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Rules Coordinator

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To the Honorable Chairman and Commissioners of the Railroad Commission of Texas:

On behalf of the Texas Land and Mineral Owners Association (TLMA), I respectfully submit the following comments regarding the proposed amendments to 16 TAC Chapter 3.15 and 16 TAC §3.107 implementing House Bill 2663, authored by Chairman Drew Darby and enacted by the 89th Texas Legislature.

TLMA is a statewide advocacy organization representing more than 600 members who are mineral and royalty owners, landowners, farmers, and ranchers across Texas.

For years, inactive wells have created serious challenges for our members. Many landowners have endured physical damage to their property long before the devastating Panhandle wildfires of 2024 drew statewide attention to this issue. The consequences of neglect are both economic and environmental, and they fall disproportionately on landowners who often lack standing in oil and gas leasing negotiations.

We commend the Legislature and the Commission for taking steps to address the growing problem of inactive wells. The removal of electrical equipment is a vital component of these reforms. What may appear to be a minor change has the potential to prevent millions of dollars in losses and protect landowners from the continued impacts of operator negligence.

TLMA appreciates the opportunity to participate in this rulemaking process and strongly urges the Commission to adopt these proposed rules. We further encourage the Commission to enforce them vigorously, including the imposition of maximum penalties on violators, to ensure meaningful compliance.

Thank you for your consideration of our comments.

Sincerely,

Jennifer Owen

Executive Director

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