From: rrcwebcontact
To: Rules Coordinator
Subject: Rule comment email
Date: Wednesday, November 4, 2026 11:42:23 AM

Rule comment email

Choose Rule
Amend §§3.15 and 3.58 (Senate Bill 1150)
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No, I request my e-mail address to remain confidential
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Comments concerning proposed rulemakings
Re: Public Comment on Proposed Amendments to 16 TAC §§3.15 and 3.58 – Senate Bill 1150

I strongly encourage the Railroad Commission of Texas to prioritize clear, detailed, and transparent communication with operators as these amendments are implemented.

As a regulatory professional working for a service provider company that manages compliance responsibilities for numerous oil and gas operators, I cannot emphasize enough how important it is for the RRC to provide specific, actionable information rather than broad statements that leave operators trying to interpret what is required.

Too often, operators and their regulatory representatives are left attempting to read between the lines of Commission notices, requirements, and correspondence. When an operator's compliance status and ability to maintain an active P-5 are at stake, there should be absolutely no uncertainty regarding what must be done to remain compliant.

I respectfully request that the RRC provide:

Well-specific information: Clearly identify all affected wells, including API numbers, lease numbers, operator numbers, and the specific compliance issue associated with each well.

Detailed corrective actions: Explain exactly what an operator must do to resolve each deficiency, including required forms, documentation, testing, plugging requirements, or extension applications.

Clear P-5 renewal guidance: Provide a detailed explanation of how the new requirements affect P-5 renewals, what could prevent renewal, and the exact steps necessary to resolve outstanding issues before an operator's authority is affected.

Plugging extension instructions: Clearly outline eligibility, required documentation, deadlines, and application procedures for each available extension option.

Timely and informative email notifications: Do not eliminate email notifications or replace detailed correspondence with generic notices simply stating whether legislation, an application, or a compliance determination has passed, failed, been approved, or been denied. These communications should explain what the decision means for the operator, which wells are affected, what actions are required, and the exact steps and deadlines necessary to move forward.

Consistent communication: Ensure operators receive consistent guidance regardless of which RRC department, district office, or representative they contact.

Simply notifying an operator of a decision or change without providing instructions on what happens next is not sufficient communication. Operators should not receive an email announcing that something has passed, failed, or changed and then be left searching through statutes, rules, and various RRC resources to determine what they are supposed to do next.

If new requirements are being implemented, the Commission should provide comprehensive written guidance, step-by-step instructions, applicable forms, important deadlines, and clear explanations of how those changes directly affect each operator's compliance obligations and P-5 status.

For companies like ours that provide regulatory services to multiple operators, vague notices and inconsistent instructions create unnecessary delays, confusion, and additional administrative burdens. We are often responsible for interpreting these communications and ensuring that multiple clients remain compliant. The information provided by the Commission must be thorough enough for us to accurately advise those operators without having to make assumptions.

We fully understand the importance of regulatory compliance and the Commission's responsibility to enforce its rules. However, compliance should not require operators to guess what the Commission expects or repeatedly seek clarification simply to determine the appropriate corrective action.

If the RRC expects operators to meet increasingly detailed regulatory requirements, it is reasonable to expect the Commission to provide an equally detailed explanation of those requirements.

Our goal is not to avoid compliance. Our goal is to have the information, transparency, and specific guidance necessary to achieve compliance correctly, efficiently, and within the required timeframes.

I respectfully ask the Commission to consider these concerns when finalizing the

proposed amendments and developing the procedures, notifications, and communications that will accompany their implementation.

Thank you for the opportunity to provide comments.

Verification Check

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