



Dear Commissioners,

Thank you for the opportunity to comment on the proposed changes to 16 TAC §3.8 and §3.57, and 16 TAC Chapter 4. First, we want to thank each of you for your service to the State of Texas and all that you do to for Texas' oil and natural gas industry. The Texas Railroad Commission has a long and storied history and is well served by the leadership each of you provide.

My name is Vance Landry and I am the President of Enviro Resources LLC. Enviro Resources LLC is a Louisiana-based company with over 30 years of experience serving the oil and gas industry. Since 1994, we have specialized in protecting the environment, reducing client costs, and preserving land. We currently employ over 80 professionals in Texas with operations in Texas, Louisiana, Oklahoma, and New Mexico.

We believe that the proposed changes to 6 TAC §3.8 and §3.57, and 16 TAC Chapter 4 reflect the Railroad Commission's position as the leading oil and gas regulatory body in the nation. We believe, that with some minor changes to reflect our understating of the intent of the rules from public stakeholder meetings, we will be able to provide our clients with industry leading pit remediation in an economical manner that provides stewardship for the land, the environment, and landowner.

We ask that the Commission clarify in the rules that during the pit closure process, after drilling operations have ceased, remediation teams may use equipment and machinery in the pit. To accomplish this we recommend the following change to §4.114 (d) (2):

(2) Equipment, machinery, waste, or other materials that could reasonably be expected to puncture, tear, or otherwise compromise the integrity of the liner shall not be used or placed in lined pits during drilling operations.

In addition, in order for remediation teams to successfully stabilize or solidify the remaining authorized pit contents to a physical state sufficient to support the final cover of the authorized pit, teams need to be able trench into the bottom of the pit. To accomplish this, we recommend the following change to §4.114 (e) (1) (c):

(c) verify that authorized disposal of oil and gas waste by burial pursuant to §4.111 of this title will not result in migration from the ~~physical boundaries~~ authorized length and width of the authorized pit; and

And, the following change to §4.114 (g) (1):

(1) The operator shall ensure that any oil and gas waste, including synthetic liners, that will be



disposed of in the pit as authorized by §4.111 of this title is buried in a manner such that the waste will remain below the natural ground surface and be confined to the authorized length and width ~~original dimensions~~ of the pit.

We believe that with these clarifications the Commission will achieve its goal of responsible and sustainable environmental practices that benefit the natural environment, landowners, and industry participants. Thank you for addressing this important issue, and we look forward to working together as these rule revisions progress.

Regards,

Vance Landry  
President, Enviro Resources LLC