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From: rrcwebcontact@gmail.com
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To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Wednesday, August 10, 2016 10:45:37 AM

Submitted By

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Amend §3.15--inactive wells and return to production

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In regards to this proposal, I am certainly of the mindset that production, however small, is still better than no production at all. However, I do not think that a reduction in the production minimums is warranted without further reasoning behind the request. In order to validate the reduced minimum volumes to be considered an "active" well, I would suggest that operating expense data should be included. If the operator can prove that the producing well generates revenue after all expenses attributable to producing such well (including any lease operating expenses, marketing fees, transportation fees, etc.), the minimum volumes may be okay. However, I am concerned that simply producing a well regardless of economic return could potentially hurt the landowners that subject to leases requiring only production.

For what it is worth, I would not be in favor of changing the minimum requirements as proposed. I would only be in favor of such change as a supplement to the existing rule, which would require expense data to be submitted to reflect paying quantities.

Thank you for your consideration,
Kyle Haley

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