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CORPORATION COMMISSION
OF OKLAHOMA

Statement By

Continental Resources

In the Matter of a Permanent Rulemaking of the Oklahoma Corporation Commission

Amending OAC 165:10 Oil and Gas Conservation

Cause No. RM201600019

February 10, 2017

Continental Resources respectfully requests that the Oklahoma Corporation Commission consider adopting the following changes in the above captioned rulemaking:

- **Increase Time To Submit Well Completion Reports (Form 1002A):** Continental requests that the Commission adopt a ninety (90) day time frame to submit Well Completion Reports. This will allow sufficient time to accurately address production rates and well classifications, among other issues. This request is supportive of the Oklahoma Oil and Gas Association's recommendation to adopt a ninety (90) day submittal timeframe on this same issue.
- **165:10-3-25 Completion Reports:** This proposal attempts to mirror the current rules for confidential treatment of well logs in 165:10-3-26(e) and afford completion reports the same opportunity.
(e) Obtaining Temporary Confidential Treatment of a Completion Report. For good cause shown, an operator may obtain confidential treatment of a Completion Report and the associated Form 1016 submitted to the Commission.
 - i. Good cause shall include, but not be limited to, a showing that:
 - (1) a pooling application in the drilling and spacing unit for the well remains under protest;
 - (2) the Completion Report for which confidential treatment is sought contains information which the operator: (a) believes is confidential, competitively sensitive, and carries a significant risk of being misinterpreted by third parties when considered in isolation apart from other non-public information.

- ii. Unless the operator requests confidential treatment of a well Completion Report, any Completion Report submitted to the Conservation Division shall be available for public inspection.

- iii. To obtain confidential treatment of a Completion Report and any associated Form 1016, the operator of the well shall, within 90 days after completion of operations:
 - (1) place the Completion Report along with a completed Form 1016 in a sealed envelope with the well name and well location printed on the envelope;

 - (2) submit the sealed envelope to the Technical Services Department of the Conservation Division, together with an unsealed statement of the operator's good cause for temporary confidential treatment.

- iv. A Completion Report submitted for confidential treatment shall remain confidential for one year from the date the well was completed or the time for which the reason for confidential treatment has elapsed, whichever occurs first. Upon written request, the Conservation Division may administratively extend the period of confidentiality for six months. Under no circumstances shall confidential treatment be granted for a period in excess of 18 months from the date the well was completed.