From: bdrawert@everyactioncustom.com on behalf of Benjamin Drawert <bdrawert@everyactioncustom.com>
Sent: Monday, November 2, 2026 2:55 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.

Thank you,
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