

## Schuyler Wight, Texas

The RRC's orphan well plugging program is woefully inadequate to stay ahead of the liability and damage to the environment and ecosystem. My ranch has over 100 orphan wells on it. The RRC does not plug one until it starts to flow to surface. By that time, the damage is done. When they go into the well, there is pipe in the hole, wellbore problems, casing parted, and a host of other issues that turn what should have been a \$20,000 plug job into a \$200,000 plugging operation.

There are 3 wells on the ranch that are in the Pecos riverbed. According to the RRC's ranking system, they will not become a high priority until they actively leak into the river. This is really a shame that the regulatory agency can't put a priority on wells that are in a sensitive area. There are a number of P-13 wells that are actively flowing to surface. I don't have the means to plug them.

Years ago, they were given to the landowners who did not and will never have the means to plug them. In what universe does it make sense to turn an environmental problem that pollutes the water that we all depend upon to someone who does not have the wherewithall to handle and fix the liability? There are several operators on the ranch who are financially suspect who are allowed to keep operating.

They can't even afford to pay their royalties to the mineral owners. When the next downturn in the oilfield happens, these operators will bankrupt their company and turn the liability over to the taxpayers. Also on my ranch, there are approximately 30 wells that the RRC does not have in their GIS database. One of them has been leaking salt water to surface for over a decade. This well was drilled as a sulphur test well in 1969.

The RRC refuses to plug this well because it ain't in their database. Part of the RRC's mission statement is to protect the environment. I'm no expert in bureaucracy, but it is clear that their system of managing their liability is broken. Letting this continue is not a good plan. Leaving this looming problem for our children is not the right thing to do. Thank you, Schuyler Wight