



September 25, 2024

Railroad Commission of Texas
Rules Coordinator: rulescoordinator@rrc.texas.gov

Milestone Environmental Services is an environmental infrastructure services company formed in 2014. Milestone owns and operates 14 commercial disposal facilities in Texas and New Mexico and specializes in handling and safely disposing of drilling, completion and production waste.

Milestone supports updating Rule 8 and has advocated for tighter regulations related to commercial facilities like Milestone's. The proposed Rule 8 changes to commercial waste disposal practices are welcomed and Milestone takes no exception to them.

However, the absence of meaningful updates to non-commercial waste practices – i.e. the use of reserve pits – is alarming. The realities of modern drilling practices necessitate modern waste disposal rules, and the August draft of Rule 8 (now Chapter 4, Subchapter A) falls woefully short in that respect.

It is undeniable that drilling and production practices are vastly different now than in 1984, which is the last time Rule 8 was updated. Horizontal, shale drilling generates exponentially more waste than shallow, conventional drilling. Horizontal wellbore lengths are much longer and require different, more complex fluids. The fluids used in horizontal drilling contain oil-based muds and chemical fracking fluids. On average, a vertical well generates between 2,000 and 5,000 barrels of waste. By comparison, on average, just one horizontal well generates between 8,000 and 16,000 barrels of waste, with multiple wells using one large reserve pit. This data is not controverted and can be validated by the quarterly reports submitted to the Railroad Commission by commercial disposal facility operators.

And yet, in Texas, drilling waste can be permanently buried onsite with virtually no oversight and no restrictions. Further, the landowner often has no knowledge of the reserve pit's contents and is unaware that burial will take place. Texas is the only state in the country that allows onsite burial without the landowner's consent.

The Railroad Commission can update Rule 8 to address current drilling practices and current waste contents and volumes without imposing undue cost or operational burdens on smaller operators. Stated another way: we do not have to choose between cost and environmental protection.

Modernized Waste Management Practices Do Not Increase Operator Cost

Updated pit regulations are not prohibitively costly and will not put small operators out of business. Quite the opposite is true. In fact, it is often less expensive or roughly the same cost to use offsite disposal or closed loop systems versus on-site burial. Even when onsite burial is less expensive at the time of pit closure, the cost to remediate a reserve pit when it later contaminates the soil and groundwater is exponentially higher than using proper practices in the first place.

Based on Milestone's experience, reserve pits that were not properly constructed and closed often fail. Free liquids that should have been removed, but were not, cause sink holes across the pit surface. The liner is torn in multiple places. Drilling fluids and cuttings have migrated to the surface. Remediation requires excavating an area typically 2 or 3 times the size of the original reserve pit to remove all contamination. The additional liability and cost to the operator, as well as groundwater and soil contamination, could have easily been avoided.

A review of the case study published by the Railroad Commission in support of its Waste Minimization Program confirms this fact.

In the Railroad Commission's case study, attached here as Exhibit A, a small, independent operator drilling shallow, vertical wells, **saved approximately \$10,000 per well by using a closed loop drilling system, which eliminated the need for a reserve pit.**¹

The Railroad Commission's conclusion is consistent with Milestone's findings. For most smaller drilling operations, closed-loop drilling is cost-neutral or a moderate savings to the operator.

For larger drilling operations, the utilization of proper waste management practices (including closed loop drilling systems) constitutes less than 2% of the total spend for a well. In other words, the cost to protect groundwater and the environment is negligible and not determinative for larger operators.

Reserve Pit Failures Cause Groundwater Contamination

Increased reserve pit standards are necessary because of the direct correlation between failed reserve pits and groundwater contamination. **This has been confirmed since the late 1980s.**

¹ Exhibit A. See also <https://www.rrc.texas.gov/oil-and-gas/publications-and-notice/publications/waste-minimization-program/waste-minimization-case-histories/closed-loop-drilling-fluid-system/>

In its 1987 Report to Congress, which originated in Texas but was subsequently expanded to include other states, the Environmental Protection Agency confirmed that unlined reserve pits are responsible for multiple incidents of groundwater contamination.²

Currently, both the TCEQ Joint Groundwater Contamination Report (issued annually) and Railroad Commission field inspection reports have recorded thousands of surface and groundwater pollution events. There are many documented cases directly linking contamination to reserve pits, and even more instances where pits have contributed to groundwater contamination without being identified as the primary source.

The Railroad Commission has documented nearly 70,000 instances of unpermitted oil and gas waste disposal, 3,200 unpermitted uses of pits, **and 715 recorded cases of surface or groundwater contamination** just since 2015. Additional reserve pit-related pollution cases are documented in the 2023 Texas Joint Groundwater Contamination Report, attached as Exhibit B, which identifies 560 groundwater contamination cases under the Railroad Commission's jurisdiction.³

Finally, we urge you to speak with any landowner in West, East or South Texas who lives with ongoing oil and gas operations on their land and ask them about contamination issues they face every day. A cursory litigation search reveals dozens of active lawsuits in Texas filed by surface owners against operators for pollution of surface and groundwater related to drilling fluids.

One ranching family has identified over 500 contamination events on their property, many due to failed reserve pits, and is grappling with widespread confirmed contamination of the groundwater and soil. The water cannot be consumed by humans or livestock, and vegetation has not been able to regrow in impacted areas.

Industry Largely Supports Updated Waste Rules

Texas lags virtually every other state and most countries in its drilling waste management regulations. Many operators have already adopted modern waste practices in Texas, both to align with their corporate values and to standardize disposal practices across all states in which they operate. It is well past time for Texas to modernize its requirements.

² <https://archive.epa.gov/epawaste/nonhaz/industrial/special/web/pdf/530sw88003a.pdf>

³ Exhibit B. <https://www.tceq.texas.gov/groundwater/groundwater-planning-assessment/sfr-056-joint-groundwater-monitoring-contamination-report>

Proposed Change

Milestone's proposed change to the August draft of Rule 8 is as follows:

Reserve pits and mud circulation pits should be moved from "Schedule A Authorized Pits" to "Schedule B Authorized Pits". Schedule B Authorized Pits are subject to reasonable construction, operation and closure standards protective of groundwater and soil.

Exhibit A

 

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Closed Loop Drilling Fluid System

Problem: A small independent operator was concerned about the volume of drilling waste in conventional reserve pits at his drilling locations. Waste management costs were a concern, as well as the costs associated with impact on adjacent land due to pit failures. The operator was concerned about the potential for surface water or ground water contamination and the associated potential liabilities.

Solution: The operator was drilling relatively shallow wells in normally pressured strata. Because the drilling plan was relatively simple, the operator investigated the feasibility of using a closed-loop drilling fluid system for these wells. The use of a closed-loop system eliminated the need for a conventional reserve pit. The operator negotiated with drilling contractors to obtain a turn-key contract that required the drilling company to use a closed-loop system and take responsibility for recycling the waste drilling fluid.

Benefits: The turn-key contract was incrementally more expensive. However, because of reduced drillsite construction and closure costs, reduced waste management costs, and reduced surface damage payments, the operator realized a savings of about \$10,000 per well. Also, the operator reduced the potential for environmental impact and associated potential liability concerns.

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Exhibit B

May 2023 Joint Groundwater Contamination Report

<https://www.tceq.texas.gov/groundwater/groundwater-planning-assessment/sfr-056-joint-groundwater-monitoring-contamination-report>

Texas Groundwater Protection Committee

Committee Membership: Texas Commission on Environmental Quality

Texas Water Development Board

Railroad Commission of Texas

Texas Department of State Health Services

Texas Department of Agriculture

Texas State Soil and Water Conservation Board

Texas Alliance of Groundwater Districts

Texas A&M AgriLife Research Bureau of Economic Geology

The University of Texas at Austin Texas Department of Licensing and Regulation

Oil-field cleanup activities fall under the jurisdiction of the RRC and are subject to regulations under Statewide Rule (SWR) 8, SWR 20, SWR 91, and RRC Special Orders. Other rules that protect groundwater and influence cleanup activities include: SWR 13 (well completion requirements), SWR 14 (plugging requirements), SWR 9 (injection [disposal] into a non-productive zone), SWR 46 (injection into a productive zone), SWR 57 (reclamation plants), SWR 93 (water quality certification), SWR 98 (standards for management of hazardous oil and gas waste), and 16 TAC 4.601 - 4.632 (disposal of oil and gas NORM waste). Through SWR 30 (Memorandum of Understanding), RRC maintains jurisdiction over natural gas plants and compressor stations. If groundwater contamination occurs at a site, the responsible party is required to remediate to acceptable levels. Responsible parties may volunteer remedial action, or cleanup may be required by legal action (Operator Cleanup Program). Operators, developers, or individuals who are not responsible for the contamination may participate in the Voluntary Cleanup Program. When investigation and research cannot locate a responsible party, the Site Remediation Section of the Oil and Gas Division will oversee the remediation of the groundwater contamination with Oil and Gas Regulatory and Cleanup (OGRC) funds (State Funded Cleanup Program).

Status of Groundwater Contamination. This report includes 560 groundwater contamination cases located in 118 counties. Of these, 5 are new cases added under RRC regulations. Cases were due to self-reporting, routine investigation, review of data, complaints, violation letters, and legal enforcement action. Two sites were transferred from OCP to CU, activities were completed on six cases listed in the report, and 6 cases were removed from the previous report.

Current RRC Online Inspection Report

<https://webapps2.rrc.state.tx.us/PDA/ice/pdalceHome.xhtml?action=reloadQueryAction>

As of 9/12/24

Violations

**Violation query: 8(b) Surface and groundwater contamination
8(d)(1) Unpermitted disposal of waste
8(d)(2) Unpermitted use of pit**

Prior to being added to the Joint Groundwater Contamination Report, cases are often identified by agency-specific routine investigations and or as a response to complaints. The following is drafted from the living RRC online inspection lookup. They represent inspection, violations, and enforcement. Data prior to August 1, 2015, is not available via this record archive. The current report includes 69,746 instances of unpermitted disposal of oil and gas waste, 3,252 unpermitted uses of pits, and 715 surface or groundwater pollution violations across all RRC oil and gas districts.

Major Violation Indicator cases: **19**

Referred to Austin for possible legal enforcement: **29**

Cases associated with RRC reserve, workover, completion and other onsite pits: **116**

Joint Groundwater Contamination Report site list

COUNTY	DIVISIO	DISTRIC	NEW	FILE NAME	FILE NUMBER	LOCATION	CONTAMINATION DESCRIPTION
GALVESTON	RRC	03		REEF EXPLORATION	OCP#2214	RESERVE PITS AT FORMER TEPPCO WELL (TEXAS NO 3)	BENZENE, BARIUM, CHLORIDE
GALVESTON	O&G	03		E.A. DEWITT FEE FORMER PIT (LEASE NO 05611)	OCP#5164	BP AMERICA PRODUCTION COMPANY	TPH, BTEX, CHLORIDES
GALVESTON	O&G	03		LEAGUE CITY HISTORIC PITS	OCP#4970	CONOCO PHILLIPS	TPH, BTEX, OTHER METALS, CHLORIDE
ANDREWS	O&G	08		SAN ANDRES PITS	OCP#5038	ENTERPRISE PRODUCTS OPERATING LLC	CHLORIDE
BRAZORIA	O&G	03		WEST COLUMBIA PIT	OCP#4837	EXXONMOBIL ENVIRONMENTAL AND PROPERTY SOLUTIONS COMP	TPH, BTEX, PSH, CHLORIDE
CALDWELL	O&G	01		R.W. CARTER PIT, SALT FLAT FIELD	OFCU#60292	CRYSTAL OIL & LAND CO.	TPH
CHAMBERS	O&G	03	*	WEST STORAGE BRINE PIT 1	OCP#4935	ENTERPRISE PRODUCTS TEXAS OP LP	CHLORIDE
FORT BEND	O&G	03		FORMER WELL NO. 6 SITE	OCP#5081	ATLAS OIL & GAS EXPLORATION, LLC	TPH, BTEX, SVOCS
GALVESTON	O&G	03		LEAGUE CITY HISTORIC PITS	OCP#4970	CONOCO PHILLIPS	TPH, BTEX, OTHER METALS, CHLORIDE
HARRIS	O&G	03		FORMER SUN HUMBLE PITS SITE (HUMBLE, TX) (RRC ORDER	OCP#1064	SUNOCO INC.	TPH, PSH
HARRIS	O&G	03	*	RESERVE PIT G	OCP#5285	EXXONMOBIL ENVIRONMENTAL AND PROPERTY SOLUTIONS COMP	CHLORIDE
HIDALGO	O&G	04		EAST MCCOOK PIT	OCP#5026	SHELL EXPLORATION AND PRODUCTION CO.	TPH, BTEX
HOCKLEY	O&G	8A		ELLWOOD "A" LEASE (06169), WELL NO. 50W	OCP#5189	APACHE CORPORATION	BTEX, CHLORIDE, TDS, LI, RA, SR, V
HOCKLEY	O&G	8A		RATLIFF SITE, NON-SABINAL OWNED PROPERTY	OCP#5202	SABINAL ENERGY OPERATING, LLC, FORMERLY CHEVRON USA INC.	CHLORIDE
HOUSTON	O&G	06		PIT, NAVARRO CROSSING FEE PROPERTY NOS. 95892/107580	OCP#4458	EXXONMOBIL ENVIRONMENTAL AND PROPERTY SOLUTIONS COMP	CHLORIDE
HOWARD	O&G	08		O'DANIEL PIT TRENCH	OCP#3095	MERIT ENERGY CO.	CHLORIDE
JEFFERSON	O&G	03		BIG HILL PITS	OCP#1037	CHEVRON (FORMERLY UNOCAL)	CHLORIDE
JIM WELLS	O&G	04		PODEST PIT	OFCU#106643/	CORPUS CHRISTI - JEROME PODEST	TPH
KARNES	O&G	02		MAURER MCFARLAND UNIT LEASE RELEASE	OCP#5141	MARATHON OIL EF LLC	TPH, BTEX
KLEBERG	O&G	04		KING RANCH MADERO 8 PIT RELEASE	OCP#4923	EXXONMOBIL ENVIRONMENTAL AND PROPERTY SOLUTIONS COMP	TPH, BTEX, OTHER METALS, CHLORIDE
LIBERTY	O&G	03		CLUBB, A.J. #1 (GREGG ROYALTY)	OFCU#60934	200 ARKANSAS, DAISSETTA, TX 77533	CHLORIDE
MONTAGUE	O&G	09		MONTAGUE SALT-WATER DISPOSAL PITS	OCP#2430	MULTIPLE OPERATORS	CHLORIDE
NOLAN	O&G	7B		LAKE TRAMMEL UNIT PIT	OCP#5107	MERIT ENERGY COMPANY	TPH, BTEX, CHLORIDE
NUECES	O&G	04		DRISCOLL #3 SITE	OCP#4178	EXXONMOBIL ENVIRONMENTAL AND PROPERTY SOLUTIONS COMP	TPH, BTEX, PAH, VOCS, CHLORIDE
PANOLA	O&G	06		ALLISON LEASE	OCP#4844	BP AMERICA PRODUCTION COMPANY	BENZENE, NATURAL GAS, CHLORIDE
PANOLA	O&G	06		BEASLEY 3 LEASE, WELL #5	OCP#5187	CONOCOPHILLIPS COMPANY	BTEX, CHLORIDE, TDS
SAN PATRICIO	O&G	04		HOSKINSON WELL NO. A4	OCP#1974	CHEVRON ENVIRON. MANAGEMENT CO. (FORMERLY PURE RESOUF	BENZENE, PSH
SCURRY	O&G	8A		SACROC UNIT PITS	OCP#5093	KINDER MORGAN PRODUCTION COMPANY, LLC	TPH, CHLORIDE
STARR	O&G	04		SAMANO, M. (07975) LEASE PIT	OCP#5147	TRINITY RIVER ENERGY OPERATING, LLC	TPH, BENZENE
VAN ZANDT	O&G	05		ENAS PIT SITE	OCP#1872	CHEVRON (FORMERLY UNOCAL, PURE RESOURCES)	TPH, BENZENE, CHLORIDE
NUECES		REM/SF		BALLARD PITS	SUP099	LOTS 2 & 3 OF SECTION 6 OF THE WADE RIVERSIDE SUBDIVISION, C	TOTAL PETROLEUM HYDROCARBONS
GALVESTON	RRC	03		DMA DEVELOPMENT LLC	VCP#3-90004	NW CORNER OF FM 646 AND 11TH ST, SANTA FE	CHLORIDE
BEE	RRC	2		EXXON MOBIL CORPORATION	OCP#1285		BTEX IN GROUNDWATER
BROOKS	RRC	4		HILCORP ENERGY CORPORATION	OCP#2043	GLORIA GARCIA LOPEZ #1	BENZENE
COKE	RRC	7C		ORYX ENERGY CORPORATION		JAMESON FIELD	CHLORIDES
ECTOR	RRC	8		TEXACO EXPL & PROD	OCP#1802	MCKNIGHT	PSH ON GROUNDWATER
HARRIS	RRC	3		ISAACKS RD PROPERTIES, WESTERN VACANT LOT	OCP#4820	CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY	CHLORIDE
HIDALGO	RRC	4		FORMER SHELL GAS WELL (1401 N. 16TH ST. MCALLEN)	OCP#5159	SHELL EXPLORATION AND PRODUCTION COMPANY	CHLORIDE, TDS, AS
HIDALGO	RRC	4		FORMER SHELL GAS WELL (1401 N. 16TH ST. MCALLEN)	OCP#5159	SHELL EXPLORATION AND PRODUCTION COMPANY	CHLORIDE, TDS, AS
MONTGOMERY	RRC	03		BISHOP TRACT, BRINE PIT RELEASE	OCP#4294/VCP	GEOSOUTHERN ENERGY CORP.	TPH, BTEX, CHLORIDES, PSH
CALLAHAN	O&G	7B		BAKER RANCH SEEP	OFCU#60296	UNIDENTIFIED	TPH, BTEX, PSH
GREGG	O&G	6E		ANDERSON COLLECTION CENTER PIT	OCP#5125	EAST TEXAS SALTWATER DISPOSAL	BTEX, CHLORIDE

RRC violations list

Violation Discovery Date	Violated Rule Description	Violated Rule	Oil & Gas District	Operator Name	Lease No	Lease/Facility Name	County	Well No	Last Enforcement Action	Last Enforcement Action Date
12/28/2018	Surface or subsurface water pollution	16 TAC § 7B		FINLEY RESOURCES, INC.	01862	TUCKER, S. P.	FISHER	7	Notice of Violation	01/03/2019
12/26/2022	Surface or subsurface water pollution	16 TAC § 09		RIDGE OIL COMPANY	29703	IMU	YOUNG	2623I	Issued a Severance/Se	12/28/2022
12/21/2015	Surface or subsurface water pollution	16 TAC § 05		XOG OPERATING LLC	02449	EDENS 'A'	NAVARRO	1	Notice of Violation	12/29/2015
12/18/2019	Surface or subsurface water pollution	16 TAC § 7B		M & K OPERATING LLC	05881	DAVIS, MERRICK -A-	SHACKELFORD	2	Notice of Violation	12/31/2019
12/17/2019	Surface or subsurface water pollution	16 TAC § 09		RICHEY, RAY MANAGEMENT CO., INC.	150430	RATLIFF, L. D.	WISE	3	Notice of Violation	10/23/2020
12/14/2017	Surface or subsurface water pollution	16 TAC § 7B		BASA RESOURCES, INC.	14358	EAST ELIASVILLE (CADDO) UNIT	STEPHENS	187	Notice of Violation	12/15/2017
12/12/2018	Surface or subsurface water pollution	16 TAC § 7C		ATM ENERGY GROUP, LLC	02654	VAUGHAN, ISABEL -D-	CROCKETT	12W	Notice of Violation	01/28/2019
12/09/2016	Surface or subsurface water pollution	16 TAC § 03		GOLDSMITH OPERATING, LLC	19879	PIERCE	LEON	1	Notice of Violation	01/03/2017
12/07/2017	Surface or subsurface water pollution	16 TAC § 7B		BRAKA OPERATING, L.L.C.	208531	MCINTIRE	STEPHENS	1	Issued a Severance/Se	12/11/2017
12/06/2016	Surface or subsurface water pollution	16 TAC § 05		NEW CENTURY OPERATING, LLC		MARBURGER A UNIT	LEE	1H	Notice of Violation	12/09/2016
11/30/2015	Surface or subsurface water pollution	16 TAC § 06		LAYLINE ENERGY I LLC	204256	ARCO NO. 2	SHELBY	7	Notice of Violation	01/27/2016
11/19/2018	Surface or subsurface water pollution	16 TAC § 03		SANTA ROSA OPERATING, LLC		TRES BRWITAS	WALKER	01	Notice of Violation	01/29/2019
11/17/2016	Surface or subsurface water pollution	16 TAC § 08		PEARL RESOURCES OPERATING CO.LL		GARNET STATE	PECOS	4	Notice of Violation	02/09/2017
11/15/2021	Surface or subsurface water pollution	16 TAC § 03		DARTEX ENERGY CORPORATION	01718	QUINN, B. E., ETAL #3	NEWTON	13	Notice of Violation	11/17/2021
11/14/2018	Surface or subsurface water pollution	16 TAC § 03		COVEY PARK OPERATING LLC	25729	GRESHAM TRUST	LEON	1H	Notice of Violation	01/22/2019
11/12/2019	Surface or subsurface water pollution	16 TAC § 06		KJ ENERGY, LLC		KENNEDY GAS UNIT	RUSK	7H	Notice of Violation	12/17/2020
11/12/2015	Surface or subsurface water pollution	16 TAC § 06		SAMSON LONE STAR, LLC	136967	HOLT, J. W.	GREGG	2	Violation Corrected	02/23/2016
11/09/2015	Surface or subsurface water pollution	16 TAC § 05		CH4 ENERGY II, LLC	03636	POWER-TRUST / T BAR-X	ROBERTSON	1	Notice of Violation	11/12/2015
11/04/2015	Surface or subsurface water pollution	16 TAC § 7C		PARSLEY ENERGY OPERATIONS, LLC	17402	ARNETT 44	REAGAN	4	Notice of Violation	11/05/2015
11/02/2018	Surface or subsurface water pollution	16 TAC § 08		ROVER PETROLEUM OPERATING, LLC	21120	WESTBROOK SOUTHWEST UNIT	MITCHELL	410	Notice of Violation	12/04/2018
10/28/2016	Surface or subsurface water pollution	16 TAC § 05		MUELLER EXPLORATION, INC.	04066	GRANT	HENDERSON	1	Notice of Violation	01/03/2017
10/20/2015	Surface or subsurface water pollution	16 TAC § 10		CHESAPEAKE OPERATING, L.L.C.	265577	NELL, PATSY	HEMPHILL	2H	Notice of Violation	10/27/2015
10/19/2016	Surface or subsurface water pollution	16 TAC § 01		BLACKMAR, JIM OIL OPERATOR		METZLER, JACK	CALDWELL	1	Notice of Violation	02/09/2017
10/16/2015	Surface or subsurface water pollution	16 TAC § 7C		ENDEAVOR ENERGY RESOURCES L.P.	03361	ZULETTE	REAGAN	2	Notice of Violation	10/21/2015
10/15/2015	Surface or subsurface water pollution	16 TAC § 7C		ENDEAVOR ENERGY RESOURCES L.P.	10052	MERTZ (P) 2-12	REAGAN	3	Notice of Violation	11/17/2015
10/15/2015	Surface or subsurface water pollution	16 TAC § 7C		ENDEAVOR ENERGY RESOURCES L.P.	05562	WEGER UNIT	CROCKETT	802	Notice of Violation	10/16/2015
10/13/2016	Surface or subsurface water pollution	16 TAC § 10		LE NORMAN OPERATING LLC	280331	LEWIS 32	HEMPHILL	1H	Notice of Violation	10/17/2016
10/13/2016	Surface or subsurface water pollution	16 TAC § 10		4P ENERGY TEXAS, LLC	09424	HUMPHREYS 59 UNIT	HEMPHILL	5HB	Notice of Violation	11/29/2016
10/07/2021	Surface or subsurface water pollution	16 TAC § 04		ARETE OPERATING COMPANY, LLC		HAYNES ESTATE	ZAPATA	10	Notice of Violation	11/30/2021
10/07/2019	Surface or subsurface water pollution	16 TAC § 08		SILTSTONE RESOURCES OP II, LLC		STATE-HAYTER 35/42S	PECOS	4HA	Notice of Violation	12/04/2019
10/02/2015	Surface or subsurface water pollution	16 TAC § 01		ENERGON3		ANGEL ARMS	WILSON	1	Notice of Violation	10/05/2015
09/28/2015	Surface or subsurface water pollution	16 TAC § 09		LMH ENERGY	14449	KEMPNER -H-	WICHITA	4	Notice of Violation	09/29/2015
09/26/2018	Surface or subsurface water pollution	16 TAC § 09		RYAN, JOSEPH G.	07418	ADAMS, GEO. G.	YOUNG	1	Notice of Violation	09/27/2018
09/24/2015	Surface or subsurface water pollution	16 TAC § 10		UNIT PETROLEUM COMPANY	269374	ISAACS 'D' SL	HEMPHILL	3H	Notice of Violation	01/07/2016
09/23/2015	Surface or subsurface water pollution	16 TAC § 10		APACHE CORPORATION		NIX 83 UNIT	HEMPHILL	2H	Notice of Violation	09/29/2015
09/21/2016	Surface or subsurface water pollution	16 TAC § 09		STAMPER OPERATING CO., INC.		WILLIAMS	JACK	2	Notice of Violation	03/05/2019
09/19/2016	Surface or subsurface water pollution	16 TAC § 01		ADVANTAGEWON OIL, US, CORP.		HW WISEMAN	WILSON	30	Notice of Violation	09/22/2016
09/17/2015	Surface or subsurface water pollution	16 TAC § 09		FIVE STATES OPERATING CO, LLC		WAGGONER-EPCO	WILBARGER	5507	Notice of Violation	09/18/2015
09/14/2015	Surface or subsurface water pollution	16 TAC § 7B		WINCO OIL INC.		HINDS	TAYLOR	1	Notice of Violation	09/17/2015
09/10/2015	Surface or subsurface water pollution	16 TAC § 10		LE NORMAN OPERATING LLC		GEORGE 36	HEMPHILL	1H	Notice of Violation	09/11/2015
09/08/2015	Surface or subsurface water pollution	16 TAC § 10		BP AMERICA PRODUCTION COMPANY	274741	WRIGHT A	HEMPHILL	2H	Notice of Violation	09/09/2015
09/08/2015	Surface or subsurface water pollution	16 TAC § 09		TRI ENERGY RESOURCES, INC.	19924	WARD, MAMIE MCFADDIN -A-	KNOX	2W	Referred to Austin Field	09/09/2015
09/06/2023	Surface or subsurface water pollution	16 TAC § 09		TRI ENERGY RESOURCES, INC.		FARMER, ANNA BETH	KNOX	9	Referred to State-Mane	09/07/2023
08/17/2015	Surface or subsurface water pollution	16 TAC § 08		BEACH OIL & GAS, INC.	30825	LINEBERY -E-	WINKLER	1	Notice of Violation	10/01/2015
08/17/2015	Surface or subsurface water pollution	16 TAC § 8A		CROSS TIMBERS ENERGY, LLC	60378	HARRISON, LEE UNIT	LUBBOCK	1202	Notice of Violation	08/27/2015
08/17/2015	Surface or subsurface water pollution	16 TAC § 08		BEACH OIL & GAS, INC.	30825	LINEBERY -E-	WINKLER	1B	Notice of Violation	10/01/2015
08/17/2015	Surface or subsurface water pollution	16 TAC § 08		BEACH OIL & GAS, INC.	30825	LINEBERY -E-	WINKLER	2	Notice of Violation	10/01/2015
08/17/2015	Surface or subsurface water pollution	16 TAC § 08		LINN OPERATING, INC.		NOBLES	MIDLAND	2H	Notice of Violation	08/29/2015
08/17/2015	Surface or subsurface water pollution	16 TAC § 08		BEACH OIL & GAS, INC.	30825	LINEBERY -E-	WINKLER	3	Notice of Violation	10/01/2015
08/12/2019	Surface or subsurface water pollution	16 TAC § 7B		RONNING GAS AND OIL LLC	12913	KINCAID, ALVIN	EASTLAND	1	Notice of Violation	08/13/2019
08/12/2015	Surface or subsurface water pollution	16 TAC § 02		GRAND RESOURCES, INC.	06705	KUPPINGER SWD	JACKSON	1	Notice of Violation	08/19/2015
08/12/2015	Surface or subsurface water pollution	16 TAC § 08		ENERGEN RESOURCES CORPORATION	39543	UNIVERSITY 11-19	LOVING	1H	Notice of Violation	08/25/2015
08/10/2018	Surface or subsurface water pollution	16 TAC § 08		NBL PERMIAN LLC		BLACK COBRA 1-2 UNIT B	REEVES	66H	Notice of Violation	08/15/2018

08/08/2018	Surface or subsurface water pollution	16 TAC § .08	FLAMINGO OPERATING, LLC		REED B 15	PECOS	10	Notice of Violation	12/04/2018
08/08/2018	Surface or subsurface water pollution	16 TAC § .08	FLAMINGO OPERATING, LLC		REED 'A' 23	PECOS	3	Referred to State-Mana	01/31/2020
08/07/2015	Surface or subsurface water pollution	16 TAC § .8A	MCDONALD PRODUCTION, LLC	63444	DEAN, C. L.	LUBBOCK	1	Notice of Violation	08/18/2015
08/07/2015	Surface or subsurface water pollution	16 TAC § .7B	ITX CORPORATION	28346	VEALE-PARKS (CADD) UNIT	STEPHENS	3	Issued a Severance/Se	08/11/2015
08/02/2021	Surface or subsurface water pollution	16 TAC § .09	RIDGE OIL COMPANY	29703	IMU	YOUNG	26241	Notice of Violation	09/14/2021
08/02/2019	Surface or subsurface water pollution	16 TAC § .09	GUIDANCE OIL DEVELOPERS	10057	HUDSON-FISH UNIT	ARCHER	6	Notice of Violation	08/27/2019
07/28/2016	Surface or subsurface water pollution	16 TAC § .03	PARTEN OPERATING INC.	22761	FORT TRINIDAD DEXTER UNIT	HOUSTON	315	Notice of Violation	08/01/2016
07/12/2019	Surface or subsurface water pollution	16 TAC § .01	VERDISYS LLC		GOODSON	VAL VERDE	3	Notice of Violation	05/05/2020
07/10/2018	Surface or subsurface water pollution	16 TAC § .6E	WILLIAMS LEASE CAPITAL GROUP, LLC	07753	WILLIAMS	GREGG	5	Notice of Violation	12/12/2018
07/09/2021	Surface or subsurface water pollution	16 TAC § .09	MASSIE OIL COMPANY	01583	SHUMAKE	CLAY	45	Notice of Violation	07/12/2021
07/08/2016	Surface or subsurface water pollution	16 TAC § .09	M3 OIL COMPANY, LLC		PERKINS, MELINDA	JACK	2	Notice of Violation	02/17/2022
07/07/2016	Surface or subsurface water pollution	16 TAC § .09	FIVE STATES OPERATING CO, LLC		WAGGONER-EPCO	WILBARGER	1107	Notice of Violation	07/11/2016
06/30/2022	Surface or subsurface water pollution	16 TAC § .7C	BJG OPERATING COMPANY	14495	MCCAMEY UNIT	UPTON	S207RW	Notice of Violation	07/08/2022
06/27/2019	Surface or subsurface water pollution	16 TAC § .7C	CREST OPERATING COMPANY	15590	CAMAR, SW (STRAWN) UNIT	SCHLEICHER	12	Notice of Violation	12/06/2019
06/26/2019	Surface or subsurface water pollution	16 TAC § .09	DRAKE PETROLEUM, LLC	11141	KENDALL 2400 STRAWN SAND UN	YOUNG	1	Notice of Violation	07/02/2019
06/15/2016	Surface or subsurface water pollution	16 TAC § .05	OBAX OIL AND GAS LLC	03951	OSA	ROBERTSON	1H	Notice of Violation	06/17/2016
06/13/2019	Surface or subsurface water pollution	16 TAC § .6E	CHESTNUT EXPLOR. AND PROD., INC.	07248	ANDERSON, GEO.	GREGG	3	Notice of Violation	09/04/2019
06/13/2016	Surface or subsurface water pollution	16 TAC § .05	OBAX OIL AND GAS LLC	04129	MARIE	ROBERTSON	1H	Notice of Violation	06/15/2016
06/13/2016	Surface or subsurface water pollution	16 TAC § .05	OBAX OIL AND GAS LLC	04003	CHARIDEE	ROBERTSON	1H	Notice of Violation	06/15/2016
06/12/2018	Surface or subsurface water pollution	16 TAC § .03	BROOKS PETROLEUM COMPANY	26599	WILLIAM B. HARRISON	HOUSTON	1H	Notice of Violation	06/14/2018
06/07/2016	Surface or subsurface water pollution	16 TAC § .05	OBAX OIL AND GAS LLC	03569	OWEN	ROBERTSON	1H	Notice of Violation	08/30/2016
06/07/2016	Surface or subsurface water pollution	16 TAC § .08	ELEVATION RESOURCES LLC		WHISKEY BARREL STATE 12	REEVES	1H	Notice of Violation	06/10/2016
05/29/2022	Surface or subsurface water pollution	16 TAC § .03	GALVESTON BAY OPERATING CO LLC	08004	TRINITY BAY STATE UNIT NO. 1	CHAMBERS	108 H	Referred to Austin Field	05/31/2022
05/24/2019	Surface or subsurface water pollution	16 TAC § .7C	LAREDO PETROLEUM, INC.	19148	SRH E 7-8 (PSA-A)	REAGAN	1SM	Notice of Violation	05/28/2019
05/21/2018	Surface or subsurface water pollution	16 TAC § .7B	WEST INLAND ENERGY, INC.	162620	HART RANCH 23	STEPHENS	1	Notice of Violation	05/22/2018
05/20/2019	Surface or subsurface water pollution	16 TAC § .7C	PIONEER NATURAL RES. USA, INC.	12620	NEAL "F"	UPTON	4D	Notice of Violation	05/22/2019
05/18/2017	Surface or subsurface water pollution	16 TAC § .03	GOLDSMITH OPERATING, LLC	20000	LANE	LEON	1	Notice of Violation	11/09/2017
05/17/2024	Surface or subsurface water pollution	16 TAC § .6E	BASA RESOURCES, INC.	07036	TURNER, J. W.	RUSK	33	Notice of Violation	06/18/2024
05/12/2016	Surface or subsurface water pollution	16 TAC § .10	LE NORMAN OPERATING LLC	278396	SHELL FEE 45	HEMPHILL	2H	Notice of Violation	05/13/2016
05/08/2019	Surface or subsurface water pollution	16 TAC § .09	TAM2 SQUARED OPERATING, LLC	32799	LOFTIN D	ARCHER	3D	Notice of Violation	01/03/2020
05/07/2024	Surface or subsurface water pollution	16 TAC § .03	SENORA RESOURCES, INC.	24637	ELO #3	FAYETTE	3	Notice of Violation	07/29/2024
05/05/2020	Surface or subsurface water pollution	16 TAC § .7B	CLEARLY PETROLEUM, LLC	17853	ATKINS-TEXACO	STEPHENS	8	Notice of Violation	05/06/2020
05/01/2024	Surface or subsurface water pollution	16 TAC § .04	GREEN EXPLORATION COMPANY	09602	STATE TRACT 973	NUJECES	1	Notice of Violation	05/03/2024
04/30/2018	Surface or subsurface water pollution	16 TAC § .7B	WEST INLAND ENERGY, INC.	162620	HART RANCH 23	STEPHENS	1	Issued a Severance/Se	05/02/2018
04/01/2019	Surface or subsurface water pollution	16 TAC § .09	JAMES, DERYL	23896	HAUSLER BROS. LEASE	WICHITA	1	Notice of Violation	04/02/2019
03/31/2017	Surface or subsurface water pollution	16 TAC § .03	LAYLINE ENERGY I LLC	10826	ADAMS, C. T. OIL UNIT #2	HOUSTON	2	Notice of Violation	04/11/2017
03/31/2016	Surface or subsurface water pollution	16 TAC § .10	CIMAREX ENERGY CO. OF COLORADO	278337	CAMPBELL, J.C. 37	HEMPHILL	4H	Notice of Violation	04/04/2016
03/22/2019	Surface or subsurface water pollution	16 TAC § .09	FABELA OPERATING, LLC	26424	ELLEDGE-FURR	BAYLOR	1D	Notice of Violation	06/18/2019
03/16/2018	Surface or subsurface water pollution	16 TAC § .10	LATIGO PETROLEUM TEXAS, LP		COURSON RANCH 157	ROBERTS	11	Notice of Violation	04/17/2018
03/14/2024	Surface or subsurface water pollution	16 TAC § .04	LAMAR OIL & GAS, INC.	151428	NINE MILE PT. FLD. CONSL. UNIT	ARANSAS	17	Notice of Violation	03/18/2024
03/12/2020	Surface or subsurface water pollution	16 TAC § .7C	APACHE CORPORATION	18159	MC ELROY RANCH CO D	UPTON	2A	Notice of Violation	04/09/2020
03/11/2020	Surface or subsurface water pollution	16 TAC § .08	SEGURO OIL AND GAS, LLC	36685	UNIVERSITY "J"	CRANE	1	Notice of Violation	04/21/2020
02/27/2024	Surface or subsurface water pollution	16 TAC § .08	BIRCH OPERATIONS, INC.	57152	ROWDY THE COWBOY 42-30 E	HOWARD	7WA	Notice of Violation	05/21/2024
02/27/2024	Surface or subsurface water pollution	16 TAC § .01	SOUTHERN OIL & GAS LLC		RAMERT	MCMULLEN	2	Referred to State-Mana	03/04/2024
02/26/2019	Surface or subsurface water pollution	16 TAC § .06	SABINE OIL & GAS CORPORATION	268392	HARDY HEIRS-MODISETTE (SA)	RUSK	2H	Notice of Violation	12/18/2020
02/17/2020	Surface or subsurface water pollution	16 TAC § .08	MADISON AND WRIGHT LLC	38499	NORTHSHOT	REEVES	3	Notice of Violation	02/27/2020
02/17/2016	Surface or subsurface water pollution	16 TAC § .06	RHC ENERGY (USA) LLC		HASSLER	RUSK	1	Notice of Violation	04/22/2016
02/13/2023	Surface or subsurface water pollution	16 TAC § .09	JUST OIL & GAS, INC.	07477	ATCHLEY, KATHERINE HAMILTON	YOUNG	54 G	Notice of Violation	02/24/2023
02/12/2018	Surface or subsurface water pollution	16 TAC § .10	UNIT PETROLEUM COMPANY		DIXON 5554 CXL	HEMPHILL	6H	Notice of Violation	02/13/2018
02/09/2016	Surface or subsurface water pollution	16 TAC § .10	CORLENA OIL COMPANY		BRAINARD 64	LIPSCOMB	2H	Notice of Violation	02/11/2016
02/08/2016	Surface or subsurface water pollution	16 TAC § .05	USA SUPERIOR ENERGY LLC		CRAIG LEASE	NAVARRO	2	Referred to State-Mana	12/05/2017
01/26/2017	Surface or subsurface water pollution	16 TAC § .7B	FRONTIER RESOURCES, INC.	059669	SMITH KING W. A	STEPHENS	1	Issued a Severance/Se	01/27/2017
01/24/2019	Surface or subsurface water pollution	16 TAC § .08	DIAMONDBACK E&P LLC		NEAL LETHCO STATE 24-23 UNIT	PECOS	3WA	Notice of Violation	02/01/2019
01/16/2019	Surface or subsurface water pollution	16 TAC § .08	HALCON OPERATING CO., INC.		MAXWELL-NATALIE	PECOS	1H	Notice of Violation	01/29/2019

01/10/2023	Surface or subsurface water pollution	16 TAC § 7.03	GAITHER PETROLEUM CORPORATION	01771	BEAUMONT PETROLEUM CO. - S HARRIS		58	Notice of Violation	01/18/2023
01/10/2019	Surface or subsurface water pollution	16 TAC § 7B	CLEARLY PETROLEUM, LLC	12449	SLOAN, MARTIN UNIT	STEPHENS	11W	Notice of Violation	01/11/2019
01/09/2017	Surface or subsurface water pollution	16 TAC § 7.08	AMERICO ENERGY RESOURCES, LLC		COLEMAN RANCH UNIT	MITCHELL	410	Notice of Violation	01/30/2017
01/08/2020	Surface or subsurface water pollution	16 TAC § 7.08	PARSLEY ENERGY OPERATIONS, LLC		PATTERSON 5-8-G	GLASSCOCK	4313H	Notice of Violation	01/13/2020
01/08/2016	Surface or subsurface water pollution	16 TAC § 7C	LAREDO PETROLEUM, INC.		SUGG-A-	REAGAN	1716SM	Notice of Violation	01/11/2016
01/07/2016	Surface or subsurface water pollution	16 TAC § 7.09	BLAKENERGY OPERATING, LLC		GARNER	JACK	2	Notice of Violation	01/12/2016
01/04/2023	Surface or subsurface water pollution	16 TAC § 7.03	GAITHER PETROLEUM CORPORATION	10330	GOOSE CREEK WASTE WATER	HARRIS	1	Notice of Violation	01/09/2023
01/04/2019	Surface or subsurface water pollution	16 TAC § 7C	PIONEER NATURAL RES. USA, INC.	03913	NORTH PEMBROOK SPRABERRY	UPTON	8516A	Notice of Violation	01/07/2019