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**Date:** Friday, July 8, 2022 1:17:49 PM



# General Comment

Here is a new comment from the Web.

## Comment

### Choose Form

New §3.66, Weather Emergency Preparedness Standards

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**Comments concerning proposed rulemakings**

Any required weatherization should be tied to the GOR of the wells. Low GOR wells like many San Andres waterfloods in the Central Basin Platform that also have a high water cut, are impossible to weatherize due to tens of thousands of miles of flowlines laid on the surface that will freeze below 25 degrees F. If the RRC mistakenly tries to classify such wells as indispensable, it will cause hundreds of Operators to declare bankruptcy because the cost to do so would be astronomical. Wells with high GOR's (10,000 or greater) should be the focus of any possible weatherization push. Jim Stevens, President, Reverence Operating LLC

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