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To: [Rules Coordinator](#)
Subject: The Form "Rules Comment Form" was submitted
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General Comment

Here is a new comment from the Web.

Comment

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New §3.66, Weather Emergency Preparedness Standards

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Comments concerning proposed rulemakings

Comments to Statewide Rule 66: • Gas wells and oil leases producing less gas than the minimum production volumes described in Statewide Rule 65 should be exempt from Statewide Rule 66. Furthermore, the Texas Railroad Commission should amend Statewide Rule 65 wherein all gas wells or oil leases producing less than 250 MCF/day are automatically exempted from State Rule 66 without being required to file a Form CI-D. 3rd Party engineering review and weatherization for these low producing gas wells and oil leases will serve as an unreasonable undue burden on operators and provide minimal contribution to power generation throughout the state of Texas. • Statewide Rule 65 and Statewide Rule 66 should contemplate exemptions for gas wells or oil leases that require the purchase of fuel to run equipment required to produce gas during a Weather emergency when the cost of such fuel is greater than the economic benefit of the gas produced for such gas wells or oil leases. • The definition of “repeated weather-related forced stoppage” should be revised to include the word “major” in the definition to avoid minor or immaterial weather-related forced stoppages triggering the undue burden on operators of being required to hire 3rd party engineers with no added benefit to grid reliability. • When should operators expect to be notified whether operated properties fall within the PUC electricity supply chain map? • Will the RRC’s mapping and live visualization of weather watches and warnings be viewable by operators? Will the RRC use this as a means to quantify a Weather Emergency/load shedding event and provide notice to operators? If so, what will that process look like for operators? • Can we obtain further clarification on the definition of extreme weather and when shut-down notifications are required by the RRC so that we can have a quantifiable measure to build out appropriate data tracking and processed to enact the

compliance notifications?

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