

Kellie Martinec

From: rrcwebcontact@gmail.com
Sent: Monday, November 02, 2015 2:48 PM
To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Monday, November 02, 2015 3:48:22 PM

Submitted By

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Amend §3.86 and other rules re: UFT fields

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The proposed Texas RRC commission rules require well plats to be prepared by a professional land surveyor or a registered professional engineer. In the State of Texas, only a registered professional land surveyor is allowed to give opinions on boundary lines. While mineral ownership usually no longer reflects surface ownership, mineral ownership is based on previous tract boundaries that can still be retraced and located by a registered professional land surveyor with experience in determining proper boundary placement. Continuing to allow other individuals to prepare well permit plats can leave the well permitting process open to errors including well placement and mineral acreage calculations. I strongly encourage the Texas RRC to adopt an amended proposed rule that requires well permit plats to be prepared by only a registered professional land surveyor.

Sincerely,

Connor G. Brown, RPLS 6366