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Kellie Martinec, Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, TX 78711-2967

Via email rulescoordinator@rrc.texas.gov

Re: Comments on Proposed SWR 66

Dear Ms. Martinec:

I appreciate the opportunity to comment on this proposed rulemaking. While I do not personally operate oil and gas wells, I assist many clients in their compliance activities concerning Railroad Commission rules and regulations.

In general, the requirements of proposed SWR 66 are overly burdensome to the smaller operator. Most of the smaller operators' volumes could hardly be considered "critical" in any light. Therefore, weatherization standards applied to truly "critical" facilities should not be applied to marginal or near-uneconomic operations. I have one client, for example, with two gas wells making 16 mcf and 17 mcf, that are defined as "critical" under SWR 65 but cannot support the winterization costs required by proposed SWR 66. My client is seriously considering plugging and abandoning these two wells solely due to the winterization expense which would be required by proposed SWR 65.

I have been involved in the comment process for both the Texas Oil & Gas Association and the Permian Basin Petroleum Association and have reviewed the comments provided separately by Henry Resources. I strongly urge the Commission staff to closely review these three sets of comments. Please consider the information presented and the ramifications the proposed rule will have on the operating community, and revise the rule proposal to suit the needs of the citizens of the State of Texas more precisely.

If you have any questions, please feel free to contact me at 432-894-1857 or via email, mark@permianregulatory.com. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Henkhaus', written in a cursive style.

R. Mark Henkhaus, PE
Permian Regulatory Solutions, PLLC