From: clarissacipcic88@gmail.com
Sent: Friday, November 20, 2026 12:30 PM
To: Rules Coordinator
Subject: Public Comment — Proposed Amendments to Rules 3.15 and 3.58 (Senate Bill 1150) — Clarissa Susan Joy Cipcic, Royalty Owner, Tom Green County

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Dear Members of the Commission:

I am a royalty owner in Tom Green County, Texas, holding interests in the Mozelle 1H and Guadalcanal 1H units, and an heir of the Estate of John Paul Stephen Sutherland. Although I reside in California, my family's mineral interests are in Texas, and the Commission's decisions regarding inactive wells and operator responsibility affect owners such as myself directly.

I support Senate Bill 1150 and the proposed amendments to Rules 3.15 and 3.58. Wells that have remained inactive for fifteen years or more should not be carried indefinitely on extensions while the associated risk continues to grow. I respectfully ask the Commission to adopt these rules without weakening them, and in particular:

1. Require full-cost, per-well financial assurance. Financial assurance should reflect the actual cost of plugging the specific well, including surface restoration, and should remain with the well for its entire life, including upon any sale or transfer. A single blanket bond spread across an operator's entire inventory does not adequately protect owners or the public when an operator defaults.

2. Strengthen operator qualification. Licensing and financial assurance should ensure that an operator unable to demonstrate the capacity to plug its wells cannot continue acquiring additional wells.
The joint compliance statement required for transfers under Rule 3.58 is a sound step; I ask the Commission to retain it, together with the rule that a seller's extension does not carry over to a buyer.

3. Provide notice to mineral and surface owners. Owners should receive notice when wells on their property are transferred and when extensions are requested for long-inactive wells on their property, and owners should have standing to be heard in those proceedings. In my own family's experience, interests remained in an estate for years while heirs were left uninformed regarding their own minerals. Owners cannot protect what they are never told about.

4. Maintain strict definitions. "Returned to operation" should mean genuine production in paying quantities, not a token restart, and financial hardship should be documented and narrowly defined, so that the exceptions do not displace the rule.

5. Require licensing and insurance for the sale of mineral rights. I ask the Commission to support — and to adopt wherever it holds the authority — licensing and insurance requirements governing the purchase and sale of mineral rights, so that buyers are identified, accountable, and answerable for misconduct. My own mineral interests were taken through fraud and impersonation while I was grieving my father's death. Unlicensed and unaccountable buyers are how heirs are victimized, and licensing and insurance are basic consumer protections.

6. Establish a single statewide mineral-owner database. At present, an owner holding interests in several Texas counties must search county by county, under different systems and different rules, merely to identify what she owns. Texas should maintain one statewide database in which a mineral owner may view all of her interests in a single place — their value, their most recent sale, their ownership history, and their production for the current and prior years. Operators know where owners are. They should be required to locate owners and pay them, and should be fined when they instead allow royalties to accumulate as unclaimed property, shifting that burden onto the State's Unclaimed Property Division, which already carries a substantial workload.

7. Protect new heirs. Individuals who have recently inherited mineral rights are frequently approached while they are grieving. Texas should require education for new heirs so that they are not blindsided, impose strict rules governing who may contact them and in what manner, mandate disclosure of any escrow account connected to an offer, and provide meaningful penalties for coercion, threats, and bad-faith offers. I was pressured and threatened into signing away rights for a fraction of their value. No heir should endure that experience.

8. Dedicate licensing and registration revenues to those this industry has harmed. If Texas assesses fees for the licensing, registration, and insurance of mineral-rights sales, those revenues should be put to work: a portion toward restoring Native American tribes and families whose land and mineral rights were taken from them; a portion toward the families of oilfield workers killed or burned in the course of keeping these wells in operation, so that their families are not left without support when their provider dies; a portion toward fire departments, for the equipment and protective gear required to fight oil-related fires safely; a portion toward the ambulance services and police departments that respond to oilfield emergencies and work to keep rigs and their crews out of harm's way; and a portion toward education — a hands-on children's museum devoted to the Texas oil and gas industry, perhaps in partnership with a university such as Texas A&M, where children may safely engage with real equipment and learn the true history of Texas oil and gas. The industry that profits should bear these costs.

9. Address a matter of fairness. The State of Texas's own mineral lands are exempt from property tax, while private mineral owners are taxed on their minerals each year. I ask that owners be treated fairly — that a fair balance be found — and I intend to raise this matter with the Legislature as well.

In closing, I wish to speak to the character of this industry. The oil and gas industry in Texas must improve its communication. We should be working alongside one another — not opposing one another in court, not proceeding through lawyers at every turn, and not turning against our own family members. There was a time when the people of this industry worked together and helped one another thrive. We should ask ourselves how we became an industry in which corruption and deception, backstabbing and betrayal, and the illegal transfer of minerals behind an owner's back are tolerated at all. We have the opportunity to restore this industry's standing — to make it once again an industry known for virtue and integrity, and a community in the truest sense.
That is my hope for the oil and gas industry in Texas.

The cost of plugging a well belongs to the operator who profited from it — not to royalty owners, not to landowners, and not to the taxpayers of Texas. Thank you for the opportunity to comment, and for extending the comment period so that owners outside Texas could be heard.

Respectfully submitted,
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