From: Robert Beverly <Robert.Beverly@messages.earthworks.org>
Sent: Wednesday, November 11, 2026 2:36 AM
To: Rules Coordinator
Subject: Amend §§3.15 and 3.58 (Senate Bill 1150)

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Rules Coordinator
Railroad Commission of TX

Dear Commissioners,

I am writing to you as a Texan to ask that you put meaningful measures in place to fix the massive inactive and orphaned well problem that wastes taxpayer money and pollutes our air and water.

Specifically I ask that you:

Set a virtual and in-person rulemaking to allow more impacted stakeholders to participate in submitting public comments.
Make public all applications & decisions about extensions, compliance, and compliance plans.
Make the rule enforceable: establish the required penalties to prevent violation.
Clarify and strengthen the definition of an active well. A well that is brought back into service should produce more than a gallon of oil per month to be considered active and avoid decommissioning and clean-up.
If an operator’s history of returning wells to service is to be considered as a factor in granting well-plugging extensions, a demonstrated history must include a representative population of wells (15/25 wells) and have a reactivation rate of more than 10%.
Market conditions should not be a factor in determining financial hardship of an operator or granting an extension to clean up a well.