

# RAILROAD COMMISSION OF TEXAS

## Oil and Gas Division



### NOTICE TO OIL AND GAS OPERATORS

Extension of Certain Expirations and Filing Requirements Administered by  
the Administrative Compliance and Technical Permitting Sections

On March 13, 2020, the Governor of Texas declared a state of disaster for the State of Texas due to the COVID-19 epidemic. During this disaster declaration period, the Railroad Commission of Texas ("Commission") is extending deadlines for certain expirations and filing requirements effective immediately through September 30, 2020, as follows:

1. All current **permits, licenses, registrations, and rule exceptions** (except Form P-5, see subsection 2.i. for the applicable extension for Form P-5) issued by the Commission's Oil & Gas Division with termination or expiration dates between March 1, 2020, and September 30, 2020, are hereby extended so that the new termination or expiration date will for all purposes be September 30, 2020. This relief does not apply to matters granted and/or required by a Commission Final Order.
2. An operator who has received a **Notice of Violation ("NOV") issued by the Administrative Compliance, or Technical Permitting Sections of the Oil & Gas Division**, between March 1, 2020, and September 30, 2020, related to the following Statewide Rules ("Rules"), Forms, or processes shall resolve the violation(s) on or before the response date indicated on the NOV or September 30, 2020, whichever is **later**:
  - a. Over-Production Letters
  - b. Form G-10 (Gas Well Status Report)
  - c. Form W-10 (Oil Well Status Report)
  - d. Notice of Severance or Cancellation regarding the Form P-4 (Certificate of Compliance and Transportation Authority)
  - e. Form H-10 (Annual Disposal/ Injection Well Monitoring Report)
  - f. Form H-10H (Annual Well Monitoring Report Underground Storage in Salt Formation)
  - g. Form P-18 (Skim Oil/ Condensate Report)
  - h. Rule 14(b)(2)
  - i. Rule 15 requirements for renewal of Form P-5 (Organization Report); as follows:
    - i. the deadline to resolve a Rule 15 violation is hereby extended through September 30, 2020; the Commission shall process P-5 renewals with pending Rule 15 violations until September 30, 2020

- ii. this exception does not apply to renewal requirements other than those requirements related to Rule 15; operators are still required to file a Form P-5, P-5O, filing fee, all other documents and fees, etc. required to renew the Form P-5
- iii. this exception does not apply to the requirement to file financial security; the timely filing of all financial security is still required; any bond or other financial security instrument expiring between March 1, 2020, and September 30, 2020, including those bonds or other financial security instruments on file for commercial facilities, must be renewed in accordance with 16 Texas Administrative Code § 3.78, regardless of whether the permit, license, registration, or other authorization issued by the Commission has been continued/ extended by this exception
- iv. the Commission shall continue to collect financial security on file with the Commission due for collection for operators who fail to maintain an active P-5 status
- j. Form H-5 (Disposal/ Injection Well Pressure Test Report), due between March 1, 2020, and September 30, 2020; this exception does not apply to violations evidenced by Forms H-5 which may cause health, safety, waste, or environmental concerns; operators must timely resolve these violations as required by the NOV and/or applicable rule or regulation
- k. Form H-15 (Test on an Inactive Well More than 25 Years Old), due between March 1, 2020, and September 30, 2020; this exception does not apply to violations evidenced by Forms H-15 which may cause health, safety, waste, or environmental concerns; operators must timely resolve these violations as required by the NOV and/or applicable rule or regulation

**This extension does not apply to violations identified as a result of inspections, complaints, tests, or incidents that may cause health, safety, waste, or environmental concerns.** Operators must timely resolve these violations as required by the NOV and/or applicable rule or regulation.

Unless otherwise extended in this Notice, all other filing requirements, e.g. PR (monthly production report) are still in effect. This extension does not prohibit operators from seeking relief for deadlines and filing requirements other than those identified in this Notice. Such requests for relief may be granted by the Commission on a case-by-case basis.

This extension does not prohibit operators from submitting renewals and/or correcting violations in accordance with existing regulations, guidance, or as directed by the Commission prior to this Notice.

*Please Forward to the Appropriate Section of Your Company*