

**Kellie Martinec**

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**From:** rrcwebcontact@gmail.com  
**Sent:** Thursday, August 25, 2016 2:13 PM  
**To:** rulescoordinator  
**Subject:** Comment Form for Proposed Rulemakings



## Comments Form for Proposed Rulemakings

Date Submitted

Thursday, August 25, 2016 2:12:33 PM

Submitted By

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### Amend §3.15--inactive wells and return to production

Amend §3.15--inactive wells and return to production

I am extremely concerned with the state of our industry in this state for small operators such as myself. In particular, the W3X form requirements that have now been placed on us. The submittal of the minimum of 10% of the state estimated plugging of an inactive well, that is part of an active producing lease is ludicrous. This amount is creating an extreme burden on small operators in the present pricing environment. As long as wells on given lease are not under any RRC violation, 2 wells on a producing lease that are inactive should be under a 13B2 exception by just filing a \$100 per well fee to maintain its inactive status and not be required for plugging escrow money. \$3,000+ is significant to a lease and a small operator that make 1-2 loads (300 barrels) per month. These are very hard times on the small Texas oil and gas operator, please reconsider these requirements to make it fair and equitable to those of us who strive to be prudent in our operations. Thanks.

David Stapp