

**TEXLAND PETROLEUM, L.P.**  
EXPLORATION AND PRODUCTION  
600 BAILEY AVE, SUITE 150  
FORT WORTH, TEXAS 76107

---

(817) 336-2751

October 15, 2024

Commissioner Christi Craddick, Commissioner Wayne Christian, Commissioner Jim Wright:

I would like to complement the Commission staff on the Final Draft of Rule 8 that has been published. Texland Petroleum, LP is an active driller and operator in the Permian Basin of West Texas. We employ about 80 people directly and many other contractors daily for drilling, servicing, and maintaining our wells.

We understand the importance of updating Rule 8 and the importance of protecting the environment in which we all live. We agree that the advent of water recycling and long-term storage of water in above ground pits required the Commission to act to protect against groundwater contamination.

Texland's staff has spent a great deal of time reviewing and commenting on the proposed Rule changes. We believe that the Commission staff has done an excellent job of distinguishing between Schedule A (temporary) pits and Schedule B (permanent) pits. This is the commonsense approach to regulating pits because of the very different risk profile of these two classes of pits.

Texland drills mostly vertical wells and all the pits that we create are temporary. We agree with the new Schedule A authorized pit regulations.

Concerning Schedule A authorized pits, the specifications for pit contents, construction, depth to groundwater, and closure will allow operators to utilize local experience, industry standards and flexibility to accomplish the common goal of good environmental stewardship while complying with the RRC's regulations. Timeframes specified in the new Rule 8 for dewatering, backfilling and compacting are reasonable and will be effective. Registration of the pits will ensure that the timeframes will be met.

We encourage the Commissions to approve the proposed Changes to Rule 8 and appreciate the time, effort, and thoughtfulness that the Commission staff has employed in crafting this Rule.

Sincerely,



Jim Wilkes

President