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**To:** [Rules Coordinator](#)  
**Subject:** Statewide Rule 8, Section 3.8 and Chapter 4, Waste Management Procedures  
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Chairman Christi Craddick  
Commissioner Wayne Christian  
Commissioner Jim Wright

Dear Commissioners:

As a Texas landowner, a concerned Texas citizen and a Sustainability Professional with over 20 years of experience in the oil and gas industry, I am writing to express my concern in the strongest terms for the lack of standards regarding reserve pits in the final draft issued on August 15, 2024 or Statewide Rule 8. This draft raises some important concerns about landowner rights, as well as the environmental protection of Texas lands, groundwater, and community health.

In the 20 years that I have worked in this industry, I have witnessed the innovation and efforts put in place by many companies to improve environmental protections, and safeguard communities, groundwater and wildlife. Today, I am outraged to see that the Railroad Commission has the opportunity to improve regulations governing reserve pits in Texas, and yet it is choosing not to do so. The Commission will not only be judged by future generations for this, but it will go down on the wrong side of history for choosing to disregard calls for stronger standards to protect all Texans. These are some of the lowest standards in the COUNTRY, and we all deserve better.

The previous draft of the rule issued in October 2023 included standards for authorized pits on construction, operation, and closure. Alarming, those were removed in the most recent draft, as were requirements for groundwater monitoring, sampling, and liners.

I would like to kindly request the Railroad Commission of Texas revisit its proposed updates regarding the use of authorized pits and strengthen regulations in the following area:

Establish uniform requirements for construction, operation, and closure standards of all authorized pits.

The updated rule imposes no construction, operation, or closure requirements on these pits. While the new pit registration requirement may be helpful in identifying pit locations, it will not eliminate the inherent hazards reserve pits pose to groundwater or land. Reasonable construction standards, liner requirements, groundwater monitoring, pre-closure testing of waste, and closure standards are the best ways to protect our groundwater and preserve our land.

Reserve pits may be smaller than commercial disposal pits, but they contain the same waste and pose a similar risk to groundwater yet are almost entirely unregulated.

As a Texas landowner, it is my belief that reasonable regulations for authorized reserve pits will protect our groundwater and the environment while still allowing Texas' thriving energy industry to lead from the front. I kindly urge you to consider strengthening the regulations as outlined above.