From: robertpierson37@everyactioncustom.com on behalf of Robert Pierson Jr <robertpierson37@everyactioncustom.com>
Sent: Monday, November 2, 2026 8:08 PM
To: Rules Coordinator
Subject: Public Input for SB 1150 Rulemaking

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Dear Rules Coordinator,

Please set virtual and in-person public hearings for this rulemaking, with at least 2 weeks notice. Don't end the comment period before the hearings. Direct public feedback is essential to the RRC's mission of stewarding natural resources & the environment and protecting personal & community safety.

To adequately address Texas' inactive well problem, please make these changes to the rules:

-As statute requires, specify that an extension isn't an option unless the RRC fully considers "risk to public safety, health, and the environment; wellbore and wellhead integrity, including the ability to monitor casing pressure; and regional risk considerations, including penetration of corrosive or over-pressured formations and completion in zones containing hydrogen sulfide."
-Set stricter well integrity standards & monitoring; ban extensions in high-risk zones. Require annual mechanical integrity testing of these wells, not annual reporting of past results.
-Establish statutorily required penalties for violations to deter bad behavior, with bigger penalties for falsification or repeat offenses.
-Set clear metrics based on statutory criteria to ensure operators applying for "financial hardship" still plug wells & that they have a path out of hardship. As is, the proposal allows business-as-usual practices of indefinite plugging extensions that lead to well orphaning.
-Only 15/25 wells, not younger wells, should count toward qualifying for a plugging extension based on a history of "returning inactive wells to operation." The definition of "active operation" must prevent gaming by temporarily shutting wells on and off.
-Set clear metrics for a good-faith transfer & make operators submit evidence to substantiate their claim.
-Give more notice and standing to surface & mineral owners for observing well tests and participating in transfer & extension proceedings.
-Make public all applications & decisions about extensions, compliance, and compliance plans.

The sooner we step up and solve this environmental risk the less spent on cleanup, and health issues later.

Thank you,
Robert Pierson Jr
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