

**RAILROAD COMMISSION OF TEXAS  
HEARINGS DIVISION**

**OIL & GAS DOCKET NO. 20-0307830**

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**IN RE: P-5 ORGANIZATION REPORT OF ALLTEX OPERATING COMPANY**

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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. Alltex Operating Company [Operator #015056] (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 June 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 Alltex Operating Company's P-5 Organization Report is hereby **DENIED**.

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

**It is further ORDERED** that Alltex Operating Company 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 Alltex Operating Company 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 December 5, 2017.)

API Number	District	ID Number	Lease Name	Well Number
055 32357 No approved W-3X on file	01	07991	WILLIAMS, J. T.	4
055 32360 No approved W-3X on file Must resolve Field Operations	01	07991	WILLIAMS, J. T. H-15 delinquency preventing 14B2 approval	7
055 32367 No approved W-3X on file Must resolve Field Operations	01	07991	WILLIAMS, J. T. H-15 delinquency preventing 14B2 approval	14
055 32417 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	3
055 32446 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	8
055 32447 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	6
055 32448 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	4
055 32449 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	5
055 32451 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	2
055 32452 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	7
055 32453 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	9
055 32513 No approved W-3X on file	01	07991	WILLIAMS, J. T.	16
055 32514 No approved W-3X on file Must resolve Field Operations	01	07991	WILLIAMS, J. T. H-15 delinquency preventing 14B2 approval	15
055 32838 No approved W-3X on file Must resolve Field Operations	01	07991	WILLIAMS, J. T. H-15 delinquency preventing 14B2 approval	17
055 32839 No approved W-3X on file Must resolve Field Operations	01	07721	GARNER, E. G. H-15 delinquency preventing 14B2 approval	1

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
055 32847	01	07991	WILLIAMS, J. T.	20
Production fluids must be purged (certify on Form W-3C) No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
055 32848	01	07991	WILLIAMS, J. T.	19
No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
055 32849	01	07991	WILLIAMS, J. T.	21
Production fluids must be purged (certify on Form W-3C) No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
055 32850	01	07991	WILLIAMS, J. T.	18
No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
089 32467	03	229103	WIED	1
No approved W-3X on file				
187 00772	01	02881	KLEIN, M. T. -A-	1
Production fluids must be purged (certify on Form W-3C) No approved W-3X on file				
187 00773	01	02881	KLEIN, M. T. -A-	2
No approved W-3X on file				
187 00775	01	02881	KLEIN, M. T. -A-	4
No approved W-3X on file				
187 02889	01	02881	KLEIN, M. T. -A-	6
No approved W-3X on file				
187 02890	01	02881	KLEIN, M. T. -A-	7
No approved W-3X on file				
187 03042	01	03660	KNODEL, ANNIE, -C-	2C
No approved W-3X on file				
187 03043	01	03660	KNODEL, ANNIE, -C-	1C
Production fluids must be purged (certify on Form W-3C) No approved W-3X on file				
187 03044	01	03660	KNODEL, ANNIE, -C-	3C
No approved W-3X on file				
187 03045	01	03660	KNODEL, ANNIE, -C-	4C
No approved W-3X on file				
187 03048	01	02881	KLEIN, M. T. -A-	8
No approved W-3X on file				
187 03049	01	02881	KLEIN, M. T. -A-	10
No approved W-3X on file				

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
187 03050 No approved W-3X on file	01	02881	KLEIN, M. T. -A-	9
187 30108 No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval	01	04194	KNODEL, ANNIE, -D-	2
187 30109 Surface equipment must be removed (certify on Form W-3C) No approved W-3X on file	01	14481	KNODEL -D-	3
187 30110 No approved W-3X on file	01	04194	KNODEL, ANNIE, -D-	4
187 30111 No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval	01	04194	KNODEL, ANNIE, -D-	5
187 30113 No approved W-3X on file Must resolve Field Operations H-15 delinquency preventing 14B2 approval	01	04194	KNODEL, ANNIE, -D-	7
187 30120 No approved W-3X on file	01	04194	KNODEL, ANNIE, -D-	1
187 30267 No approved W-3X on file	01	03129	KNODEL, ANNIE, -B-	5B
187 30268 No approved W-3X on file	01	03129	KNODEL, ANNIE, -B-	6B
187 30269 No approved W-3X on file	01	03129	KNODEL, ANNIE, -B-	7B
187 30270 No approved W-3X on file	01	03129	KNODEL, ANNIE, -B-	8B
187 30271 No approved W-3X on file	01	03129	KNODEL, ANNIE, -B-	9B
321 32104 No approved W-3X on file	03	250182	SKYLAR	1
423 80190 Production fluids must be purged (certify on Form W-3C) No approved W-3X on file	06	10763	PONDER-GIBSON UNIT 1	2

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# Exhibit A