

**Comments to the Sunset Commission 8/22/2016  
Regarding The Texas Railroad Commission**

**by Chris Guldi**

Ted has a watchdog that he let his two-year-old son name "Puffy." Puffy is supposed to guard the house and protect the family. Early on, though, the roofing contractor Ted hired befriended Puffy with doggie biscuits. Puffy now seems to think anyone in a big truck is a friend. Ted needs a watchdog whose name is not a joke, and who is actually able to protect his owners.

The TRRC is praised and petted by the oil and gas industries, who want it to keep its quaint name. You have an excellent report from the Sunset Commission Staff explaining why the TRRC needs a name change, which, by the way, would cost nothing to implement. I see no reason to repeat what you all know very well. The citizens of Texas do not benefit from keeping the arcane name, only Oil and Gas insiders do.

Similarly the staff report recommends changes that would make TRRC data more useable. The TRRC's chaos is so notorious that Texas alone among all oil and gas producing states, warranted disclaimers from the FracTracker Alliance, which professionally analyzes such data, for the obscurity of its data sets. They wrote "So in short, we still don't have Texas well data, even though it is technically available." I also checked Texas-Drilling.com, which sells its data to the industry. Its counts of Texas producing oil and gas leases is 2/3 of what the RRC claims.

Texas data is unreliable. According to your Staff Report, 151 inspectors conducted 134,484 inspections in 2015. They must have averaged four per day - I can't imagine when they had time to report on their work. They identified 61,189 violations. That was really only 15,056 violations, because the same violation was counted again every time an inspector checked to see whether the violation had been fixed.

We cannot find out which leases have been inspected. There is no plan for inspecting most leases. The TRRC site does not indicate the seriousness of the violations, so we do not know whether there were 15,000 life-threatening hazards or 15,000 misspelled signs. We do not know who among the more than 4000 drillers are doing a good job of complying with state regulations and who are laughing off the state's wimpy fines, which at their maximum, \$10000 a day, are a fraction of those charged by other states and are not assessed until after the offender has repeatedly refused to address a violation.

We do not know what complaints have been made or what has happened to any complaint. The State of Colorado by contrast invites you to file complaints to the Colorado Oil and Gas Conservation Commission online and lets you track it through their database, so you know what is being done about it. Even the Oklahoma Corporation Commission lets you file complaints online. The TRRC lists its district offices.

You can give us a better watchdog. It will not hurt the best of our state's drillers, but will help to restrain those who do the most damage to our state.