



# RAILROAD COMMISSION OF TEXAS

## OFFICE OF GENERAL COUNSEL

### MEMORANDUM

**TO:** Chairman Wayne Christian  
Commissioner Christi Craddick  
Commissioner Ryan Sitton

**FROM:** Haley Cochran, Attorney *HCC/KM*  
Office of General Counsel

**THROUGH:** Alexander C. Schoch, General Counsel

**DATE:** October 15, 2019

**SUBJECT:** Proposed Amendments to 16 TAC §3.40, relating to Assignment of Acreage to Pooled Development and Proration Units.

October 22, 2019		
Approved	Denied	Abstain
<i>MC</i>	<i>CC</i>	<i>RA</i>

Attached is Staff's recommendation to amend 16 Texas Administrative Code §3.40 to allow the same surface acreage to be assigned to more than one well in an unconventional fracture treated (UFT) field when mineral ownership is severed at different depths below the surface.

Staff requests the Commission's approval to publish the proposed amendments in the *Texas Register* for public comment. If approved at conference on October 22nd, the proposal should appear in the November 8th issue of the *Texas Register*. The proposal and an online comment form would also be made available on the Commission's website by October 23rd, giving interested persons more than two additional weeks to review and submit comments to the Commission.

cc: Wei Wang, Executive Director  
Danny Sorrells, Director, Oil and Gas Division  
Jason Clark, Director of Agency Projects

1           The Railroad Commission of Texas proposes amendments to §3.40, relating to Assignment of  
2           Acreage to Pooled Development and Proration Units. The amendments are proposed to allow the same  
3           surface acreage to be assigned to more than one well in an unconventional fracture treated (UFT) field  
4           when mineral ownership is severed at different depths below the surface.

5           Currently, §3.40 prohibits acreage from being assigned to more than one well in a field, except in  
6           limited circumstances. The Commission recognizes significant changes have occurred in the exploration  
7           and production industry in Texas, and certain rule changes are needed to uphold the Commission's  
8           statutory requirements to prevent waste and protect correlative rights. Specifically, the Commission has  
9           determined there are circumstances in which the assignment of acreage to more than one well in a field is  
10          necessary to prevent waste and protect correlative rights. The basis for this determination arises from  
11          primarily two factors: (1) severed ownership of mineral rights at depth, and (2) technological advances  
12          that have unlocked heretofore inaccessible hydrocarbon resources in UFT fields.

13          Several years ago, Commission staff and operators in certain fields began to experience difficulty  
14          in applying the language of §3.40 because many fields contain multiple productive zones within the  
15          field's overall interval. In these same fields, private lease provisions were creating horizontal severances  
16          such that undeveloped intervals were required to be returned to lessors after some period of time. These  
17          depth severances created more than one ownership interval beneath the surface. In December 2013, the  
18          Commission recognized the limitations of §3.40 as applied to the Spraberry (Trend Area) Field and  
19          signed a final order (O&G Docket No. 7C-0283443) creating a "Rule 40 Exception Field" to allow  
20          acreage in the Spraberry to be assigned twice – to a well in the shallow portion of the field and a well in  
21          the deep portion. Since 2013, the issue with depth severances has expanded so that more fields are  
22          experiencing the same limitations with §3.40. In addition, private lease agreements are creating multiple  
23          depth severances such that even allowing duplicate assignment of acreage to wells in shallow and deep  
24          portions of a field may still limit development in UFT fields. For example, private lease agreements and  
25          other land transactions for a tract may create five or more distinct ownership intervals that vary by depth  
26          within a single field. Under current §3.40, the operator could develop one ownership interval. Under  
27          existing field rules in the Spraberry, an operator could develop two. In either scenario, at least three  
28          intervals could not be developed.

29          In 2016, the Commission established UFT fields to address the efficient production of  
30          hydrocarbons from reservoirs that exhibited certain "unconventional" characteristics. A UFT field is a  
31          field in which horizontal drilling and hydraulic fracturing must be used in order to recover resources from  
32          all or part of the field and which is developed using either vertical and horizontal drilling techniques. This

1 designation includes shale formations in which the drainage of a wellbore is based upon the area reached  
2 by the hydraulic fracturing treatments rather than conventional flow patterns. That is, in UFT fields  
3 hydrocarbon fluids do not flow beyond the spatial limits of the stimulated reservoir volume. Efficient  
4 production is not dependent upon conventional reservoir structure, stratigraphy, or native reservoir  
5 properties, but on the quality and characteristics of the fracture stimulation treatments. Therefore, the  
6 Commission recognized the need for special provisions for UFT fields through the amendments to §3.86,  
7 relating to Horizontal Drainhole Wells, adopted in 2016. Similarly, the Commission now proposes  
8 amendments to §3.40 to allow the same surface acreage to be assigned to more than one well in a UFT  
9 field when mineral ownership is severed below the surface.

10 In preparation for this proposal, Commission staff circulated an informal draft and received  
11 several comments, which informed the proposed amendments described below. The Commission  
12 appreciates the interest and participation from stakeholders.

13 Proposed amendments to §3.40(d) and (e)(1) are nonsubstantive. The amendments proposed in  
14 §3.40(d) clarify the term “multiple assignment of acreage,” and amendments to §3.40(e)(1) reorganize  
15 existing language related to assignment of acreage to horizontal and vertical wells.

16 Proposed amendments to §3.40(e)(2) provide that where ownership of the right to drill or produce  
17 from a tract in a UFT field is divided horizontally, acreage may be assigned to more than one well  
18 provided that the wells having the same wellbore profile are not completed in the same ownership  
19 interval. “Divided horizontally” means that ownership of the right to drill or produce has been divided  
20 into depth intervals defined by total vertical depth, depth relative to a specific geological contact, or some  
21 other discriminator. A tract may be “divided horizontally” even where one operator has the right to drill  
22 or produce multiple intervals on the same tract of land in the same field.

23 Proposed amendments to §3.40(e)(2)(A) require that an application for multiple assignment of  
24 acreage under subsection (e) show the upper and lower limits of the operator’s ownership interval. The  
25 interval is measured as the total vertical depth from the surface. The Commission understands that, due to  
26 geological characteristics, the total vertical depth provided by an operator will be an approximation.  
27 However, Commission staff needs this information to conduct required due diligence before granting a  
28 drilling permit.

29 The proposed amendments in §3.40(e)(2)(B) require that within 15 days prior to filing its drilling  
30 permit application, an applicant for multiple assignment of acreage shall locate any well, including wells  
31 permitted but not yet drilled or completed, that is located within one-half mile of the applicant’s proposed  
32 wellbore between the first and last take points. The applicant must use all available resources, including

1 but not limited to the Commission's GIS well database, to find wells within the one-half mile radius. The  
2 applicant shall then send written notice of its application to the P-5 address of record of each  
3 Commission-designated operator of those wells.

4 Proposed amendments to §3.40(e)(2)(C) provide a right to request a hearing to a person who was  
5 entitled to notice but claims he or she did not receive it. If the Commission determines at a hearing that  
6 the applicant did not provide the notice as required by this subsection, the Commission may cancel the  
7 permit.

8 Proposed amendments to §3.40(e)(2)(D) provide a method for obtaining copies of directional  
9 surveys, and proposed amendments to §3.40(e)(2)(E) clarify that field density rules will apply separately  
10 to each ownership interval.

11 Proposed amendments to §3.40(e)(2)(F) clarify that upon the effective date of the proposed rule  
12 amendments, which will be added at such time as the amendments are adopted, existing field rules that  
13 allow assignment of acreage to more than one well in a UFT field are superseded by §3.40. Subparagraph  
14 (F) also prohibits field rule applications regarding multiple assignment of acreage in UFT fields until two  
15 years after the effective date of the proposed amendments. Several comments on the informal draft  
16 requested removing this provision. The commenters believed a ban on field rule applications would be  
17 unduly prejudicial. The Commission disagrees. Commission staff must develop and learn new procedures  
18 to implement the proposed amendments, if adopted. If, after adoption of any amendments to §3.40, field  
19 rule amendments were adopted to create different requirements for each field, then Commission staff  
20 would have to develop and learn different procedures for each field. Therefore, the Commission proposes  
21 a hold on field rule applications to allow Commission staff time to test these procedures and resolve any  
22 issues before making piecemeal changes. The amendments are proposed with a minor change to the  
23 informal draft language such that field rule applications may be submitted two years after the effective  
24 date of the rule amendments. The Commission also notes that the temporary prohibition would only apply  
25 to UFT fields and only to field rule applications addressing multiple assignment of acreage. In addition,  
26 operators would still have the opportunity to seek relief from §3.40 by applying for an exception for an  
27 individual well or lease.

28 Proposed new §3.40(e)(3) allows the Commission to require non-confidential information  
29 supporting the operator's right to drill or produce in the interval indicated on the operator's drilling permit  
30 application.

31 Proposed new §3.40(f) allows the Oil and Gas Director or the director's delegate to resolve  
32 existing instances of multiple assignment of acreage upon an operator's written request and for good

1 cause shown. If such a request is administratively denied, the operator shall have a right to request a  
2 hearing to review the denial. The term “existing” is not meant to apply only to instances of multiple  
3 assignment of acreage existing at the time of the adoption of proposed amendments but is intended to  
4 apply to instances of multiple assignment of acreage existing at the time of the written request for relief.  
5 In other words, the relief proposed in subsection (f) can be requested for good cause when acreage is  
6 assigned to more than one well and the subject wells have already been drilled or completed.

7 Proposed new §3.40(g) formalizes the process for obtaining an exception to §3.40. If an operator  
8 does not qualify for multiple assignment of acreage under subsection (e), acreage cannot be assigned to  
9 more than one well unless the operator is granted an exception after public hearing held after notice to all  
10 persons described in subsection (g).

11 Jason Clark, Director of Agency Projects, has determined that for each year of the first five years  
12 the amendments as proposed will be in effect, there will be minimal fiscal implications to the  
13 Commission as a result of enforcing or administering the amendments. Any costs associated with the  
14 amendments would be due to minor programming to update online systems. There will be no fiscal effect  
15 on local government.

16 Mr. Clark has determined that for the first five years the proposed amendments are in effect, the  
17 primary public benefit will be increased development of resources.

18 Mr. Clark has determined that for each year of the first five years that the amendments will be in  
19 effect, there will be no economic costs for persons required to comply as a result of adoption of the  
20 proposed amendments. The amendments would allow surface acreage to be assigned to more than one  
21 well in a UFT field.

22 The Commission has determined that the proposed amendments to §3.40 will not have an adverse  
23 economic effect on rural communities, small businesses or micro businesses. As noted above, there is no  
24 anticipated additional cost for any person required to comply with the proposed amendments. Therefore,  
25 the Commission has not prepared the economic impact statement or the regulatory flexibility analysis  
26 pursuant to Texas Government Code §2006.002.

27 The Commission has also determined that the proposed amendments will not affect a local  
28 economy. Therefore, the Commission has not prepared a local employment impact statement pursuant to  
29 Texas Government Code §2001.022.

30 The Commission has determined that the amendments do not meet the statutory definition of a  
31 major environmental rule as set forth in Texas Government Code, §2001.0225(a); therefore, a regulatory  
32 analysis conducted pursuant to that section is not required.

1           During the first five years that the rules would be in effect, the proposed amendments would not:  
2 create or eliminate a government program; create or eliminate any employee positions; require an increase  
3 or decrease in future legislative appropriations; create a new regulation; increase or decrease the number  
4 of individuals subject to the rule's applicability; expand, limit, or repeal an existing regulation; or effect  
5 the state's economy. The proposed amendments may increase fees paid to the agency. Because the  
6 amendments would allow increased development in UFT fields, the Commission may receive more  
7 drilling permit applications and corresponding fees.

8           Comments on the proposed amendments may be submitted to Rules Coordinator, Office of  
9 General Counsel, Railroad Commission of Texas, P.O. Box 12967, Austin, Texas 78711-2967; online at  
10 [www.rrc.texas.gov/general-counsel/rules/comment-form-for-proposed-rulemakings](http://www.rrc.texas.gov/general-counsel/rules/comment-form-for-proposed-rulemakings); or by electronic mail  
11 to [rulescoordinator@rrc.texas.gov](mailto:rulescoordinator@rrc.texas.gov). The Commission will accept comments until 12:00 noon on Monday,  
12 December 9, 2019. The Commission finds that this comment period is reasonable because the proposal  
13 and an online comment form will be available on the Commission's website more than two weeks prior to  
14 *Texas Register* publication of the proposal, giving interested persons additional time to review, analyze,  
15 draft, and submit comments. The Commission cannot guarantee that comments submitted after the  
16 deadline will be considered. For further information, call Mr. Clark at (512) 463-2655. The status of  
17 Commission rulemakings in progress is available at [www.rrc.texas.gov/general-counsel/rules/proposed-](http://www.rrc.texas.gov/general-counsel/rules/proposed-rules)  
18 [rules](http://www.rrc.texas.gov/general-counsel/rules/proposed-rules).

19           The Commission proposes the amendments to §3.40 pursuant to Texas Natural Resources Code  
20 §§81.051 and 81.052, which provide the Commission with jurisdiction over all persons owning or  
21 engaged in drilling or operating oil or gas wells in Texas and the authority to adopt all necessary rules for  
22 governing and regulating persons and their operations under the jurisdiction of the Commission; Texas  
23 Natural Resources Code, Chapter 102, which gives the Commission the authority to establish pooled units  
24 for the purpose of avoiding the drilling of unnecessary wells, protecting correlative rights, or preventing  
25 waste; and Texas Natural Resources Code §§85.201 - 85.202, which require the Commission to adopt and  
26 enforce rules and orders for the conservation and prevention of waste of oil and gas, and specifically for  
27 drilling of wells, preserving a record of the drilling of wells, and requiring records to be kept and reports  
28 to be made.

29           Statutory authority: Texas Natural Resources Code §§81.051, 81.052, 85.201, 85.202 and Chapter  
30 102.

31           Cross reference to statute: Texas Natural Resources Code Chapters 81, 85, and 102.  
32

1 §3.40. Assignment of Acreage to Pooled Development and Proration Units.

2 (a) An operator may pool acreage, in accordance with appropriate contractual authority and  
3 applicable field rules, for the purpose of creating a drilling unit or proration unit by filing an original  
4 certified plat delineating the pooled unit and a Certificate of Pooling Authority, Form P-12, according to  
5 the following requirements:

6 (1) Each tract in the certified plat shall be identified with an outline and a tract identifier  
7 that corresponds to the tract identifier listed on Form P-12.

8 (2) The operator shall provide information on Form P-12, accurately and according to the  
9 instructions on the form.

10 (A) The operator shall separately list each tract committed to the pooled unit by  
11 authority granted to the operator.

12 (B) For each tract listed on Form P-12, the operator shall state the number of  
13 acres contained within the tract. The operator shall indicate by checking the appropriate box on Form P-  
14 12 if, within an individual tract, there exists a non-pooled and/or unleased interest.

15 (C) The operator shall state on Form P-12 the total number of acres in the pooled  
16 unit. The total number of acres in the pooled unit shall equal the sum of all acres in each ~~individual~~ tract  
17 listed. The total acreage shown on Form P-12 shall only include tracts in which the operator holds a  
18 leased or ownership interest in the minerals or other contractual authority to include the tract in the pooled  
19 unit.

20 (D) If a pooled unit contains more tracts than can be listed on a single Form P-12,  
21 the operator shall file as many additional Forms P-12 as necessary to list each pooled tract individually.  
22 The additional Forms P-12 shall be numbered in sequence.

23 (E) The operator shall provide the requested identification and contact  
24 information on Form P-12.

1 (F) The operator shall certify the information on Form P-12 by signing and  
2 dating the form.

3 (3) Failure to timely file the required information on the certified plat or Form P-12 may  
4 result in the dismissal of the W-1 application. "Timely" means within three months of the Commission  
5 notifying the operator of the need for additional information on the certified plat and/or Form P-12.

6 (4) The operator shall file Form P-12 and a certified plat in the following instances:

7 (A) with the drilling permit application when two or more tracts are joined to  
8 form a pooled unit for Commission purposes;

9 (B) with the initial completion report if any information reported on Form P-12  
10 has changed since the filing of the drilling permit application;

11 (C) to designate a pooled unit formed after a completion report has been filed; or

12 (D) to designate a change in a pooled unit previously recognized by the  
13 Commission. The operator shall file any changes to a pooled unit in accordance with the requirements of  
14 §3.38(d)(3) of this title (relating to Well Densities).

15 (b) If a tract to be pooled has an outstanding interest for which pooling authority does not exist,  
16 the tract may be assigned to a unit where authority exists in the remaining undivided interest[;]  
17 provided[;] that total gross acreage in the tract is included for allocation purposes, and the certificate filed  
18 with the Commission shows that a certain undivided interest is outstanding in the tract. The Commission  
19 may not allow an operator to assign only the operator's undivided interest out of a basic tract[;] where a  
20 nonpooled interest exists.

21 (c) The nonpooled undivided interest holder retains the development rights in the basic tract. If  
22 the development rights are exercised, the Commission grants authority to develop the basic tract, and the  
23 well is completed as a producing well on the basic tract, then the entire interest in the basic tract and any  
24 interest pooled with another tract shall be assigned to the well on the basic tract for allocation purposes.

1 Splitting of an undivided interest in a basic tract between two or more wells on two or more tracts is not  
2 acceptable.

3 (d) Multiple assignment of acreage is not permitted, except [Except] as provided in subsection (e)  
4 of this section. Multiple assignment of acreage is defined as the assignment of the same surface acreage to  
5 more than one well in a field[, acreage assigned to a well for drilling and development, or for allocation of  
6 allowable, shall not be assigned to any other well or wells completed or projected to be completed in the  
7 same field; such duplicate assignment of acreage is not acceptable]. However, this limitation shall not  
8 prevent the reformation of development or proration units so long as:

9 (1) no multiple [duplicate] assignment of acreage occurs; and

10 (2) such reformation does not violate other conservation regulations.

11 (e) In unconventional fracture treated (UFT) fields defined in §3.86 of this title (relating to  
12 Horizontal Drainhole Wells), multiple [duplicate] assignment of acreage [~~to both a horizontal well and a~~  
13 ~~vertical well for drilling and development or for allocation of allowable]~~ is permissible as follows:

14 (1) Assignment of acreage to both a horizontal well and a vertical well for drilling and  
15 development or for allocation of allowable is permissible. The field density rules apply independently to  
16 horizontal wells and vertical wells. Acreage assigned to horizontal wells shall not count against acreage  
17 assigned to vertical wells, and acreage assigned to vertical wells shall not count against acreage assigned  
18 to horizontal wells.

19 (A) [(2)] Acreage assigned to horizontal wells for drilling and development[;] or  
20 for allocation of allowable[;] shall be permissible [acceptable] so long as the horizontal well density  
21 complies with §3.38 of this title and/or special field rules, as applicable. For the purposes of this section,  
22 stacked lateral wells as defined in §3.86(a)(10) of this title are not considered assignment of acreage to  
23 multiple horizontal wells.

1                   (B) [(3)] Acreage assigned to vertical wells for drilling and development[;] or for  
2 allocation of allowable[;] shall be permissible [~~acceptable~~] so long as the vertical well density complies  
3 with §3.38 of this title and/or special field rules, as applicable.

4                   [(4) For the purposes of this section, ~~stacked lateral wells as defined in §3.86(a)(10) of~~  
5 ~~this title are not considered duplicate assignment of acreage to multiple horizontal wells.~~]

6                   (2) Where ownership of the right to drill or produce from a tract in a UFT field is divided  
7 horizontally, acreage may be assigned to more than one well provided that the wells having the same  
8 wellbore profile are not completed in the same ownership interval. For purposes of this section "divided  
9 horizontally" means that ownership of the right to drill or produce has been separated into depth intervals  
10 defined by total vertical depth, depth relative to a specific geological contact, or some other discriminator.  
11 A tract may be "divided horizontally" even where one operator has the right to drill or produce multiple  
12 intervals on the same tract of land in the same field.

13                   (A) To apply for multiple assignment of acreage under this subsection, the  
14 operator's drilling permit application shall indicate the upper and lower limits of the operator's ownership  
15 interval. The interval shown on the drilling permit application is measured as the total vertical depth from  
16 the surface.

17                   (B) Within 15 days prior to filing its drilling permit application, the applicant  
18 shall locate any well, including any wells permitted but not yet drilled or completed, that is located within  
19 one-half mile of the applicant's proposed wellbore between the first and last take points. The applicant  
20 shall then send written notice of its application to the P-5 address of record of each Commission-  
21 designated operator of the wells determined to fall within the one-half mile radius. The applicant shall  
22 attach to the notice a certified plat that clearly depicts the projected path of the wellbore and the one-half  
23 mile radius surrounding the wellbore from the first take point to the last take point. Copies of the notice,  
24 service list, and certified plat shall be filed with the drilling permit application.

1                   (C) If any person entitled to notice under this subsection did not receive notice,  
2 that person may request a hearing. If the Commission determines at a hearing that the applicant did not  
3 provide the notice as required by this subsection, the Commission may cancel the permit.

4                   (D) To mitigate the potential for wellbore collisions, the applicant shall provide  
5 copies of any directional surveys to the persons entitled to notice under this subsection, upon request,  
6 within 15 days of the applicant's receipt of a request.

7                   (E) Where ownership of the right to drill or produce from a tract in a UFT field is  
8 divided horizontally, the field density rules for the field will apply separately to each ownership interval,  
9 such that proration units on a tract above and below a division of ownership are accounted for separately.

10                   (F) Field rules that allow assignment of acreage to more than one well in UFT  
11 fields are superseded by this rule amendment, as of the effective date of this amendment. If, prior to the  
12 effective date of this amendment, an operator has assigned acreage to more than one well pursuant to  
13 previous field rules, such multiple assignment remains valid. After the effective date of this amendment,  
14 multiple assignment of acreage is not permissible unless the applicant complies with the requirements of  
15 this subsection. The Commission will not consider any applications for field rules regarding multiple  
16 assignment of acreage in UFT fields until two years after the effective date of this amendment.

17                   (3) Upon request by the Commission, an operator shall provide non-confidential  
18 information supporting its right to drill or produce in the interval indicated on its drilling permit  
19 application.

20                   (f) Upon an operator's written request and for good cause shown, the director or the director's  
21 delegate may resolve an existing instance of multiple assignment of acreage. If such a request is  
22 administratively denied, the operator shall have a right to request a hearing to review the denial.

1           (g) If an operator does not qualify for multiple assignment of acreage under subsection (e) of this  
2 section, acreage cannot be assigned to more than one well unless the operator is granted an exception after  
3 a public hearing held after notice to all persons described in paragraph (2) of this subsection.

4           (1) An operator applying for an exception must show:

5                   (A) an exception is necessary to prevent waste, prevent confiscation, or protect  
6 correlative rights;

7                   (B) ownership under the tract is divided horizontally as defined in subsection (e)  
8 of this section; and

9                   (C) the wells are not completed in the same ownership interval.

10           (2) With its application for an exception, the operator shall file the mailing addresses of  
11 all mineral interest owners within the Commission-designated field underlying the drilling unit and all  
12 mineral owners of any tracts adjacent to the drilling unit. In the event the applicant is unable after due  
13 diligence to locate the whereabouts of any person to whom notice is required by this subsection, the  
14 applicant shall publish notice of this application pursuant to §1.43 of this title (relating to Notice by  
15 Publication).

16           (3) To mitigate the potential for wellbore collisions, the applicant shall provide copies of  
17 any directional surveys to the persons entitled to notice under this subsection, upon request, within 15  
18 days of the applicant's receipt of a request.

19           (h) [(f)] If an offset, overlying, or underlying operator, or a lessee or unleased mineral interest  
20 owner determines that any operator has assigned identical acreage to two or more concurrently producing  
21 wells in violation of this section, the operator or owner may file a complaint with the Hearings Division to  
22 request that a hearing be set to consider the issues raised in the complaint. If the Commission determines  
23 after a hearing on the complaint that acreage has been assigned in violation of this section, the

1 Commission may curtail or cancel the allowable production rate for any affected wells and/or may cancel  
2 the Certificate of Compliance (Form P-4) for any affected wells for failure to comply with this section.

3 (i) [~~g~~] An operator shall file Form P-16, Acreage Designation, with each drilling permit  
4 application and with each completion report for horizontal wells in any field and for all wells in  
5 designated UFT fields as defined in §3.86 of this title. An operator assigning surface acreage to more than  
6 one well pursuant to subsection (g) of this section shall file Form P-16, Acreage Designation, with each  
7 drilling permit application and with each completion report. The operator may file Form P-16 with each  
8 drilling permit application and with each completion report for all other wells. The operator may also file  
9 proration unit plats for individual wells in a field.

10 This agency hereby certifies that the proposal has been reviewed by legal counsel and found to be  
11 within the agency's authority to adopt.

Issued in Austin, Texas on October 22, 2019.

Filed with the Office of the Secretary of State on October 22, 2019.

  
Haley Cochran  
Rules Attorney, Office of General Counsel  
Railroad Commission of Texas