

Commission Shift analysis of Major Violations in the RRC's Oil and Gas Monitoring and Enforcement Plan for FY 2022.

Summary: Fiscal Year 2020 Violations by Severity

	Number	Percent of total
Major violations	14,269	44%
Non-major violations	18,092	56%
Total	32,361	

Table 3 adaptation: Fiscal Year 2020 Number of Violations Per Rule by Subsection, as of March 16, 2021.

Statewide Rule	Number of Violations <u>Fiscal Year 2020</u>	Meets Major Violation Definition in Appendix B?
<u>Commission Access to Properties</u>	-	
16 TAC § 3.2(a)	440	
16 TAC § 3.2(b)	12	
<u>Identification of Properties, Wells, and Tanks</u>	-	
16 TAC § 3.3(1)	2,139	
16 TAC § 3.3(2)	6,006	
16 TAC § 3.3(3)	1,582	
16 TAC § 3.3(4)	2	
16 TAC § 3.3(5)	109	
<u>Application To Drill, Deepen, Reenter, or Plug Back</u>	-	
16 TAC § 3.5	2	
16 TAC § 3.5(a)	3	Y
16 TAC § 3.5(c)	5	
<u>Water Protection</u>	-	
16 TAC § 3.8	100	
16 TAC § 3.8(b)	60	Y
16 TAC § 3.8(d)(1)	7,430	Y
16 TAC § 3.8(d)(2)	322	
16 TAC § 3.8(d)(4)(H)(i)	290	
16 TAC § 3.8(d)(4)(H)(i)(I)	93	
16 TAC § 3.8(d)(4)(H)(i)(II)	27	
16 TAC § 3.8(d)(4)(H)(i)(III)	208	

Statewide Rule	Number of Violations <u>Fiscal</u> <u>Year 2020</u>	Meets Major Violation Definition in Appendix B?
16 TAC § 3.8(d)(4)(H)(i)(IV)	86	
16 TAC § 3.8(d)(5)(B)	1	
16 TAC § 3.8(f)(1)	7	
16 TAC § 3.8(f)(1)(C)(ii)	3	
16 TAC § 3.8(f)(1)(C)(iii)	8	
<u>Disposal Wells</u>	-	-
16 TAC § 3.9	159	Y
16 TAC § 3.9(1)	40	Y
16 TAC § 3.9(12)(C)(i)	32	Y
16 TAC § 3.9(12)(C)(ii)	5	Y
16 TAC § 3.9(9)(A)	1	Y
16 TAC § 3.9(9)(B)	46	Y
<u>Casing, Cementing, Drilling, and Completion Requirements</u>	-	-
16 TAC § 3.13(a)(6)(A)	2,405	
16 TAC § 3.13(a)(6)(B)	4	Y
16 TAC § 3.13(b)(1)(B)(i)	NOT REPORTED BY RRC	Y
<u>Plugging</u>	-	-
16 TAC § 3.14(a)(3)	25	
16 TAC § 3.14(b)(1)	17	
16 TAC § 3.14(b)(2)	5,217	Y
16 TAC § 3.14(d)(1)-(11)	40	
16 TAC § 3.14(d)(12)	452	
<u>Surface Equipment Removal Requirements and Inactive Wells</u>	-	
16 TAC § 3.15(f)(2)(A)	47	
16 TAC § 3.15(f)(2)(A)(i)	13	
16 TAC § 3.15(f)(2)(A)(ii)	107	
<u>Log and Completion or Plugging Report</u>	-	
16 TAC § 3.16(b)	107	
<u>Pressure on Bradenhead</u>	-	
16 TAC § 3.17(a)	959	
<u>Notification of Fire Breaks, Leaks, or Blow-outs</u>	-	
16 TAC § 3.20(a)(1)	116	
<u>Fire Prevention and Swabbing</u>	-	
16 TAC § 3.21(j)	364	

Statewide Rule	Number of Violations <u>Fiscal</u> <u>Year 2020</u>	Meets Major Violation Definition in Appendix B?
16 TAC § 3.21(k)	2	
16 TAC § 3.21(l)	451	
Protection of Birds	-	
16 TAC § 3.22(b)	341	
Separating Devices, Tanks and Surface Commingling of Oil	-	
16 TAC § 3.26(a)(2)	2	
Gas To Be Measured and Surface Commingling of Gas	-	
16 TAC § 3.27(a)	67	
Gas Well Gas and Casinghead Gas Shall Be Utilized for Legal Purposes	-	
16 TAC § 3.32(d)(2)	29	
16 TAC § 3.32(h)	105	
Oil, Gas, or Geothermal Resource Operation in Hydrogen Sulfide Areas	-	
16 TAC § 3.36(c)(14)	3	
16 TAC § 3.36(c)(5)(B)	231	
16 TAC § 3.36(c)(6)(A)	14	
16 TAC § 3.36(c)(6)(B)	14	
16 TAC § 3.36(c)(6)(C)	6	
16 TAC § 3.36(c)(8)	66	
16 TAC § 3.36(c)(9)(A)	5	Y
16 TAC § 3.36(c)(9)(Q)	2	Y
16 TAC § 3.36(d)(1)(G)	44	
16 TAC § 3.36(d)(2)	1	
Fluid Injection into Productive Reservoirs	-	
16 TAC § 3.46	641	Y
16 TAC § 3.46(a)	97	Y
16 TAC § 3.46(g)(1)	8	Y
16 TAC § 3.46(g)(2)	167	Y
16 TAC § 3.46(j)	352	Y
Reclaiming Tank Bottoms, Other Hydrocarbon Wastes, and Other Waste Materials	-	-
16 TAC § 3.57(c)(1)	1	
16 TAC § 3.57(d)	1	



Reforming oil and gas oversight in Texas

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Statewide Rule	Number of Violations <u>Fiscal</u> <u>Year 2020</u>	Meets Major Violation Definition in Appendix B?
Pipeline Connection; Cancellation of Certificate of Compliance; Severance	-	-
16 TAC § 3.73(a)	1	
16 TAC § 3.73(h)	6	
16 TAC § 3.73(i)	213	
Brine Mining Injection Wells	-	-
16 TAC § 3.81(b)(2)	1	
Cleanup of Soil Contaminated by a Crude Oil Spill	-	-
16 TAC § 3.91(d)(1)	349	
16 TAC § 3.91(e)(3)	NOT REPORTED BY RRC	Y
Underground Gas Storage	-	-
16 TAC § 3.96(b)(1)	3	
Underground Storage of Gas in Salt Formations	-	-
16 TAC § 3.97(b)(1)	1	
Standards for Management of Hazardous Oil and Gas Waste	-	-
16 TAC § 3.98(d)	44	
False Applications, Reports, and Documents and Tampering with Gauges	-	-
Tex. Nat Res Code § 91.143	2	