

## Report on Oil and Gas Field Operations' Violations and Enforcement

### CHART 1: OIL AND GAS FIELD OPERATIONS DATA

The data below does not track the identification of a specific violation to enforcement action, as detailed in Chart 3, but rather is time-specific aggregate data.

|  | FY 2024<br>Quarter 1 | FY 2024<br>Quarter 2 | FY 2024<br>Quarter 3 | FY 2024<br>Quarter 4 | FY 2024 Total |
|--|----------------------|----------------------|----------------------|----------------------|---------------|
| Number of oil and gas inspections performed  | 114,211              | 114,584              | 121,154              | 111,903              | 461,852       |
| Number of oil and gas facility inspections with no violation                                 | 106,757              | 107,131              | 108,321              | 108,036              | 430,245       |
| Number of statewide rule violations  | 6,978                | 6,620                | 7,201                | 7,949                | 28,748        |
| Number of major statewide rule violations  | 2                    | 1                    | 0                    | 0                    | 3             |
| Number of oil and gas complaints received  | 93                   | 121                  | 192                  | 150                  | 556           |
| Number of oil and gas complaints resolved  | 117                  | 113                  | 121                  | 140                  | 491           |
| Number of pipeline severances/seal orders issued   | 21,568               | 21,724               | 43,336               | 31,408               | 118,036       |
| Number of district-initiated issuance of severance/seal orders                               | 222                  | 194                  | 228                  | 224                  | 868           |
| Number of alleged oil and gas violations sent to Office of General Counsel Legal Enforcement | 760                  | 528                  | 291                  | 434                  | 2,013         |

| CHART 2: OIL AND GAS FIELD OPERATIONS VIOLATIONS BY RULE                                     |                      |                      |                      |                      |               |
|--|----------------------|----------------------|----------------------|----------------------|---------------|
|  | FY 2024<br>Quarter 1 | FY 2024<br>Quarter 2 | FY 2024<br>Quarter 3 | FY 2024<br>Quarter 4 | FY 2024 Total |
| Number of alleged oil and gas violations sent to Office of General Counsel Legal Enforcement | 760                  | 528                  | 291                  | 434                  | 2,013         |
| Rule Number  |                      |                      |                      |                      |               |
| <a href="#">3.1: Organization Report; Retention of Records; Notice Requirements</a>          | 0                    | 0                    | 0                    | 0                    | 0             |
| <a href="#">3.2: Commission Access to Properties</a>   | 0                    | 0                    | 0                    | 0                    | 0             |
| <a href="#">3.3: Identification of Properties, Wells, and Tanks</a>                          | 146                  | 84                   | 87                   | 74                   | 391           |
| <a href="#">3.5: Application To Drill, Deepen, Reenter, or Plug Back</a>                     | 5                    | 0                    | 0                    | 0                    | 5             |
| <a href="#">3.8: Water Protection</a>  | 139                  | 103                  | 43                   | 92                   | 377           |
| <a href="#">3.9: Disposal Wells</a>  | 2                    | 4                    | 1                    | 3                    | 10            |
| <a href="#">3.13: Casing, Cementing, Drilling, and Completion Requirements</a>               | 35                   | 14                   | 16                   | 16                   | 81            |
| <a href="#">3.14: Plugging</a>   | 304                  | 225                  | 117                  | 214                  | 860           |
| <a href="#">3.15: Surface Equipment Removal Requirements and Inactive Wells</a>              | 0                    | 1                    | 0                    | 0                    | 1             |
| <a href="#">3.16: Log and Completion or Plugging Report</a>                                  | 16                   | 1                    | 3                    | 5                    | 25            |
| <a href="#">3.17: Pressure on Bradenhead</a>   | 2                    | 6                    | 1                    | 9                    | 18            |
| <a href="#">3.20: Notification of Fire Breaks, Leaks, or Blow-outs</a>                       | 13                   | 5                    | 0                    | 3                    | 21            |
| <a href="#">3.21: Fire Prevention and Swabbing</a>   | 46                   | 43                   | 3                    | 9                    | 101           |
| <a href="#">3.22: Protection of Birds</a>  | 6                    | 2                    | 0                    | 1                    | 9             |
| <a href="#">3.26: Separating Devices, Tanks and Surface Commingling of Oil</a>               | 0                    | 9                    | 0                    | 0                    | 9             |

| <b>CHART 2: OIL AND GAS FIELD OPERATIONS VIOLATIONS BY RULE, continued</b>                        |                              |                              |                              |                              |                      |
|---|------------------------------|------------------------------|------------------------------|------------------------------|----------------------|
|   | <b>FY 2024<br/>Quarter 1</b> | <b>FY 2024<br/>Quarter 2</b> | <b>FY 2024<br/>Quarter 3</b> | <b>FY 2024<br/>Quarter 4</b> | <b>FY 2024 Total</b> |
| <a href="#">3.27: Gas To Be Measured and Surface Commingling of Gas</a>                           | 0                            | 0                            | 1                            | 1                            | 2                    |
| <a href="#">3.32: Gas Well Gas and Casinghead Gas Shall Be Utilized for Legal Purposes</a>        | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.36: Oil, Gas, or Geothermal Resource Operation in Hydrogen Sulfide Areas</a>        | 10                           | 0                            | 6                            | 0                            | 16                   |
| <a href="#">3.46: Fluid Injection into Productive Reservoirs</a>                                  | 16                           | 13                           | 3                            | 2                            | 34                   |
| <a href="#">3.57 Reclaiming Tank Bottoms, Other Hydrocarbon Wastes, and Other Waste Materials</a> | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.58: Certificate of Compliance and Transportation Authority; Operator Reports</a>    | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.73: Pipeline Connection; Cancellation of Certificate of Compliance; Severance</a>   | 19                           | 9                            | 10                           | 4                            | 42                   |
| <a href="#">3.81: Brine Mining Injection Wells</a>  | 0                            | 8                            | 0                            | 0                            | 8                    |
| <a href="#">3.91: Cleanup of Soil Contaminated by a Crude Oil Spill</a>                           | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.96 Underground Gas Storage</a>  | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.98: Standards for Management of Hazardous Oil and Gas Waste</a>                     | 1                            | 0                            | 0                            | 0                            | 1                    |
| <a href="#">3.99: Cathodic Protection Well</a>  | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">3.106 Sour Gas Pipeline Facility Construction Permit</a>                              | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">4.611: Oil and Gas NORM Prohibited Disposal</a>                                       | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">TNRC 85.3855: Administrative Penalty</a>  | 0                            | 0                            | 0                            | 0                            | 0                    |
| <a href="#">TNRC 91.143: False Applications, Reports, and Documents and Tampering with Gauges</a> | 0                            | 1                            | 0                            | 1                            | 2                    |

| <b>CHART 3: OIL AND GAS ENFORCEMENT AND DOCKET DATA</b>   |                              |                              |                              |                              |                      |
|---|------------------------------|------------------------------|------------------------------|------------------------------|----------------------|
| The data in Chart 3 does not track the identification of a violation listed in Chart 1 to penalty action. This chart contains time-specific aggregate data. The number of oil and gas enforcement docket is not necessarily related to the number of violations sent to the Office of General Counsel for docketing in the same time period. Additionally, each docket may contain multiple violations. |                              |                              |                              |                              |                      |
|   | <b>FY 2024<br/>Quarter 1</b> | <b>FY 2024<br/>Quarter 2</b> | <b>FY 2024<br/>Quarter 3</b> | <b>FY 2024<br/>Quarter 4</b> | <b>FY 2024 Total</b> |
| Number of oil and gas enforcement dockets   | 105                          | 111                          | 74                           | 76                           | 366                  |
| Number of repeat oil and gas violators based on a seven-year look back of docketed cases  | 30                           | 36                           | 40                           | 57                           | 163                  |
| Amount of final oil and gas enforcement penalties assessed  | \$ 1,906,428                 | \$ 1,109,643                 | \$ 2,087,581                 | \$1,487,578                  | \$6,591,230          |