November 5, 2026
Rules Coordinator
Railroad Commission of Texas

Re: Public Input for SB 1150 Rulemaking

To the Rules Coordinator:

Nearly 175 people submitted comments via Commission Shift and the Environmental Defense Fund's online form asking for our recommendations to be made during the SB 1150 Rulemaking.

Here is the message submitted by 117 signers:

> Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.
>
> **Limit Extensions and Shut Down Loopholes**
> -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations.
> -Define "Hardship": Do not grant extensions to companies just for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells.
> -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations.
> -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify.
>
> **Make Sure Wells Are Safe**
> -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging

extensions for all ages of inactive wells in those zones, as the risk of well failure is too high.
-Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results.
-Risk-Based Prioritization: Apply the RRC's "orphaned well prioritization system" to an operator's inactive fleet to address the most hazardous wells first.
-Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up.

Strengthen Rules to Stop Bad Transfers
-Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells.
-Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership.
-Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions.

Accountability and Transparency
-Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses.
-Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells.
-Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.

Signed,

Anderson, Craig	Flower Mound,	TX	75022-5656
Ashe, Tessie	Magnolia,	TX	77355-5322
Austin, Rachel	Liberty Hill,	TX	78642-3831
Baird, Craig	Fort Worth,	TX	76110-1756
Barnett, Holly	Dallas,	TX	75225-5430
Barnhart, Leesa	Garrison,	TX	75946-7523

Beard, Rick	Granbury,	TX	76049-5483
Beard, Terry	Normangee,	TX	77871-2008
Blackwell, Tom	Abilene,	TX	79602-8717
Blanton, Joey	Weatherford,	TX	76087-7526
Bloodworth, Winston	Alvin,	TX	77511-0410
Boren, Debra	Sadler,	TX	76264-4148
Bowen, James	Dale,	TX	78616-3321
Bowers, Mac	Tyler,	TX	75703-6002
Brantley, Tim	Ranger,	TX	76470-6232
Braun, Gerald	College Station,	TX	77845-8382
Bridges, Hollis	Quitman,	TX	75783-5594
Bridwell, Ken	Nacogdoches,	TX	75965-2638
Briscoe, Lura	Three Rivers,	TX	78071-0128
Brock, Valerian	Houston,	TX	77007-2197
Brown, Jim	Beaumont,	TX	77706-7265
Bryant, Joe	Lubbock,	TX	79424-3919
Buhrmann, Glenda	Lubbock,	TX	79567-9004
Burns, Nathaniel	Winters,	TX	76262-6352
Carpenter, Brett	Roanoke,	TX	76935-3381
Carrillo, Sheila	Christoval,	TX	76426-9734
Castorena, Estefania	Runaway Bay,	TX	79766-9452
Chance, Carl and Vicki	Odessa,	TX	75783-4721
Choate, Sean	Quitman,	TX	76021-2505
Cook, William L	Bedford,	TX	76012-1738
Denson, Jack	Arlington,	TX	79602-4246
Dodd, Pat	Abilene,	OK	73071-8144
dodgen, leslie	Norman,	TX	78155-7425
Drawert, Benjamin	Seguin,	TX	78209-5418
Driggers, Neta	San Antonio,	TX	79549-4570
Farek, Paul	Snyder,	TX	78414-6128
Ferguson, Andrew	Corpus Christi,	TX	77471-2980
Freeman, David	Rosenberg,	TX	77493-1133
Friederich, Karl	Katy,	TX	76858-4503
Fritsch, Lee	Melvin,	TX	78945-4262
Goerlitz, Roger	La Grange,	TX	76687-2629
Green, Joshua	Thornton,	TX	75693
Harris, Robert	White Oak,	TX	75654-7100
Hart, Bobby	Henderson,	TX	76448-5605
Hennigan, Steve	Eastland,	TX	76252-4503
Herridge, Marsha	Muenster,	TX	77356-1745
Hester, Nick	Montgomery,	TX	75165-1618
Hill, Laura	Waxahachie,	TX	75654-8554
Hillert, Walden	Henderson,	TX	76859
Hoffman, Frank	Menard,	TX	75692-5629

Howard, Matt	Menard,	TX	75601-3716
Hughes, Jeremy	Waskom,	TX	77480
Huston, Terry	Longview,	TX	76234-8110
Jenkins, Marvin	Sweeny,	TX	75654
Johnson, Todd	Decatur,	TX	76458
Jones, Tom	Henderson,	TX	77058-4318
Kaufmann, Brian	Jacksboro,	TX	78410-4807
King, Dean	Houston,	TX	75001-3518
Klasing, Robert	Corpus Christi,	TX	75019-5999
Korth, Fritz	Addison,	TX	78703-5368
Kuhlmann, Peter	Coppell,	TX	76450-5810
Layne, Patricia	Austin,	TX	78731-3839
Lewis, John H	Graham,	TX	75964-1731
Lightsey, Robert	Austin,	TX	76866-4124
Lux, Lisa	Nacogdoches,	TX	76950
Mangnall-Williams, Christine	Paint Rock,	TX	76234-5572
Martin, Jimmy	Paint Rock,	TX	76437-8808
Mathisen, Pamela	Sonora,	TX	77586-4729
McCord, Clovie	Decatur,	TX	75848
Miller, Jess	Cisco,	TX	76556-2858
Miller, Troy	Seabrook,	TX	76179-5531
Montgomery, Mariann	Seabrook,	TX	76491-2453
Morgan, Rustin	Kirvin,	TX	76366-3906
Morrow, Samantha	Milano,	TX	76060-5495
Moyers, William	Fort Worth,	TX	77562-2349
Murphy, John	Woodson,	TX	75019-7314
Novak, Jeff	Holliday,	TX	78132-3897
Nunn, Jeff	Kennedale,	TX	79121-1808
Olson, Lynda	Highlands,	TX	75252-0017
Padgett, Gladys	Coppell,	TX	78659-4479
Pannell, Douglas	New Braunfels,	TX	75654-9394
Reed, Hugh	Amarillo,	TX	75840-0013
reneau, Mark	Dallas,	TX	77304-5087
Reyes, Hernan	Paige,	TX	75104-6931
Richardson, George	Henderson,	TX	78723
Richey, Robert	Fairfield,	TX	76901
Ricketts, Keith	Conroe,	TX	77389-3977
rike, timothy	Cedar Hill,	TX	75783-4618
Roach, Byron	Austin,	TX	75660
Robison, Charles	San Angelo,	TX	79720-0253
Rogers, Larry	Spring,	AZ	86442-8760
Romero, Fernando	Quitman,	TX	79549-9045
Roof, Virginia	Judson,	AZ	86351-7438

Rowland, Byron	Big Spring,	TX	75783-4999
Rudd, Ryan	Bullhead City,	TX	76366-0542
Saegert, Barbara	Snyder,	TX	78659-4266
Schaumberg, Debra	Sedona,	TX	76088-7293
Smith, Douglas	Quitman,	TX	75182-4616
Smith, JImmy Don Smith	Holliday,	TX	78746
Solise, James	Paige,	TX	77318-5076
Sowell, Dianne	Paige,	TX	77856-4517
Stockman, James	Weatherford,	TX	77515-2001
Stubbs, Helena	Sunnyvale,	TX	79054-0192
Swain, Reona	Austin,	TX	78648-1749
Toledo, Rosa	Willis,	TX	75654
Uzick, Nina	Franklin,	MD	20832-2412
Velvin, Neal	Angleton,	TX	75752
Vesely, Renee	Angleton,	TX	77905-1943
WaltonChiusa, Mary	Lefors,	TX	78142
Williams, Jeffrey	Luling,	TX	76234-5572
WIlliams, Rodney	Henderson,	TX	77051-3147
Wilson, Darrel	Olney,	TX	75644-4360
Wilson, Linda	Athens,	TX	77808-5894
Worley, Tom	Victoria,	TX	75605-6911
York, Charles	Normanna,	TX	75057
Young, Johnnie Lee	Decatur,	TX	79014-5708
Zaheer, Minnah	Houston,	TX	78737

Additionally, 51 submitters customized their message upon submission.

Anderson, William Huffman, TX 77336-2983 bander9491@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship."

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	enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Ashe, Kevin Magnolia, TX 77355-5322 ktashefamily@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages

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Baggett, Ray Holliday, TX 76366-4039 raybaggett@outlook.com	I worked for Conoco Inc for 37 years. I have extensive knowledge of the damage these abandoned wells cause. Wells should be plugged sooner than later because later will always be more expensive. Casings corrode and collapse preventing a rig from getting back to bottom so they can be plugged properly and the cost of services continue to climb. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for

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Bassham, Morgan Colorado City, TX 79512-8712 flagranch@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas

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Berryhill, Greg Santa Fe, TX 77510-8758 greg.berryhill@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment

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Blair, Matthew Ira, TX 79527-2109 matthewblair@matthewblair.com	Located on my property is the first oil well drilled in Scurry County, Texas. It was completed in 1925. It is still there. Over the next 50 years the field was drilled out, unitized, and water flooded. It is now known as the Ira 1700 unit. Has approximately 619 wells. On my property alone , consisting of about 320 acres, there remain about 35 wells. Some of them have been converted to injection wells. There might be 10 wells that are equipped and capable to produce any oil at all together with large quantities of saltwater. On my property there is also a large tank battery and a saltwater disposal well. There are also numerous flow lines, both newer and older, lying on the surface and buried, together with an entire electric grid to support each location. All the equipment is in poor to inoperable condition. Malfunctioning electrical equipment has caused at least three wildfires on my property in six years. There has been a succession of operators since the 1980s, each trying to make as much oil while spending as little as possible. The current operator is functionally bankrupt, but is still the listed as the operator for the property. The remaining wells are showing high levels of both tubing and casing head pressure. Leaks are starting to occur as are spills. Because there is a current operator, technically these are not orphan wells. Because the operator is broke, there is no money to plug wells. The bonds

	posted with the Texas Railroad Commission would be wholly inadequate to fund the work required. Because these are not orphan wells, state money is not available to plug the wells. It is a Catch-22 situation. I do not own the minerals under my tract, but it would not be to the benefit of the mineral owners to plug and abandon the entire field. An Operator might be able to produce in paying quantities from some of the wells for the benefit of both the operator and the mineral owners, but no operator will touch this field because of the giant plugging liabilities that come with it. I would like to see a public-private partnership whereby a responsible operator could still assume responsibility for and operate the most productive wells and receive state financial assistance to plug the nonproductive wells and clean up the field. In closing, and on a personal note, I am very pro oil business, and have made substantial amounts of money in various aspects of the oil business for the last 50 years. That having been said, I do feel that there is a responsibility of the "oil business" to clean up after themselves. If it can't, or won't, the State of Texas needs to take action.
Blume, Barbara League City, TX 77573-6796 axblume123@gmail.com	Protect landowners/environment •Give affected people notice/voice. Notify surface owners, nearby residents, and relevant local governments bf extension approval or compliance plan. Publish application, supporting materials, inspection findings, decision, and reasons in accessible online docket; allow written comments/request for hearing. •Make well-specific risk assessments mandatory. Require an inspection & documented evaluation of casing/wellhead condition, pressure/fluid-level test results, leaks or emissions, groundwater/surface-water risks, proximity to homes and sensitive resources, & nearby abandoned wells. Use independent experts when operator's assessment is inadequate or credible dispute. •Set clear monitoring/response requirements. For every extended well, require periodic inspections & tests, continuous or frequent monitoring where risk warrants it, rapid reporting of leaks or pressure changes, & funded emergency response plan. Publish results/promptly notify affected owners of material problems. •Protect landowners' access, safety, & property. Require notice and coordination for site visits or work, safe access routes, livestock and crop protections, prompt cleanup of spills/debris, restoration of disturbed land, & clear process for complaints & compensation. Extension should not expand an

	operator's surface-use rights. •Require credible financial backing. Before an extension, require security based on a current, well-specific estimate of plugging, remediation, monitoring, and site restoration—not nominal per-well or blanket amount. Keep the security available through transfer or insolvency, & increase it when costs/risk rise. •Make accountability public. Maintain a searchable, well-by-well record of inactivity, inspections, complaints, spills, extension dates, responsible operators, financial security, & final plugging. Audit compliance plans/report outcomes annually. Restrictions on waivers after 15 years •Require a concrete, near-term purpose. Grant an extension only for a documented, technically and economically credible plan to return the well to active use—not general claim that well might be useful someday. Require dated milestones, permits, financing, & evidence of actual progress. •Use short, nonrenewable terms. Set short initial extension, limit to one or two years, with no automatic renewal. Allow at most one further extension only after public review showing substantial milestone completion & no unresolved safety or environmental violations. Set absolute end date. •Do not let operator history substitute for well safety. A good record of plugging or reactivating other wells should not, by itself, justify extending well. Require individual well to meet current integrity, monitoring, & financial-security standards. •Make hardship relief limited/verifiable. Require audited financial evidence, consider operator's assets & related entities, & require maximum feasible security and a binding plugging schedule. Hardship should not excuse monitoring, repair, or emergency-response duties, and should not become a route to delay plugging indefinitely. •Bar extensions for serious noncompliance or elevated risk. Deny/revoke an extension for unresolved violations, failed integrity tests, leaks, significant contamination risk, inadequate security, missed milestones, or failure to report. Require immediate plugging or other protective action when a well presents an imminent threat. •Prevent evasion through transfers or reclassification. Do not reset the inactivity clock when ownership changes, and do not allow extension rights to be transferred as a workaround. Require new owner to demonstrate financial capacity & accept existing plugging schedule & obligations. •Require prompt plugging when conditions fail. If operator misses a milestone, fails a test, or lets required security lapse, extension

	should terminate automatically, subject to prompt notice and a chance to contest factual errors—not an open-ended process.
Brinkley, Anita Kilgore, TX 75662-6929 abrinkley@lisd.org	The unplugged and orphaned wells definitely need to be addressed asap. The water towers and all of the other equipment that is no longer being used needs to be used. Needs to be removed or land owners needs to be able to sell it, recycle or repurpose these materials. I understand that most of this land can not be for livestock, gardening. What it is an eyesore to the land owner and community. Thanks for listening, Anita M Brinkley 903-315-9167
Brothers, Steven West Point, TX 78963-5236 bbrothers52@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages

	of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Burns, Kevin Denver, CO 80209 Kevin@denveroil.com	Property ID: 60EC99 We can only use part of our property because of this well. We have not been able to rent out or sell our land because of the possible H2S gas hazard. This piece of land sits literally in a residential neighborhood. Surrounded by homes. This needs to be plugged asap. For the safety of the children first and the operational use for us. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15

	years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding

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Ceniceros, Glenn Pampa, TX 79065-1772 glennray_ranch@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to

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Connor, Larry Longview, TX 75605-3453 larryconnor5641@att.net	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 5 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional

	safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Ermis, Jonna El Campo, TX 77437-6206 jonna.ermis@gmail.com	We have an either inactive or orphaned well (we were told it was orphaned) on our property that has existed for at least 15 years. In that time period, we have had two or three people to come out and talk to us about plugging it, but nothing has happened. If there is a possibility of land contamination to us, wildlife, or vegetation on our property, and/or this is reducing the value of our land, we would like to see the responsible party take care of plugging it. This should not be the landowner's responsibility to pursue a remedy or financially take care of the problem. Establishing legislation or rule-making that puts these wells on a cleanup schedule, monitors the progress, and holds companies accountable is necessary. Thank you for your consideration of these suggestions. I hope you find them helpful. Jonna Ermis Landowner, Jackson Co., TX
Farrell, Jameson Houston, TX 77080-7106	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately

jamesonf7@gmail.com	address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, require operators to plug wells. My property has many inactive wells on it. Multiple of those have been inactive for over 15 years and the regulators have not been involved enough to force compliance. Those inactive wells are not tended to and I often find their old chemical totes blown across the pasture, impacted soil around the area from leaks, and have even had calves die caught up in their unmaintained perimeter fences. When these wells go inactive, they are often assigned to a contract pumper. When that happens there is no accountability or ownership on making sure those inactive wells are operated in a prudent manner. It becomes the obligation of the landowner to constantly pressure the operator to maintain their operations. In my experience, they operate by exception and but the burden on the landowner. If there is no noise from the landowner, there is no reason for them to allocate resources to maintaining those wells. Texas must put stringent requirements on inactive wells and get them plugged much sooner and without excuse. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that

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Fauber, Dan Granbury, TX 76048-5520 dancarolyn1@outlook.com	We own property in Hood County on which the FAULKNER, K. H. , Lease No.: 071330 , Well No.: 1 is located. This well has not produced since 2008. The buried natural gas pipeline, water tanks and all other supporting equipment have been removed, but this well has not been plugged. It is now an environmental and safety hazard. We need the Texas Railroad Commission to take clear, decisive action to force companies to plug these orphaned wells! Dan Fauber
Fugate, Matt Burkburnett, TX 76354-5664 mkfranch@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not

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Glass, Philip Water Valley, TX 76958-0218 info@dorper.net	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure

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Gonser, Skyler R Era, TX 76238-2032 skyler1729@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions

	and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their

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Grasich, David Lockhart, TX 78644-4770 dgrasich@yahoo.com	In the year 2000I received a letter stating that landowners with oil Wells on it, that are shut down Can be reopened with government assistance, incentives to reopen these polluting ugly machines. Before that time , I was told by the landowners that these oil whales barely produce enough oil to make its electric bills, since that time , they have been running nonstop , making noise and polluting the air with sulphuric smells that are hazardous to our health, on top of the that, coal are natural gas that it takes to run these electric machines. so now I get this letter saying that it's just a matter of time before these wells will have to be cleaned up and plugged adding more cost to the taxpayers.
Harmon, Shane and Michele Granbury, TX 76049-1843 micheleh72@Gmail.com	As a Texas property owner directly affected by an inactive well (Unique Property ID: 7F5EBD), I strongly support stricter regulations and enforcement requiring operators to properly maintain, plug, and clean up inactive oil and gas wells. I urge the Commission to strengthen the SB 1150 rulemaking by: Limiting extensions: Establish firm deadlines, restrict financial hardship exemptions, and require realistic, enforceable plugging plans. Protecting land and water: Require stronger well integrity testing, prioritize hazardous wells, and ensure prompt action when contamination or safety risks arise. Holding operators accountable: Require adequate financial assurances, including full-cost bonding

	where appropriate, and prevent well transfers to operators unable to meet cleanup obligations. Protecting property owners: Require notification of well transfers and extension requests, and provide affected landowners an opportunity to participate in relevant proceedings. Increasing transparency: Make well status, compliance records, extensions, and violations readily accessible to the public. I am particularly concerned about the inactive well affecting my property and the potential long-term risks to land, groundwater, property values, and public safety. Additionally, inactive wells and their abandoned or unused structures hinder property owners' ability to maintain and improve their land. These structures can become unsightly eyesores that negatively affect the surrounding landscape and community. Responsible plugging, cleanup, and removal of unnecessary equipment would allow property owners to restore and beautify their land, eliminating structures that no longer serve a productive purpose. The financial responsibility for plugging and cleanup should remain with the operators who benefit from these wells, not Texas landowners or taxpayers. I respectfully urge the Commission to adopt meaningful regulations, close loopholes, and enforce timely cleanup of inactive wells. Thank you for your consideration. Shane and Michele Harmon
Hartmann, Matthew White Oak, TX 75693-3815 matthewhartmann145@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards

	decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -old equipment not being used.
Henderson, Don Terrell, TX 75161-6485 dh3hins2025@yahoo.com	My Property ID: 82B040... We purchased the property, in 2020, and so far, I know of, at least 4 different people/companies, that have had control of our lease. There have been several leaks, since then, and I have been in contact with the Abilene RRC office, during that time. Matthew Pippin has been very attentive, to my complaints, and I feel like that may be the reason that we have had no pumping activity for SEVERAL months (2 years). Besides the leaks, my next complaint is that there is OLD pipe, a Pump Jack,

	and various parts, scattered all over the property. 3)Several of the wells have no panels to keep livestock away from the well. 4)The tank battery fence is in complete dis-repair, and the gate is laying on the ground. 5)The man who runs cattle, on our place, has pulled his cattle off, when a new leak shows up, because he doesn't trust anyone to clean things up. My Dad was a ranch manager, most of my life, and we bought the property so that our boys, and our grand-children, would have a place to hunt, trap, and get outdoors. However, we are still finding junk from YEARS of letting the next guy clean it up. The Abilene RRC has copies of the photo's that I have sent in, previously. Any help with this matter will be appreciated! DH
Hoppe, Bill Nacogdoches, TX 75963-1425 bhoppe1952@gmail.com	There are 3 wells on my property-- 1 inactive and 2 submarginal producing wells. The estimated costs for the State of Texas to plug these well using public funds, if necessary, is over $1 MILLION! I recommend the RRC enact language similar to the below to establish the rules that will implement SB 1150 and help determine its effectiveness. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas

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Jones, Dennis Gladewater, TX 75647-5853	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission,

jones.dennis55@gmail.com	which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than

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Keuer, SHANNON Tyler, TX 75711-7028 skeuer@peltier.net	I am submitting these comments as a Texas surface landowner regarding the proposed rules implementing Senate Bill 1150 and addressing the growing problem of inactive and abandoned oil and gas wells. We own property on which an inactive oil well is located. We have no ownership interest in the mineral rights, no involvement in the oil and gas operations, and have never received any financial benefit from the well. We have no authority to operate, maintain, or plug the well. I support efforts to strengthen operator accountability and ensure that inactive wells are properly maintained and ultimately plugged. However, I believe it is essential that the rules expressly protect surface landowners who have no involvement in oil and gas operations from being held financially responsible for abandoned wells. I respectfully request that the Commission incorporate the following protections into its rulemaking: 1. Explicit Protection Against Surface Landowner Liability The rules should clearly establish that surface landowners who are not operators, mineral interest owners, or otherwise legally responsible parties cannot be assessed or held liable for the cost of plugging abandoned wells simply because those wells are located on their property. Ownership of the surface estate should not create financial responsibility for oil and gas

	operations over which the landowner has no control and from which the landowner has received no financial benefit. 2. Operator Financial Responsibility Operators should be required to maintain sufficient financial assurance to cover the actual cost of plugging their wells. These obligations should remain with the legally responsible parties and should not be transferred to innocent surface landowners when an operator becomes insolvent, abandons a well, or otherwise fails to meet its obligations. 3. State-Funded Plugging and Cost Recovery When the State of Texas must step in to plug an abandoned well, the Commission should pursue reimbursement from legally responsible operators and other parties liable under Texas law. If those costs cannot be recovered, they should not be passed along to a surface landowner who had no participation in the underlying oil and gas operations. 4. Notification and Landowner Rights Surface landowners should receive notification of well transfers, plugging extensions, changes in operator responsibility, and any determination that a well has become orphaned. Landowners should also have an opportunity to provide information and express concerns regarding wells located on their property, particularly when those wells present potential environmental, safety, or property-related risks. 5. Preventing Future Abandoned Well Liabilities I support stricter requirements for plugging extensions, meaningful financial assurance, and greater scrutiny of transfers to operators who may lack the financial ability to fulfill their plugging obligations. These safeguards are important to prevent operators from abandoning their responsibilities and leaving the consequences to the State of Texas and affected property owners. Conclusion Texas surface landowners should not be placed in the position of inheriting financial obligations associated with oil and gas operations in which they have no ownership interest, no decision-making authority, and no opportunity to benefit financially. The oil and gas industry should bear responsibility for the proper retirement of its wells. Surface landowners should not be required to pay for the failure of operators to fulfill those obligations. I respectfully urge the Commission to include explicit protections for non-operating surface landowners in the final rules implementing SB 1150 and to confirm that state-funded plugging expenses will not be assessed against surface landowners solely because an abandoned well is located on their property. Thank you for considering the

	perspective of Texas property owners directly affected by this issue. Since
King Jr., Harvey Addison, TX 75001-3518 swmdean1@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's

	inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Kirksey, Joe Marshall, TX 75672-8337 captainj85@yahoo.com	The subject of extensions affected our family directly. We have a well that has been inactive for 20 years on land that has been in my wife's family since the 50's. None of the family members recall a notification being made regarding an extension that was filed by Merrit Energy. The extension went uncontested because of no communication to the landowner. Please consider the following: Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for

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Lee, Dan Mingus, TX 76463-6601 Dan.Lee@professionalflooring.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC

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Leslie, Andrew Dime Box, TX 77853 drew2000@hotmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance

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Ludwig, Herman Lavernia, TX 78121 hermanludwigjr55@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a

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Mashburn, Curtis Langtry, TX 78871-2000	Every since the Spanish Land Grants were given to Texican settlers, greedy SOBs have been buying/stealing the mineral rights out from under the surface owner. Today the vast majority of

curtis.mashburn.hr@gmail.com	mineral rights on Texas land is not owned by the surface owner due to being sold or stolen from previous surface and mineral owners over many generations. Just like Jerry Reed's song says 'She got the gold mine and I got the shaft,' rich mineral investors from California and global energy companies got the proverbial gold mine while the current surface owners got the shaft. These California investors and global energy companies now control almost all of the mineral rights in Texas except for a very few ranches that have been in the same family since the Spanish Land Grants. The current ranchers trying to make a living and only owning the surface rights, have had to deal with well operators leaving gates open, leading to loss of livestock, destruction of ranch roads and fences, pollution of surface livestock water sources, and sometimes ground water sources, deaths of livestock due to escaping natural gas and crude oil pooling on the surface. The ranchers have little to no recourse, as surface rights are always subservient to the mineral rights, and they have no way to force the well operators to be mindful of the rancher's needs, correct their behavior, and repair or make restitution for losses of the rancher due to the operators mistakes or negligence. This has gone on long enough. Now is the time to stand up to the big money and do what is right for the Texas surface owners. Just make the mineral owners and well operators be held responsible for their actions and negligence. Make them be responsible for their wells, during drilling, operation, and retirement. No mineral owner or well operator should be allowed to just walk away from a mess, their negligence, or a well that is no longer profitable. Just like wind and solar, make them clean up and restore the land back to its original condition after they are done with the wells or are no longer interested in extracting the minerals. Just do what is right for the surface owner, as it is time for the surface owner to stop getting the shaft while the mineral owner and energy companies get the gold mine.
McCathern, Robert Iowa Park, TX 76367-7203 mccathernlandandcattlellc@gmail.com	As a Texas landowner and cattle rancher in Wichita County, I strongly support SB 1150 and urge the Railroad Commission of Texas to adopt strong, enforceable rules that hold oil and gas operators accountable for properly plugging inactive wells. I own and manage 358 acres of agricultural land. I invest considerable time and money maintaining my property, improving pastures, managing livestock, and protecting its long-term productivity. My

	land represents more than a financial investment. It is something I intend to preserve for future generations. I am particularly concerned about the effects of decades of oil and gas operations on our aquifers. Historical saltwater injection, deteriorating well casings, and improperly plugged wells can create pathways for contamination. Inadequate regulatory oversight has allowed these risks to persist, potentially leaving landowners with environmental damage they did not cause and cannot afford to correct. I respectfully urge the Railroad Commission to strengthen SB 1150 implementation by incorporating the following recommendations: 1. Protect Landowner Rights: Require notification to surface and mineral owners when wells are transferred or plugging extensions are requested, and provide opportunities for affected landowners to participate in the process. 2. Protect Aquifers: Require stronger well integrity testing, evaluate historical saltwater injection and disposal operations, and prioritize plugging wells that threaten underground water resources. 3. Prevent Irresponsible Transfers: Ensure operators cannot escape plugging obligations by transferring inactive wells to financially unstable companies. Require adequate bonding and financial assurances to cover plugging costs. 4. Limit Extensions: Establish firm plugging deadlines, restrict repeated extensions, and require operators claiming financial hardship to provide documented justification and realistic compliance plans. 5. Strengthen Accountability: Establish meaningful penalties for noncompliance, consider operators' compliance histories when granting extensions, and make well status and extension information publicly accessible. The companies that profit from extracting our natural resources must also accept responsibility for properly maintaining and plugging their wells. As landowners, we are expected to maintain our property, pay our taxes, and meet our obligations. Oil and gas operators should be held to the same standard. My greatest concern is that once an aquifer becomes contaminated, the damage may be irreversible. We cannot continue allowing operators to delay their responsibilities while landowners and taxpayers bear the long-term risks and costs. SB 1150 received overwhelming bipartisan support. The Railroad Commission should honor the Legislature's intent by closing loopholes, limiting unnecessary extensions, and enforcing meaningful protections for Texas landowners and natural resources.

Mcmillian, Robert Odessa, TX 79764-1044 mcmillian.robert91@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional

	safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Meazell, James Trent, TX 79561-4218 jamesmeazell@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books,

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Moran, Patrick College Station, TX 77845 moranpatrickj@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. ALL TOO OFTEN A NONVIABLE WELL IS RESTARTED BRIEFLY AND WITHOUT MEANINGFUL PRODUCTION JUST TO MEET REQUIREMENTS TO KICK THE RESPONSIBILITY FOR PLUGGING IT DOWN THE ROAD. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity

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Oppermann, Bruce Lexington, TX 78947-5045 bruce.oppermann@yahoo.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship

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Otts, ELIZABETH Graham, TX 76450-0672 bethotts.wadkins@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No

	Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Packard, Trenton White Deer, TX 79097-3014	As a private landowner in the great state of Texas, it pains me to see the lack of accountability the oil companies have been held to regarding inactive oil and gas production. I currently own a half section of land that has 13 inactive wells on it. I understand the

trentonp123@gmail.com	cost of production and understand why the wells are inactive, that should not be an excuse for the operator to allow the lease to fall apart. Aside from the 13 wells scattered amongst my land there is also 3 different sets of tank batteries on my land along county roads. All of this has been inactive or unused since the fall of 2020 to my best remembrance. We had a major ice storm the fall of 2020 which led to numerous powerlines falling, several of which belong to the operator of these leases, that I had to go clean up myself. The current operator has done a much better job than the previous operators at communicating with me what they were doing and why which I greatly appreciate. They take more pride in doing their job than many others I see. That being said, I'm sorry you spent good money on a bad investment, but these wells need to be plugged and cleaned up if they aren't going to be in production. They've been sitting inactive for at least 6 years now. I would much appreciate if the wells were plugged and the tank battery sites cleaned up and gone. Thank you, Trenton Packard
Pastor, Vivian Cypress, TX 77429 hello@vivianpastor.con	Please strengthen the SB1150 rules to protect landowners and hold operators accountable for inactive wells. My family has owned land in Tomball for more than 30 years, but an inactive well and pipeline easements dating back to the 1930s have repeatedly driven away buyers and effectively prevented development. Tandem Energy Corporation is listed as the well's operator. We have hired an attorney, face potential costs exceeding $100,000 to resolve these issues, and continue paying rising property taxes while our land remains difficult to use or sell. Our experience shows why these rules matter. Please limit repeated plugging extensions, establish strict and verifiable financial-hardship criteria, require funded plans with enforceable deadlines, and prevent brief restarts from resetting the clock on inactive wells. Require stronger integrity testing, prioritize hazardous wells, and ensure transfers do not move plugging obligations to companies unable to meet them. Full-cost financial assurance, meaningful penalties, public compliance records, and landowner notification and participation are essential protections. Families should not be left carrying these burdens indefinitely. Please explain what process is available to seek operator-funded plugging of the well on our property, rather than leaving the cost to us or a potential buyer, and direct us to the appropriate process for resolving the separate pipeline easement issues. We ask the Commission to

	meaningfully incorporate these protections into the rulemaking.
Pickett, Richard Liberty, TX 77575-4135 atopickett@utexas.edu	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 55 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. No mineral or royalty owner would ever want a well plugged.
Roberton, John Lake Charles, LA 70605-7745 john@johnrobertson.net	I am in Bee County and have two unplugged wells that I know for sure on my property, they have not produced in approx 10 years. I contacted the operator and their response was they dont have any money. I then hired an attorney and got no where. The wells both have pump jacks on them and are an eye sore. I have left over a dozen messages with the rrc and have yet to have my phone calls returned. These wells still have casing, tubing and sucker rods in them. Oil has leaked around the well head and nothing has been done. 581130. John Robertson, manager of Jasper County Real Estate LLC
Simmons, James Burkburnett, TX 76354-3007 simmonsscott@hotmail.com	First of all, thank you for hearing our concerns. At our address the lease is directly behind our house. -We see the tank batteries from our kitchen window. We are constantly having to call the operator to either clean up around those and weed eat the 5' weeds down. They finally painted the tank batteries 2 years ago. That helped the looks some! -The water pump is exposed, cords on the ground and there is no fencing. -About a year ago the operator had the electrical power shut off and the meter was pulled. -This operator is habitual about leaving equipment and or "junk" around the wells. We have heard so many broken promises to we believe nothing he says. -Quite frankly I will be glad to see it all gone! Again, thank you for your time. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset

	-Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property.
Skoruppa, Sharon Lake Jackson, TX 77566-3198 skoruppa88@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas’ mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not

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	Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Spaethe, Matt Haslet, TX 76052-4029 gilding-stratus0z@icloud.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure

	formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and is financially able to plug their wells. The operator shall hold 15% of the cost of plugging the well in escrow at all times. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention.
Sprandel, Kelsey North Zulch, TX 77872-6402 kelseysprandel@gmail.com	• Rulemaking Comments Portal: RRC Proposed Rules Well Reference Data: • API Number: 42-313-30808 • Operator: Digger Energy LLC (Operator No. 100677 / Rees Arnim) • Lease/Well Name: Mitchell Unit 1 (Lease Owner: Don Schofield) • Plugging Order Number: 272445 (Issued July 2, 2025) • Current

	Designation: Priority Level 3 / Plugging Extension Denied/ H-9 Denied Dear Commissioners and District 03 Director, I am writing to provide dual-purpose testimony: first, as a formal public comment objecting to leniency mechanisms in the proposed rulemaking for Senate Bill 1150, and second, to file an emergency public safety complaint regarding an un-plugged, non-compliant sour gas well located within 380 feet from my home and neighboring homes also within 700 feet. The well in question—the Mitchell Unit 1 (API 42-313-30808), operated by Digger Energy LLC and lease owned by Don Schofield—was ordered by this Commission to be plugged on July 2, 2025 (Order No. 272445). Over a year has elapsed, and the well remains unplugged. This well is completed in a hazardous, high-concentration hydrogen sulfide (H2S) zone. At a distance of only 380 feet, my primary residence sits directly within the lethal Radius of Exposure (ROE) should the wellhead suffer a structural failure or atmospheric breach. Texas Natural Resources Code § 89.032, enacted via SB 1150, mandates that the Commission strictly weigh 'completions in zones containing hydrogen sulfide' and 'public safety risks' when formulating rules for long-term inactive wells. As the RRC finalizes the rules for SB 1150, I formally request the integration of the following enforcement mandates: 1. Absolute Exclusion from SB 1150 Extensions: Operators who are already subject to an active Commission Plugging Order (such as Order No. 272445) on a well within an H2S zone must be strictly prohibited from seeking new extensions, financial hardship waivers, or multi-year compliance plan phase-ins under SB 1150. Non-compliance must result in immediate state intervention. 2. Emergency Escalation of Priority 3 Status: While this well may carry a baseline administrative ranking of Priority 3, the combination of an existing plugging violation, high H2S levels, and a 380-foot proximity to a residential home constitutes an imminent threat to human life. The final rule must automatically escalate any well within 500 feet of a home to an emergency priority status. 3. Immediate State-Funded Plugging & Warrant Execution: Because Ron Schofield that has hired Digger Energy LLC has failed to execute the July 2, 2025 order, I request that the RRC immediately transition this asset into the State-Funded Orphan Well Plugging Program. The RRC should utilize available federal infrastructure funding to plug this well immediately to protect my family and my

	neighbors while seeking full cost recovery and bond forfeiture against Digger Energy LLC and its principals. Please place this formal objection into both the official SB 1150 rulemaking record and the active enforcement file for API 42-313-30808. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Stone, Mary Lee San Antonio, TX 78258-1661 mlstone145@hotmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the inactive well problem. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define "Hardship": Do not grant extensions to companies for claiming "financial hardship." This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for "Return to Operation" Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more

	rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Tuggle, Justin Stephenville, TX 76401-8892 cropdocs@gmail.com	Please consider incorporating the following recommendations into the SB1150 rulemaking to strengthen the rule and adequately address the submarginal well problem. Considerig takeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment and protecting personal and community safety. Shut Down suboptimal wells, less than 1 bbl or equivalent per day, limit operators to no extensions unless they submit a full, RRC-approved clean-up and plugging plan. Limit companies to a maximum of one financial hardship extensions and require them to demonstrate they can viably meet their asset retirement

	obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding

	transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Warbois, William Hawley, TX 79525-2348 warbois@yahoo.com	Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more

	rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC's 'orphaned well prioritization system' to an operator's inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Williamson, Jerry Eastland, TX 76448-5211 karen.l.williamson@outlook.com	There is a well on our property with an open valve into a pipeline, and according to info from local pumpers, the well has a casing leak but operator cannot justify financially plugging the well. The headwaters of the Colony Creek are located nearby. If this well does in fact have a casing leak, then we would presume product is leaking into the groundwater. Sounds like a great outcome for all Texans wishing to preserve our natural resources. Thank you for your attention. I hope to see common sense suggestions meaningfully incorporated into the rulemaking. Jerry Williamson

Wills, Johnny Henderson, TX 75652-7522 jlwills@aol.com	I have an old non-producing well on my property and would like to have it plugged. I would like to use the land for livestock and it would greatly improve the appearance of the property it the well and all the associated tanks and equipment were removed. Limit Extensions and Shut Down Loopholes -Time Limits: After a well has been inactive for 15 years, limit operators to only two extra years of extensions unless they submit a full, RRC-approved compliance plan. Limit companies to a maximum of three financial hardship extensions and require them to demonstrate they can viably meet their asset retirement obligations. -Define “Hardship”: Do not grant extensions to companies for claiming “financial hardship.” This term needs strict, measurable criteria for what qualifies (like market prices dropping drastically for months). The cost of plugging a well should not be considered a hardship, and companies should demonstrate, through a review of their books, that they are preparing for and contributing towards decommissioning costs for their wells. -Require Viable Plans: Companies must provide clear, viable plans and update them annually for plugging or returning wells to operation, exiting financial hardship, and demonstrating preparedness for future well-retirement obligations. -Real Production for “Return to Operation” Wells: If a company gets an extension by promising to bring an old well back online, the well must actually return to operation and produce in paying quantities. Briefly restarting a marginal well should not qualify. Make Sure Wells Are Safe -No Extensions in High-Risk Zones: Identify the most dangerous areas (such as those with corrosive chemicals or high-pressure formations) and consider banning plugging extensions for all ages of inactive wells in those zones, as the risk of well failure is too high. -Stronger Testing Requirements: Modernize how the RRC assesses the physical condition of wells (mechanical integrity testing) by requiring new, high-accuracy equipment; more rigorous hydraulic pressure tests (especially in high-risk zones); increased notification and witnessing requirements; and secure, accurate reporting of results. -Risk-Based Prioritization: Apply the RRC’s 'orphaned well prioritization system' to an operator’s inactive fleet to address the most hazardous wells first. -Water Protection: If a well fails an integrity test, place additional safeguards to ensure that nearby water is not contaminated and that any leaks are cleaned up. Strengthen Rules to Stop Bad

	Transfers -Good Faith Deals Only: Require a certified analysis demonstrating that the well still has economic value greater than the estimated cost to plug it, and that the new operator has a track record of compliance and appears financially able to plug their wells. -Full-Cost Bond: Encourage and require full-cost bonding whenever possible to ensure that the full cost of plugging remains with the well, regardless of ownership. -Notify Landowners: All surface and mineral owners must be notified of who is buying and selling the wells on their property, and given standing in any proceedings regarding transfers or extensions. Accountability and Transparency -Tougher Penalties: Set administrative penalties high enough to discourage bad behavior. If an operator is caught submitting fraudulent information, they should face maximum penalties, including for repeat offenses. -Compliance Scores: Create a compliance history scoring system (like a risk rating) for every operator. A low score and repeated violations should make an operator ineligible for extensions or for receiving transferred wells. -Public Data: Make information about well extensions and operator compliance accessible to the public via monthly reports or online data queries. Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the rulemaking.
Womack, Aaron Troup, TX 75789-8232 Womackranch287@gmail.com	We have a well on our property in Troup TX, and in December of 2019 one of the production tanks was struck by lighting and exploded, Buffco, the operator of the well, removed the tank and left the pipe that hooked to the tank open ended and have never done anything else to correct the issue. It looks as if in years prior that have removed production equipment and have left open ended pipe sticking up out of the ground. I contacted Bufco to ask them to come and clean up the property and they never came out. I asked a pumper while they were out on sight if he could coordinate someone to come and clean up the sight and he told me no. I then contacted the RRC to get them to come out and inspect the sight to see if there could be anything done and now I have this chance to voice my concerns about plugging and cleaning up the well sights that are no longer in use. I think Oil and Gas is valuable industry in Texas, however the operators have to be held accountable for the wells they drill and the production sights that they build. The environmental impacts that they cause by abandoning equipment with hydrocarbons and produced water in the lines and in tanks has caught up with us and has to be delt with

	in way that is feasible for the operator and the beneficial for the environment.