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DOCKET SERVICES
RAILROAD COMMISSION
OF TEXAS

September 19, 2016

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

Re: Proposed Amendment of 16 TAC Section 3.15, relating to Surface Equipment Removal and Inactive Wells; Docket Number 20-031256

These comments are filed on behalf of the Texas Alliance of Energy Producers (Texas Alliance). With more than 3,000 members, the Texas Alliance is the largest statewide oil and gas association serving independent energy producers and associated industries.

The Texas Alliance supports the proposed amendment change as presented by RRC staff. One of the primary functions of the RRC is to prevent waste, and the proposed definitional revision will help ensure producing wells that contribute to the tax base of Texas are not prematurely plugged.

In addition, this change in the regulatory definition is just that, a regulator's definition. It does not prevent mineral owners from including in private lease agreements drilling schedules, production requirements, or other lease specific needs as part of the lease negotiations.

Based on the Alliance analysis, the fiscal impact will likely be positive for the State, with additional revenue from marginal wells that remain active and reporting production helping meet statewide budget concerns.

Please contact me should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Tintera". The signature is written in a cursive style with a large, looping initial "J".

John Tintera
Texas Alliance of Energy Producers
Executive Vice President

Cc: Chairman David Porter
Commissioner Christy Craddick
Commissioner Ryan Sitton
Kimberly Corley, Ex. Dir.
Lori Wrotenbury, Director – Oil and Gas Division