

PIONEER

NATURAL RESOURCES

August 15, 2022

Via Email: rulescoordinator@rrc.texas.gov

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

RE: Proposed Statewide Rule §3.66, Weather Emergency Preparedness Standards

Pioneer Natural Resources USA Inc., (Pioneer) writes to you today to provide comments and perspectives regarding the proposed Statewide Rule 3.66 (“Rule” or “Rule 3.66”) by the Railroad Commission of Texas (“Commission” or “RRC”). Pioneer is a large independent oil and gas exploration and production company headquartered in Dallas, Texas. Pioneer’s operations include oil leases, gas leases, saltwater disposal, and intrastate pipelines transporting natural gas and/or hazardous liquids. Pioneer is committed to delivering much needed crude oil and natural gas in a safe and responsible manner.

Pioneer notes the following areas of concern or necessary clarification in the draft version of Rule 3.66 as published.

1. *Applicability.* Pioneer believes the proposed rule is ambiguous about which upstream oil and natural gas facilities are on the Supply Chain Mapping Committee’s Map as operators have not been officially noticed as being on the map. Pioneer further believes operators may not have adequate time to prepare and meet the initial attestation deadline of December 1, 2022 for any facilities on the map due to industry supply chain shortages. Pioneer appreciates the exclusionary comments within the preamble of Rule 3.66 related to minimal volumes, but believes the Commission can target a large percentage of produced natural gas by implementing higher production thresholds in Rule 3.65 and thereby limiting weatherization requirements on wells providing only minimal benefit to statewide natural gas production
2. *Attestation.* The attestation statement itself is best signed by an authorized individual in possession of the knowledge of the facts and should be worded similar, or identical, to the Commission’s current Form P-5 certification.
3. *Safety.* Employee and contractor safety should be explicitly stated as the highest priority at all times including during a weather emergency. In the event a weather emergency necessitates the deployment of personnel in the field, operators cannot and will not send employees or personnel into the field until it is safe to do so.
4. *Weatherization Methods.* Weatherization methods are best addressed within a notice-to-operators or other published RRC guidance document. Furthermore, the weatherization methods should

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be explicitly stated as available technology and not listed as a prescriptive list to which operators are required to adhere to.

5. *Definitions.* Clarification is needed as to critical components on multi-well oil leases in order for field inspectors to properly identify which facilities are included in an operator's weather preparedness efforts and which, by design, are omitted as a non-critical subsystem. The definition of a weather emergency should be comprehensively defined to avoid differing interpretations.

Pioneer believes most of these items have been adequately addressed by comments from the larger trade associations including TXOGA, PBPA, The Alliance, and TIPRO. Pioneer supports comments and proposed rule revisions submitted by these associations on the list above and other elements of the proposed rule.

Regards,



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