RAILROAD COMMISSION OF TEXAS HEARINGS DIVISION

OIL & GAS DOCKET NO. 20-0309694

IN RE: P-5 ORGANIZATION REPORT OF PALO PINTO BOND COMPANY, LLC

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. Palo Pinto Bond Company, Llc [Operator #637403] (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 September 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 Palo Pinto Bond Company, Llc's P-5 Organization Report is hereby **DENIED**.

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

It is further ORDERED that Palo Pinto Bond Company, 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 Palo Pinto Bond Company, 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 100 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 March 20, 2018.)

API	Number Dis	strict	ID Number	Lease Name	Well	Numbe
363	00335 No approved			NOLAND, E.T.		1
363	31003 No approved		26688 file	HINKSON		4
363	31004 No approved		26688 file	HINKSON		3
363	32284 Electricity No approved	must be	disconnected	IRSFELD ET AL d (certify on Form W-3C)		1
363	32841 No approved		26251 file	RIEBE, G.		1
363	33031 Electricity No approved	must be	disconnected	ANDREATTA A d (certify on Form W-3C)		1
363	33123 Electricity No approved	must be		HINKSON d (certify on Form W-3C)		9
363		fluids m		KIRK A d (certify on Form W-3C)		2
363	33526 No approved			STUART HEIRS		3
363	33658 Electricity No approved	must be	disconnected	LONG,C.B. "A" d (certify on Form W-3C)		1
363	33759 No approved			STEPHEN UNIT	5	501
363	33767 Electricity No approved	must be	disconnected	STEPHEN, PAUL "B" d (certify on Form W-3C)		2
363	33778 No approved	7B W-3X on		STEPHEN, PAUL		4WD
363	33779 Electricity No approved		disconnected	STEPHEN, PAUL d (certify on Form W-3C)		3
363	33864 No approved	7B W-3X on	27652 file	STEPHEN UNIT	5	502
363	33869 No approved	7B W-3X on	24265 file	STEPHEN, PAUL		5U

API	Number D	istrict	ID Number	Lease Name	Well Numbe
363	33873 Electricit No approve	y must be	disconnecte	STEPHEN, PAUL d (certify on Form W-3C)	6
363	33874 No approve			STEPHEN UNIT	407
363	33880 Electricit No approve	y must be	disconnecte	STEPHEN, PAUL d (certify on Form W-3C)	8
363	33891 No approve			STEPHEN UNIT	305
363	33895 No approve			STEPHEN UNIT	503
363	33945 Production No approve	fluids m	ust be purge	LONG,LOLITA d (certify on Form W-3C)	3
363	33976 No approve			STEPHEN, PAUL	10
363	33985 Electricit No approve	y must be	disconnecte	HINKSON-CALDWELL d (certify on Form W-3C)	1 8
363	34008 No approve Must resol	7B d W-3X on ve Field (file	STEPHEN, PAUL -15 delinquency preventing 1	12 .4B2 approval
363	34010 No approve		133589 file	HINKSON	1
363	34017 No approve			LONG, LOLITA	5
363	34018 No approve	7B d W-3X on		WOODWARD TRUST #1	1
363	34028 Electricit No approve		disconnecte	CRAWFORD "B" d (certify on Form W-3C)	1
363	34037 Electricit No approve	y must be		ELIZABETH d (certify on Form W-3C)	1
363	34053 Production No approve	7B fluids m d W-3X on	136922 ust be purge file	JIANT-HINKSON d (certify on Form W-3C)	1
363	34082 No approve	7B d W-3X on	24265 file	STEPHEN, PAUL	13

API	Number Dis	strict	ID Number	Lease Name	Well Numbe	2
363	34094 No approved			HINKSON	2	
363	34138 No approved			STEPHEN, PAUL	14	
363	34202 No approved			HINKSON	6	
363	34270 No approved			MARINER	2	
363	34276 Electricity No approved			HALIFAX d (certify on Form W-3C)	1	
363	34282 No approved			NOLAND, E.T.	В 1	
363	34328 Surface equ: No approved	ipment m	ust be remove	HINKSON, LAURA ed (certify on Form W-3C)	A 1	
363	34328 Surface equ: No approved	ipment mu	ust be remove	HINKSON, LAURA ed (certify on Form W-3C)	2	
363	34337 No approved			HINKSON	8	
363	34378 No approved			HINKSON	10	
363	34390 No approved		154605 file	PONTREMOLE	2	
363	34403 No approved			HINKSON	11	
363	34409 Electricity No approved	7B must be W-3X on	disconnecte	MARINER "A" d (certify on Form W-3C)	1	
363	34449 No approved	7B W-3X on	156798 file	SLEMMONS, HELEN	1	
363	34467 No approved		26688 file	HINKSON	12	
363	34469 No approved	7B W-3X on	28704 file	HINKSON	7701	
363	34533 No approved	7B W-3X on	26688 file	HINKSON	13	

API	Number Di	strict	ID Number	Lease Name	Well Nu	ımbe
363	34576 No approved			HINKSON	14	:
363	34607 No approved			HINKSON	7702	2
363	34670 No approved			MARINER "B"	1	1 0
363	34682 Electricity No approved	must be	31055 disconnecte file	BAKER d (certify on Form W-3C)	1	in .
363	34687 Surface equ No approved	ipment m	ust be remov	HINKSON "79" ed (certify on Form W-3C)	7902	2
363	34693 Electricity No approved	must be		HINKSON d (certify on Form W-3C)	15	5
363	34704 Electricity No approved	must be		HINKSON 79 d (certify on Form W-3C)	3	1
363	34714 Electricity No approved	must be	256474 disconnecte file	HINKSON d (certify on Form W-3C)	16	5
363	34732 Electricity No approved	must be	disconnecte	HINKSON "79" d (certify on Form W-3C)	7904	ŀ
363	34732 Electricity No approved	must be		HINKSON 79 d (certify on Form W-3C)	4	L ig
363	34737 No approved			HINKSON	17	7
363	34737 No approved			HINKSON	17	7
363	34862 No approved			HINKSON	1.8	3
363	35014 Electricity No approved	must be		HINKSON d (certify on Form W-3C)	7905	5
363	35097 No approved			STEPHEN UNIT	504	ŀ
363	35157 Electricity No approved	must be	disconnecte	HINKSON, BILL "A" d (certify on Form W-3C)	A 3	3

API	Number Dis	strict	ID Number	Lease Name	Well Numbe
363	35172 No approved			STEPHEN UNIT	105
363	35191 Production f No approved	Eluids mu	ist be purge	HINKSON d (certify on Form W-3C)	20
363	35468 Electricity No approved	must be	disconnected	KIRK d (certify on Form W-3C)	1
363	35481 Electricity No approved	must be	disconnected	HINKSON d (certify on Form W-3C)	7703
363	35619 Electricity No approved	must be	disconnecte	BILL HINKSON "A" d (certify on Form W-3C)	A 5
363	35623 No approved			HINKSON	21
363	35639 Electricity No approved	must be	disconnecte	ANDREATTA d (certify on Form W-3C)	1
363	35970 No approved			KIRK A	1