

# **A “Model Regulatory Framework”**

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Scott Kell, Geologist



# Purpose

- Blueprint for state oil and gas regulatory agencies
- Based upon “best-in-kind” state regulations and effective industry practices
- Measure for self-assessment
- Tool to assist enhancement of state regulations



# History

- Joint-project: EDF and SWN Energy
- Conceived as a BMP project
- Initial review:
  1. STRONGER guidelines
  2. API HF-1
  3. GWPC State Regulations for the Protection of Water Resources
- Comparative state rule review



# Participation Principles

- Recognizes the significant role of natural gas
- Goal: Consensus on key issues regarding the framework for effective state regulations
- Goal: reduce impacts to extent reasonably possible
- Recognizes legitimate variation
- Values significant interim progress



# Scope: the Borehole

- Well planning
- Drilling
- Well construction
- Completion including hydraulic fracturing stimulation
- Mechanical integrity monitoring/verification
- Eventual plugging and reclamation



# Goal

- Improve scope, consistency, and overall strength
- Assist states in identifying and addressing substantive gaps in regulatory standards
- Advocates chemical disclosure
- Enhance public confidence



# One Size Can't Fit All !

- We agree
- **NOT** an exhaustive regulatory scheme
- Working structure
- Standards address substantive components of effective regulations
- Respects legitimate regional and state variation



# Who are you to propose a “model” regulatory scheme ?

- Sponsors prefer that regulation of hydraulic fracturing be maintained under rigorous state authority
- Based upon existing state standards
- Seeks balance: environmentally responsible/business practical
- Work in progress: Needs state input



# Rulemakings: The Gauntlet





# Well Construction

- Structure
- Texas flavor
- Performance objectives
- Material standards
- M.I. testing/verification
- Special standards for wells with limited intervening strata between stimulated reservoir and base of protected water



# Ohio Experience

Tight deadlines  
High expectations





# Next Steps

- Comments welcome
- State input desired
- Avoid this

