DEFINE what is meant by the phrase "deposited in a suffocating layer" and the term "weathered oil" in this sentence.

8-43, 1st full para., sentence beginning with, "Completion fluids..." DELETE or provide basis for this sentence.

8-44, 4, DELETE section on brush debris. REASON: No other industry is required to comply with such a requirement.

8-46a, Table 8.1, DEFINE criteria that would satisfy "compelling economic or social need" as described in Class I Wetlands in this table.

8-50, Figure 8.7, line 8 of the caption accompanying this photograph, ADD phrase to read "...in a pink Cadillac," after "deer were sighted driving to the well..."

8-51, 7, AGREE with first sentence of this section which states that access roads can enhance wetland's value.
This example is illustrative of the damages that can occur as a result of brine discharge into a sensitive wetland habitat. The paragraph further explains that discharges of this nature have not occurred recently.

See Topical Response Number 1 on Public Taking Without Compensation.

See Topical Response Number 1 on Public Taking Without Compensation.

See Topical Response Number 2 on Visual Resources and Assessment Requirement.

See SEQR regulations, 6NYCRR Part 617.12, for a complete listing.

Local governments designate areas such as inactive hazardous waste sites as Critical Environmental Areas (CEA) because of the threat to public health or safety which could be caused by disturbance. They can also designate their public water supply as a CEA because of the important benefit it provides to public health.

See Topical Response Number 4 on Access Roads as Part of Project.

Reasonable alternative proposals will be considered during the rulemaking process.

Support is noted for our recommendation and the suggestion for a confirmation number has merit.
ADD phrase at the end of the sentence stating, "and if permit is not used, fees are transferrable to a new permit application within 12 months from the date of permit approval."

I-208 Support for the recommendation to extend the expiration date of drilling permits to 12 months is noted. Transfer of permit fees is covered by 6NYCRR Part 552.4(a).

I-209 Delete the phrase "to a powder."

I-210 Although many wells in the past have been drilled deeper than 2,000 feet with cable tool rigs, present day economics restrict the use of cable tool rigs to shallower wells as stated in the GEIS.

I-211 Correction noted. However, the majority of wells drilled in New York State at this time are not shallow oil wells.

I-212 The sentence is correct as written. The word "excessive" is intended to modify both "pressure" and "amounts of water."

I-213 The suggested change would not appreciably alter the intent of this sentence.

I-214 The suggested change is correct but it would not appreciably alter the intent of this sentence.

I-215 The suggested change would not appreciably alter the intent of this sentence.

I-216 The suggested substitution of "smaller" for "small" in this sentence would be more technically correct.

I-217 The suggested substitution of "may extend" for "extends" in this sentence would be more technically correct.

I-218 As stated in the response to I-192, federal regulatory agencies usually do not have sufficient local enforcement staff. In addition, OSHA regulations are not comprehensive with respect to drilling rig safety. Many aspects of rig safety, such as blowout prevention equipment guidelines which could have a direct effect on the environment, are left to the states to regulate.

I-219 The suggested removal of this phrase has merit.

I-220 The recommendations in this paragraph are not yet part of the federal (OSHA) requirements.
lifelines and lanyards of suitable strength to protect them.'

9-6, 1st full para., line 4, ADD phrase at sentence ending on line 4 to read, '....as specified in OSHA regulations.'

9-6, 1st full para., line 8, ADD sentence at beginning of recommendation to read, "When blowout preventers are used under extraordinary circumstances, the process is for the drilling contractor to make regular operating tests.

9-7, b, RERITE this section to coincide with SPCC regs.

9-8, 1st para., line 1, QUESTION: What are the new regulations referred to in this sentence? We recommend that line 7 of the recommendation be CHANGED from "one barrel of oil" to "10 barrels of oil in aggregate." The sentence beginning on line 7 should be DELETED as safe operations are already covered by OSHA regulations. The last sentence of the recommendation should be CHANGED to read as follows: "All drilling contractors must be registered in New York State."

9-8, 2nd para., ADD phrase at beginning of sentence to read, "Although most conductor casing is driven, when the hole...."

9-9, line 6, ADD final sentence at the end of this paragraph to read, "Because of this requirement, conductor strings in primary aquifers are routinely drilled rather than driven."

9-9, 1st full para., line 8, ADD phrase at the end of sentence to read, "...however, grouting from the surface may not accomplish a complete seal between conductor and formation which may cause damage to the aquifer."}

9-9, 2nd full para., QUESTION: Are these steps required of water well drillers and others penetrating aquifers?

9-9, 3rd full para., line 2, ADD sentence to read, "This occurs only if the conductor hole is drilled and the conductor cemented back to surface."

9-11, line 1, 1st sentence, QUESTION: Under what conditions can surface casing be omitted?

9-11, 2nd full para., 1st sentence, DELETE this sentence. REASON: Inadequate cement jobs can result from poor hole conditions, rather than industry's reliance on a 'recipe."

9-11, 2nd full para., line 5, CHANGE first part of the sentence beginning on this line to read, "Many New York operators do not practice reciprocating (rotating or moving) the..." and ADD phrase at the end of this sentence to read, "...however, reciprocation and rotation can cause lost circulation during cementing resulting in a poor cement job. The primary purpose of
Reciprocating and rotating is to remove mud that may be used when drilling. Mud is not commonly used in New York State.

Reciprocation is not a standard New York State practice, but it is recommended by many industry experts. We agree that improper reciprocation techniques can cause pressure surges which could result in lost circulation. However, there are many benefits of rotation and reciprocation. While the primary purpose of rotation or reciprocation of pipe may be mud removal, other purposes include improved circulation and reduction in cement channeling.

The casing and cementing guidelines only state that cement baskets shall be installed above major lost circulation zones. See page 9-15.

This paragraph is discussing logs that would be run after cementing operations to verify cement top and/or bond. The temperature log would only be effective for a short time after the cementing operations, but a cement bond log can be run at any time.

The suggested change is correct. The new completion form was adopted during the preparation of the GEIS.

Where this situation is likely to occur, the operator should discuss a waiver of this requirement with the Regional Minerals Manager.

Comment noted.

The suggested change is not necessary because reviews are made and approvals are obtained before the final GEIS is published.

The reference is to the GEIS.

Reasonable alternative requirements will be considered during the final rulemaking process.

The State makes every effort to have an inspector available within eight hours.

See response to I-229.

This point is made more appropriately elsewhere in the text. See page 8-22.
sentence to read, "It is also noted that the implementation of surface casing cementing guidelines with some alterations could be applied to water well drilling operations." REASON: Most contamination of water wells occurs from surface entry.

I-247 9-14, Surface Casing Guidelines. COMMENT on this section: The regulations and permit conditions should be equally enforced and complied with in all DEC regions.

I-248 9-15, last statement after §11 at the bottom of the page, line 1 of final paragraph, ADD the phrase "within five days" so that this line reads, "When requested by the department in writing within five days."

I-249 9-16, 1st para., line 4, ADD phrase at end of sentence to read "as specified in the GEIS." REASON: The GEIS encompasses those areas requiring special regulations.

I-250 9-16, §12, line 1, ADD the word "design" so that this line reads, "The production casing cement design shall extend..."

I-251 9-16, §12, line 6, ADD phrase to sentence ending on this line to read, "but as the frontiers in New York State become deeper, this may not be possible, and could be detrimental in deeper producing horizons."

I-252 9-17, 1st para., line 1, ADD phrase "within five days" so that the sentence reads, "When requested by the Department in writing within 5 days...."

I-253 9-17, 2nd para., line 4, ADD phrase at end of sentence to read, "as specified in the GEIS."

I-254 9-17, Note (1): DELETE this note. REASON: The State sets these requirements.

I-255 9-18, 1st full para., line 4, CHANGE sentence beginning on this line to read, "Cement will filtrate into permeable zones." COMMENT: This is a reason why grouting is not advisable.

I-256 9-18, 1st full para., line 6, ADD phrase so that sentence beginning on this line reads, "The majority of these situations are temporary and may be due to unregulated water well drilling...."

I-257 9-18, 1st full para., DELETE last sentence. REASON: Interference in agreements between landowner and operator.

I-258 9-18, D, line 2 and line 5, DELETE the word “high” in these two sentences.

I-259 9-18, D, line 6, DELETE the word “high” and ADD a phrase to read, “but this is not applicable to cable tool rigs.”

I-246 See response to I-229.

I-247 We agree with this comment.

I-248 The Department has no time limit for requesting pertinent records or information.

I-249 The text is correct as written. The suggested addition is limiting in nature.

I-250 The text is correct as written. The suggested addition would change the intent of the requirement.

I-251 In the stated situation, intermediate casing might be appropriate.

I-252 See response to I-248.

I-253 See response to I-249.

I-254 The note is included because it is necessary to follow manufacturer’s specifications for minimum hole size to avoid problems such as stuck casing.

I-255 The suggested change is technically correct. Comment regarding grouting is noted.

I-256 See response to I-245.

I-257 This is not a suggested State requirement. Any responsible operator would volunteer to replace the affected landowner’s water well in this situation.

I-258 This is a general description of a blowout. It is not specific to New York.

I-259 The suggested changes alter the intent of the text.
We agree. Since screwed connections are allowed in New York, this recommendation should be added to the text.

We agree that the casing grade and weight may not be known in some older wells. The suggested change to the text is not appropriate to this section because the overall focus is on new wells.

Correction noted. The drilling permit form has been revised to include casing weight and grade.

This is the most common size production casing in New York. This statement is true for New York; thus, "In New York" should preface the sentence.

The sentence should be corrected to state "A listing of crew member responsibilities for blow-out prevention control must be posted in the dog house by the drilling company."

6NYCRR Part 554.4(d) requires sufficient cement behind the production casing to prevent any migration of oil, gas or other fluids behind pipe whether flow be from the production zone or other intervals.

The suggested changes would alter the intent of the proposal.

Correction noted. The phrase "under fixed conditions" should be deleted.

Comment noted.

The Regional Minerals Manager must be aware of oil and gas activities in his or her region that have potential for adverse environmental impact.

The first two sentences would be more correct if reworded as follows: "Open hole completions are those where the production casing is set just above the producing formation instead of running the full length of the wellbore. Open hole completions can present problems." The last sentence is correct as written.
Although most shallow oil wells are completed open hole, some wells currently represent only 5\% of the new well completions. Some new gas wells are also completed open hole, but cased hole completions are more common. Therefore, the sentence starting 'In most new wells in New York...' is correct.

These sentences should be reworded as follows: "Gas, oil and water zones can be isolated by selective perforation of the casing as long as adequate cement bond exists between the zones behind pipe. Perforated casing completions..."

Reword as follows: "Since most gas wells in New York must be stimulated to produce, setting casing across the producing zone and perforating is the preferred method of completion. In some areas of the State the open wellbore is so competent that it can be perforated and hydraulically fractured like a cased and cemented well."

Correction noted. The word 'every' should be deleted from this sentence. Correction noted. Insert the words 'most of' into the sentence before the volume information.

Discussion in this section concerns typical surface pressures required during stimulation, not absolute stimulation pressure ranges.

The suggested change is more technically correct.

Replacing the word 'Once' with the word 'When' is preferable to replacing it with 'As'.

The phrase "back up without a trace" should be deleted.

The phrase should be reworded as follows: "...must be assisted by mechanical means such as swabbing or coiled tubing and nitrogen."

Addition of the phrase "or for the movement of injected water from the wellbore through the formation" would better convey the information.

Foam frac systems which have gained popularity in recent years can cause gas marketing problems for some New York wells. Wells fractured with foam, which contains nitrogen, will flow back gas containing increased amounts of nitrogen for a period of time. Nitrogen has no heating value, and many pipelines limit the amount of nitrogen they will accept in purchased gas. Recently, marketing problems resulting from nitrogen contamination have been minor.

The suggested text change is more technically correct. A description of possible problems is appropriate. We agree the phrase "abrade paint off cars," should be deleted from the last sentence.

See response to I-284.
Regional field staff estimated that tanks were used in about 50 percent of the flowback operations. Whether the text states "about 50 percent" or "many" makes no appreciable difference.

There is no definition of "completion" on form 85-15-7.

It is true that this information has been required for several years, but these requirements have not been formalized into regulations.

Submissions of specific suggestions for better guidance in completing the form will be reviewed. This sentence recognizes that the regulation exists, but states non-compliance is a problem.

Low-angle pit walls are not being recommended for every well. The commentators should submit information to DEC substantiating their claim. Reasonable alternative proposals will be considered during the rulemaking process.

The adequacy of a clay-lined pit for containing brine depends on the chemical nature of brine and clay used. Calcium chloride brines in particular can cause permeability problems in pits lined with a clay which contains sodium ions. Clay lined pits can also react chemically with any acidic wastes.

Manufacturer information gathered by this Department indicated that factory installed seams were the most effective. Reasonable alternative proposals will be considered during the rulemaking process.

This recommendation does not preclude site-specific determination of pit requirements.

Support for the proposed minimum pit liner standards is noted.

See response to I-293.

Support for additional regulations allowing pitless drilling is noted. Reasonable additions to existing and proposed regulations will be considered during the rulemaking process.

Comment noted.

The current regulations in 6NYCRR Part 556.4(c) state "When it is deemed necessary by the Department for the protection of life, health, or property, the Department may require any lease or other oil storage tanks to be surrounded by an earthen dike . . . ." The Department deems diked oil tanks necessary where an oil spill would result in contamination of surface and groundwater. Therefore, this sentence is correct as written.

The sentence that the space within the dike must be kept free of vegetation, not the dikes themselves, was taken directly from the existing regulations (6NYCRR Part 556.4(c)). Reasonable revisions to these regulations will be considered during the rulemaking process.
The GEIS recognizes that drilling mud is rarely used in New York. However, were drilling mud to be used chromium ligno-sulfonate, a common mud conditioning additive, might be used in non-aquifer areas.

The word "most" should be inserted in place of the word "all".

Correction noted. The word "can" should be added to these two sentences.

Correction noted.

Sufficient quantity and length of time needed for a substance to pose an environmental threat would depend on site-specific conditions and the substance composition.

Comment noted. This table was taken as published in the Upstate Groundwater Management Plan.

The suggested addition would be more appropriate in Chapter 15.

Partial restoration means restoration of that portion of the site not needed for production. Full restoration would occur only after plugging and abandonment.

See response to I-146.

Comment noted.

This section applies only to gas wells. Flow-through separation pits are associated with oil production.

The suggested additional wording is not necessary as this section clearly applies to producing gas wells. The term "brine blowbox" or "brine blowdown pit" should have been used instead of the term "brine disposal pit."
I-315 10-7, line 2 ADD phrase so that end of sentence on this line reads, 'may increase or decrease up to five barrels a day.'  
I-316 10-7, 2, 2nd para., line 4, DELETE "the" so that sentence beginning on this line reads, "Paraffin clogs in small underground plastic flow lines..."  
I-317 10-7, 2, 3rd para., line 3, DELETE phrase starting with "stock tank" to the end of the sentence and REPLACE with "specialized separation vessels for separating oil and water."  
I-318 10-8, sentence beginning on line 4, COMMENT: This would be a rare occurrence.  
I-319 10-9, line 4, DELETE rest of paragraph beginning in bold print on line 4 through the end of the paragraph.  
I-320 10-9, 1st full para., COMMENT: The statements made in this paragraph seem to contradict theory on page 10-10, paragraph 1.  
I-321 10-10, 3rd para., line 9, QUESTION: Are these numbers correct? The concentrations are very small to have an environmental impact.  
I-322 10-11, Produced Brine, line 6, ADD sentence before recommendation to read, "In addition, some produced brine is disposed of in municipal wastewater treatment facilities or brine injection wells."  
I-323 10-11, Produced Brine, line 6, COMMENT on recommendation: New York State does not have a large commercial facility for brine disposal or oilfield waste materials. Further, prior to drilling, an operator doesn't know the quantity of brine to be encountered or if any brine will be encountered. In any event, an approved plan is required for disposal - why must this must done in advance?  
I-324 10-12, line 1, CHANGE "150" to "100".  
I-325 10-12, 3, GENERAL COMMENT. The Bass Island production regulations have not necessarily prevented waste. The production allowables and required pressure testing have, in fact, decreased and, in some cases, stopped production. The industry has pointed out that the reservoir is a fault fracture, and not matrix. Therefore, matrix production gas/oil ratios are not applicable.

I-314 Blowboxes are no longer authorized. Enforcement action is currently being taken against those operators who have not complied with the blowbox or blowpit elimination order.

I-315 Correction noted. The sentence should read, "As the well gets older the volume of brine may increase or decrease."

I-316 Correction noted. The sentence should read "Paraffin clogs in the small flow lines have also been known to cause the lines to rupture or leak."

I-317 The suggested wording is technically correct.

I-318 Comment noted.

I-319 As part of the current administrative enforcement process, an operator who consistently had this problem could be given a choice between paying a stiff fine or installing automatic shut down equipment. Such permit conditions might be appropriate mitigation for a wells site in a sensitive wetland. These actions in either case are not discriminatory.

I-320 The referenced sections do not contradict each other.

I-321 This discussion deals with the concentrations of pollutants that could inhibit microbe metabolism, not the concentrations which would have environmental impact.

I-322 The suggested addition is appropriate.

I-323 A conscientious operator will plan in advance for waste handling and disposal.

I-324 Reasonable alternative proposals will be considered during the rulemaking process.
and are not necessarily prudent production practice. The State
has the Bass Island reservoir listed as a fracture reservoir on
the Oil and Gas Map and on 1985 and 1986 production reports.
State pressure testing and pooling have further indicated
linear fracture reservoirs. IOGA believes production regulations
should now be updated to conform with testing and production
results.

10-12, 3, 1st para., line 4, DELETE phrase beginning on this line
with "whether the operator...practices", REPLACE with "reservoir
drive mechanism."

10-12, 3, 2nd para., line 2, CHANGE regulatory reference from
"556.8" to "554.8".

10-12, 3, 2nd para., line 7, DISAGREE with recommendation. IOGA
feels that proper enforcement of existing regulations should
suffice, but suggests that wording of recommendation be changed
as follows:

"For this reason, it is recommended that a notice of
intention be required for any operation that will in any manner
alter the casing, permanent configuration, or designated use and
status of a well. It is not the intention of this
recommendation to require a permit for routine well servicing.
Notification will be required for the following actions:

- To perforate casing in a previously unperforated interval
  for the purpose of production and injection in existing zone
- To mill out or remove casing or liner
- To run and cement casing or tubing
- To drill out any type of permanent plug

Permits may be required for the following actions:

- To redrill or deepen any well
- To set any type of permanent plug (bridge, cement, sand,
gravel, gel, etc.)

No notification is required for the following actions:

- To run and set an inner string or casing or liner
- To run and cement an inner string of casing, liner or tubing
- To repair damaged casing by means of cementing, or by
  placing a casing patch, swaging, etc.

REASON for deleting 'possible permit' in recommendation: time
frame for permit application procedures would not be conducive to
responsible operations and these activities are inconsequential
environmental actions. Further, it could significantly increase
the paperwork burden on operators. The notice of intention should
suffice."