From:	rrcwebcontact
To:	Rules Coordinator
Subject:	Rule comment email
Date:	Wednesday, November 11, 2026 8:36:23 PM

Rule comment email

Choose Rule
Amend §§3.15 and 3.58 (Senate Bill 1150)
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Comments concerning proposed rulemakings

I am a mechanical engineer in Houston with experience in natural gas pipeline measurement and pressure systems, and I am establishing a consultancy to help small independent operators with inactive-well compliance. I support the Commission's implementation of SB 1150 and offer the following comments to make the 15/25 provisions workable for small operators.

Using the Commission's Inactive Well Aging Report (data as of October 6, 2026), I estimate that about 22,660 unplugged land wells already meet the 15/25 test, held by about 682 operators with active P-5 status. Many of these are small operators with a handful of wells and no compliance staff. The following clarifications would help them comply on time.

1. Agents and consultants (§3.15(h)(4)(C)). The proposal allows the financial-hardship attestation to be signed by "the operator or operator's representative," but has no corresponding provision for compliance plans. I ask the Commission to allow an operator's designated agent or RAMP Secondary Organization to prepare and submit a compliance plan on the operator's behalf, with the operator's attestation still required.

2. A standard form and filing method. I ask the Commission to publish a compliance-plan form or template, and to state whether plans will be filed through LoneSTAR, before the rules take effect. A common format would reduce incomplete applications and the 90-day cure cycle in §3.15(i)(1).

3. Plan amendments. The proposal addresses annual renewal but not changes during the year. I ask the Commission to provide a simple amendment process for when wells are

sold, plugged early, returned to production, or delayed by plugging-contractor availability, so that operators acting in good faith are not treated as deviating from the plan under §3.15(i)(2)(F).

4. Scope of a plan. §3.15(h)(4)(C) suggests a plan may include some of an operator's inactive wells, while §3.15(i)(1)(C)(i) refers to compliance for "all 15/25 wells" by September 1, 2042. I ask the Commission to clarify whether a plan may cover only part of an operator's 15/25 wells when the rest are under another extension path.

5. Annual minimum for small operators. The annual minimum is total 15/25 wells divided by the remaining years. I ask the Commission to state how fractional results are rounded. For example, an operator with 3 wells and 15 years remaining has a minimum of 0.2 wells per year.

6. Missing completion dates. About 1,366 wells in the October 2026 report have no original completion date. I ask the Commission to state how it will determine the 25-year test for those wells, and how an operator may correct a well's completion date.

7. Escrow amount (§3.15(q)(1)). The proposal requires escrow funds with each extension application but does not state the amount. I ask the Commission to specify it.

8. Advance notice. I ask the Commission to identify 15/25 wells for each operator before the effective date, for example with a 15/25 flag in the Inactive Well Aging Report, so small operators can plan plugging and restoration work in time.

Thank you for considering these comments.

Hosam Farrag - Texas Compliance Solutions
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Verification
Check