



COMMENTARY

SEP 9

Calls to halt Texas injection wells because of earthquake are premature

By Ryan Sitton

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There is no question that the Texas Railroad Commission, the state's oil and gas regulator, is doing its job to protect Texans and that we take the issue of induced earthquakes and seismicity very seriously.

As I have stated repeatedly, it is scientifically possible for injection wells that safely dispose of fluids deep underground to cause earthquakes in certain cases, with the right set of conditions.

In the wake of the recent Pawnee, Oklahoma, earthquake, some groups are now calling on the commission to halt injection well activity. A blanket prohibition isn't the answer. That solution would be like lowering all speed limits across the state to 50 miles per hour in response to concerns on a few specific stretches of road.

The commission is taking action, though. We are working with several different organizations, including the Bureau of Economic Geology, to study seismic events and better understand what is causing them.

In 2015, the Texas Legislature allocated \$4.6 million to the study of seismicity, some of which is being used to fund the TexNet Seismic Network that is deploying additional seismic monitors across Texas. That group is committed to developing comprehensive research that will help us better understand induced seismicity in Texas. If we determine that there are causal factors associated with injection activity in certain areas, then we will take steps to eliminate those factors through regulation.

While we are studying this, the commission has already taken notable steps to reduce potential risks.

In November 2014 we implemented new rules for injection wells that require applicants to conduct a search of the U.S. Geological Survey seismic database and report if the proposed well is in an area of historic seismicity. These rules give the commission the authority to modify, suspend or terminate an injection well permit.

Since the rules went into effect, 57 applications for injection wells in areas of historic seismicity have been filed. The commission has put special conditions on 30 of those wells to minimize seismic concerns. Eleven have been returned or withdrawn because the commission wasn't satisfied with the application. The commission approved only 10 injection wells without special conditions because our scientists who review these applications were confident there were no risks.

Much of the negative criticism of the commission on this issue has centered on one study, the Southern Methodist University paper about one set of seismic events and two disposal wells. This study of the Azle and Reno area was very limited in scope and analysis.

To delve into this study in detail, I hosted in June 2015 a six-hour meeting with SMU researchers and technical experts, and we livestreamed to people across Texas could see the discussion. I appreciated the SMU researchers' participation and candid admissions that additional research is necessary to enhance and improve their work. I concluded that there were gaps in the study, and that much work needs to be done to develop a comprehensive understanding of this issue.

In spite of the criticism many level at the Railroad Commission on this issue, the Environmental Protection Agency recently praised the commission for its actions on injection wells, saying "the RRC is also commended for establishing new regulations specific to seismicity, including solidifying RRC authority to take appropriate action related to injection well operations."

Texas has been a leader on seismicity, although we have been slow to communicate everything we are doing to address this important issue. No other state is putting this much money and resources into researching seismic activity. The Texas Legislature deserves high praise for their strong commitment to this research and for the funding they provided.

I understand North Texans' concerns about this issue. I grew up in Irving and my mom and dad still live in the area. I am confident that the TexNet research is going to help us better understand seismicity, and I am committed to working with researchers, technical experts and others in the scientific community.

If we find definitive links between oil and gas injection and earthquakes in Texas, I will be the first person to advocate for appropriate regulatory action.

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