

H.R. Stasney & Sons, Ltd.
Lance Thomas, Manager
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Albany, Texas 76430

Submitted 11/1/23

I am the manager of roughly 35,000 acres of ranch land and mineral interests for H.R. Stasney & Sons, Ltd. in Shackelford County, Texas.

H.R. Stasney & Sons owns the surface and minerals of the historic 25,000 acre Cook Ranch ("Ranch") that was founded in the late 1800's. Shallow oil production on the Ranch is the reason that the Cook Children's Hospital in Ft. Worth exists.

Stasney Well Service operates the cattle business, the wildlife business and the stripper-well oilfield operations on the Ranch and an additional 10,000 in Shackelford County. There is no underground fresh water or "usable quality" drinking water on the Ranch or any other acreage Stasney owns in Shackelford County. In the early days of drilling on the Ranch, fresh water was piped from the Clear Fork of the Brazos River from over 15 miles away. Today our drinking water comes from Lake Hubbard in Stephens County via pipelines from over 17 miles away. Our cattle utilize man-made stock tanks dug into clay.

Over the past 100 years, roughly 1900 vertical wells have been drilled, completed, maintained and plugged on the Cook Ranch utilizing simple, effective and safe earthen pits as permitted by the existing Rule 8. Earthen pits work well on our property because all of the shallow beds on the Ranch consist of alternating impermeable clay beds separated by solid impermeable limestone layers. There are no shallow sand beds or permeable shallow soil beds on the ranch. NOT ONE WELL on the Ranch has encountered subsurface drinking or usable quality groundwater.

We take land stewardship seriously. As a result, Stasney's Cook Ranch has received land stewardship awards and wildlife awards from Texas Parks and Wildlife. Utilizing earthen pits on the Ranch for the last 100 years has not harmed the environment, persons, cattle or wildlife. If it did, as owners, ranchers and wildlife managers we would change the practice with or without RRC regulations.

So, with these facts in mind, I make the following statements.

First, geology, lithology and soil conditions vary drastically from the Gulf Coast to Shackelford County, Tx. Because of this fact, drafting a "one-size-fits-all" rule is like forcing every person in Texas to wear one boot size. That size might fit a few, but would be terrible and/or painful for most. The existing Rule 8 allows for a more constructive and less wasteful approach for land owners, operators and regulators at the district level to balance local needs and concerns according to local conditions.

Second, earthen pits on our ranches do not leak because of the nature of the ground on which we operate; therefore, requiring plastic liners adds plastic pollution to our land that we do not need and do not want! The proposed pit rules require all pits be lined whether or not they need it. This is a complete waste of time, money, human resources and economic resources. The existing Rule 8 works and should remain in effect for all vertical wells.

Third, economic margins are thin on independent vertical well operations. Requiring operators to waste money, time and labor resources on unnecessary plastic liners and/or costly clay compacted construction practices will double the cost of well drilling and operations and significantly prevent and/or shorten the economic life of every well that is operated on our property. Reducing, hampering and inhibiting the economic and productive life of oil and gas production on our property and other property in Texas is the exact opposite of what the RRC should be doing for Texas landowners, mineral owners, rural Texas economies and the USA. In short, Texas private landowners have the right to use their own land as they see fit. If the RRC intends to limit the free exercise of property rights in any manner without quantifiable proof of actual environmental harm, it will amount to an unconstitutional taking of our property. Therefore, we want the existing Rule 8 to remain in place for vertical wells on our property and we strongly object to the proposed wasteful New Mexico style pit rules for our property.

Sincerely,
Lance Thomas, Manager
H.R. Stasney & Sons, Ltd.