From: rrcwebcontact
To: Rules Coordinator
Subject: Rule comment email
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Rule comment email

Choose Rule
Amend §§3.15 and 3.58 (Senate Bill 1150)
Name
Stephenie Lacy
Address
1808 Mary Ellen St NE Apt B
City
Albuquerque
State
NM
Zip
87112
Business Phone, Fax
(505) 226-1966
Email Confidentiality Preference
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Email Address
[redacted]
Comments concerning proposed rulemakings
Re: Comments on Proposed Amendments to 16 TAC §3.15 and §3.58 — Orphaned Well Prioritization under SB 1150

Submitted by: Ride Wire LLC
Stephenie Lacy, Founder/Owner
Albuquerque, New Mexico

Ride Wire LLC appreciates the opportunity to comment on the Commission's proposed rules implementing SB 1150. We are a New Mexico diagnostic and field-intelligence firm whose work centers on orphaned and inactive well documentation. We submit these comments in support of the proposed framework, and to urge that the final rules lock in two features that will determine whether the program succeeds in the field: transparent prioritization, and data-driven triage.

The scale of the task argues for both. As of March 2026, Texas carried 12,247 known orphan wells. The Commission's own performance shows what disciplined execution can do: in FY2026 the State Managed Cleanup Program plugged a record 2,022 orphan wells at a cost of roughly $125.6 million — approximately $62,000 per well. With up to approximately $318.7 million in federal formula funding in play, the difference between a prioritized program and an unprioritized one is not administrative. At current per-well costs, triage quality is measured in hundreds of additional wells plugged — or not plugged — with the same dollars.

1. Publish the prioritization scoring, and publish it per well. We support the risk-based

prioritization reflected in §3.58, and we urge the Commission to make the scoring factors, weights, and resulting priority list public at the individual-well level. A published list does three things no internal list can: it lets operators, surface owners, and local governments plan around a known queue; it lets the Legislature and the public verify that the highest-risk wells — those near water, near people, and actively leaking or venting — move first; and it creates the record that defends the program when a lower-profile well is reached before a louder one.

2. Triage on current field data, not solely on records of record. Orphan well files are, by the nature of the problem, incomplete and frequently stale. A well's paperwork age is a poor proxy for its present condition. We urge the rules to credit, in the prioritization process, current documented field observations — casing and wellhead condition, evidence of leakage or venting, proximity to occupied structures and water sources, and site accessibility — gathered by any qualified party and submitted in a standard form. Data-driven triage does not require the Commission to accept any submitter's conclusions; it requires only that fresh, verifiable field facts be allowed to move a well up the list when the facts warrant it.

3. Keep the record whole. Each plugged well should close with a complete public file: pre-plugging condition documentation, the work performed, and post-plugging verification. That closing record is what converts a spending program into an auditable asset-protection program, and it is what future Commissions will rely on when today's plugged wells are re-examined decades from now.

An offer to the Commission. To demonstrate the field-intelligence documentation standard described above, Ride Wire LLC offers the Commission, at no charge, a 48-hour pilot on a single orphan well of the Commission's choosing: we will document that well's current field condition and deliver a written field-intelligence report in the standard form contemplated by these comments. One well, one complete record, no obligation. Should the Commission or its operators later require documentation at scale, our published dossier services are priced at $3,000 per standard file, $5,000 per complex file, and $15,000 per five-file package.

Texas is demonstrating, at record pace, that orphan wells are a solvable problem when the queue is honest and the data is current. These rules can make that the permanent condition of the program. We respectfully urge their adoption with the transparency and triage provisions above.

Respectfully submitted,
Stephenie Lacy
Founder/Owner, Ride Wire LLC
Albuquerque, New Mexico

Verification

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