From: brytad@everyactioncustom.com on behalf of Bryan Adkison <brytad@everyactioncustom.com>
Sent: Monday, November 9, 2026 8:53 AM
To: Rules Coordinator
Subject: Public Input for SB 1150 Rulemaking

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Dear Rules Coordinator,

Please incorporate the following recommendations to strengthen rules for inactive, unplugged wells and fulfill the RRC's mission of stewarding natural resources & the environment and protecting personal & community safety.

The final rules should reduce Texas's inventory of inactive wells, prevent new orphans, and prevent inactive wells from remaining unplugged indefinitely. To accomplish this, please make these changes to the rules:

-As statute requires, before granting any extension, specify how the RRC is fully considering "risk to public safety, health, and the environment; wellbore and wellhead integrity, including the ability to monitor casing pressure; and regional risk considerations, including penetration of corrosive or over-pressured formations and completion in zones containing hydrogen sulfide."

-Set tougher well integrity standards & monitoring of casing pressure; ban extensions in high-risk zones. Require annual mechanical integrity testing of these wells.

-Set clear metrics based on statutory criteria to ensure operators applying for "financial hardship" still plug wells & that they have a path out of hardship. As is, the proposal allows business-as-usual practices of indefinite plugging extensions that lead to well orphaning.

-Update the definition of "active operation" to require meaningful, economic production.
Require well-specific reports for each 15-year inactive/25-year-old well, certified by professionals, confirming the well has economic value and future beneficial use.

-Regardless of the extension option requested, require a well-specific plugging-or-restoration plan and schedule for all 15/25 wells, and deny extensions if the operator deviates without good cause so wells with no benefit are eventually plugged.

-Only 15/25 wells, not younger wells, should count toward qualifying for a plugging extension based on a history of "returning inactive wells to operation." The definition of "active operation" must prevent gaming by temporarily shutting wells on and off.

-Say the RRC "shall," not "may," deny applications that remain incomplete and do not meet the rule's criteria.

Ensure that an operator's compliance history is fully considered before granting extensions, and more clearly specify what types of violations will result in denial of extensions.

- Establish administrative penalties for rule violations and false affirmations for transfers as required by SB 1150, with bigger penalties for falsification and repeat offenses.

-Set clear metrics for a good-faith transfer & make operators submit evidence to substantiate their claim.

-Give notice and standing to surface & mineral owners for observing well tests and participating in transfer & extension proceedings. Give landowners the opportunity to protest, and operators the opportunity to prove their good-faith claim to operate and maintain 15/25 wells, or make them plug the wells.

- Maintain public, searchable information on applications, compliance plans, why and which wells are granted extensions, and whether the operator is complying with its declared plan.

Thank you,
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