



August 10, 2017

Submitted Electronically
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RE: Comments on STRONGER's Draft Guidelines for Produced Water Pipelines

The American Exploration and Production Council ("AXPC") submits the following comments on the "Draft Guidelines for Produced Water Pipelines" published by STRONGER on July 10, 2017. In addition to generalized commentary on the direction and purpose of the document, attached to this letter is a copy of the draft guidelines with suggestions for specific revisions, complete with commentary or questions about the clarity or purpose of those revisions and AXPC's suggested changes.

AXPC is a national trade association representing 33 of America's largest and most active independent natural gas and crude oil exploration and production companies. AXPC's members are "independent" in that their operations are limited to the exploration for and production of natural gas and crude oil. Moreover, its members operate autonomously, unlike their fully integrated counterparts, which operate in additional segments of the energy business, such as downstream refining and marketing. AXPC's members are leaders in developing and applying the innovative and advanced technologies necessary to explore for and produce crude oil and natural gas, and that allow our nation to add reasonably priced domestic energy reserves in environmentally responsible ways.

AXPC appreciates the opportunity to provide public comment on STRONGER's guidelines before they are finalized for use in state-by-state reviews. AXPC also applauds the effort of STRONGER in drafting the guidelines, using a well-established multi-stakeholder process that allows flexibility for the states to design programs that meet their individual needs; that allow operators to apply and use the most advanced and modern technologies, and; adequately protects the needs of the states, the public, and the environment.

The draft guidelines as published consider many aspects of produced water pipeline management, and in many cases remain flexible for the states to interpret as best needed for the operations within their borders. We do however, as will be shown in AXPC's specific language changes, suggest that more flexibility should be afforded to states in developing their programs. Many state programs consider potential risk from produced water lines in the larger scheme of their infrastructure and site permitting programs. In many cases, new specific rules and requirements could create duplicative work for operators and state permit staff, without providing any additional environmental benefit.

Over the past two decades, operators have spent significant capital to investigate, pilot, and operate treatment facilities for the purpose of reclaiming produced water to be used in completion operations. This reuse has reduced the use of fresh water by the industry in several states, and has provided other environmental benefits such as reducing truck traffic from water transportation.

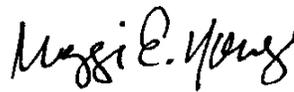
Many of these recycling technologies are very new, and their application depends on the ability to construct and operate water treatment facilities. Some of these facilities require large mixing basins and other large equipment and impoundments. In some cases, current state regulations may not contemplate or allow for operating these facilities. AXPC believes that STRONGER should consider the limitations that may be unintentionally placed on operators in both permitting and operating these facilities by states within the guidelines. Additionally, STRONGER should consider how burdensome additional requirements on produced water lines might discourage the use of treating, reusing and recycling technologies, or otherwise make their use less economically feasible.

Should STRONGER desire further clarification on any suggestions made within the document, do not hesitate to contact AXPC.

Sincerely,



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