

BOB ANTHONY
Commissioner

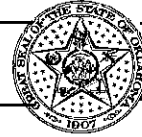
DANA MURPHY
Commissioner

TODD HIETT
Commissioner

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Tim Rhodes, Director of Administration



November 29, 2016

Ron Curry, Regional Administrator
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Curry,

Thank you for your letter of November 22, 2016. I have been asked to respond on behalf of the Commission. Among the many critical matters that face this agency, none is more important than the earthquake issue.

As the EPA is the agency charged with overseeing and granting primacy for all state disposal well programs, we are grateful for the assistance your office has provided OCC staff.

As was made clear in the directive that issued as an initial response to the 5.0 magnitude earthquake in Cushing on November 3, 2016, the Oil and Gas Conservation Division is working on additional actions for the Pawnee/Cushing area. As you know, this work involves staff from your office, and includes wells that are under sole EPA jurisdiction.

Regarding other methods of disposal, Governor Fallin has appointed a task force to look into alternative methods of handling produced water from oil and gas wells, and this agency awaits the task force findings with great anticipation. While the Oklahoma Corporation Commission has limited permitting authority over such recycling facilities, it fully supports the effort to reduce the amount of wastewater that is being disposed into the Arbuckle formation. Thus far the Commissioners have received only one application for a recycling operation that involves OCC jurisdiction, and that has been approved on a provisional basis in order to allow adequate testing to ensure it does not put protected water at risk. Further, staff has supported (providing water protection standards are not compromised), applications from Arbuckle disposal well operators to change to disposal into other formations not linked to the earthquake problem.

The Oklahoma Corporation Commission staff has long valued the positive working relationship they have had with the Region 6 EPA office, and know you share our commitment to see that it continues.

Sincerely,



Tim Rhodes
Director of Administration, Appointing Authority
Oklahoma Corporation Commission

Cc to: Bob Anthony, Chairman
Dana Murphy, Vice Chairman
Todd Hiatt, Commissioner
Tim Baker, Director: Oil and Gas Conservation Division
Michael Teague, Oklahoma Secretary of Energy and the Environment