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**From:** rrcwebcontact@gmail.com  
**Sent:** Wednesday, October 21, 2015 11:45 AM  
**To:** rulescoordinator  
**Subject:** Comment Form for Proposed Rulemakings



## Comments Form for Proposed Rulemakings

### Date Submitted

Wednesday, October 21, 2015 11:45:15 AM

### Submitted By

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## Amend §3.86 and other rules re: UFT fields

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Currently the Texas RRC has a requirement for well permit plats to show distances to nearest lease lines and Abstract lines. It does not have a requirement for a Registered Surveyor to provide these distances. This results in plats with lines that have been approximated by any number of individuals, sometimes using something as unreliable as an appraisal district map to place the property lines. In some cases, this leads to hundreds of feet of error. This makes a large difference when acreage calculations are done, and for placement of well locations. Wells have even been placed in the wrong location, simply because an approximate measurement to someone's best guess of a property line has been used, rather than an accurate measurement, provided by a licensed professional with experience in determining proper boundary placement. Now consider that, and consider if you were being paid royalties using that process. Would you feel comfortable that your rights as a property owner were being respected? What if you were not paid for minerals to which you were entitled, because accurate measurements were not attained? The lines need to be properly located by a Registered Surveyor.

I strongly encourage the Texas RRC to adopt the proposed rule change that requires a plat bearing a Registered

Surveyor's signature and seal. While mineral ownership no longer reflects surface ownership, it is based upon previous tract boundaries that can still be established. This needs to be applied universally to any permit plat that shows property boundaries, but for now this one change would be a huge step in the right direction. Thank you for your time.

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