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To: [Rules Coordinator](#); [Christi Craddick](#); [Wynn B. Baker](#); [Wayne Christian](#); [Jeremy Hagen](#); [Jim Wright](#); [Christopher Hotchkiss](#)
Subject: Proposed Statewide Rule 8 Public Comment
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The Railroad Commission of Texas

To Whom it May Concern:

I am writing regarding oil and gas waste management practices in Texas. I urge you to create regulations that protect our water, air and land. The Railroad Commission's proposed new rules released on August 15th do not limit how close a reserve pit can be to groundwater, and there is no groundwater monitoring required.

The proposed updates to Statewide Rule 8 do not protect Texas land, landowners, or groundwater. Our water, property, livestock, and wildlife deserve better. The updates need to include essential reforms that would:

- Require Landowner Consent: Landowners should have the right to be notified in advance and either given the opportunity to consent or refuse the disposal of waste on their property (off-site commercial methods of disposal are available for operators). This would ensure transparency and protect property rights, allowing landowners to make informed decisions about the use of their land.
- Enhance Groundwater Protection: The new rules should require reserve pits to be lined and equipped with leak detection and groundwater monitoring systems, similar to the standards used for commercial pits. These measures are critical for preventing toxic chemicals from seeping into our groundwater.
- Implement Safer Waste Management Practices: The industry has successfully adopted more responsible practices in many other states that minimize environmental risks. Texas should follow suit by mandating these best practices to reduce the impact of oilfield waste on our land and water. Don't Texans deserve the protections New Mexico and Louisiana have already adopted?

This leaves our water exposed to contamination from all the toxic chemicals in oil and gas waste.

Other states, such as North Dakota, have enacted reasonable reserve pit requirements – why

can't Texas do the same?

Most landowners only own surface rights, and do not own the minerals under the land, which is not their fault. Surface owners should be notified before a reserve pit is dug on their land. This way, landowners can know what is going to happen on their land and be allowed to make informed decisions.

Please adopt better regulations for reserve pits to ensure that our water is protected from pollution.

Thank you,

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