

**RAILROAD COMMISSION OF TEXAS  
HEARINGS DIVISION**

**OIL & GAS DOCKET NO. 20-0307358**

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**IN RE: P-5 ORGANIZATION REPORT OF PRICKLY PAIR PRODUCTION**

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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. Prickly Pair Production [Operator #677108] (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 May 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 Prickly Pair Production's P-5 Organization Report is hereby **DENIED**.

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

**It is further ORDERED** that Prickly Pair Production 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 Prickly Pair Production 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 November 7, 2017.)

| API Number   | District | ID Number | Lease Name             | Well Number |
|--|----------|-----------|------------------------|-------------|
| 417 01306<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 8           |
| 417 01596<br>No approved W-3X on file  | 7B       | 07558     | GREEN, WILLIE G., ETAL | 9           |
| 417 04622<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE            | 10A         |
| 417 04624<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE            | 11 A        |
| 417 10489<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 20          |
| 417 10490<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 19          |
| 417 10491<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 18          |
| 417 10492<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 16          |
| 417 10493<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 15          |
| 417 10494<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 14          |
| 417 10495<br>Electricity must be disconnected (certify on Form W-3C)<br>No approved W-3X on file | 7B       | 03537     | DOUGLAS, W. L.         | 13          |
| 417 10496<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 11          |
| 417 10497<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 10          |
| 417 10498<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 9           |
| 417 12402<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.         | 5           |
| 417 30258<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE            | 470         |
| 417 30362<br>No approved W-3X on file  | 7B       | 11418     | HICKMAN, REAVES -A-    | 1           |
| 417 30905<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE            | 5 A         |

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Exhibit A

| API Number   | District | ID Number | Lease Name           | Well Number |
|--|----------|-----------|----------------------|-------------|
| 417 30961<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE          | 6 A         |
| 417 31063<br>No approved W-3X on file  | 7B       | 11418     | HICKMAN, REAVES -A-  | 4           |
| 417 31064<br>No approved W-3X on file  | 7B       | 11418     | HICKMAN, REAVES -A-  | 3           |
| 417 31683<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE          | 7A          |
| 417 31931<br>Electricity must be disconnected (certify on Form W-3C)<br>No approved W-3X on file | 7B       | 03537     | DOUGLAS, W. L.       | 22          |
| 417 33205<br>No approved W-3X on file  | 7B       | 03460     | ROXANA-RICE          | 8 A         |
| 417 33318<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.       | 24          |
| 417 33321<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.       | 23          |
| 417 33322<br>Electricity must be disconnected (certify on Form W-3C)<br>No approved W-3X on file | 7B       | 03537     | DOUGLAS, W. L.       | 17          |
| 417 33323<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.       | 21          |
| 417 33324<br>No approved W-3X on file  | 7B       | 03537     | DOUGLAS, W. L.       | 25          |
| 417 33611<br>No approved W-3X on file  | 7B       | 11421     | REVES, BERTHA F. "A" | 1 A         |
| 417 34069<br>No approved W-3X on file  | 7B       | 10921     | REVES, BERTHA F.     | 4           |
| 417 34262<br>No approved W-3X on file  | 7B       | 03513     | FRYE, ANNA F. -B-    | 50          |
| 417 34268<br>No approved W-3X on file  | 7B       | 03513     | FRYE, ANNA F. -B-    | 51          |
| 417 34716<br>No approved W-3X on file  | 7B       | 03513     | FRYE, ANNA F. -B-    | 52          |
| 417 35452<br>No approved W-3X on file  | 7B       | 03513     | FRYE, ANNA F. -B-    | 59          |
| 417 35454<br>No approved W-3X on file  | 7B       | 03513     | FRYE, ANNA F. -B-    | 56          |

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Exhibit A

| API Number               | District           | ID Number | Lease Name           | Well Number |
|--------------------------|--------------------|-----------|----------------------|-------------|
| 417 35455<br>No approved | 7B<br>W-3X on file | 03513     | FRYE, ANNA F. -B-    | 57          |
| 417 35456<br>No approved | 7B<br>W-3X on file | 03513     | FRYE, ANNA F. -B-    | 55          |
| 417 35457<br>No approved | 7B<br>W-3X on file | 03513     | FRYE, ANNA F. -B-    | 54          |
| 417 35458<br>No approved | 7B<br>W-3X on file | 03513     | FRYE, ANNA F. -B-    | 53          |
| 417 35546<br>No approved | 7B<br>W-3X on file | 11421     | REVES, BERTHA F. "A" | 5 A         |
| 417 35765<br>No approved | 7B<br>W-3X on file | 11421     | REVES, BERTHA F. "A" | 6 A         |
| 417 36549<br>No approved | 7B<br>W-3X on file | 10921     | REVES, BERTHA F.     | 6           |
| 417 36945<br>No approved | 7B<br>W-3X on file | 11421     | REVES, BERTHA F. "A" | 7 A         |
| 417 37299<br>No approved | 7B<br>W-3X on file | 25552     | KOENIG BUZZARD A     | 69          |
| 417 37337<br>No approved | 7B<br>W-3X on file | 11421     | REVES, BERTHA F. "A" | 8 A         |
| 417 37381<br>No approved | 7B<br>W-3X on file | 10921     | REVES, BERTHA F.     | 1 H         |
| 417 37644<br>No approved | 7B<br>W-3X on file | 25552     | KOENIG BUZZARD A     | 71          |
| 417 38031<br>No approved | 7B<br>W-3X on file | 174589    | STASNEY 2            | 1           |
| 417 81171<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 14          |
| 417 81172<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 16          |
| 417 81174<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 24          |
| 417 81175<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 26          |
| 417 81176<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 170         |
| 417 81177<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE          | 270         |

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Exhibit A

| API Number               | District           | ID Number | Lease Name             | Well Number |
|--------------------------|--------------------|-----------|------------------------|-------------|
| 417 81178<br>No approved | 7B<br>W-3X on file | 03460     | ROXANA-RICE            | 370         |
| 417 81566<br>No approved | 7B<br>W-3X on file | 03537     | DOUGLAS, W. L.         | 12          |
| 417 82337<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 1           |
| 417 82338<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 2           |
| 417 82339<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 3           |
| 417 82341<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 5           |
| 417 82342<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 6           |
| 417 82343<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 7           |
| 417 82346<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 10          |
| 417 82347<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 11          |
| 417 82348<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 13          |
| 417 82349<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 14          |
| 417 82351<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 19          |
| 417 82352<br>No approved | 7B<br>W-3X on file | 07558     | GREEN, WILLIE G., ETAL | 20          |
| 417 83351<br>No approved | 7B<br>W-3X on file | 10921     | REVES, BERTHA F.       | 1           |
| 417 83352<br>No approved | 7B<br>W-3X on file | 10921     | REVES, BERTHA F.       | 2           |
| 417 83515<br>No approved | 7B<br>W-3X on file | 11421     | REVES, BERTHA F. "A"   | 2           |

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**Exhibit A**