

Kellie Martinec

From: execdir@tlma.org
Sent: Monday, December 9, 2019 11:53 AM
To: Rules Coordinator
Subject: Proposed Rule Comments from Texas Land & Mineral Owners Association
Attachments: TLMA 3.40 Rule Comments.pdf

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To whom it may concern:

Please find the attached comments to the Statewide Rule 40 proposed rule amendments from the Texas Land & Mineral Owners Association.

Sincerely,
Jennifer Bremer

Jennifer Bremer
Executive Director
Texas Land & Mineral Owners Association
1005 Congress Ave., Suite 360
Austin, Texas 78701
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December 9, 2019

Rules Coordinator, Office of General Counsel
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

Re: Proposed amendments to 16 TAC Section 3.40

Dear Rules Coordinator,

The Texas Land and Mineral Owners Association ("TLMA") is a statewide advocacy organization that represents approximately 1,000 members who are mineral and royalty owners, landowners, farmers, and ranchers. As such, TLMA appreciates the opportunity to comment on the proposed amendments to Statewide Rule 40.

As stated in our comments during the informal comment period in October 2018, TLMA is encouraged to see a requirement that operators provide notice to mineral interest owners in the proposed rule changes. However, in the formal rule proposal a significant portion of those requirements were removed.

TLMA believes that all unleased mineral owners should receive notice under both 3.40(g)(2) and 3.40 (e). Unleased mineral owners should have the same rights as operators to receive notice. Not providing this information to a mineral owner has the ability to impact their rights as a property owner.

For the foregoing reasons, the Texas Land and Mineral Owners Association urges the Commissioners to include the language from the informal rulemaking draft language requiring the same notice for mineral owners under both circumstances.

Thank you for your consideration of this important concern.

Sincerely,

Jennifer Bremer
Executive Director

Cc: The Honorable Greg Abbott
The Honorable Dan Patrick
The Honorable Dennis Bonnen
The Honorable Brian Birdwell
The Honorable Chris Paddie

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