



H&L EXPLORATION COMPANY, LLC

October 19, 2023

Chairman Christi Craddick
P.O. Box 12967
Austin, TX 78011-2967

Commissioner Wayne Christian
Commissioner Jim Wright

Re: Rule 8 Proposal on Authorized Pits

Dear Chairman and Commissioners:

I have been a small operator in the Texas Panhandle, RRC District 10 for the past 42 years. Along the way, my company has contributed many millions of dollars to the state in severance taxes in addition to millions in ad valorem taxes to each county in which we operate. We are one of which used to be many.

Forty years ago there were more than 100 independent geologists and operators in the Panhandle; today there are fewer than fifteen. H&L is currently proving there may be more oil and gas left to be discovered than has already been produced in District 10. Regulations, such as this one, are simply not needed.

Since 1927, more than 70,000 wells have been drilled in District 10, an area it shares with the greatest groundwater resource in the state, the Ogallala aquifer. This treasure, shared by farmers, ranchers, manufacturers, cities and our industry, accounts for 47% of all the groundwater in the entire state of Texas. Of this, agriculture uses 75% and mining uses less than 2%.

Being aware of this for nearly 100 years, operators, large and small, have used best practices to protect this irreplaceable resource. Many of our wells are drilled on irrigated land and, to my knowledge, there has never been a complaint filed by anyone. The RRC, the TCEQ, and the Texas Water Development Board, partnering with industry, are to be commended for such a remarkable record!

Rule 8 is nothing more than Aid to Dependent Lawyers, as it is a solution looking for a problem. To a hammer, everything looks like a nail; to a regulator, everything looks like it needs to be regulated. Instead of looking to enact more regulations on our industry in an effort to satisfy the environmentalists, who we know will never be satisfied, simply educate them as to our incredible historical performance. I promise you it's better than theirs.

Please say 'NO' to Rule 8.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Gib Brown', is written over a horizontal line.

Gib Brown

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