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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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09/05/2024

Chairman Christi Craddick
Commissioner Wayne Christian
Commissioner Jim Wright

Dear Commissioners:

As a concerned Texan, I am writing to strongly urge you to update and strengthen the regulations surrounding oilfield waste disposal under Statewide Rule 8. Current practices can cause significant and irreparable harm to our health, environment, wildlife, and communities. Reserve pits are often located dangerously close to groundwater, posing severe risks to both human health and our state's most vital natural resource. Many fellow Texans are not notified nor allowed to consent before oilfield waste is buried on their property, ignoring their property rights and leaving them exposed to unexpected environmental damage and greatly reducing the value of their land.

The Railroad Commission of Texas has publicly stated your responsibility to protect our state's resources by applying critical updates to these outdated regulations. The proposed changes to Statewide Rule 8 should include:

1. Requiring Landowner Consent: Ensure landowners are notified in advance and given the opportunity to grant permission or consent before any waste disposal occurs on their property to protect their rights and prevent unexpected environmental damage. Additionally, this gives them the right to refuse on-site disposal since other more responsible disposal options are widely available.
2. Enhancing Groundwater Protection: Mandate that reserve pits be lined and equipped with leak detection and groundwater monitoring systems, similar to the standards used for commercial operations, to prevent toxic chemicals from contaminating our drinking water.
3. Implementing Better Waste Management Practices: Adopt safer practices, such as closed-loop systems operators are already successfully using in other states, to minimize the environmental risks associated with oilfield waste disposal and protect our land and water.

It is time for Texas to lead once again, not New Mexico and Louisiana, and set a higher standard that protects our environment, communities, and industry for future generations from the dangers of outdated and flawed waste disposal practices.

I urge you to act now and strengthen the proposed updates to Statewide Rule 8.

Respectfully,

James Hall

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