

Laura Briggs, Texas

My name is Laura Briggs. I live on my rural property (farm/ranch) in Pecos County, Texas. We have had and are continuing to experience terrible oil and gas operations on our land. I found this public comment opportunity just today, and the deadline for submitting comments is in just a few hours, so I will respond to the enforcement plan quickly here.

The Enforcement Plan is a summary of the RRC soft paperwork enforcement already in place, and my experience shows what is in place is realistically useless, time consuming, a costly hurdle for landowners, and nothing more than a feel good plan to accept federal funding to try to plug some old wells.

While big reputable operators may be persuaded by the rubber teeth of the RRC and it's so called limited resources of inspectors, lawyers, commissioners, and as Wayne Christian stated in the April RRC meeting something like 480 professionals in the RRC, landowners watching their property being destroyed have themselves and whatever attorney power they can pay for against the RRC paperwork and legal machine.

My experience is with small shotty operators, taking old leases for short stints to scrap metal and oil; and then the oil and gas scam operators. The scrappers just take everything of value off the property, but the scammers are the ones that profit and make the RRC look very powerless and stupid. My experience with this started with Aegis Oil and Gas. They obtain old leases like the ones here, and sell investments, and drill useless wells as fast as they can get permits. Then they file bankruptcy, leave their mess behind for the RRC, the State of Texas on the GLO lands, and the landowners.

But, Aegis did not just file bankruptcy and go away, 7S Oil & Gas bought him out and did the scam again, then Arch Oil & Gas bought the scam, and then Beach Oil & Gas, AVP McCamey and now according to press releases Maverick and Hard Rock have purchased the 7S Oil & Gas offices and leases.

So, even with SEC indictments, Texas SSB indictments, liens, and scores of complains, like using pits to dump produced water for years, setting up fake drilling rigs, stealing oil, producing without a P5/P4, and not plugging wells, as long as the "operator" changes and their paperwork gets filed the RRC lets it. Nothing in this draft will help stop the mess left by fraud.

The RRC has insisted that stopping fraud is not their job, that has to be the Sheriff, Oil & Gas task Forces, SSB and SEC. These agencies do not work together. What is left on my ranch is pump jacks not connected, one tipping, wells that need to be plugged, power lines down that Oncor says I should not touch but are hanging low enough you can not ride a horse or drive a truck/tractor under them, an open tank of oil/water and miles of abandoned fast line.

My best hope is a scrapper operator to come clean up the mess and pray the scammers find another property to use. What is the RRC plan to control fraud operators that pacify the paperwork and fee requirements? Why does it take years of persistent complaints to get the RRC to shut these non-complaint operators down? Then when they trespass and produce oil by leaving the pump jacks open and taking the free flow oil nothing happens to them for the theft? This is the equivalent of an open border for scammers, and they know it.

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