S. K. ROGERS OIL, INC.
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November 19, 2026

RE: Comments on Proposed Amendments to 16 TAC 3.15 and 3.58 (SB 1150)

Dear RRC:

Inactive wellbores and 15/25 wellbores should not be categorized solely based on age. Any inactive wellbore that has a cast iron bridge plug set above the perfs and capped with the required amount of cement (a legal plug to isolate) with the hole circulated clean of hydrocarbons with fresh fluid and oxygen scavenger, all tubing and rods are removed, and passes either a 250 psi 30 minute pressure test for an MIT or passes a 500 psi 30 minute test for a H-5, is not a sever environmental threat. To compare this type well to a similar well with tubing and rods in the hole is not a comparable comparison.

Currently, an operating company puts up a bond or irrevocable Letter of Credit to operate and another for its inactive wells. Either the bond or irrevocable letters of credit are issued on an annual basis by the issuer or guarantor. Neither a bond company or a bank is going to put up a bond or irrevocable letter of credit on a perpetual open ended basis.

Our company put up a blanket irrevocable letter of credit for both our basic operation as well as for our inactive wells. Your 15/25 well designation ignores this. Our company has seven 15/25 wells which we are going to plug prior to our P-5 renewal date in 2027 in fear of the RRC not accepting our irrevocable letters of credit. Companies with hundreds of 15/25 wells that do not have the financial resources to either plug the wells or put up acceptable financial assurances, will likely walk from their obligations. This certainly can make the Orphan Well inventory of the RRC balloon exponentially. I agree with the RRC's concern about companies that have a very large inactive well inventory and lack the financial resources to plug them but I do not like being placed in the same category having operated for over 44 years without a fine.

Regards,

Kirk Rogers
Manager
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