



March 5, 2014

Mr. Art Wright
City of Mansfield
1200 E. Broad Street
Mansfield, Texas 76063

Re: Proposed Amendments to Mansfield's Drilling Regulations

Dear Mr. Wright:

XTO Energy has read with interest the proposed amendments to Chapter 114 of the Mansfield Code of Ordinances, "Gas Well Drilling and Production". XTO supports reasonable regulations for municipal drilling, completion and production activities and respects the intent of ordinances to protect the health, safety and welfare of the residents.

XTO Energy provides the following substantive comments to the City for your consideration in amending this important Code.

Section 114.12 (1) (a) – (f) – We support the recommendation to change notification of wellsite operations from 72 hours to 48 hours before activities commence. This allows operators a minimum of production down time and economic loss.

Section 114.12 (2) – XTO believes this paragraph requires an operator to post a ten (10) day notice prior to the commencement "of any work on the drillsite." This stipulation appears to unreasonably include routine wellsite activity that is performed during daylight hours Monday through Saturday and well within the permissible decibel limits of the noise ordinance. We believe this section should be clarified to notify all residents within one thousand (1000') of the drillsite of pending drilling, re-working with a drilling rig, completion or plugging operations only and not apply to routine maintenance operations for the wellbore or wellsite.

Section 114.13 (D) – XTO supports the proposed amendments to the hours of operations for workover and fracture stimulation activities.

Section 114.13 (D) – XTO supports the proposed amendments to allow Internet access by the City's inspectors for gathering real-time continuous noise monitoring data.

Section 114.13 (B) – XTO strongly disagrees with the proposal to only use electric motors for drilling operations. This stipulation would apply to virtually all drillsites within the City of Mansfield and becomes a wholesale change in an operator's ability to select the best means of powering the systems on our rig fleet. This proposal also has farther reaching implications in suggesting that all wellsite activities be converted to electric power. We believe that using a power substation has more potential

to interfere with the lives of the public than the drone of diesel electric engines. Electric transformers are specialized and must be unique for each power supply and sized appropriately for each drilling operation. All transformers must be equipped with voltage attenuators which would keep rig power surges from coursing back through the power supply and into the surrounding neighborhood grid with excess voltage. In the event the substation lost power or could not supply the rig with power we would have to switch directly over to diesel power to conduct operations. The normal start-up time for generators is 20 minutes which we could not afford from a well control standpoint. XTO currently operates Dual Fuel systems on our rigs to lower our emissions during drilling operations. This system uses natural gas in our lean burn engines and lessens our emission footprint in the Metroplex.

We urge the Council to reconsider the requirement to notify all residents within one thousand (1000') within 10 days of all wellsite activity. XTO also asks for additional consideration to not require only electric power on drilling operations. We support a stronger commitment by industry to mitigate urban drilling impacts and better compliance with current gas well ordinances through proven community relations, responsible hours of operation and effective nuisance noise mitigation.

Yours truly,

Walter Dueease

Art Wright

From: Clifford, Judith
Sent: Thursday, March 06, 2014 11:15 AM
To: Art Wright <art.wright@mansfield-tx.gov> (art.wright@mansfield-tx.gov)
Cc: Leopold, Dave; Suszkowski, Carla; Walker, Christopher; Greathouse, Dana; Clifford, Judith
Subject: Notice of Proposed Amendments to Mansfield's Drilling Regulations - Atlas Comments

Art,

Thank you for the opportunity to comment on Mansfield's proposed drilling regulations amendments, said comments to be included in the Council meeting packet. Our comments are set out below:

1. Require gas well operator to send notice to dwellings within 1,000 feet prior to drilling operations. The notice would describe the activities and the estimated time to complete, as well as contact information for the operator, TCEQ, and the Railroad Commission.

Comment: Notice to the City, which can be displayed on the City's website, should suffice. The proposed requirement would place an undue burden on the Operator and can be accomplished much more efficiently by City website posting.

2. Require gas well operator to provide real-time, Internet access to the monitoring equipment at drill sites that are required to have 24-hour sound monitoring. This will allow the Gas Well Inspector to respond more quickly to noise complaints and better track violations.

Comment: Agreed

3. Prohibit fracking on Sundays.

Comment: Agreed

4. Require the use of electric motors connected to the electric delivery system through a ground-mounted transformer for drilling operations, unless the drill site is more than 1,500 feet from protected uses or the electric utility provider certifies that there is insufficient capacity to serve the drill site.

Comment: Operators cannot guarantee access to an electric drive rig. Smaller Operators would be significantly and adversely impacted by this requirement.

Let me know if you have any questions or would like to discuss.

Judith R. Clifford
Manager, Regulatory Compliance



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Gas Well Ordinance Amendments
Beacon E&P Company, LLC. Comments
March 6, 2014

1. Require gas well operator to send notice to dwellings within 1,000 feet prior to drilling operations. The notice would describe the activities and the estimated time to complete, as well as contact information for the operator, TCEQ, and the Railroad Commission.

Comments: Beacon has been proactive in our neighbor relations and supports this initiative.

2. Require gas well operator to provide real-time, Internet access to the monitoring equipment at drill sites that are required to have 24-hour sound monitoring. This will allow the Gas Well Inspector to respond more quickly to noise complaints and better track violations.

Comments: Beacon's noise consultants have this capability. The City might consider a short grace period to assure equipment conversion time is available to all operators. An outer limit might be considered for complaints outside of 600 feet.

3. Prohibit fracking on Sundays.

Comments: While Beacon's objective is always to minimize the time on location spent fracturing, other techniques such as simultaneous operations utilizing two frac fleets are available and preferable to Sunday operations.

4. Require the use of electric motors connected to the electric delivery system through a ground-mounted transformer for drilling operations, unless the drill site is more than 1,500 feet from protected uses or the electric utility provider certifies that there is insufficient capacity to serve the drill site.

Comments: The feasibility, planning, and construction of required infrastructure inherently encompasses long lead times. For any existing SUP, Beacon E&P would recommend making this provision of the ordinance effective 3 months after its adoption. A reasonable compliance period would allow the industry time to plan and execute the conversions with the electric delivery company.

Consideration might also be made in the ordinance provisions for inordinately long distances or difficult installations, where an economic breakeven is unlikely.

Art Wright

From: T. Brown
Sent: Thursday, March 06, 2014 4:08 PM
To: Art Wright (External)
Cc: Ellen Pierce
Subject: RE: Notice of Proposed Amendments to Mansfield's Drilling Regulations

Hello Art,

Thank you for the opportunity to provide comments on the proposed ordinance amendments. Per our conversation this morning, please see our comments below:

Concerning the amendments to Section 114.12, paragraph (V), we do have some concern over the language added under (f) "perform any other maintenance at a Drill Site or Operation Site." We believe that this language may prove to be too vague and have unintended consequences. As currently written it could be argued that mowing the grass or even daily site checks could fall under the description and require city and resident notifications.

For the addition of a new paragraph (B) under Section 114.13, we would like consideration included in the language for an occasion where there may be sufficient capacity to serve the drillsite, however the ability to access the necessary utility easements is not feasible.

Please feel free to contact me if you have any questions or concerns.

Thank you,
T. Brown
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Art Wright

From: Thomas, Lee
Sent: Thursday, March 06, 2014 5:01 PM
To: art.wright@mansfield-tx.gov
Cc: Fry, Pamela; Young, Ronnie; Trueheart, Richard; Eckhardt, Todd
Subject: RE: Notice of Proposed Amendments to Mansfield's Drilling Regulations

Mr. Wright,

Comments on Section 4 (B):

If the noise mitigation is implemented to meet the required specifications, we would prefer not to be required to use only electric motors. The engines that we use accomplish our objectives in a safe and reliable manner. The engines provide redundant power and back up that would not be available with a utility only situation. Utility companies can experience power outages that will render the drilling rig inoperable for a period of time. This will increase the risk of drilling problems extending the time the rig had stay on the site and limits our reaction to downhole conditions.

We respectfully ask that this restriction not be approved.

Sincerely,

Lee Thomas
EnerVest Operating
VP Drilling & Completions - Western Assets
Office: 713.495.1502
Cell: 281.513.5673

From: Fry, Pamela
Sent: Wednesday, March 05, 2014 4:22 PM
To: Welton, Bill; Zazzi, Alex; Saucedo, Carlos
Cc: Thomas, Lee
Subject: FW: Notice of Proposed Amendments to Mansfield's Drilling Regulations

Touched base with Lee on this today.

If there are any comments, Art Wright mentioned that he will take them up until 5pm tomorrow.

Thanks very much,
Pam

Pamela Fry
EnerVest Operating, LLC
Regulatory Compliance
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Houston, TX 77002
713-495-1563 - direct

From: Art Wright [<mailto:art.wright@mansfield-tx.gov>]
Sent: Wednesday, March 05, 2014 3:24 PM