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General Comment

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Comment

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Amend §3.65, Critical Designation of Natural Gas Infrastructure

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

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Comments concerning proposed rulemakings

In my opinion the Rule 3.65 was the result of an over reaction of the authorities who claim to be "protecting the public" with mostly vague and all encompassing rule making abilities without proof of what could actually be accomplished to avoid another electric grid failure during a weather emergency. Someone definitely jumped the gun. I hope that same someone is "protecting the small operator". I say this because the CID application and format has been impossible to deal with and answering the information requested is not possible. It is obvious, that it is too complicated and technical. We as operators do not have the information requested and even though we attempted to gather the information requested, we were ignored or told that we weren't privy to that information such as Serial Numbers (in character format) for the plants where our gas is processed or whether our leases are in a competitive area for electricity providers. The whole mess appears to be a way to blame everyone when there was no reason for it. It happened and it might happen again. The more electricity we generate, the more we will need. Maybe the public should take more weather preparedness precautions. Designation of critical infrastructure shouldn't be all encompassing and all the parties can't be vaguely responsible at all times. I also find that the RRC webinars are a joke all they can do is read what has been published and don't provide answers to questions that are specific to an operator. The Panhandle Gas Fields have been operating on a vacuum since the 1980's and we need compression to pull the gas production from the formation and to get it to the surface. Of course, this requires electricity or natural gas just to run the compressors. We do not have enough natural gas to run the compressors, so we must rely on electricity to get the gas

to the surface. Now this is at a time when electricity costs are skyrocketing too. Let me add here that Xcel Energy charges us a demand rate (which is theoretical and was supposed to stand for peak period usage). Xcel has been compensated to guard against what happened anyway. This demand factor is not cheap \$14.25/kW which is what Xcel is in the business of selling and more than the producer gets per mcf. And we pay a fuel cost factor too which is based on kilowatt hour and amounts to \$350 to \$400 per month per meter. As the fuel costs rise, the increase will be passed down to the producer. And we are burdened by the midstream costs associated with the gas plant operations and we must place the compression in close proximity of the wells. The midstream companies could help this process by supporting the larger boosters but have recently removed them putting the entire cost back onto the gas producers. This is just to get the production out of the ground, these wells do not flow gas without compression. When the electricity is critical to our production of 22 mcf/d I believe that we use more electricity to produce our gas and that is why I supported the higher minimums of 250 mcf/d for gas leases and 500 mcf/d for oil leases. However, I will not be able to receive an exception to the rule because our gas lease is on the electrical supply map @ 22 mcf/d. I do appreciate that someone is trying to undo what has been done with Rule 3.65 because it needs revising. Also I don't understand why the disposal wells are included except that maybe someone used the excuse that they had to shut in gas production because the saltwater tank was full? ? More restraints do not help us keep operating and I do not think it will make us do a better job either or generate more electricity. We just don't have the gas production to make a difference. Plus the pipeline infrastructure is aging and the midstream companies are consistently shutting us down to repair the pipelines.

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