

From: director@fracdallas.org
To: [Oil and Gas Conservation Rulemaking](#)
Cc: lwasden@cableone.net; [Tom Schultz](#)
Subject: IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601
Date: Tuesday, October 25, 2016 11:31:21 PM

Dear Mr. Wilson,

The e-mail addresses issues regarding Section 310 - General Metering Rules, as follows:

Section 310 – General Drilling Rules

There are many issues with the proposed rules relating to well casing. In Texas, Oklahoma and other places there may be as many as five intermediate casings between the surface casing and the production casing. This is done to protect the well, as well as the freshwater-bearing strata through which the well penetrates.

Dr. Anthony Ingraffea, the Professor of Fracture Mechanics at Cornell University (and previously over 20 years as a geological engineer for Schlumberger) has publicly stated that 5% of all well casing fail immediately, and that 50% will fail within 15 years. This is widely known to the industry, and the problem is exacerbated by the frequent and common use of inferior quality Chinese steel pipe that is more brittle and weaker than US-made steel. Allowing use of Chinese steel pipe is an open invitation to well blow-outs, loss of control, possible releases of toxic, neurotoxic and carcinogenic contaminants into our water, air and soil, and such use of Chinese steel pipe should be strictly prohibited under penalty of law.

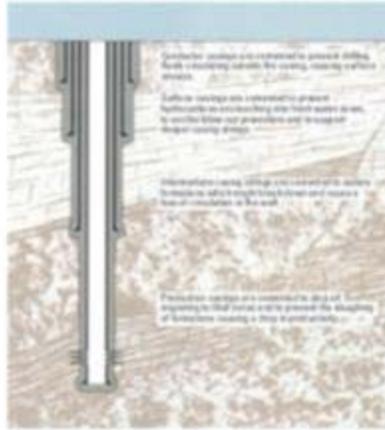
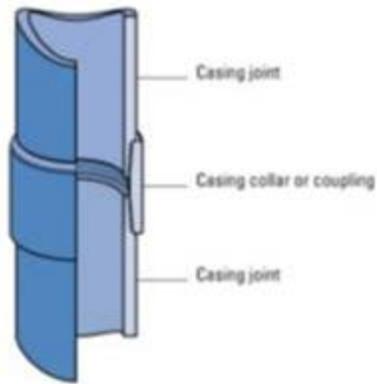
Then, there is the issue of using Chinese steel pipe resulting in American steelworkers losing work to China for the financial benefit of the producer and the detriment of the public.

Finally, the earth constantly moves – it expands, contracts, shakes and trembles, sometimes causing casing failures due to stress and pressures against the casing and surrounding grout (they do NOT use cement to “cement” a well). Allowing the use of inferior quality, substandard steel is an invitation to harm people, property and the environment.

Section 310.05 – Surface Casing Requirements

Section 310.05.b - Surface casing must be set at a minimum depth equal to ten percent (10%) of the proposed total depth of the well. In areas where pressures and formations are unknown, a minimum of two hundred (200) feet of surface casing shall be set.

The whole purpose of a surface casing is to protect groundwater from contamination. To that end the specification for surface casing requirements is irrelevant and illogical. In most mature oil and gas states the requirement for surface casing is to set it from the surface to a depth of at least 200 feet BELOW the lowest freshwater table through which the well penetrates. As proposed, the rule would not necessarily protect the well or freshwater tables. This subsection needs to be radically re-written to align with the regulations in mature oil and gas states.



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It is imperative that casing requirements be tightened to protect the groundwater reservoirs that provide drinking water for Idaho citizens from contamination due to leaks, blow-outs or other well control problems related to casing and cementing.

Please make sure this e-mailed information is included in the official record of public documents submitted to IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601, as required by federal and state laws.

Most sincerely,

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"We only have one environment. When we destroy it we will become as extinct as the dinosaurs!"