



Compliance Reporting Requirements

Chapter 4 and Related Rules Overview and Compliance Update

Cassandra Quiroz
July 2025



Important Compliance Updates Section II



© 2025 Railroad Commission of Texas. All Rights Reserved.

- *Compliance Activities*
- *Electronic System Filing*
 - Division 4
 - Quarterly Reporting Template
- *Closures & Transfers*
 - Division 4 & 5
 - Closure Requirements
 - Transfer of facilities notes
- *Reclamation Form (R2)*
 - Division 8
 - R2 Form Overview
- *Responding to Notices*
- *Know your Waste Hauler*
 - Division 10
 - Profile Form
 - Waste Manifest Form

Compliance Activities



Field Inspections



Report Reviews



Closure
Requests



Reuse of Material
Request



Hauler Permits
Verifications



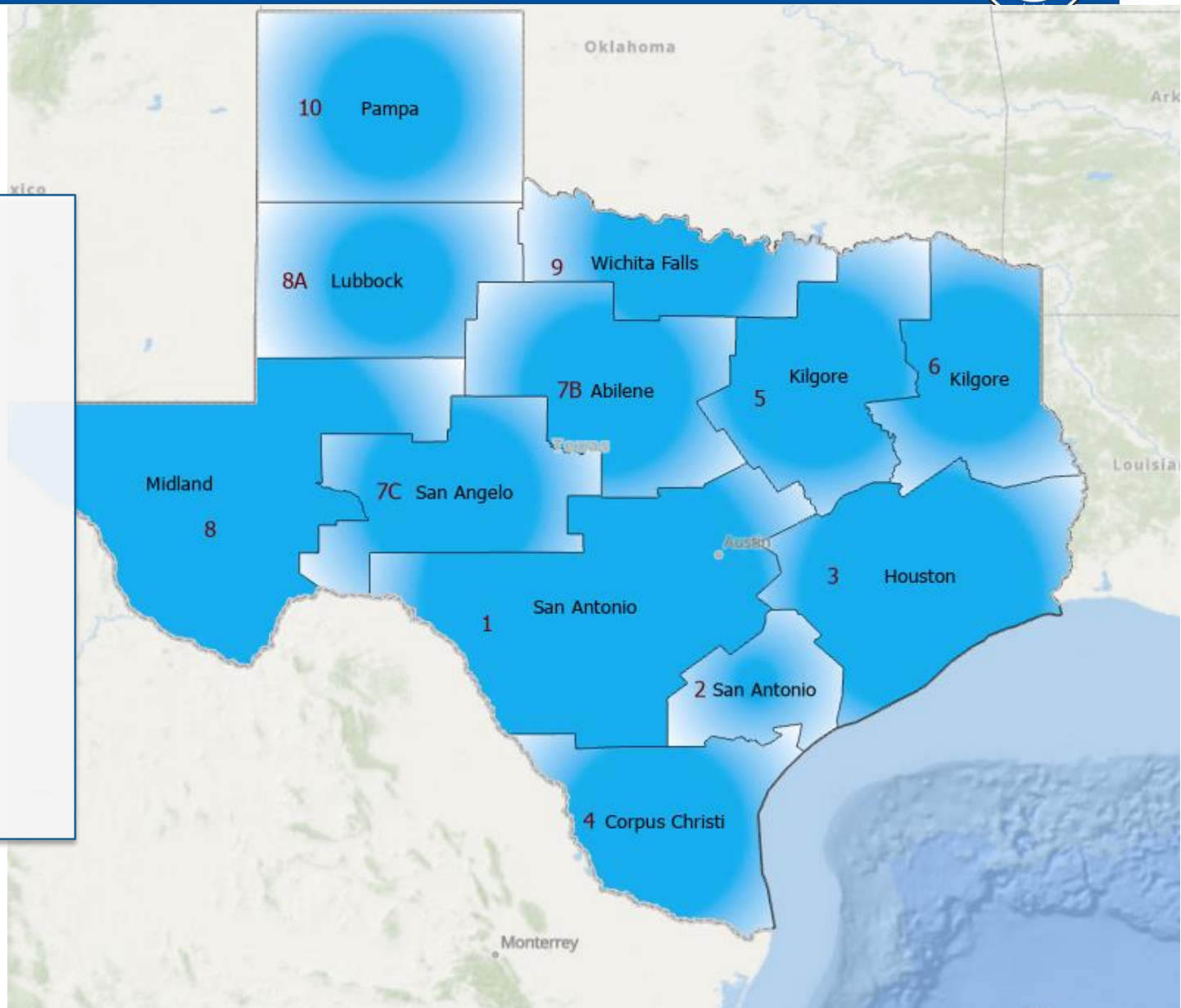
Issues RADs and
Violation Letters

District Office



Goal

To assist EPS with Statewide Rule compliance, Permit Compliance, Construction, Operating Requirements, Final Closure inspections, etc.





§4.130 (d)(4) - Electronic Filing

Reporting Requirements

The commission is developing an Electronic filing system

System in place : Reports shall be filed electronically in a digital format acceptable to the Commission.

Report Types

- › Monthly
- › Quarterly
- › Semi-annual
- › Annual
- › Monthly Reclamation (R2's)

Reminder-Quarterly Filings Schedule

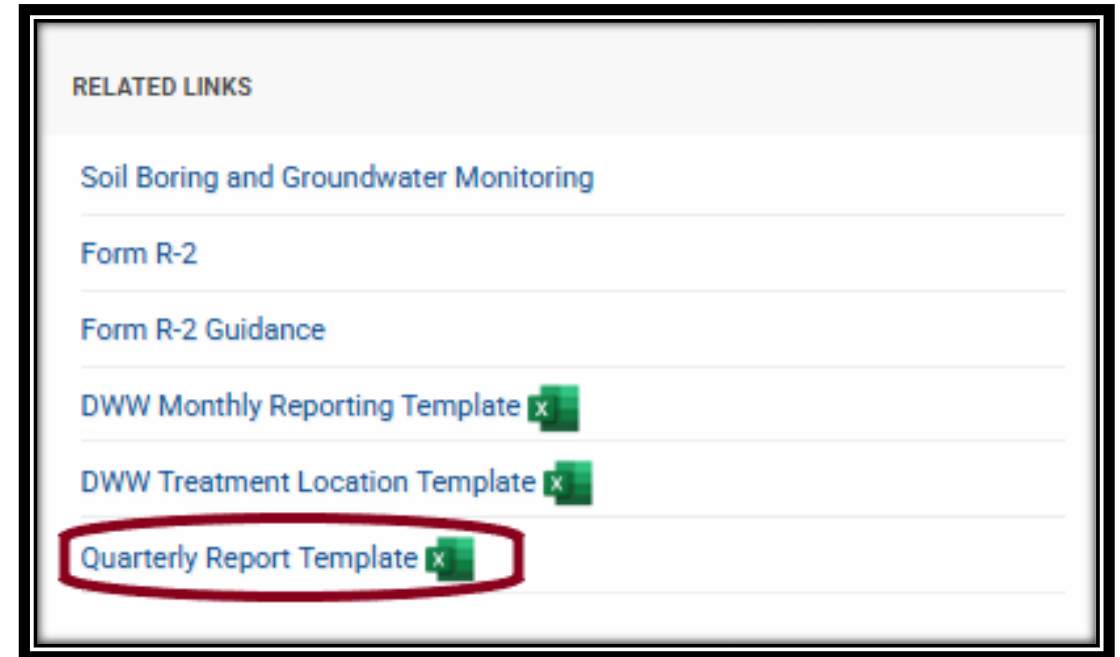


Recommended Quarterly Reporting Template



Template Includes:

- Instructions
- Checklist
- Executive Summary
- Incoming Waste testing
- LDS (Leak Detection System)
- Annual Pit Inspections
- Exceedances in Groundwater or Soil Sampling



Use the Template to File Electronically! <https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/environmental-permit-types/monitoring-and-reporting/>

Checklist



Jan - Mar 2025 (1Q2025)

Contact: _____
Phone or email: _____

Quarterly Report Checklist

Permit Condition*	General Facility Sections:	Included in report:	Included as attachment
I.S.4	Executive Summary	X	
III.H.1	● Incoming Waste	X	
III.H.1	● Incoming Waste Summary	X	
III.H.2	● Outgoing Waste	X	
III.H.2	● Outgoing Waste Summary	X	
IV.M	● Monthly facility inspection - Attachment		X
Pits:			
IV.N	● Annual Pit Inspection	X	
IV.O	● Leak Detection System	X	
Disposal Pit			
VII.E	● Disposal Pit Capacity	X	
VIII.G	● Intermediate Cover - Quarterly Inspection		
XIII.E	● Post-Closure - Quarterly Inspection		
Groundwater monitoring			
X.B	● Groundwater Gauging & Analytical Summary Table	X	X
III.D; III.E	● Analytical testing - Attachment		X

* Fill this in with the specific permit section numbers in your permit. Standard permit condition numbers have been included in this template, but permits may vary

Jan - Mar 2025 (1Q2025)

Contact: _____
Phone or email: _____

Quarterly Report Checklist

Permit Condition*	General Facility Sections:	Included in report:	Included as attachment
I.R.	Executive Summary	X	
III.H	● Incoming Waste	X	
III.H	● Incoming Waste Summary	X	
III.H	● Outgoing Waste	NA	
III.H	● Outgoing Waste Summary	NA	
IV.K	● Monthly facility inspection - Attachment		X
Pits:			
IV.L	● Annual Pit Inspection	NA	
IV.M	● Leak Detection System	X	
Disposal Pit			
#	● Disposal Pit Capacity	NA	
#	● Intermediate Cover - Quarterly Inspection		NA
#	● Post-Closure - Quarterly Inspection		NA
Recycling			
#	● Volumes processed & stockpile status	NA	
#	● Analytical testing - Attachment		NA
Mobile Recycling			
#	● Mobile Recycling Report	NA	
#	● Analytical testing - Attachment		NA
Groundwater monitoring			
X.C	● Groundwater Gauging & Analytical Summary Table	X	
X.C	● Analytical testing - Attachment		X
Soil Sampling			
#	● Soil Analytical Summary Table	NA	
#	● Analytical testing - Attachment		NA

Executive Summary



Executive Summary

(Q1 2025 January, February and March)

This executive summary (ES) has been prepared for the [REDACTED] and associated permits (Facility) located in Ector County, Texas and cover the months of January, February and March 2025 (Reporting Period).

Relevant activities that occurred during the Reporting Period are as follows:

- The [REDACTED] Landfill received 67,135 cubic yards of waste and 125,806 barrels of waste for the reporting period. The waste load information is provided in the RCT Waste Record Template in **Attachment 2**.
- Facility completed monthly inspections. Copies of the monthly inspections are provided in **Attachment 4**.
- Annual pit inspections were not conducted during Q1 of 2024.
- Groundwater monitoring was performed on 2/25/2025 in Q1. The quarterly groundwater monitoring report is provided in **Attachment 6**.
- LDS was monitored daily. The pit LDS record is provided in the [REDACTED] in **Attachment 2**. Laboratory analytical of the LDS is provided in **Attachment 7**.
- No waste was removed from the facility in Q1. All waste is interred in the disposal pit or injected via onsite saltwater disposal well.
- The quarterly final cover inspection of pit 7 is provided in **Attachment 5**.
- Laboratory analytical data from commercial oil and gas facilities was received during the first quarter of 2025 and is provided in **Attachment 3**. Upon review, approximately 436 cubic yards of waste was received from 1 commercial oil and gas facility without TOX testing. These customers have been reminded of their obligation as a commercial facility to provide TOX testing for any commercial waste as a requirement of permit condition III.E. These commercial waste loads are highlighted within the [REDACTED] Waste Record template provided in **Attachment 2**.
- Construction of disposal cell 5B is scheduled to be completed during Q2 of 2025.
- On April 11th, 2025 [REDACTED] received a Notice of Intent (NOI) letter from

Railroad Commission of Texas
Technical Permitting Department
P.O. Box 12967
Austin, Texas 78711-2967

Reference: Quarterly Report: January 1st through March 31, 2025

Permit #s: [REDACTED]

Permit Conditions: III.I, IV.K, IV.L, VI.C.3., VI.C.4., VII.D., and X.F

Executive Summary

Since the last quarterly report, [REDACTED] has not received or processed any oil-based solids/cuttings (OBS). In preparation for the RRC's annual inspections, all of the OBS, Oil-based Mud and Road Base Material was from [REDACTED] site last quarter and hauled to [REDACTED]. [REDACTED] is in the process of renewing its permit, which is now administratively complete, and we are now waiting for final approval before resuming operations.

III.I.1 Summary of Incoming Waste

No waste recieved

III.I.1.d Summary of Waste Haulers

No waste hauled.

III.I.2 Summary of Outgoing Waste

No outgoing waste to report.

III.I.3 Copies of Analysis per III.B, III.C, III.D and III.E

None this quarter.

IV.K Monthly Facility Inspection

Report Attached.



Summary of Analytical Reports



TABLE 4
General Chemistry Groundwater Analytical Results
██████████ Disposal Facility
(all results in mg/L)¹

Well Name	Sample Date	Calcium	Q ²	Magnesium	Q	Potassium	Q	Sodium	Q	Bromide	Q	Chloride	Q	Nitrate	Q	Sulfate	Q	Bicarbonate	Q	Carbonate	Q	Total Alkalinity	Q	pH ³	Q	Total Dissolved Solids	Q
MW-5	3/15/2019	155		24.2		8.9		81.3		0.6		194		11.2		23.6		342		<20.0		342		7.40		754	
	4/12/2019	120		23.0		3.5		74.0		0.8		180		8.3		20.0		260		<20.0		260		7.97		870	
	8/6/2019	130		23.0		3.5		75.0		0.9		184		8.4		25.7		265		<20.0		265		7.65		910	
	12/17/2019	140		24.0		4.0		81.0		0.8		250		9.1		25.0		260		<10.0		260		7.50	HF	760	
	3/19/2020	160		24.0		4.1		90.0		1.2		260		11.0		24.0		250		<10.0		250		7.30	HF	800	
	5/26/2020	180		26.0		4.3		88.0		0.9		300		11.0	H	24.0		250		<10.0		250		7.50	HF	1,100	
	8/18/2020	200		28.0		4.5		86.0		0.9		300		12.0		22.0		210		<10.0		210		7.10	HF	1,100	
	10/29/2020	210		29.0		4.8		91.0		1.3		370		6.1		25.0		230		<10.0		230		7.70	HF	1,200	
	3/4/2021	200		29.0		4.6		87.0		1.5		430		13.0		28.0		220		<10.0		220		7.30	HF	980	
	6/11/2021	220		31.0		4.7		89.0		1.8		410		14.0		26.0		220		<10.0		220		7.10	HF	1,300	
	8/2/2021	210		31.0		5.9		96.0		1.3		390		13.0		28.0		230		<10.0		230		7.50	HF	1,100	
	11/15/2021	200		29.0		4.7		94.0		2.2		390		12.0		29.0		250		<10.0		250		7.30	HF	1,100	
	3/3/2022	220		31.0		5.0		96.0		1.4		440		13.0		24.0		210		<10.0		210		7.20	HF	1,000	
	5/24/2022	220		31.0		4.8		93.0		1.3		450		13.0		24.0		210		<10.0		210		7.30	HF	1,200	
	8/4/2022	190		29.0		4.5		86.0		1.3		450		14.0		28.0		220		<10.0		220		7.10	HF	1,200	
	10/6/2022	220		32.0		4.7		93.0		1.4		460		14.0		29.0		210		<10.0		210		7.20	HF	1,200	
	2/6/2023	240		34.0		5.9		99.0		4.9		520		14.0		32.0		210		<10.0		210		7.20	HF	1,200	
	4/10/2023	240		34.0		5.4		99.0		1.2		450		14.0		28.0		210		<10.0		210		7.20	HF	1,000	
	7/19/2023	220		34.0		5.2		99.0		4.3		470		14.0		29.0		210		<10.0		210		7.40	HF	1,300	
	10/24/2023	220		33.0		4.9		96.0		1.2		510		6.5		31.0		220		<10.0		220		7.40	HF	1,200	
	2/13/2024	230		35.0		4.9		93.0		2.3		430		15.0		26.0		210		<10.0		210		7.30	HF	1,100	
	5/21/2024	230		33.0		4.8		98.0		1.2		370		14.0		27.0		200		<10.0		200		7.40	HF	1,200	
	8/13/2024	220		30.0		4.8		98.0		1.0		610		15.0		34.0		210		<10.0		210		7.10	HF	1,200	
	11/13/2024	220		31.0		4.8		89.0		1.1		460		15.0		32.0		210		<10.0		210		7.30	HF	1,100	
	2/18/2025	190		30.0		4.6		22.0		1.0		350		16.0		23.0		220		<10.0		220		7.30	HF	1,000	

- Notes:
 1. mg/L - milligrams per Liter
 2. Lab Qualifiers
 <- sample concentration was not detected at the Reporting Limit
 HF - field parameter with a holding time of 15 minutes. Test performed by laboratory at client's request
 H - sample was prepped or analyzed beyond the specified holding time
 3. pH reported in Standard Units
 4. MW-1, MW-2, and MW-6 have been historically dry (therefore, not sampled) and were dry for the this event.



Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: ██████████
 Hydrogeologic Engineering of Texas

Generated: ██████████

JOB DESCRIPTION

██████████

JOB NUMBER

██████████



§4.132 Closure Requirements for all Permitted Waste Management Operations

New requirements related to closure:

- › 45 days notice required
- › §4.132(b)(3) - Additional requirements may apply
- › Financial Security must remain in place through closure



Subchapter A - Division 4 - Closures



§4.132 Requirement for all Permitted Waste Management Operations Closure

General Closure Requirements	<ul style="list-style-type: none">• Remove all wastes• Notify at least 45 days before commencement of any closure operations
Closure Plan	<ul style="list-style-type: none">• Submit the Closure plan within 30 days to Technical Permitting before the commencement of any closure activity
Waste Removal and Disposal	<ul style="list-style-type: none">• Removed all waste from the site• Disposed of waste at an authorized disposal facility• Follow handling procedures
Soil and Groundwater Sampling	<ul style="list-style-type: none">• Soil samples must be collected for analysis• Groundwater monitoring is also required
Backfilling and Restoration	<ul style="list-style-type: none">• Backfilling and restoration of the site
Post-Closure Monitoring	<ul style="list-style-type: none">• Ongoing monitoring of the site may be required after closure

Subchapter A - Division 4 - Closures



I. General Closure Request

Completed	Task	Notes
<input type="checkbox"/> Yes <input type="checkbox"/> No	Submit written request for permit cancellation to TP and the District Office (DO) with a request for DO initial closure inspection	Include permit number(s)
<input type="checkbox"/> Yes <input type="checkbox"/> No	Submit hard copy of Closure Plan	Electronic submissions are not accepted

II. Initial Closure Activities

Completed	Task	Notes
<input type="checkbox"/> Yes <input type="checkbox"/> No	Provide NORM Survey	
<input type="checkbox"/> Yes <input type="checkbox"/> No	include confirmation that all waste, equipment, and contaminated soil have been removed	Provide third-party documentation if available
<input type="checkbox"/> Yes <input type="checkbox"/> No	Confirm all pits are demolished and liners disposed of off-site	Provide disposal manifest(s) if applicable
<input type="checkbox"/> Yes <input type="checkbox"/> No	Confirm all concrete pads are steam cleaned and demolished, and that the rubble and wash water are disposed of in an authorized manner	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Provide soil sampling plan results	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Include confirmation that permit-specific conditions have been addressed (older permits must meet current standards)	Reference permit terms or RRC website

III. Soil Sampling

Completed	Task	Notes
<input type="checkbox"/> Yes <input type="checkbox"/> No	Notify TP and DO at least 48 hours before sampling	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect a minimum of four (4) representative soil samples (grab) per acre and four (4) soil samples per pit (more may be required)	Based on site's size/conditions
<input type="checkbox"/> Yes <input type="checkbox"/> No	Confirm analytical lab results meet all parameter limits per permit	Attach summary table, lab reports, and chain of custody. If parameter limits are not met, see IV. Non-Compliant Results.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Submit all sampling results within 30 days of receiving lab results	

- Requires EPS approval
- EPS cannot approve release a portion of financial assurance until the closure is complete

<https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/environmental-permit-types/all-about-chapter-4/>

Reminder -Permit Transfers



Content Search

GO

RRC
APPLICATIONS

ABOUT US ▾

RESOURCES ▾

FORMS

EVENTS ▾

COMPLAINTS

ACCIDENTS ▾

CONTACT US

ESPAÑOL

Home / Oil and Gas / Applications and Permits / Environmental Permit Types

Renewal, Transfer & Amendment

Implementation for 16 TAC Chapter 4 New and Amended Rules

On December 17, 2024, The Railroad Commission (RRC) adopted revisions to 16 Texas Administrative Code (TAC) Chapter 4, Subchapter B, *relating to Commercial Recycling*, and new 16 TAC Chapter 4, Subchapter A, *relating to Oil and Gas Waste Management*. The RRC is inviting interested parties to participate in the implementation of the rules.

NOTE: The official document will be available on the Secretary of State's website July 1, 2025.
You can view the adopted revisions [here](#) and adopted penalties [here](#).

To ensure receipt of notifications related to this new rule, [subscribe to Oil & Gas News email news](#). After subscribing, please check your spam or junk folder for a confirmation email. We suggest emails from Constant Contact are marked as safe.

Proposed Implementation Timeline

RELATED LINKS

[Environmental Regulatory Cost-Cutting Measures](#)

[Notice Instructions for Commercial Facilities](#)

[Closure Cost Estimate Requirements](#)

- Permits must be transferred when operatorship changes
- Requires RRC approval

<https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/environmental-permit-types/renewal-transfer-amendment/>

Division 8 - Reclamation Form R2 Overview



Form R2 Overview

- How to Fill Out Monthly Form R2 for Reclamation Facilities:
https://www.rrc.texas.gov/media/4f3mmgll/form_r2_instructions.pdf

MONTHLY REPORT FOR RECLAIMING AND TREATING PLANTS

**RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION**

FORM R-2
Rev. 12/77
Page 1

SERIAL NUMBER _____
FOR THE MONTH OF _____, 19____

OPERATOR _____
ADDRESS _____
STREET CITY STATE ZIP

CORRECTED REPORT

STOCK ON HAND BEGINNING OF MONTH			RECEIPTS	TREATED MATERIALS			DELIVERIES		STOCK ON HAND END OF MONTH		
Net Oil and/or Other Material 1	Unprocessed Material 2	Total Stock 3	Actual Gross 4	Gross 5	Oil and/or Other Material Recovered 6	Loss of Waste 7	Net Oil 8	Other Material 9	Net Oil and/or Other Material 10	Unprocessed Material 11	Total Stock 12

COMPANY RECEIVED FROM	LETTER OF AUTHORITY DATE	(G-ESA) FORM T-5 NUMBER	ACTUAL RECEIPTS		
			CALCULATED BS & W	CALCULATED NET OIL	GROSS TOTAL

TOTALS

COMPANY DELIVERED TO	REG./SERIAL NUMBER	PLACE OF DELIVERY	TYPE MATERIAL DELIVERED	ACTUAL DELIVERY

TOTAL

— FORMULAS —
 Columns 1 + 2 = 3 (Stock on Hand Beginning of Month)
 10 + 11 = 12 (Stock on Hand End of Month)
 6 + 7 = 5 (Gross Treated Material)
 2 + 4 - 5 = 11 (Unprocessed Material)
 1 + 6 - 8 - 9 = 10 (Net Oil and/or Other Material)
 3 + 4 - 5 + 6 - 8 - 9 = 12 (Basic Formula)

METHOD OF DISPOSAL: Salt Water _____
 Solids _____

CERTIFICATE
 I declare under penalties prescribed in Sec. 91.143, Texas Natural Resources Code, that I am authorized to make this report, that this report was prepared by me or under my supervision and direction, and that data and facts stated therein are true, correct, and complete, to the best of my knowledge.

Signature _____
 Date _____ Title _____
 Name of Person (Type or Print) _____
 Telephone No. _____ Area Code _____ Number _____

Waste Transportation

Electronic Filing of Waste Hauler Permit Applications

- The RRC Access Management Process (RAMP) is the method for managing online filing accounts.
- For assistance with your RAMP account, contact HelpDesk@rrc.texas.gov.



Oil and Gas Waste Characterization & Documentation

Responsibilities:

Generator

- Waste Profile; and
- Manifest Forms

Hauler

- Active WHP

Disposal Facility

- Waste Profile; and
- Waste Manifest



Operators may use: RRC forms – OR – their own forms



§4.191 Waste profile

- › ***Requirements for Waste Transport by Vehicle***
- › Documents Characteristics of the waste
- › Accompanied by Manifest Information
- › Record-keeping requirements
- › Use is optional

Waste Profile Form



RAILROAD COMMISSION OF TEXAS
Oil & Gas Division | Technical Permitting
Waste Profile

Form EP - 9
(Rev. 07/01/25)

GENERATOR	Organization Name		
	P-5 No.		
	Facility Permit No.		
	Facility Location		
	<i>Latitude</i> <i>Longitude</i> <i>County</i>		
	Contact Name		
	Email Address		Phone No.
	CERTIFICATION: I certify that I am authorized to make this application, that this application was prepared by me or under my supervision and direction, and that the data and facts stated herein are true, correct, and complete to the best of my knowledge.		
	<i>Generators Signature</i> <i>Generators Printed Name</i> <i>Date Signed</i>		
	Waste Details		
	Waste ID		
	Waste Type		
	Physical Characteristics		
Classification			
<input type="checkbox"/> Non-Exempt Non-Hazardous <input type="checkbox"/> Exempt Non-Hazardous			
Chemical Characteristics			
Constituents			
Basis of Characterization			
Supporting Documentation			
<input type="checkbox"/> Lab Reports <input type="checkbox"/> Historical Data <input type="checkbox"/> Process Knowledge			

Operators may use: RRC forms – OR – their own forms



§4.191 Waste manifest

- › ***Requirements for Waste Transport by Vehicle***
- › Accompanied by a paper manifest
- › Manifest Information
- › Record-keeping requirements
- › Waste rejection & notification
- › Use is optional

Waste Manifest (1 of 2)



RAILROAD COMMISSION OF TEXAS
Oil & Gas Division | Technical Permitting
Waste Manifest

Form EP - 10
(Rev. 07/01/25)

GENERATOR	Organization Name				
	P-5 No.				
	Contact Name				
	Email Address				Phone No.
	Designated Facility Name				
	Lease Name/No.				
	API No.		Facility Permit No.		
	Facility Location				
	Latitude		Longitude		County
	Waste Type	RCRA Exempt?	Total Quantity	Unit Weight/Vol.	Commercial Or Non-Commercial
		<input type="checkbox"/> Y <input type="checkbox"/> N			
		<input type="checkbox"/> Y <input type="checkbox"/> N			
		<input type="checkbox"/> Y <input type="checkbox"/> N			
		<input type="checkbox"/> Y <input type="checkbox"/> N			
		<input type="checkbox"/> Y <input type="checkbox"/> N			
	<input type="checkbox"/> Y <input type="checkbox"/> N				
	<input type="checkbox"/> Y <input type="checkbox"/> N				
Description of Type 17: Other					
Out of State?		State			
<input type="checkbox"/> Y <input type="checkbox"/> N					
CERTIFICATION: I certify that I am authorized to make this application, that this application was prepared by me or under my supervision and direction, and that the data and facts stated herein are true, correct, and complete to the best of my knowledge.					
Generators Signature		Generators Printed Name		Date Signed	
HAULER	Hauler's Acknowledgment of Receipt of Materials				
	Hauler Organization Name				WHP No.
	CERTIFICATION: I certify that I am authorized to make this application, that this application was prepared by me or under my supervision and direction, and that the data and facts stated herein are true, correct, and complete to the best of my knowledge.				
	Hauler Signature		Hauler Printed Name		Date Signed
	Discrepancy		<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Other		
Details					



RAILROAD COMMISSION OF TEXAS
Oil & Gas Division | Technical Permitting
Waste Manifest

Form EP - 10
(Rev. 07/01/25)

DISPOSAL	Disposal's Acknowledgment of Receipt of Materials		
	Date of acceptance	Time of acceptance	
	CERTIFICATION: I certify that I am authorized to make this application, that this application was prepared by me or under my supervision and direction, and that the data and facts stated herein are true, correct, and complete to the best of my knowledge.		
	Disposal Signature		
	Disposal Printed Name		Date Signed
	Acceptance testing		
	Paint filter test	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	
Discrepancy		<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Other	
Details			

The generator of the oil and gas waste, the waste hauler, and the receiver shall keep for a period of three years from the date of shipment copies or electronic records of all manifests.

INSTRUCTIONS

Operators may use: RRC forms – OR – their own forms

Know Your Waste Hauler



What to Know About Waste Hauler Permits.

- WHP's must be renewed annually.
- WHP initial and renewal application fee is **\$250**.
- Submit WH Applications electronically in LoneSTAR.

What to Know BEFORE Applying for a Waste Hauler Permit.

- Operators must have an Active Organization Report (Form P-5).
- Organizations must register for an RRC Access Management Process (RAMP) account and assign a Delegated Administrator.



GUIDANCE

[Waste Hauler FAQs](#)

[Waste Haulers User Guide](#)

RELATED LINKS

[Permitted Oil & Gas Waste Haulers and Commercial Disposal Wells](#)

[Permitted Commercial Surface Waste Facilities](#)

[RRC District Map](#)

RULES

[Rule 8](#)

[Rule 98](#)

[Chapter 4](#)

Designed for:

- MOU is SWR 30
- Movement of O&G waste
 - TCEQ & RRC facilities

Chapter 4 implements §4.192:

- December 31, 2026
- Requires approval from **both** agencies
- Special Waste Authorization form



Resolving RADs



- Submit the requested information to EPS
- Failure to respond may result in a Notice Of Violation

CHRISTI CRADDICK, CHAIRMAN
WAYNE CHRISTIAN, COMMISSIONER
JIM WRIGHT, COMMISSIONER

THE STATE OF TEXAS

DANNY SORRELLS
ASSISTANT EXECUTIVE DIRECTOR
DIRECTOR, OIL AND GAS DIVISION
PAUL DUBOIS
ASSISTANT DIRECTOR, TECHNICAL PERMITTING

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

██████████

455-19
██████████

Re: **COMPLIANCE REQUEST FOR ADDITIONAL DATA (RAD)
QUARTERLY REPORT REQUIREMENTS**

██████████
Latitude, Longitude: ██████████
██████████ County, Texas
RRC District ██████████
Operator No. ██████████
Facility ID: ██████████
Permit No. ██████████

Acknowledging NOIs



CHRISTI CRADDICK, CHAIRMAN
WAYNE CHRISTIAN, COMMISSIONER
JIM WRIGHT, COMMISSIONER

THE STATE OF TEXAS

DANNY SORRELLS
ASSISTANT EXECUTIVE DIRECTOR
DIRECTOR, OIL AND GAS DIVISION
PAUL DUBOIS
ASSISTANT DIRECTOR, TECHNICAL PERMITTING

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

██████████

455-19
██████████

Re: NOTICE OF INTENT (NOI)
UTILIZING SERVICES OF UNPERMITTED CARRIER
██████████
Latitude, Longitude ██████████
County, Texas ██████████
RRC District 0X, Name ██████████
Operator No. ██████████
Facility ID: ██████████
Permit No. ██████████

The Railroad Commission of Texas (the "Commission") Statewide Rule 8 ("SWR 8"), 16 Texas Administrative Code §3.8, pertains to the regulation and management of oil and gas waste. SWR 8 sets forth requirements for protecting the waters of Texas from pollution caused by waste transportation, storage, disposal, and recycling activities associated with exploration, development, and production of oil and gas.

According to 16 TAC 3.8 (5)(A), no generator or receiver may knowingly utilize the services of a carrier to transport oil and gas wastes if the carrier is required by this rule to have a permit to transport such wastes but does not have such a permit. No carrier may knowingly utilize the services of a second carrier to transport oil and gas wastes if the second carrier is required by this rule to have a permit to transport such wastes but does not have such a permit.

██████████ indicate that ██████████ is in violation of SWR 8 for utilizing the services of ██████████ to transport oil and gas wastes within the Commission's jurisdiction when ██████████ did not have the necessary permit.

Provide a letter of acknowledgment detailing ██████████ will no longer accept waste from ██████████ or any other unpermitted carrier until the appropriate permits are obtained. The letter must be submitted to Technical Permitting no later than thirty (30) calendar days from the date of this letter to the address shown in this transmittal's footnote.

- Serves as a warning
- Submit a letter of acknowledgment and/or the appropriate information requested no later than 30 days
- If the violation occurs again, it will lead to a Notice of Violation (NOV)

Resolving NOVs



Railroad Commission of Texas, Oil and Gas Division
Technical Permitting Department
1701 North Congress Avenue
P.O. Box 12967
Austin, Texas 78711-2967
ATTN: Cassandra Quiroz

RE: **Response to
NOTICE OF VIOLATION (NOV)
PERMIT CONDITIONS VIOLATION**

Latitude, Longitude: [REDACTED]
[REDACTED] County, Texas
RRC District: [REDACTED]
Operator No. [REDACTED]
Facility ID: [REDACTED]
Permit No. [REDACTED]

The purpose of this letter is to provide a response to a Notice of Violation letter received from the Railroad Commission, dated [REDACTED] resulting from an inspection performed [REDACTED] NOV Comments are provided for reference and are shown in black text with italics. Responses are provided in GREEN text. Proposed repairs will be implemented immediately and completed within sixty (60) days of receipt of conceptual approval by the Technical Permitting Department.

Permit Condition IV.A.

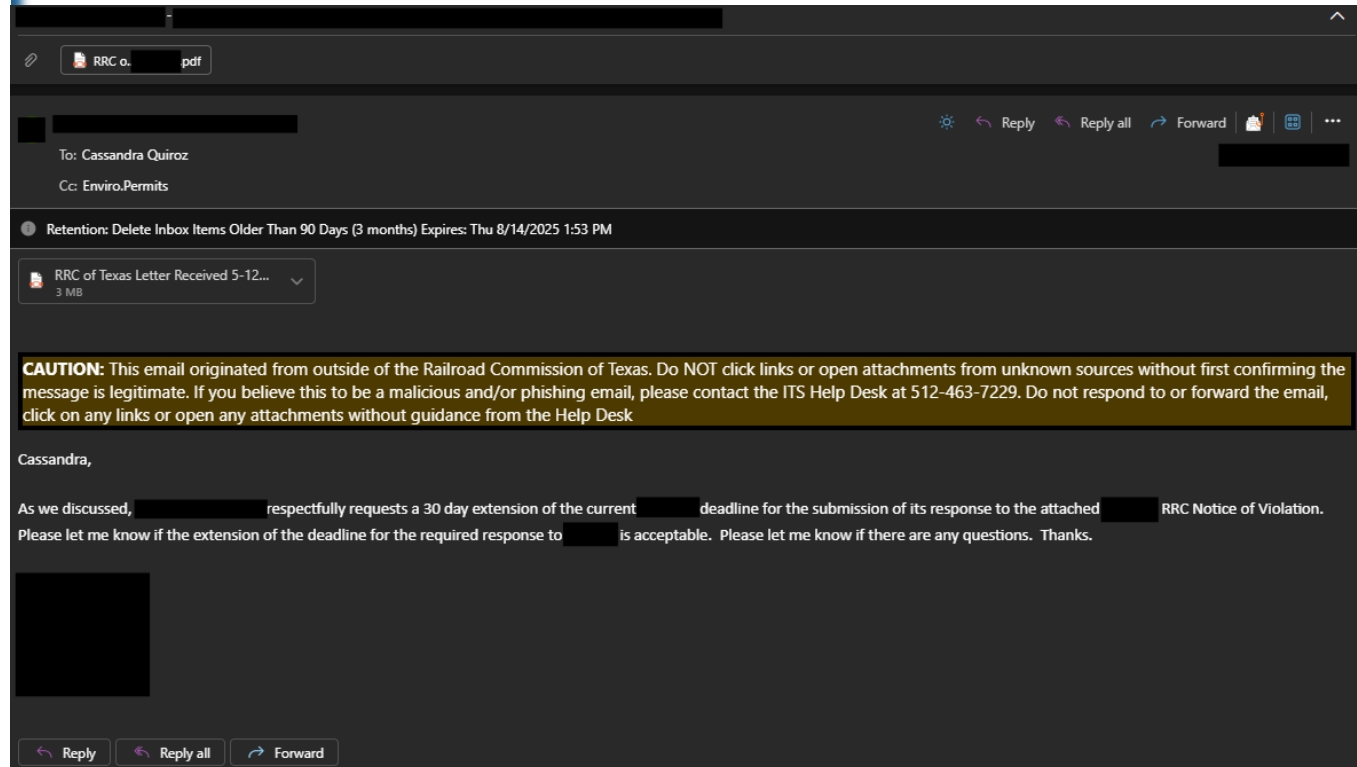
*There is a shaker located alongside the [REDACTED]
There is a shaker located alongside the [REDACTED]
There is an opening in the [REDACTED].
Figure 1, Site Map has been amended to indicate the shakers and other current conditions onsite. The Amended Site Map will be submitted for Permit Approval. The opening in the [REDACTED] was resolved [REDACTED]*

Permit Condition VI.D.

*Remove all waste, including oil, standing fluids, and treated or untreated waste, from any unapproved locations, including the ground or concrete pad. Remediate or remove all visually contaminated soil from the facility. The contaminated soil is considered waste and manifests showing that the waste has been removed for off-site disposal at an authorized facility must be provided in quarterly reports.
Waste and fluids have been removed from unapproved locations and subject areas have been remediated. The Permit condition is an ongoing maintenance/operations item which requires daily due diligence.*

Permit Condition IV.H.

*The retaining wall allows the flow of stormwater run-on to enter the three [REDACTED] containment area.
The subject area is designed to accommodate stormwater and was constructed according to the initial permit documents that contemplated the flow of stormwater into the subject area.*



Failure to respond may result in Enforcement Action



§4.107 (e) Minimum Penalty Amount or Range Table 4.107

Actual penalties determined by:

- › Enforcement Section of the Office of General Counsel
- › Administrative Law Judge and Technical Examiner (Hearings Division)
- › The Commissioners

Amount of penalty depends on:

- › Type of violation;
- › Number of days in violation
- › Number of repeated violations

Contact us



Need to make an amendment to or transfer your permit?

EPS Permitting: enviro.permits@rrc.texas.gov

Have questions about WHPs?

EPS Waste Haulers: whp@rrc.texas.gov

Have questions about reporting?

EPS Compliance: EPSCompl@rrc.texas.gov

Need to update operator contact information?

P5: P5@rrc.texas.gov

The screenshot shows the RRC website's 'Environmental Permits & Support' page. The page has a blue header with the RRC logo and navigation links: ABOUT US, RESOURCES, FORMS, EVENTS, COMPLAINTS, ACCIDENTS, CONTACT US, and ESPAÑOL. A search bar is located in the top right. The main content area is titled 'Environmental Permits & Support' and 'Oil & Gas Division'. There are three main columns of content:

- AUTHORIZED PITS**: Registration Flow Chart, Registration Flow Chart Guidance, Form EP-1 & EP-2 Guidance, Financial Security Calculator, Financial Security Calculator Instructions.
- WASTE PROFILE & MANIFEST**: Form EP-9 & EP-10 Guidance, Waste Characterization Guidance, **INTERIM FORMS**: Waste Profile Form EP-9, Waste Manifest Form EP-10.
- CONTACT US**: Permitting Phone: 512-463-3840, Waste Hauler Phone: 512-463-7371, Authorized Pit Registration Email: AuthPits@rrc.texas.gov, Permitting Email: Enviro.Permits@rrc.texas.gov, Waste Hauler Email: whp@rrc.texas.gov, Chapter 4 Questions and Permitting Application Email: EPSch4@rrc.texas.gov.

<https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/environmental-permit-types/all-about-chapter-4/>