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To: [Rules Coordinator](#)
Subject: Response to Proposed Changes to Rule 8
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Dear TRRC Commissioners,

The latest changes to Rule 8 concerning pits is not applicable to the many areas of Texas where water tables are not near the surface such as the Texas Panhandle. There no data available where water contamination was caused due to a temporary pit such as used for drilling or well workovers . The overarching reach of these rules will significantly impact the operations of the small operators who operate the large majority of the low production wells. The cost associated with ground water monitoring and soil monitoring will have a detrimental impact on their ability to operate by driving costs up. These rules would result in an increase in abandoned wells and reduce the revenues that are provided to the school districts in these counties and also reduce the revenue to the state of Texas. Texas is one of the states that still has a positive environment for businesses to start and to flourish. It has been Texas' history to push back on the regulations that attempt to put the "one size fits all" approach and encourages input from industry to address "real" problems through cooperation and input. I highly encourage that the Commissioners have a serious "re-boot" of these proposed changes and request that rules put in place without evidence is a detrimental approach and will do more harm by driving more cost into the regulatory system.

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