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General Comment

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New §3.66, Weather Emergency Preparedness Standards

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Comments concerning proposed rulemakings

I manage the operations of several small gas wells in Moore County, Texas. Each of these wells average daily production is less than 100 mcf per day. None of these operators have any employees. One operator uses the services of a third party company as its pumper. Production expenses must be kept to a minimum to make the production of these wells profitable for the operators.

Unfortunately, the burden of these proposed regulations is unbearable to the profitable operations of these wells and will jeopardize the profitability of these operators. Furthermore, the threatened penalties will be disastrous to these operators even as they try in good faith to comply with these requirements without staffing and the expertise to do so without substantial third party costs. Therefore, I would strongly recommend and request that the Commission exempt from these regulations any wells making less than 250 mcf per day and if that is not acceptable, then any wells making less than 100 mcf per day and any operator operating less than 20 wells. Thank you for your consideration.

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