From: Marce Walsh <Marce.Walsh@messages.earthworks.org>
Sent: Wednesday, November 11, 2026 7:54 AM
To: Rules Coordinator
Subject: Amend §§3.15 and 3.58 (Senate Bill 1150)

CAUTION: This email originated from outside of the Railroad Commission of Texas. Do NOT click links or open attachments from unknown sources without first confirming the message is legitimate. If you believe this to be a malicious and/or phishing email, please contact the ITS Help Desk at 512-463-7229. Do not respond to or forward the email, click on any links or open any attachments without guidance from the Help Desk

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.