



Statewide Rule 15 and Inactive Well Compliance

Jennifer Gilmore
July 2025





- Overview of Oil & Gas Statewide Rule 15
- The process of obtaining a plugging extension
- Form W-3C in LoneSTAR
- Form W-3X in LoneSTAR
- Enforcement process for non-compliance

Definition of an Inactive Well



Once a well has reached 12 consecutive months of no reported activity, the well becomes subject to Statewide Rule 14(b)(2) (plugging operations) unless the Commission approves a plugging extension under Statewide Rule 15.

Definition of an Active Well



Definition of a producing well:

- For Oil Wells – 5 barrels for 3 consecutive months, or 12 months of at least 1 barrel of reported production.
- For Gas Wells – 50 MCF for 3 consecutive months, or 12 consecutive months of at least 1 MCF of reported production.
- UIC wells must show at least 1 month of injection volumes in a 12-month period to be considered active

Inactive Well Extension Requirements



- Operator has a current organization report
- Well is compliant with RRC rules and orders
- Operator has a good faith claim to a continuing right to operate the well
- For inactive land wells only
- Bay/Offshore wells are excluded from the following:
 - Completion of required surface equipment cleanup/removal and certification on Form W-3C
 - Application for plugging extension and qualification on Form W-3X

Inactive Well Listing



- The P-5 renewal packet is mailed out approximately 85 days prior to the P-5 due date.
- The P-5 renewal packet contains a listing of wells that have been inactive for 12 months or longer.
- The P-5 renewal packets are now generated from LoneSTAR and are visible in the documents section of LoneSTAR.

Inactive Well Listing



RAILROAD COMMISSION OF TEXAS
LIST OF INACTIVE WELLS BY OPERATOR
ORGANIZATION REPORT (P5) RENEWAL DUE BY September 01, 2025

Page 1 OF 20
PRINTING DATE: June 04, 2025

P-5 RENEWAL DATE: September 01, 2025

FILE BY: August 01, 2025

EXPIRES: August 31, 2026

OPERATOR >



API NUMBER	LOCATION	COST CALC	SHUT-IN DATE	FORM W3C REQUIRED	INACTIVITY AS OF P5 RENEWAL DATE
O/G	DIST	LEASE	WELL NO	LEASE NAME	
079-31357	LAND	\$68,268	03/2022	N	3YRS 6MOS
Oil	8A	63279	3	SLAUGHTER, G. M.	
079-32101	LAND	\$68,582	03/2020	N	5YRS 6MOS *
Oil	8A	71195	1	FRENCH, JACK	
135-03728	LAND	\$199,864	11/2023	Y	1YRS 10MOS
Oil	08	09433	1	FEE-10	
135-03801	LAND	\$206,975	01/2024	Y	1YRS 8MOS
Oil	08	02443	9	PARKER, J. E.	
135-05360	LAND	\$203,582	01/1998	N	27YRS 8MOS **
Oil	08	02443	2	PARKER, J. E.	
135-05361	LAND	\$197,726	07/2018	N	7YRS 2MOS *
Oil	08	02443	3D	PARKER, J. E.	
135-05362	LAND	\$199,864	10/2014	N	10YRS 11MOS **
Oil	08	02443	4	PARKER, J. E.	

Surface Equipment Requirements (1 of 3)



Based on length of inactivity at P-5 renewal time determines what work the operator is required to do at the surface level on Form W-3C:

- Inactive at least 12 months
- Inactive at least 5 years but less than 10 years
- Inactive at least 10 years



Ownership of Surface: (100% ownership interest held by operator of well)

- Need not purge fluids
- Need not remove equipment
- (Electricity must still be disconnected)



Commission recognized EOR project:

- May leave equipment intended for future use within the project in place.
- (Electricity must still be disconnected, and fluids must still be purged.)

Form W-3C



Form Information

* Indicates required field

Form Name

W-3C Certification of Surface Equipment Removal for an Inactive Well

Organization *

TEST ORGANIZATION (123456)

Certification Option *

- ☐ A. Electric service to the production sites for the well(s) identified has been physically terminated, or the sites do not have electrical service. ⓘ
- ☐ B1. All piping, tanks, vessels, and equipment associated with and exclusive to the well(s) identified have been emptied or purged of production fluids; OR ⓘ
- ☐ B2. The Operator owns the surface of the land where the well(s) is located. ⓘ
- ☐ C1. All surface equipment and related piping, tanks, tank batteries, pump jacks, headers, fences, and firewalls associated with and exclusive to the well(s) identified have been removed, all open pits associated with and exclusive to the well(s) identified in this form have been closed and all junk and trash, as defined by Commission rule have been removed; OR ⓘ
- ☐ C2. The Operator owns the surface of the land where the well is located; OR ⓘ
- ☐ C3. The well is part of a Commission recognized EOR and the equipment remaining on the lease is solely associated with current and future operations of the project. ⓘ
- ☐ D. I am unable to comply with the surface equipment cleanup/removal requirements due to safety concerns or required maintenance of the well site. I have attached a written affirmation of the facts regarding the safety concerns or maintenance and request a temporary exception. (Fee set under Rule 78, Tex. Nat. Res. Code 81.0521 & Tex. Nat. Res. Code 81.070) (**\$375.00 fee per well**). ⓘ
- ☐ This well is not subject to 14(b)(2). ⓘ
- ☐ One or more wells require a removal of certification. ⓘ

W-3C Organization Information Step



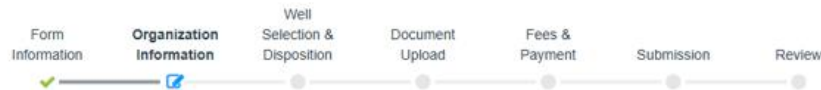
Online Forms | W-3C Certification of Surface Equipment Removal for an Inactive Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3C Certification of Surface Equipment Removal for an Inactive Well - [REDACTED]

Help

Tracking ID: 128921



Form Detail Navigation

- Form Information ✓
- Organization Information
- Well Selection & Disposition
- Document Upload
- Fees & Payment
- Submission
- Review

Organization Information

Please confirm the correct Organization has been selected, and designate contact(s) with their correct role. By default, the form submitter is selected as a contact.

* Indicates required field

Organization Long Name

Organization Short Name

Organization Primary Address

Organization Primary Phone Number

Type of Organization

Corporation (Co., Inc., Corp., or Incorporated)

RRC Operator Number

Ext

Contacts

Advanced Filtering

Actions

Name ↑	Phone Number	Email	Role	Actions
JENNIFER GILMORE		jennifer.gilmore@rrc.texas.gov	Submitter	

W-3C Well Selection & Disposition Step (1 of 2)



784

Explore Data

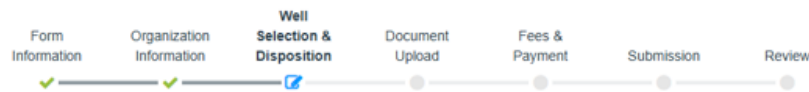
Forms

Tools

Online Forms | W-3C Certification of Surface Equipment Removal for an Inactive Well

W-3C Certification of Surface Equipment Removal for an Inactive Well - [REDACTED]

Tracking ID: 128921



Form Detail Navigation

Form Information



Organization Information



Well Selection & Disposition

Document Upload

Fees & Payment

Submission

Review

Well Selection & Disposition

By associating a well, or list of wells to this application you certify that all wells have been placed in compliance with the surface equipment removal requirements associated with the certification selected.

Certification A

Select Well(s)



Advanced Filtering

Act

<input type="checkbox"/>	API Number ↑	Shut-In Date	W-3C Status	Oil Lease/Gas ID Number	Year 1 Certification Date	Y	D
--------------------------	--------------	--------------	-------------	-------------------------	---------------------------	---	---

- ☐ Organization Name
- ☒ API Number
- ☐ District Number
- ☐ Lease Number
- ☐ Well Number
- ☐ Well Status
- ☐ Estimated Plugging Cost
- ☐ Rule 15 Inactive Well Compliance
- ☒ Shut-In Date
- ☐ W-3X Status
- ☒ W-3C Status
- ☐ Violations
- ☐ Lease Name
- ☐ County
- ☐ Field Name
- ☒ Oil Lease/Gas ID Number
- ☐ Inactivity
- ☒ Year 1 Certification Date
- ☒ Year 5 Certification Date
- ☒ Year 10 Certification Date
- ☐ 14(b)(2) Flag
- ☐ Required for Renewal?
- ☐ 14(b)(2) Data Update Required
- ☐ P-4 Approval Date
- ☐ W-3C Cert Needed

W-3C Well Selection & Disposition Step (2 of 2)



Associated Well(s)

<div><div>Advanced Filtering</div><div>Actions</div><div>Search</div></div>									
<input type="checkbox"/>	API Number ↑	Shut-In Date	W-3C Status	Oil Lease/Gas ID Number	Year 1 Certification Date	Year 5 Certification Date	Year 10 Certification Date	Missing Required Fields	Actions

W-3C Document Upload Step



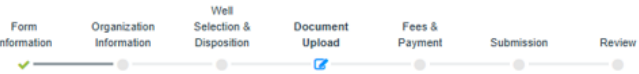
Online Forms | W-3C Certification of Surface Equipment Removal for an Inactive Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3C Certification of Surface Equipment Removal for an Inactive Well - [REDACTED]

Help

Tracking ID: 128835



Form Detail Navigation

- Form Information ✓
- Organization Information
- Well Selection & Disposition
- Document Upload
- Fees & Payment
- Submission
- Review

Document Upload

Uploaded Documents

Advanced Filtering Actions Search

Upload Date	Uploaded By	Type	Description	Filename
06/26/2025	ROXANNE ACOSTA			[REDACTED]

Back Next Save

W-3C Fees and Payments Step



764 Explore Data Forms Tools

Online Forms | W-3C Certification of Surface Equipment Removal for an Inactive Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3C Certification of Surface Equipment Removal for an Inactive Well - [REDACTED]

Help

Tracking ID: 128921



Form Detail Navigation

- Form Information ✓
- Organization Information ✓
- Well Selection & Disposition
- Document Upload
- Fees & Payment
 - Fees & Payments**
- Submission
- Review

Fees & Payments

Displayed below are current fees and payments for this Organization. You are not required to pay all pending fees. Please note that a payment processing fee will be assessed for each separate electronic payment.

Advanced Filtering Actions

Type	Name	Status	Date Paid	Amount	RMS Register Number	Actions

20 items per page

No results to display

W-3C Submission Step



Acknowledgement

Submitter

JENNIFER GILMORE

Submitter Title *

RRC Staff

Submission Date *

06/26/2025



Form Submit Preview

Click the button below to preview your submission summary.

Preview Submission Summary

Back

Submit

Save



- If applicable, your form will be reviewed by a processor for a determination
- Auto-Approval of certain options
- You will receive correspondence on your filing via the primary email(s) on file (or via mail) if no primary email address is designated

Cost Calculation Definition



- “Cost Calculation”: Estimated plugging cost based on the average per-foot cost, by district, for state funded plugging operations in the previous fiscal year. Multiply that per-foot cost times the well depth according to Commission records.

Available on the RRC website:

<http://www.rrc.texas.gov/compliance/hb2259/HB2259-CostCalculation.pdf>

Inactive Well Listing



RAILROAD COMMISSION OF TEXAS
LIST OF INACTIVE WELLS BY OPERATOR
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135-05360	LAND	\$203,582	01/1998	N	27YRS 8MOS **
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135-05361	LAND	\$197,726	07/2018	N	7YRS 2MOS *
Oil 08	02443	3D		PARKER, J. E.	
135-05362	LAND	\$199,864	10/2014	N	10YRS 11MOS **
Oil 08	02443	4		PARKER, J. E.	



Operator of an inactive land well must:

- Apply for a plugging extension by filing Form W-3X
- Qualify for an extension under one of several options.

Three blanket options

Five individual well options



Blanket Options:

- 10% plugged/restored
- If publicly traded, secured creditor status.
- Blanket additional financial security

Individual Well options:

- Abeyance of Plugging Report (Fee required)
- EOR project status (Eligibility Required)
- H-15 well test (Fee and Eligibility Required)
- Additional financial security
- Escrow deposit (10% of "Cost Calculation")

W-3X 10% Detail Information



W-3X 10% Plugging/Restoring Progress

Previous Inactive Well Count
130

Total Wells Meeting 10%
0

Percent Complete
0.000%

Total Wells Meeting 10%



Total Wells Meeting 10% : 0

APIs : 0

Carryover Wells : 0

Specific APIs for carryover wells are not available.

Carryover wells are defined as wells that were plugged in excess of the previous year's 10% renewal requirement.

Carryover wells are only eligible to carry over for 1 year.

Form W-3X



[Online Forms](#) | [W-3X Application for an Extension of Deadline for Plugging a Well](#)

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3X Application for an Extension of Deadline for Plugging a Well

[Help](#)

Form Detail Navigation

Form Information

* Indicates required field

Form Name

W-3X Application for an Extension of Deadline for Plugging an Inactive Well

Organization *

TEST ORGANIZATION (123456)

Purpose for Filing *

☐ Blanket Extension

☐ Individual Extension

☐ Remove Extension

☐ Revised Cost Calculation Update

Hard Copy Submission?

☐

Description *

[Cancel](#)

[Save & Continue](#)

W-3X Organization Information Step



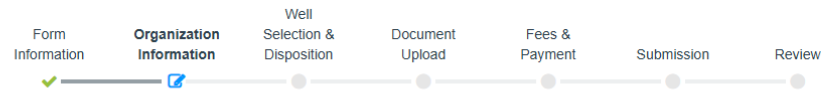
[Online Forms](#) | W-3X Application for an Extension of Deadline for Plugging a Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3X Application for an Extension of Deadline for Plugging a Well - TEST ORGANIZATION (123456)

Help

Tracking ID: 128948



Form Detail Navigation



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- Organization Information**
- Well Selection & Disposition
- Document Upload
- Fees & Payment
- Submission
- Review

Organization Information

Please confirm the correct Organization has been selected, and designate contact(s) with their correct role. By default, the form submitter is selected as a contact. * Indicates required field

Organization Long Name
TEST ORGANIZATION

Type of Organization
Joint Venture

Organization Short Name
TEST ORGANIZATION

RRC Operator Number
123456

Organization Primary Address
1234 TEXAS LANE
Austin, Texas 78701

Organization Primary Phone Number
(512) 463-6903

Ext

Contacts

Advanced Filtering

Actions

Name ↑	Phone Number	Email	Role	Actions
JENNIFER GILMORE		jennifer.gilmore@rrc.texas.gov	Submitter	

W-3X Well Selection & Disposition Step (Blanket)



Well Selection & Disposition

Please select an extension option below. Click [here](#) to see the plugging estimate costs per district for the current fiscal year

* Indicates required field

- ☒ A. The filing operator has plugged or restored to active status 10% of the number of inactive wells operated at the time of the last annual renewal of the operator's organization report.
- ☐ B. The filing operator is a publicly traded entity and has filed with the Commission documentation naming the operator as "debtor" and the Railroad Commission of Texas as the "secured creditor" and specifies the funds covered by the documents in the amount of the cost calculation for plugging all inactive wells.
- ☐ C. The filing operator has submitted additional financial security covering the amount of the cost calculation for plugging all inactive wells or \$2 million, whichever is less.

Blanket Plugging Cost Calculation (Option A)

N/A

Total Inactive Wells Plugged

N/A

Wells Plugged Overage

N/A

Prior Total Inactive Wells

N/A

Total Inactive Wells Restored

N/A

Total Plugged and Restored %

N/A



W-3X Well Selection & Disposition Step (Individual)

Well Selection & Disposition

Please select an extension option below, and then indicate which well or wells you would like to include in the application. Click [here](#) to see the plugging estimate costs per district for the current fiscal year.

* Indicates required field

- ☒ D. the well identified is covered by an abeyance of plugging report and the operator has paid the required filing fee and surcharge of \$250.00 under Rule 78 and Tex. Nat. Res. Code §81.070. (Please attach the abeyance of plugging report)
- ☐ E. The well identified is part of a Commission – approved EOR Project
- ☐ F. The well identified is not otherwise required by Commission rule or order to conduct a fluid level or hydraulic pressure test of the well, and the operator has conducted a successful fluid level or hydraulic pressure test of the well and has paid the required filing fee and surcharge of \$125.00 under Rule 78 and Tex. Nat. Res. Code §81.070 (The test results must be filed with the Railroad Commission on Form H-15)
- ☐ G. The operator has filed additional financial security in the amount of the cost calculation for plugging the well identified.
- ☐ H. The operator has filed an escrow fund deposit in an amount at least equal to 10% of the cost calculation for plugging the well identified above. (In the form of a certified cashier check or currency)

Select Wells Grid

						Advanced Filtering	Actions	Search	
<input type="checkbox"/>	API Number	Oil Lease/Gas ID Num...	W-3X Status	Original Cost Calculat...	Revised Cost Calculat...	Required for Renewal?			

W-3X Well Selection & Disposition Step (Selection)



Associated Wells Grid

				Advanced Filtering	Actions	Search	
<input type="checkbox"/>	API Number ↑	Oil Lease/Gas ID ...	W-3X Status	Original Cost Calc...	Revised Cost Calc...	Required for Rene...	Actions

W-3X Document Upload Step



764

Explore Data

Forms

Tools

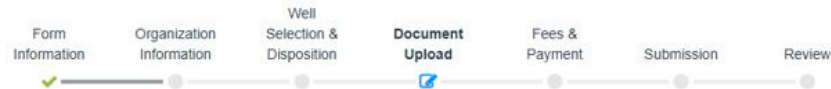
Online Forms | W-3X Application for an Extension of Deadline for Plugging a Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3X Application for an Extension of Deadline for Plugging a Well - [REDACTED]

Help

Tracking ID: 128552



Form Detail Navigation

Form Information

Organization Information

Well Selection & Disposition

Document Upload

Fees & Payment

Submission

Review

Document Upload

Select documents to be uploaded, if applicable. Click Add New and complete all required fields to upload a document.

Uploaded Documents

Advanced Filtering

Actions

Search

Upload Date	Uploaded By	Type	Description	Filename	Actions
06/24/2025	[REDACTED]	Abeyance of Plugging Report	Turner, Everett 2-1 Abeyance ltr	Turner, E 2 #1_67925_Abeyance ltr 06 24 2025.pdf	Actions

W-3X Fees and Payments Step



764 Explore Data Forms Tools

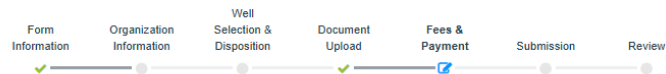
Online Forms | W-3X Application for an Extension of Deadline for Plugging a Well

Hello JENNIFER GILMORE, Railroad Commission of Texas

W-3X Application for an Extension of Deadline for Plugging a Well - COBRA OIL & GAS CORPORATION (163000)

Help

Tracking ID: 128552



Form Detail Navigation

- Form Information ✓
- Organization Information
- Well Selection & Disposition
- Document Upload ✓
- Fees & Payment
 - Fees & Payments
- Submission
- Review

Fees & Payments

Displayed below are current fees and payments for this Organization. Option D. requires a fee of \$250.00 per well to be made at this time. Please note that a payment processing fee will be assessed for each separate electronic payment.

Advanced Filtering Actions

Type	Name	Status	Date Paid	Amount	RMS Register Number	Actions
<input type="checkbox"/> Electronic Payment	W-3X Abeyance of Plugging Report Filing Fee 2025 Payment	Successful	06/24/2025	\$250.00	521700	
<input type="checkbox"/> Fee	W-3X Abeyance of Plugging Report Filing Fee 2025	Paid	06/24/2025	\$250.00		
<input type="checkbox"/> Electronic Payment	W-3X Abeyance of Plugging Report Filing Fee 2025 Payment	Successful	06/24/2025	\$250.00	521694	
<input type="checkbox"/> Fee	W-3X Abeyance of Plugging Report Filing Fee 2025	Paid	06/24/2025	\$250.00		
<input type="checkbox"/> Fee	W-3X Abeyance of Plugging Report Filing Fee 2025	Paid	06/24/2025	\$250.00	521704	
<input type="checkbox"/> Payment	Filing Fee & Surcharges 2025 Payment	Successful	02/07/2025	\$2,500.00	497499	Actions

1 2 3 4 20 items per page Viewing 1 - 20 from 71 results

W-3X Submission Step



Acknowledgement

Submitter

JENNIFER GILMORE

Submitter Title *

RRC Staff

Submission Date *

06/26/2025



Form Submit Preview

Click the button below to preview your submission summary.

Preview Submission Summary

Back

Submit

Save



- If applicable, your form will be reviewed by a processor for a determination
- Auto-Approval of certain options
- You will receive correspondence on your filing via the primary email(s) on file (or via mail) if no primary email address is designated

P-5 Renewal Summary (1 of 2)



Organization Detail

Help

TEST ORGANIZATION - 123456

P-5 Renewal Summary

Actions

Select Renewal Year 2025		
RRC Operator Number 123456	P-5 Renewal Date 04/01/2025	Org Status Last Updated 12/19/2024
Rule 15 Default Not in Rule 15 Default	P-5 Overall Approval Date Not yet approved	Organization (P-5) Status See Remarks
P-5 Organization Report Approval Date Not yet approved	Current P-5 Renewal Fee \$1,812.50	
Total Aggregate Well Depth 0		Option 1 Amount Required N/A
Option 2 Amount Required \$25,000.00	Total Amount On File \$325,000.00	P-5 Financial Assurance Renewal Requirement Status Met

Well Summary for Renewal

Total Wells 0	Bay Wells 0	Offshore Wells 0
Inland Waterway Wells 0	Inactive Wells 0	Inactive Bay Wells 0
Inactive Offshore Wells 0	Inactive Inland Waterway Wells 0	

P-5 Renewal Summary (2 of 2)



Inactive Wells		
10-year Inactive Wells	5-year Inactive Wells	Rule 15 Inactive Well Overall Compliance
Original Blanket Cost Calculation \$0.00	Revised Blanket Cost Calculation N/A	Capped Blanket Plugging Cost \$2,000,000
W-3X 10% Plugging/Restoring Progress		
Previous Inactive Well Count	Total Wells Meeting 10%	Percent Complete

P-5 Renewal Inactive Well Listing

Advanced Filtering

Actions

Search

API No. ↑	Oil Lease/Gas ID	W-3C Status	W-3X Status	Original Cost Calculation	Revised Cost Calculation	Violations	Violation Type	P-4 Approval Date	Shut-In Date	Actions



- If you file everything needed for your P-5 renewal ***except*** for compliance with your inactive wells, then you are given a 90-day extension to complete those requirements.
- Your 90-day extension runs from the date your P-5 would have expired.

Rule 15 Compliance Timeline (2 of 3)



- If an operator is still non-compliant at the end of their 90-day extension, a second notice of non-compliance will be sent.
- An operator has 30 days from the date of notice to request a hearing. If you request a hearing, you must pay the cost for the hearing, which is a non-refundable fee of \$4,500.00.



Failure to respond within the 30-day period will begin the process to:

- Deny the P-5 renewal
- Issue Severance/Seal orders
- Collect financial security

RRC Website



Railroad Commission Website:
<https://www.rrc.texas.gov/>

Expanded Website Access (EWA) – P5 Query:
<http://webapps2.rrc.texas.gov/EWA/organizationQueryAction.do> (Data updated nightly)

Oil & Gas Directory: <https://www.rrc.texas.gov/oil-and-gas/research-and-statistics/operator-information/oil-gas-directory-operator-contact/> (Data updated monthly)

HB 2259 Information (Inactive Well requirements):
<https://www.rrc.texas.gov/oil-and-gas/compliance-enforcement/hb-2259-hb-3134-inactive-well-requirements/>

Questions?



Please contact us with any questions you may have.

P-5 Department: 512-463-6772

p5@rrc.texas.gov