

John Conner, Texas

There are legacy Wells on the Pecos River with existing wellheads not in the RRC GIS records (i.e. no API #, or posted in RRC GIS)

60% of known Legacy wells are miss represented in the RRC GIS by 50' and greater

Wells are continually being plugged and abandoned but their digital location is still miss represented in the RRC GIS, making them miss represented wellbores of the future with no surface evidence to identify their location.

Many legacy wells have been plugged and abandoned and their records do not appear in the RRC GIS (RRC does state that their online records only go back to 1964 but it is not clear how far back their RRC GIS goes). Often these legacy wells appear on a topo map or in old libraries hard copy records (i.e. Midland Energy Library for the Permian) but are not in the RRC

The RRC digital records continue to grow and unless a sound "gatekeeping" process is put in place, the issue of miss represented or unknown well locations is going to continue to exist and as wells are plugged and abandoned or orphaned, the problem continues to grow accordingly.

The public sector, industry, landowners, even the RRC itself depend on the RRC GIS and supporting records. Everyone depends on the "digital" data and assume it to be correct because it is digital but it cannot be depended on to be correct.

In our G-Forensic white paper, previously provided to the RRC, we identify solutions to the well location issues. It is a tremendous task to correct the RRC surface hole well locations (SHL) but we have to start somewhere as all the bottom hole location of wells (BHL) are dependent on the SHL location so accuracy is important at the surface and the subsurface.

We should start with putting a reliable and verifiable "gatekeeping and governance" process in place for orphan well locations and P/A locations. For orphans wells, go back year by year and resolve miss representation errors and update the RRC records accordingly. Same should be done for wells as they are plugged and abandoned, ensure their location values are correct/corrected and updated in the RRC as well and start going back year by year and correct. In an example of the plugged wells on the Rocker B Ranch it shows wells P/A'd and yet still miss represented. This is total lack of governance.

We also believe that a team of experts needs to be put together and work with RRC and industry and build a more reliable digital well data set that is made available via the RRC GIS which in turns benefits everyone. A lot of operators have better and more reliable location data than the RRC that currently they don't want to share with the RRC.

Collaboration between the RRC, industry, and suppliers should be considered for building a common and reliable land survey grid as everyone is using something different with the RRC land grid being the most unreliable. Again, the public only has access to the RRC land grid for their use.

In general, the RRC needs to have a "governance and gatekeeping" process in place for the verification of their digital well data location (surface and subsurface) and adhere to the old saying "measure twice, cut once", in other words double check the data before putting in the database.