Kellie Martinec

From:	Mari Ruckel <mruckel@txoga.org>
Sent:	Monday, September 26, 2016 11:16 AM
To:	rulescoordinator
Subject:	TXOGA Comments on SWR 15 Amendments RE: Inactive Wells Being Returned to Production
Attachments:	TXOGA Rule 15 Support Letter 092616.pdf

To: Rules Coordinator

The Texas Oil and Gas Association is pleased to submit the attached letter in support of the proposed rule amendments regarding surface equipment removal requirements and inactive wells.

Please let me know should you have any questions or need additional information.

Best,

Mari

Mari Ruckel
Vice President
Government & Regulatory Affairs
Office: (512) 478-6631
Mobile: (512) 771-2583
Email: mruckel@txoga.org

TXOGA
TEXAS OIL & GAS ASSOCIATION | SINCE 1919

TXOGA

TEXAS OIL & GAS ASSOCIATION | SINCE 1919

Jonny Jones
Chairman

D. Todd Staples
President

September 26, 2016

Railroad Commission of Texas
1701 North Congress Avenue
P.O. Box 12967
Austin, Texas 78711-2967

Chairman Porter and Commissioners:

The Texas Oil & Gas Association ("TXOGA") is a non-profit corporation representing the interests of the oil and natural gas industry in the State of Texas. Founded in 1919 and currently representing more than 5,000 members, TXOGA is the largest and oldest petroleum organization in Texas. The membership of TXOGA produces in excess of 90 percent of Texas' 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. The oil and natural gas industry not only produces the products we use every day; it anchors our state's economy. In 2015 Texas' oil and natural gas industry paid $13.8 billion in taxes and royalties that directly fund our schools, roads and emergency services.

The Texas oil and natural gas industry is the lifeblood of our economy in terms of jobs, economic activity and state and local tax revenue. The Commission has made great progress in its work on the Oilfield Relief Initiative and its commitment to ensure that the oil and natural gas industry continues to anchor our economy, protect our environment and provide for Texas families well into the future. The proposed amendments would further that effort.

TXOGA supports the Railroad Commission's proposed amendments to 16 Tex. Admin. Code § 3.15 relating to Surface Equipment Removal Requirements and Inactive Wells. These amendments remove portions of the rule which dealt with the initial orderly phase-in of additional safety requirements for the State's population of wells. Now that the requirements have been fully and successfully implemented, the phase-in can be removed. Additional changes proposed further refine the process by which a well would be considered active after a period of inactivity, which would reduce the burden on the agency and industry while more accurately reflecting the actual producing status of individual wells.

TXOGA appreciates the opportunity to comment on the proposed amendments to 16 Tex. Admin. Code § 3.15 and supports their adoption. Please do not hesitate to contact us if you have any further questions or comments.

Sincerely,

Mari Ruckel

Mari Ruckel
Vice President, Government & Regulatory Affairs