

**RAILROAD COMMISSION OF TEXAS  
HEARINGS DIVISION**

**OIL & GAS DOCKET NO. 20-0306520**

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**IN RE: P-5 ORGANIZATION REPORT OF 4P ENERGY TEXAS, LLC**

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**FINAL ORDER**

The Commission finds that after notice and an opportunity for hearing regarding the captioned matter, the Operator failed to request a hearing and pay the hearing fee as required by 16 TEX. ADMIN. CODE §3.15(g)(4) and TEX. NAT. RES. CODE §89.022(f). This matter having been duly submitted to the Railroad Commission of Texas at conference held in its offices in Austin, Texas, the Commission makes the following findings of fact and conclusions of law.

**FINDINGS OF FACT**

1. 4P Energy Texas, Llc [Operator #953803] (the "Operator"), is the record operator or one or more inactive wells in the State of Texas and is required to file Organization Report (Form P-5) with the Commission. Operator's most recent P-5 was due on or before March 1, 2016.
2. After filing its most recent Organization Report (Form P-5) with the Commission, the Operator was notified they were deficient and had failed to comply with the requirements of 16 TEX. ADMIN. CODE § 3.15 (Surface Equipment Removal Requirements and Inactive Wells) and provided with a written statement of the reasons for the determination and allowed ninety (90) days from the date its P-5 was due to comply with the requirements of 16 TEX. ADMIN. CODE § 3.15 and TEX. NAT. RES. CODE §§89.021 - 89.030.
3. After the expiration of ninety (90) days and pursuant to 16 TEX. ADMIN CODE §3.15(g)(4), an authorized Commission employee determined that the Operator's Organization Report still could not be renewed because the Operator continued to fail to comply with the requirements of 16 TEX. ADMIN. CODE §3.15 (Surface Equipment Removal Requirements and Inactive Wells).
4. The Commission sent the Operator a letter by certified mail giving notice to the Operator of the determination of continued non-compliance regarding specified inactive wells, attached as Exhibit A to this order, and advising the Operator of the right to request a hearing to show compliance. The letter notified the Operator that the hearing request must be received in docket services no later than 30 days after the date of the letter. The letter also notified the Operator that a final order denying renewal of the Operator's Organization Report (Form P-5) would result in the cancellation of all P-4 Certificates of Compliance and the severance of all pipeline or other carrier connections.

5. All notices and letters from the Commission to the Operator on this matter were addressed and mailed to the Operator's most recently reported address on the Form P-5 Organization Report.
6. The Operator did not timely request a hearing and pay the hearing fee on these issues as required under 16 TEX. ADMIN. CODE §3.15(g)(4) (Surface Equipment Removal Requirements and Inactive Wells).
7. Statewide Rule 15 (16 TEX. ADMIN. CODE §3.15) is a Commission rule that relates to safety or the prevention or control of pollution.

**CONCLUSIONS OF LAW**

1. The Operator received proper notice and an opportunity for hearing regarding compliance with 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §§89.021 - 89.030.
2. All things necessary to the Commission attaining jurisdiction over the subject matter and the parties in this matter have been performed or have occurred.
3. The Operator is in violation of Commission Statewide Rule 15 and did not timely request a hearing to contest the determination that it was in violation.
4. The Operator's P-5 Organization Report should not be renewed and all of the Operator's P-4 Certificates of Compliance should be cancelled, with all related pipeline or other carrier connections severed. 16 Tex. Admin. Code §3.15 (g)(4) and Tex. Nat. Res. Code §§89.022(f), 91.704 - 91.706.
5. The Operator's P-5 Organization Report cannot be renewed until the operator brings the inactive wells shown on the attached Exhibit A into compliance with the requirements of 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §§89.021 - 89.030.

**IT IS ORDERED** that renewal of 4P Energy Texas, Llc's P-5 Organization Report is hereby **DENIED**.

**It is further ORDERED** that all P-4 Certificates of Compliance issued to 4P Energy Texas, Llc as operator of record are hereby **CANCELLED** and all related pipeline or other carrier connections are hereby **SEVERED**.

**It is further ORDERED** that 4P Energy Texas, Llc shall bring the wells on Exhibit A into compliance with Statewide Rule 15 (16 TEX. ADMIN. CODE §3.15) and that the Operator's P-5 Organization Report shall not be renewed until the wells on Exhibit A have been brought into compliance as required by this order.

**It is further ORDERED** that 4P Energy Texas, Llc and each person who held a position of ownership or control in the Operator at the time the Operator's most-recent P-5 Organization Report was filed shall be subject to the terms of TEX. NAT. RES. CODE §91.114.

**It is further ORDERED** by the Commission that this order shall not be final and effective until 25 days after the Commission's Order is signed, unless the time for filing a motion for rehearing has been extended under Tex. Gov't Code §2001.142, by agreement under Tex. Gov't Code §2001.147, or by written Commission Order issued pursuant to Tex. Gov't Code §2001.146(e). If a timely motion for rehearing is filed by any party at interest, this order shall not become final and effective until such motion is overruled, or if such motion is granted, this order shall be subject to further action by the Commission. Pursuant to Tex. Gov't Code §2001.146(e), the time allotted for Commission action on a motion for rehearing in this case prior to its being overruled by operation of law is hereby extended until 90 days from the date the Commission Order is signed.

All requested Findings of Fact and Conclusions of Law which are not expressly adopted herein are **DENIED**. All pending motions and request for relief not previously granted or granted herein are **DENIED**.

**RAILROAD COMMISSION OF TEXAS**

(Signatures affixed by Rule 15 Inactive Well  
Master Order dated September 19, 2017.)

API Number	District	ID Number	Lease Name	Well Number
195 00133	10	08701	BLODGETT	102
Electricity must be disconnected (certify on Form W-3C)				
195 01264	10	027301	JACKSON, S. P. & K. K.	1
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
195 30169	10	060234	SUN-JONES	2 T
Production fluids must be purged (certify on Form W-3C)				
195 30169	10	060235	SUN-JONES	2 C
Production fluids must be purged (certify on Form W-3C)				
195 30625	10	075153	CUBINE-PARKER	1
Electricity must be disconnected (certify on Form W-3C)				
195 30753	10	08268	MORTON	1
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
195 31088	10	134464	FLOWERS	1057
Electricity must be disconnected (certify on Form W-3C)				
195 31656	10	203222	HART	3
Electricity must be disconnected (certify on Form W-3C)				
195 31890	10	08701	BLODGETT	1H
Electricity must be disconnected (certify on Form W-3C)				
211 31351	10	098486	BURTON	1107
Electricity must be disconnected (certify on Form W-3C)				
211 31797	10	06267	HUMPHREYS	1 A
Electricity must be disconnected (certify on Form W-3C)				
211 31954	10	138927	LEE	2
Production fluids must be purged (certify on Form W-3C)				
211 31974	10	141768	PARKER	2
Electricity must be disconnected (certify on Form W-3C)				
211 31974	10	204370	PARKER 19	2
Electricity must be disconnected (certify on Form W-3C)				
211 32009	10	145523	HUMPHREYS -40-	2
Production fluids must be purged (certify on Form W-3C)				
211 32220	10	168451	SMITH, S. G.	2
Electricity must be disconnected (certify on Form W-3C)				
211 32242	10	169461	LEE	3
Production fluids must be purged (certify on Form W-3C)				
211 32390	10	09202	HUMPHREYS 59	1
Electricity must be disconnected (certify on Form W-3C)				

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
211 32436	10	07500	LOCKHART 58 Electricity must be disconnected (certify on Form W-3C)	1
211 32498	10	07501	LOCKHART 57 Electricity must be disconnected (certify on Form W-3C)	3
211 32580	10	190778	JONES TRUST -25- Electricity must be disconnected (certify on Form W-3C)	4A
211 32580	10	190779	JONES TRUST -25- Electricity must be disconnected (certify on Form W-3C)	4A
211 32643	10	196469	JONES TRUST -25- Electricity must be disconnected (certify on Form W-3C)	7A
211 32749	10	197586	MARGARET Electricity must be disconnected (certify on Form W-3C)	1021
211 32787	10	197589	HUMPHREYS Electricity must be disconnected (certify on Form W-3C)	6037
211 33222	10	215150	SHELL FEE 25 Production fluids must be purged (certify on Form W-3C)	4025
211 33450	10	216738	EDEN Electricity must be disconnected (certify on Form W-3C)	301
211 33495	10	218307	LEE 5 Electricity must be disconnected (certify on Form W-3C)	5
211 33527	10	218133	SHELL FEE 19 Production fluids must be purged (certify on Form W-3C)	2
211 33568	10	223455	ISAACS, JOHN C. Electricity must be disconnected (certify on Form W-3C)	1197
211 33746	10	229589	COFFEE Electricity must be disconnected (certify on Form W-3C)	1018
211 33792	10	232204	ISAACS Electricity must be disconnected (certify on Form W-3C)	1
211 33903	10	239478	ABRAHAM NW Electricity must be disconnected (certify on Form W-3C)	1402
211 35439	10	09424	HUMPHREYS 59 UNIT Electricity must be disconnected (certify on Form W-3C)	6HA
295 00238	10	203394	GUY OIL Production fluids must be purged (certify on Form W-3C)	2
295 00244	10	022279	BRILLHART Electricity must be disconnected (certify on Form W-3C)	1852 U
295 00321	10	01913	KELLN -B- Electricity must be disconnected (certify on Form W-3C)	2

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API Number	District	ID Number	Lease Name	Well Number
295 30521	10	077299	PIPER	601
Electricity must be disconnected (certify on Form W-3C)				
295 30611	10	080298	PIPER	600
Electricity must be disconnected (certify on Form W-3C)				
295 31828	10	06498	BRILLHART "854"	5
Surface equipment must be removed (certify on Form W-3C)				
295 32136	10	148484	MASON	1
Production fluids must be purged (certify on Form W-3C)				
295 32253	10	157420	FRITZLEN	1261
Production fluids must be purged (certify on Form W-3C)				
295 32516	10	180857	SCHULTZ	1784
Production fluids must be purged (certify on Form W-3C)				
295 32945	10	219446	LENA MAE 854	1H
Electricity must be disconnected (certify on Form W-3C)				
295 32983	10	216433	FRITZLEN, JOHN	2261
Electricity must be disconnected (certify on Form W-3C)				
295 33015	10	221344	BRILLHART 853	1H
Electricity must be disconnected (certify on Form W-3C)				
295 33055	10	224886	BRILLHART 852	1H
Electricity must be disconnected (certify on Form W-3C)				
295 33284	10	07804	GUY 821	10H
Electricity must be disconnected (certify on Form W-3C)				
295 33405	10	265734	LIEPE	2831H
Electricity must be disconnected (certify on Form W-3C)				
295 80285	10	061309	PIPER	1
Electricity must be disconnected (certify on Form W-3C)				
357 00172	10	185343	CONNER	13
Electricity must be disconnected (certify on Form W-3C)				
357 00311	10	01898	TILLERSON	358
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
357 00365	10	01898	TILLERSON	458
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
357 00402	10	181374	HARBAUGH, P.A.	34
Electricity must be disconnected (certify on Form W-3C)				
357 00402	10	276650	HARBAUGH, P.A.	34
Electricity must be disconnected (certify on Form W-3C)				
357 00570	10	160722	STUMP	3
Production fluids must be purged (certify on Form W-3C)				

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API Number	District	ID Number	Lease Name	Well Number
357 30180	10	08258	MCGARRAUGH	1
Electricity must be disconnected (certify on Form W-3C)				
357 30283	10	08359	CARRIE	1
Electricity must be disconnected (certify on Form W-3C)				
357 30839	10	08359	CARRIE	2
Electricity must be disconnected (certify on Form W-3C)				
357 31065	10	137334	DAVIS BROTHERS	3049
Electricity must be disconnected (certify on Form W-3C)				
357 31795	10	06286	HARBAUGH -131-	42
Electricity must be disconnected (certify on Form W-3C)				
357 31873	10	125681	LOUISE	4 C
Electricity must be disconnected (certify on Form W-3C)				
357 31901	10	127504	CUDD -A-	1-C
Production fluids must be purged (certify on Form W-3C)				
357 31901	10	127173	CUDD -A-	1T
Production fluids must be purged (certify on Form W-3C)				
357 32095	10	157918	BRUHLMAN	1703
Production fluids must be purged (certify on Form W-3C)				
357 32097	10	156645	EATON	1502
Electricity must be disconnected (certify on Form W-3C)				
357 32097	10	167573	EATON	1502
Electricity must be disconnected (certify on Form W-3C)				
357 32557	10	08359	CARRIE	3
Electricity must be disconnected (certify on Form W-3C)				
357 32564	10	219093	DECK 18	4
Production fluids must be purged (certify on Form W-3C)				
357 32564	10	08327	DECK 18	4
Production fluids must be purged (certify on Form W-3C)				
357 32577	10	08327	DECK 18	5
Electricity must be disconnected (certify on Form W-3C)				
357 32583	10	08327	DECK 18	6
Electricity must be disconnected (certify on Form W-3C)				
357 32586	10	08359	CARRIE	4
Electricity must be disconnected (certify on Form W-3C)				
357 32625	10	228806	PEARSON, D.B.	7
Surface equipment must be removed (certify on Form W-3C)				
357 33156	10	08354	PEARSON, D. B.	3H
Electricity must be disconnected (certify on Form W-3C)				

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API Number	District	ID Number	Lease Name	Well Number
357 33354	10	08354	PEARSON, D. B. Electricity must be disconnected (certify on Form W-3C)	2H
357 33451	10	09223	BLACK STONE 15 Electricity must be disconnected (certify on Form W-3C)	2H
393 30097	10	08272	WILSON, JAMES E. Electricity must be disconnected (certify on Form W-3C)	2
393 30807	10	097246	LARD Production fluids must be purged (certify on Form W-3C)	1061
393 30993	10	05644	MILLS Electricity must be disconnected (certify on Form W-3C)	2
393 30993	10	119680	MILLS Electricity must be disconnected (certify on Form W-3C)	2 T
393 31128	10	137712	LOCKE CATTLE COMPANY Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1025
393 31676	10	210639	CONRAD Electricity must be disconnected (certify on Form W-3C)	3192
393 31711	10	214849	CAVINS-JARVIS Production fluids must be purged (certify on Form W-3C)	3
393 32129	10	07948	LARD RANCH Electricity must be disconnected (certify on Form W-3C)	7061H
483 30514	10	078714	GREENHOUSE, T. A. Production fluids must be purged (certify on Form W-3C)	1
483 31518	10	169381	SHELTON Electricity must be disconnected (certify on Form W-3C)	2701
483 31618	10	07915	ABERNETHY UNIT Electricity must be disconnected (certify on Form W-3C)	1046RE
483 31618	10	263209	ABERNETHY UNIT Electricity must be disconnected (certify on Form W-3C)	1046RE
483 31647	10	199262	ATHERTON 69 Electricity must be disconnected (certify on Form W-3C)	3
483 31652	10	199264	ATHERTON 69 Electricity must be disconnected (certify on Form W-3C)	4
483 31716	10	204975	DAVIS 25 Electricity must be disconnected (certify on Form W-3C)	1
483 31747	10	211915	MEEK Production fluids must be purged (certify on Form W-3C)	2041
483 31772	10	209469	REED Electricity must be disconnected (certify on Form W-3C)	2070

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API Number	District	ID Number	Lease Name	Well Number
483 31784	10	209636	ELMORE 21	4021
Electricity must be disconnected (certify on Form W-3C)				
483 31804	10	213132	MILLER	2026
Electricity must be disconnected (certify on Form W-3C)				
483 31817	10	211188	DAVIS 65	3
Electricity must be disconnected (certify on Form W-3C)				
483 31818	10	210636	BRYANT 21	5
Electricity must be disconnected (certify on Form W-3C)				
483 31823	10	213203	STILES 67	5067
Electricity must be disconnected (certify on Form W-3C)				
483 31870	10	214010	REED 2	8
Electricity must be disconnected (certify on Form W-3C)				
483 31875	10	213485	LOTT 2	2
Electricity must be disconnected (certify on Form W-3C)				
483 31875	10	217529	LOTT 2	2
Electricity must be disconnected (certify on Form W-3C)				
483 31879	10	213564	BRITT RANCH 7	2
Electricity must be disconnected (certify on Form W-3C)				
483 31892	10	213547	DAVIS 65	4
Production fluids must be purged (certify on Form W-3C)				
483 31897	10	216361	LEDBETTER 66	3
Electricity must be disconnected (certify on Form W-3C)				
483 31922	10	215108	STILES RANCH 23	2
Electricity must be disconnected (certify on Form W-3C)				
483 31931	10	215345	MILLER 26	4
Electricity must be disconnected (certify on Form W-3C)				
483 31952	10	214429	ATEHRTON 69	10
Electricity must be disconnected (certify on Form W-3C)				
483 31956	10	215147	STILES RANCH 23	3023
Electricity must be disconnected (certify on Form W-3C)				
483 31969	10	215106	STILES RANCH 23	4023
Production fluids must be purged (certify on Form W-3C)				
483 31979	10	215721	BRUMMETT 22	1
Electricity must be disconnected (certify on Form W-3C)				
483 31987	10	215903	MEEK 41	3
Electricity must be disconnected (certify on Form W-3C)				
483 31989	10	215916	HAGERMAN	1021
Electricity must be disconnected (certify on Form W-3C)				

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API Number	District	ID Number	Lease Name	Well Number
483 31991	10	223708	STILES RANCH 5	5
Electricity must be disconnected (certify on Form W-3C)				
483 32004	10	218306	JONES 22	2
Electricity must be disconnected (certify on Form W-3C)				
483 32029	10	216382	ELMORE 32	7
Electricity must be disconnected (certify on Form W-3C)				
483 32031	10	224872	MILLER 26	5
Electricity must be disconnected (certify on Form W-3C)				
483 32033	10	220025	ELMORE 32	6
Electricity must be disconnected (certify on Form W-3C)				
483 32053	10	219009	DAVIS 25	2
Electricity must be disconnected (certify on Form W-3C)				
483 32058	10	229592	JONES 22	3
Electricity must be disconnected (certify on Form W-3C)				
483 32067	10	218811	STILES RANCH 23	5023
Electricity must be disconnected (certify on Form W-3C)				
483 32069	10	218812	BRUMMETT 22A	2
Electricity must be disconnected (certify on Form W-3C)				
483 32071	10	219008	STILES 67	8
Electricity must be disconnected (certify on Form W-3C)				
483 32105	10	222869	GRAYSON	3203
Electricity must be disconnected (certify on Form W-3C)				
483 32112	10	227770	GRAYSON 22	4
Electricity must be disconnected (certify on Form W-3C)				
483 32113	10	223971	DAVIS 65	8
Electricity must be disconnected (certify on Form W-3C)				
483 32155	10	224300	CALCOTE 63	1
Electricity must be disconnected (certify on Form W-3C)				
483 32206	10	225231	ELMORE 32	8
Electricity must be disconnected (certify on Form W-3C)				
483 32225	10	228655	DAVIS 65	9
Electricity must be disconnected (certify on Form W-3C)				
483 32246	10	229593	BRUMMETT 22	5
Electricity must be disconnected (certify on Form W-3C)				
483 32258	10	228851	BRUMMETT 22A	2
Electricity must be disconnected (certify on Form W-3C)				
483 32319	10	236212	BRUMMETT 22	3
Electricity must be disconnected (certify on Form W-3C)				

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API Number	District	ID Number	Lease Name	Well Number
483 32354	10	234022	GRAYSON 22	3
Electricity must be disconnected (certify on Form W-3C)				
483 32425	10	234766	DAVIS 65	11
Electricity must be disconnected (certify on Form W-3C)				
483 32426	10	235492	STILES RANCH 23	8
Electricity must be disconnected (certify on Form W-3C)				
483 32475	10	236957	DAVIS 65	12
Electricity must be disconnected (certify on Form W-3C)				
483 32519	10	239451	STILES RANCH	2313
Electricity must be disconnected (certify on Form W-3C)				
483 32530	10	241684	ALEXANDER 23	2
Electricity must be disconnected (certify on Form W-3C)				
483 32902	10	257545	BRITT 5	4H
Electricity must be disconnected (certify on Form W-3C)				
483 32903	10	255527	RUBY LEE	103H
Electricity must be disconnected (certify on Form W-3C)				
483 33221	10	267507	ELMORE 21 SL	11H
Production fluids must be purged (certify on Form W-3C)				
483 33573	10	270356	STILES 67 SL	21H
Electricity must be disconnected (certify on Form W-3C)				

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**Exhibit A**