From: rrcwebcontact
To: Rules Coordinator
Subject: Draft Rules Informal Comment
Date: Friday, November 3, 2023 2:59:39 PM

General Comment

Here is a new comment from the Web.

Comment

Choose Form
3.8, 3.57 and Chapter 4

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Comments concerning draft rulemakings
The rules as they are currently proposed will undoubtably increase the cost of operations by a significant amount. For the operator of 1bbl/day well that will not payout for upwards of 2 years leaving the operator little to no incentive to work on or improve production, which will lead to the premature abandonment of wells. The waterfall from this implementation of the rules as proposed will cause a decline in an operator's capabilities, leading to the elimination jobs, not just in the oilfield, but in the offices, in the workover companies, in the supply stores and more. According to the Texas Comptroller's office in 2022 severance tax collection reached a high of $10.83 billion dollars or 14% of the State's total taxes collected. On average the annual tax growth rate is 10.4% and has been as high as 115%. An annual severance tax collection of, 10 billion dollars, if increased by just the average will cost the State of Texas an enormous amount of funding. Leading to a lower annual budget, and the loss of vital programs and services funded by severance tax dollars. Protection of the environment is of the upmost importance, and standards should be implemented to protect Texas' natural recourses, but on a situational, geological, and/or sensitive region basis. The proposed blanket implementation threatens hundreds of millions of Texans within and beyond the oil field.

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