

From: [Luke Shipp](#)
To: [Rules Coordinator](#)
Cc: Roland.Gutierrez@senate.texas.gov; [Senator Cesar Blanco](#); Brooks.Landgraf@House.State.Tx.US
Subject: Regarding Changes to Rule 8 that omit drilling mud pits
Date: Tuesday, September 10, 2024 2:43:18 PM

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Texas Railroad Commission Rule 8 Coordinator,

It is my understanding that earthen reserve drilling mud pits have been omitted from the planned revisions to Rule 8.

Drilling mud reserve pits cause the vast majority of permanent damage to the land by O&G drilling operations. I am attaching a photo of just one of the many irreversible scars that have been caused by a drilling mud reserve pits on my ranch. The reserve pit in the photo was created by Gulf in 1968 and fifty six years later the vegetation has not recovered. And it most likely never will recover.

The drilling mud reserve pits not only cause perpetual scars but the salts and chemicals in the drilling mud leach down into the fresh water aquifers that we should all be aggressively protecting. Water is what sustains our lives and it is in short supply in West Texas.

The RRC needs to either require a closed loop system for drilling mud instead of earthen pits or they need to require substantial pit liners for earthen pits and require that the pit materials to be removed and disposed of at proper sites after the pit dries out.

I am hoping that the TRRC will care about protecting the land and the fresh water aquifers and see the importance of strengthening the regulations regarding drilling reserve pits during the upcoming Rule 8 modifications.

Please see the attached photo.

Sincerely,

Luke Shipp



