

BEFORE THE CORPORATION  
COMMISSION OF THE STATE OF  
OKLAHOMA

IN THE MATTER OF AN EMERGENCY )  
RULEMAKING OF THE OKLAHOMA )  
CORPORATION COMMISSION )  
AMENDING OAC 165:5, RULES OF )  
PRACTICE )

Cause No. RM 201700008

**FILED**  
AUG 15 2017

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CORPORATION COMMISSION  
OF OKLAHOMA

**PUBLIC COMMENT**

of

**Oklahoma Oil & Gas Association**

August 8, 2017



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

TO: Chair Dana Murphy, Oklahoma Corporation Commission  
Vice Chair Todd Hiatt, Oklahoma Corporation Commission  
Commissioner Bob Anthony, Oklahoma Corporation Commission

CC: Tim Baker, Director of Oil & Gas Conservation Division; Virginia Hullinger,  
Technical Manager; Susan Conrad, Deputy General Counsel; Brenda Loggins

FROM: Annella Karges, Executive Vice President of OKOGA

DATE: August 8, 2017

SUBJECT: Public Comment in the Matter of an Emergency Rulemaking of the Oklahoma  
Corporation Commission for Senate Bill No. 867, Amending OAC 165:5, Rules of  
Practice in Cause No. RM 201700008

**PUBLIC COMMENTS**

The Oklahoma Oil & Gas Association (OKOGA) submits the following public comments to the Oklahoma Corporation Commission (OCC) in consideration of Proposed Emergency Rules for Title 165, Corporation Commission, Chapter 5, Rules of Practice, dated July 27, 2017.

The Oklahoma Oil & Gas Association, founded in 1919 as the Mid-Continent Oil & Gas Association, is the oldest energy trade association in the United States. Nearly a century later, the association remains dedicated to the advancement and improvement of the oil and natural gas industry within the state of Oklahoma and throughout the nation. It is a non-profit association composed of oil and natural gas producers, operators, purchasers, pipelines, transporters, processors, refiners, marketers and service companies which represent a substantial sector of the oil and natural gas industry within Oklahoma. The activities of OKOGA include support for legislative and regulatory measures designed to promote both the well-being and best interests of the citizens of this state and a strong and vital petroleum industry within the State of Oklahoma and throughout the United States.

OKOGA submits these comments but reserves the opportunity to submit additional comments prior to the deadline for written comments on August 15th.

OCC Proposed Emergency Rules for 165:5 – Rules of Practice  
(in Cause No. RM 201700008)

165:5-7-6. Drilling and spacing unit establishment or modification

OKOGA suggests the following change in 165:5-7-6 (k), on Page 4, to be as follows (underline and strikethrough to indicate changes from OCC Proposed Emergency Rules dated July 27, 2017) to clarify this section of law applies to multiunit horizontal wells and larger sized units:

(k) An application filed pursuant to 52 O.S. §87.1(f) which forms a horizontal well unit or units that exceeds six hundred forty (640) acres plus tolerances and variances, shall include a list of all companion applications, including any location exception(s), increased density, or exception to rule application(s) filed in conjunction with the cause. The order issued from the application shall include the requirement that upon the completion of the initial horizontal well, an affidavit and attached Form 1002A completion report shall be filed in the same cause demonstrating the resulting footage of the initial horizontal well in the drilling and spacing unit(s).

OKOGA sincerely appreciates the efforts of the Oklahoma Corporation Commission and the Oil and Gas Conservation Division to efficiently develop and appropriately limit the scope of the proposed emergency rules to achieve timely implementation of SB 867.