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Chairman's Office
Railroad Commission of Texas



October 23, 2023

Chairman Christi Craddick
P.O. Box 12967
Austin, Texas 78711

Commissioner Wayne Christian
Commissioner Jim Wright

Re: Rule 8 Proposal on Authorized Pits

Dear Chairman and Commissioners:

The purpose of this letter is to express concern over the proposed changes to Statewide Rule 8 (pit rule). This rule as you are aware governs the use of temporary surface pits associated with drilling, completions and workovers for the protection of groundwater.

The oil and gas industry have a shared goal with the TRC of preventing ground water contamination and the current rule has been a success and should be applauded, not changed. According to TCEQ's GIS Groundwater Contamination website, water contamination has never occurred from temporary drilling, completion or workover pits during the 40 years that the original Rule 8 has been in effect in Texas. There are many physical reasons for this 100% success rate. The relatively small volumes of fluid in the temporary pits and the short amount of time that fluid is in the pit, just to name a few. Of course, this will never satisfy the anti-fossil fuel people want more regulation with no justification for their arguments. Also know that even if you do change the rules, it will never be enough for them and they will always want you to do more regulation for the sole purpose of making it more difficult to produce oil and gas.

Please keep the current guidelines on temporary drilling, completion and workover pits unchanged. There is no need to change what has a 100% success rate. Pit registration for temporary drilling, completion and workover pits should also be eliminated from the proposed rule change. This is just another way to harass oil and gas producers.

Sincerely,

W. Jeffrey Sparks
President

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