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From: Lisa Lucero <llucero@txoga.org>
Sent: Monday, May 12, 2014 11:58 AM
To: rulescoordinator
Cc: Cory Pomeroy; Deb Mamula; Mari Ruckel; CJ Tredway
Subject: TXOGA Comment Submission: Proposed Amendments to 16 Tex. Admin. Code §3.80, relating to Commission Oil and Gas Forms, Applications, and Filing Requirements; O&G Docket No. 20-0287605.

Sent on behalf of Cory Pomeroy, Vice President and General Counsel for the Texas Oil and Gas Association.

Rules Coordinator
Office of General Counsel
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

Re: Proposed amendments to 16 Tex. Admin. Code §3.80, relating to Commission Oil and Gas Forms, Applications, and Filing Requirements; O&G Docket No. 20-0287605.

Dear Coordinator:

The Texas Oil and Gas Association ("TXOGA") is a non-profit corporation representing the interests of the oil and gas industry in the State of Texas. Founded in 1919, TXOGA is the largest and oldest petroleum organization in Texas, representing more than 5,000 members. The membership of TXOGA produces in excess of 90 percent of Texas's crude oil and natural gas, operates nearly 100 percent of the state's refining capacity, and is responsible for the vast majority of the state's pipelines. In 2012, the oil and gas industry employed 369,000 Texans, providing wages and salaries of over \$44 billion in Texas alone. In addition, large associated capital investments by the oil and gas industry generate significant secondary economic benefits for Texas.

TXOGA appreciates the opportunity to submit comments relating to proposed amendments to 16 Tex. Admin. Code §3.80 ("Rule 3.80"). Our members worked closely with the Commission in the development of Rule 3.80 and we do have some concerns with the proposed revisions.

We support giving flexibility to staff in making nonsubstantive changes to forms as long as the data elements and requirements of the forms remain identical. Still, we ask that clear timeframes for notice of changes be specified in the rule.

Further, we ask that the current requirements of Rule 3.80 remain in place for any revisions that result in changes, including additions, or deletions, to data elements and requirements. Such changes can have significant impact on the industry, and the opportunity for full involvement should be afforded.

Should you have any questions, please contact Cory Pomeroy at cpomeroy@txoga.org or (512) 478-6631.

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