HOUSE OF REPRESENTATIVES
COMPILATION OF PUBLIC COMMENTS

Submitted to the Committee on Energy Resources

For HB 2766

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Hearing Date: April 7, 2025 12:00 PM

Steven Collins
CCT Ranch
Decatur, TX

RANCHER COMMENTS: HB 2766 – PLUGGING OF INACTIVE WELLS

As a Texas cattle rancher, I have experienced the negative impact on inactive oil & gas wells on our land. Inactive wells and the associated roads and facilities constitute unreasonable uses of land which should be used as productive grazing land. In addition, the inactive wellbores present a clear and present danger to valuable groundwater aquifers upon which ranchers rely to sustain our herds. Also, the market value of land subject to inactive wells is substantially reduced.

Most wells that are inactive for more than 10 years are never reactivated and many are orphaned by insolvent or dissolved operators. The Texas taxpayers and landowners are often left to deal with these older inactive wells. Moreover, the longer a well remains inactive, the risk of tubing failures and casing leaks substantially increases. In many cases, it becomes impossible to remove the corroded tubing or locate the casing leaks, making it impossible to fully protect groundwater with a proper plugging method. As the Texas oilfields have matured and become unproductive, the number inactive wells as substantially increased and constitute a growing threat to Texans and their way of life.

Under current law and Railroad Commission rules, there is no requirement that operators plug wells that have been inactive for more than 10 years. Under one RRC rule an operator can avoid plugging any inactive wells by posting a 2 million dollar bond even though the operator has hundreds of inactive wells with estimated plugging costs exceeding $10,000,000.00. This illogical loophole increases the potential for orphan wells and imposes an unfair burden on Texas landowners and taxpayers.

As elected representatives in the Texas House of Representatives, you have an opportunity in the current legislative session to correct the dangers and inequities presented by inactive wells. HB 2766 should be strengthened as follows: (1) reduce to 10 years the time that a well can remain inactive; (2) reduce the phase-in period to require all wells be in compliance by 2035; and (3) eliminate extended plugging deadlines.

Finally, the Texas House should reject the amendments to SB 1150 as proposed by the Senate Natural Resources Committee. These amendments, particularly the “financial hardship” exemption, are illogical and would only serve to expand the current problem.

Please take this opportunity to protect Texas ranchers and all other Texas citizens.

Charles Scoma

Speaker Pro -Tem Texas Silver-Haired Legislature

North Richland Hills, TX

Honorable Chair Darby and Energy Resources members.
The Texas Silver-Haired Legislature (TSHL) supports House Bill 2766 Relating to the plugging of certain inactive wells subject to the authority of the Railroad Commission of Texas.
Texas faces significant risk to groundwater supplies from open, often abandoned oil and gas wellbores, necessitating increased State expenditures to hold well drillers accountable for their drilling operations, mandatory well location inspections. TSHL supports stricter penalties for non-compliance, and financial reimbursement of State expenditures from drillers.

Such contamination threatens rural citizens' health, a substantial number of whom are older Texans, along with the environment, livestock, and local wildlife. This vulnerability to such water
contaminations necessitate more effective collaboration among State agencies, local governments, environmental groups, and the oil and gas industry for effective remediation strategies with transparent processes and public input.

Comprehensive environmental and health assessments, particularly regarding water risks, and transparent reporting of such assessments are crucial due to current insufficient measures and
budget allocations for remediation.

The 20th Texas Silver-Haired Legislature urges the 89th Texas Legislature to support House Bill 2766
Thanks for considering this testimony.
Charles Scoma
Speaker Pro Tem
Texas Silver-Haired Legislature

Linda Young

I'm not with a company.

San Antonio, TX

Why can't there be a water purifying plant for the well(s) spouting salt water? West Texas can use that water if the salt is removed.

Sarah Stogner
Self
Monahans, TX

My name is Sarah Stogner. I'm a landowner, former oil and gas attorney, and the District Attorney for the 143rd Judicial District in West Texas. I'm unable to travel to Austin but am there in spirit and via official comments because Texas can no longer afford to let oil and gas operators leave inactive wells unplugged for years—or decades.

Last year, the Railroad Commission asked this Legislature for an additional $100 million just to help plug orphaned wells. That should tell you everything: the system is overwhelmed.

The cost to plug a well today isn't $10,000. In places like Pecos County, it's often $100,000 to over $10 million—especially for problem wells like those at Boehmer Lake, Christian Springs, and Lake Craddick. These sites weren't properly plugged because no one made them. Now they're flooding, leaking, and contaminating groundwater.

Boehmer Lake started as an oil and gas dry hole, later "converted" to a water well—it's been flowing hundreds of gallons per minute for decades. Christian Springs and Lake Craddick also stem from poorly tracked ag-use wells with oilfield origins. These are regulatory failures—and now they're taxpayer burdens.

Operators are allowed to indefinitely designate wells as "inactive" with no real plan to reactivate or plug them. Some get transferred to shell companies that will walk away. Others quietly rot. We already have over 8,000 orphan wells, and tens of thousands more inactive ones—many unlikely to ever produce again.

The longer these wells sit, the more expensive they are to fix—and the greater the risk to groundwater, air, and public safety. Methane leaks, aquifer contamination, and even blowouts are real threats.

Texas needs to act now. I urge this committee to:

1. Limit inactive status to no more than 2–3 years without an approved reactivation plan.
2. Increase bonding to reflect real plugging costs.
3. Prioritize high-risk wells near aquifers and people.
4. Close loopholes that let paperwork substitute for real action.
5. Make the data public so landowners and taxpayers can see what they're exposed to.

This isn't anti-industry—it's pro-accountability. We must stop subsidizing inaction and start protecting Texas land.

As a conservative, I abhor public subsidies for private corporations. But that's what we currently have. Our tax dollars subsidizing the plugging of private oil and gas wells. The proposed legislation won't fix the problem. It will simply kick the can down the road.

Hawk Dunlap
Self
Monahans, TX

Absolutely. Here's the final version of Hawk Dunlap's written testimony, under 3,000 characters, noting his global experience including work across Texas, and emphasizing that 15 years is too long to allow a well to remain shut-in without plugging or production:

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Written Testimony of Hawk Dunlap
To Chairman Charlie Geren and Members of the Texas House Committee
Re: Inactive and Orphaned Wells in Texas
April 2025

Chairman Geren and Members,

My name is Hawk Dunlap. I'm a 6th-generation Texan and a 4th-generation oil and gas worker. I'm the first in my family to specialize in well control. I've worked across Texas and around the world responding to blowouts, surface pressure events, and failed wellbores. I've seen firsthand what happens when inactive wells are ignored for too long.

Texas law currently allows operators to keep wells shut-in for 10, 15, even 20 years without producing or plugging them. That's far too long. The average life of a producing well is about 30 years. Letting a well sit idle for half its life without action is a serious risk—mechanical integrity declines, corrosion sets in, and pressure conditions change.

In 2024, the Railroad Commission requested an additional $100 million just to keep up with plugging orphaned wells. That number will keep growing unless we fix the root of the problem. Texas has over 8,000 orphan wells, and tens of thousands more that are inactive and deteriorating. Each year we delay plugging them, the risks grow—and so do the costs, which fall on taxpayers and landowners.

I respectfully urge the Legislature to:

1. Limit shut-in status to no more than 5 years without production or an approved reactivation plan. Fifteen years is too long.
2. Update bonding requirements to reflect true plugging costs.
3. Prioritize high-risk wells, especially near water sources and communities.
4. Close regulatory loopholes that allow indefinite deferrals.
5. Ensure transparency so Texans know where these wells are and who's responsible.

This isn't about being anti-oil and gas—I'm proud to be part of this industry. But we need to be responsible. If we don't act now, we're passing a dangerous and expensive legacy to the next generation.

Thank you for your time and leadership.

Molly Rooke
self, partner of family ranch and farm
Woodsboro, TX

Honorable House Energy Resources Committee Members,

Please support strengthening Representative Geren's HB 2766 (companion to SB 1150) limiting inactive oil and gas well plugging extensions. This bill, especially if improved, would help address the much-needed timely plugging of old, inactive wells. This is critical to the safety of our water supply as well as the protection of the land and air around those wells from the pollution such old wells can and do release when they degrade to the point of having leaks and blowouts. Taxpayers should not have to pay for these accidents when they could be prevented with proactive reasonable limits on plugging extensions.

My family has had adverse impacts to our ranch from long neglected, abandoned orphan oil and gas wells which we had been asking unsuccessfully the Railroad Commission for many, many years to plug. We had leaks into the nearby river and onto our land as well as into the air, including a blowout from one of our many decades old, rusted and crumbling wells and infrastructure. We had to sue the Railroad Commission to finally get them plugged. Nobody should have to resort to this. And a strengthened HB 2766 would help to prevent it.

Please, support this bill and make it more effective by shortening the time threshold for an extension to 10 years or less and limit the extension that the Railroad Commission can give to an additional 5 years, and only if the operator has a history of successfully reactivating old wells. Also, please require hydraulic pressure testing at 5 years and more frequent fluid level testing of the wells to help check and ensure well integrity (it's much more expensive to find out later through leaks or an accident that the well integrity was no longer good).

Please, also do not allow the weakening amendments added in the Senate, loopholes which would allow a bonding option rather than plugging the well, and to allow a plugging extension if a "fiscally prudent operator demonstrates financial hardship." The financial hardship excuse has been used by the Railroad Commission before to let operators off the hook while abandoned wells failed, our land and resources got polluted and the state and ultimately taxpayers got stuck with the costs of plugging and cleanup.

Please, support and pass a strengthened HB 2766.

Sincerely,
Molly Rooke
P.O. Box 626
Woodsboro, Texas 78393

Carolyn Croom, Ms.
self; retired
Austin, TX

Please strengthen and clarify information in HB 2766, on orphaned well plugging by amending it to:

1) Shorten the threshold for plugging extensions from 15 years to 10 years.
2) Limit the extension the Railroad Commission may grant to a maximum of five additional years, and specify that the operators must have a history of reactivating old wells.
3) Implement more frequent fluid level or hydraulic pressure testing beginning at five years of inactivity to ensure well integrity.
Thank you.