

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

OIL & GAS DOCKET NO. 20-0314001

IN RE: P-5 ORGANIZATION REPORT OF RENEAU, JAMES SEED CO.

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. Reneau, James Seed Co. [Operator #701747] (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 January 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 Reneau, James Seed Co.'s P-5 Organization Report is hereby **DENIED**.

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

It is further ORDERED that Reneau, James Seed Co. 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 Reneau, James Seed Co. 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 August 21, 2018.)

| API Number | District | ID Number | Lease Name | Well Number |
|---------------------------------------|----------|-----------|----------------------|-------------|
| 065 01627 No approved W-3X on file | 10 | 00172 | SCHAFFER, H., NCT-2 | 2 |
| 087 00409 No approved W-3X on file | 10 | 026896 | ANNETTE-STAFFORD | 1 |
| 087 30096 No approved W-3X on file | 10 | 073140 | COLEMAN, J. D. | 1 |
| 087 30160 No approved W-3X on file | 10 | 094093 | TROXELL, E. F. | 1 |
| 087 30161 No approved W-3X on file | 10 | 090739 | BAKER | 1 |
| 087 80377 No approved W-3X on file | 10 | 026806 | FRANKS, H. E. | 1 |
| 087 80378 No approved W-3X on file | 10 | 026807 | FRANKS, H. E. | 2 |
| 087 80392 No approved W-3X on file | 10 | 026891 | POWELL | A 1 |
| 087 80394 No approved W-3X on file | 10 | 026893 | POWELL | B 2 |
| 087 80397 No approved W-3X on file | 10 | 026897 | STAFFORD, F. M. | 2 |
| 087 80406 No approved W-3X on file | 10 | 026986 | FRANKS, H. E. | 1 |
| 087 80408 No approved W-3X on file | 10 | 026988 | FRANKS, H. E. | B 1 |
| 087 80409 No approved W-3X on file | 10 | 026989 | FRANKS, H. E. -B- | B 2 |
| 087 80410 No approved W-3X on file | 10 | 026990 | FRANKS, H. E. | B 3 |
| 179 03500 No approved W-3X on file | 10 | 01535 | GETHING, E. E. NCT-1 | 3W |
| 179 83856 No approved W-3X on file | 10 | 01535 | GETHING, E. E. NCT-1 | 1 |
| 179 83858 No approved W-3X on file | 10 | 01535 | GETHING, E. E. NCT-1 | 4 |
| 179 83861 No approved W-3X on file | 10 | 01535 | GETHING, E. E. NCT-1 | 15 |
| 179 83863 No approved W-3X on file | 10 | 01535 | GETHING, E. E. NCT-1 | 18 |

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Exhibit A

| API Number | District | ID Number | Lease Name | Well Number |
|--|----------|-----------|---------------------------|-------------|
| 357 00212 No approved W-3X on file | 10 | 02073 | CONNER, L. R. | 1 |
| 357 20138 No approved W-3X on file | 10 | 03430 | PATTON, T. O. | 1 |
| 357 80733 No approved W-3X on file | 10 | 02073 | CONNER, L. R. | 2 |
| 357 80734 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 02073 | CONNER, L. R. | 3 |
| 483 00607 No approved W-3X on file | 10 | 026992 | ATKINS | 1 |
| 483 01073 No approved W-3X on file | 10 | 02977 | HAMMER | 2 |
| 483 01754 No approved W-3X on file | 10 | 01417 | NORTHROP, JOSEPH W., ETAL | 1W |
| 483 02800 No approved W-3X on file | 10 | 152880 | BELL, G. | 3 |
| 483 30009 No approved W-3X on file | 10 | 039531 | BRADLEY, ELLA, -B- | 3 |
| 483 30140 No approved W-3X on file | 10 | 069332 | FOSTER, G. I. | 1 |
| 483 30486 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 080681 | MACINA, PAUL | 1 |
| 483 30489 No approved W-3X on file | 10 | 080303 | RENEAU | 1 |
| 483 30760 No approved W-3X on file | 10 | 092591 | MACINA | 1 |
| 483 30793 No approved W-3X on file | 10 | 092337 | ELIZABETH | 1002 |
| 483 30797 No approved W-3X on file | 10 | 090743 | SIMPSON | 1 |
| 483 30805 Production fluids must be purged (certify on Form W-3C) No approved W-3X on file | 10 | 092592 | MACINA | 2 |
| 483 30807 No approved W-3X on file | 10 | 097259 | HOLMES | 1 |
| 483 30816 Production fluids must be purged (certify on Form W-3C) No approved W-3X on file | 10 | 093510 | MACINA | 3 |

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Exhibit A

| API Number | District | ID Number | Lease Name | Well Number |
|--|----------|-----------|---------------|-------------|
| 483 30820 No approved W-3X on file | 10 | 094094 | CARPENTER | 9501 A |
| 483 30858 No approved W-3X on file | 10 | 100095 | GROGAN, J. W. | 1 |
| 483 30884 No approved W-3X on file | 10 | 097258 | CADRA | 1 |
| 483 30901 No approved W-3X on file | 10 | 100829 | RENEAU, JAMES | 1 |
| 483 30922 No approved W-3X on file | 10 | 097256 | MACINA-108- | 1 |
| 483 30924 No approved W-3X on file | 10 | 098548 | MACINA -126- | 1 |
| 483 30925 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 098546 | LINKEY -106- | 1 |
| 483 30928 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 098547 | LINKEY -129- | 1 |
| 483 30934 No approved W-3X on file | 10 | 098556 | MARNIE | 1 |
| 483 30950 No approved W-3X on file | 10 | 098948 | SIMMONS | 1 |
| 483 30986 No approved W-3X on file | 10 | 098544 | PAKAN | 1 |
| 483 31001 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 098549 | LINKEY -106- | 2 |
| 483 31008 No approved W-3X on file | 10 | 098950 | BROWN | 1 |
| 483 31053 No approved W-3X on file | 10 | 104898 | BIGGERS | 1 |
| 483 31055 No approved W-3X on file | 10 | 105397 | HENRY | 9601 |
| 483 31056 No approved W-3X on file | 10 | 117348 | RAYMOND | 9701 |
| 483 31070 No approved W-3X on file | 10 | 127611 | GROGAN -B- | 1 |
| 483 31112 No approved W-3X on file | 10 | 106372 | FRANCES | 1 |

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| API Number | District | ID Number | Lease Name | Well Number |
|--|----------|-----------|----------------|-------------|
| 483 31114 No approved W-3X on file | 10 | 145973 | COPELAND | 1 |
| 483 31152 No approved W-3X on file | 10 | 116435 | TEDDER | 3 |
| 483 31201 No approved W-3X on file | 10 | 114565 | SESCO -B- | 1 |
| 483 31244 No approved W-3X on file | 10 | 122801 | FITZGERALD | 1 |
| 483 32094 No approved W-3X on file | 10 | 226522 | RENEAU #18-1 | 1801 |
| 483 32095 No approved W-3X on file | 10 | 227467 | RENEAU #2-2 | 202 |
| 483 80078 No approved W-3X on file | 10 | 026368 | BRADLEY | B 1 |
| 483 80112 No approved W-3X on file | 10 | 026411 | MARTIN, W. C. | 1 |
| 483 80115 No approved W-3X on file | 10 | 026415 | MORGAN | 3 |
| 483 80118 No approved W-3X on file | 10 | 026421 | PURCELL, J. D. | 1 |
| 483 80120 No approved W-3X on file | 10 | 026423 | SIMMS, L. B. | 1 |
| 483 80121 No approved W-3X on file | 10 | 026424 | STUCKEY, O. P. | 1 |
| 483 80124 No approved W-3X on file | 10 | 026427 | WOFFORD, W. B. | 1 |
| 483 80127 No approved W-3X on file | 10 | 026431 | PURCELL, J. D. | 1 |
| 483 80143 No approved W-3X on file | 10 | 026542 | HOLMES, W. H. | 1 |
| 483 80145 No approved W-3X on file | 10 | 026547 | NELSON, A. L. | 3 |
| 483 80146 No approved W-3X on file | 10 | 026548 | NELSON, A. L. | 5 |
| 483 80148 No approved W-3X on file | 10 | 026550 | SMITH, C. | 1 |
| 483 80155 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 026602 | LINKEY, C. A. | 2 |

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| API Number | District | ID Number | Lease Name | Well Number |
|--|----------|-----------|-----------------------|-------------|
| 483 80221 No approved W-3X on file | 10 | 026815 | ACKLEY, M. E. | 4 |
| 483 80223 No approved W-3X on file | 10 | 026817 | ATKINS, T. HARVEY | 1 |
| 483 80229 No approved W-3X on file | 10 | 026824 | GORDON, G. C. | 1 T |
| 483 80230 No approved W-3X on file | 10 | 026825 | GORDON, G. C. | 2 T |
| 483 80231 No approved W-3X on file | 10 | 026826 | GRISWOLD, R. W. M & D | 1 |
| 483 80232 No approved W-3X on file | 10 | 026828 | GRISWOLD, R. W. | 2 |
| 483 80234 No approved W-3X on file | 10 | 026830 | GROGAN, JOHN W. | 2 |
| 483 80235 No approved W-3X on file | 10 | 026831 | GROGAN, JOHN W. | 3 |
| 483 80236 No approved W-3X on file | 10 | 026832 | GROGAN, J. W. | B 1 |
| 483 80239 No approved W-3X on file | 10 | 026836 | JONES, T. C. | 3 |
| 483 80240 No approved W-3X on file | 10 | 026837 | JONES, T. C. | 4 |
| 483 80242 No approved W-3X on file | 10 | 026839 | LAYCOCK, A. J. | 2 |
| 483 80253 No approved W-3X on file | 10 | 026853 | TROSTLE, T. E. | 2 |
| 483 80254 No approved W-3X on file Must resolve Field Operations H-15 failure preventing 14(B)(2) approval | 10 | 026855 | WALLACE, ED. R. | 1 |
| 483 80255 No approved W-3X on file | 10 | 026856 | WILLIAMS & LAYCOCK | 1 |
| 483 80256 No approved W-3X on file | 10 | 026857 | WILLIAMS & LAYCOCK | 2 |
| 483 80257 No approved W-3X on file | 10 | 026858 | WOODLEY, E. L. | A 1 |
| 483 80272 No approved W-3X on file | 10 | 026877 | LILLIAN & LUCILLE | 1 |

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Exhibit A

| API Number | District | ID Number | Lease Name | Well Number |
|---------------------------------------|----------|-----------|---------------------------|-------------|
| 483 80274 No approved W-3X on file | 10 | 026879 | CLOSE | 1 |
| 483 80275 No approved W-3X on file | 10 | 026880 | CLOSE | 2 |
| 483 80278 No approved W-3X on file | 10 | 026883 | GROGAN, J. W. | 1 |
| 483 80286 No approved W-3X on file | 10 | 026901 | CLOSE, IVEY | 3 |
| 483 80287 No approved W-3X on file | 10 | 026902 | CLOSE, IVEY | 13 |
| 483 80288 No approved W-3X on file | 10 | 026903 | CLOSE, IVEY | 14 |
| 483 80289 No approved W-3X on file | 10 | 026904 | CLOSE, IVEY | 15 |
| 483 80290 No approved W-3X on file | 10 | 026905 | CLOSE, IVEY | 17 |
| 483 80292 No approved W-3X on file | 10 | 026907 | CLOSE, IVEY | 19 |
| 483 80295 No approved W-3X on file | 10 | 026910 | GROGAN | B 1 |
| 483 80348 No approved W-3X on file | 10 | 026971 | HATCHER, M. | 2 |
| 483 80351 No approved W-3X on file | 10 | 026974 | KRIZAN | 1 |
| 483 80364 No approved W-3X on file | 10 | 026994 | PAKAN | 2 |
| 483 80396 No approved W-3X on file | 10 | 027045 | PAKAN | 1 |
| 483 80397 No approved W-3X on file | 10 | 027046 | VALENCIK | 1 |
| 483 80476 No approved W-3X on file | 10 | 039530 | BRADLEY, ELLA, -B- | 2 |
| 483 80479 No approved W-3X on file | 10 | 039827 | RICHARDSON | 1 |
| 483 80554 No approved W-3X on file | 10 | 149691 | MANKINS | 2 |
| 483 80691 No approved W-3X on file | 10 | 01417 | NORTHROP, JOSEPH W., ETAL | 2 |

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| API Number | District | ID Number | Lease Name | Well Number |
|---------------------------------------|----------|-----------|---------------------------|-------------|
| 483 80692 No approved W-3X on file | 10 | 01417 | NORTHROP, JOSEPH W., ETAL | 3 |
| 483 80693 No approved W-3X on file | 10 | 01417 | NORTHROP, JOSEPH W., ETAL | 4 |
| 483 80966 No approved W-3X on file | 10 | 151634 | BELL, G. | 1 |
| 483 80967 No approved W-3X on file | 10 | 151635 | BELL, G. | 2 |

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