

April 8, 2020

Submitted electronically to: RRCconference@rrc.texas.gov

Chairman Wayne Christian Commissioner Christi Craddick Commissioner Ryan Sitton Railroad Commission of Texas 1701 North Congress Avenue Austin, Texas 78711

Re: DOCKET NO. OG-20-00003167; IN RE: MOTION FOR COMMISSION CALLED HEARING ON THE VERIFIED COMPLAINT OF PIONEER NATURAL RESOURCES U.S.A. INC. AND PARSLEY ENERGY INC. TO DETERMINE REASONABLE MARKET DEMAND FOR OIL IN THE STATE OF TEXAS

Dear Chairman Christian and Commissioners Craddick and Sitton

Panhandle Producers & Royalty Owners Association does not wish to testify but offers, instead, written statements for your consideration.

The board of directors of the Panhandle Producers and Royalty Owners Association, being the organization that for the last 90 years, has represented the interests of the producers and royalty owners of RRC District 10, the Texas Panhandle and the State as a whole, as well as the long-term interests of all citizens, agree to the following:

- 1. That the Railroad Commission of Texas, under the explicit terms of the mandated legislation creating said Commission, should immediately cease the unnecessary and wasteful issuance of flaring permits. That the Railroad Commission of Texas should continue to monitor flaring permits to see that they apply to emergency situations and NOT the facilitation of routine production.
- 2. That the Railroad Commission of Texas impose proper allowables for every non-stripper well statewide that will result in the orderly production of oil and gas with due consideration for the elimination of the physical waste of the natural resources and the elimination of economic waste resulting from the too-rapid exploitation that has resulted in extreme price fluctuations to the detriment of the citizens of Texas.
- 3. That the Railroad Commission take up the tools provided by the state and regulate oil and gas production in the state in such a manner as to maintain and provide jobs, tax revenue, economic activity and general benefits to the citizens of Texas with stability, equity, fairness and justice.

PPROA certainly recognizes the current situation was exacerbated by the global pandemic and price war, but make no mistake, the problem existed prior to those issues. Maintaining the survival of our industry, on all levels, is past the critical point; therefore, PPROA is asking the commission to use the existing rules mandated to your custody, to make sound decisions for **all** producers, operators, districts, wells, people, state and country.

Sincerely,

Judy E. Stark, President

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Panhandle Producers & Royalty Owners Association