

From: [Brooke Swain](#)
To: [Christopher Sandoz](#)
Subject: Comment on Inactive Well Assessments
Date: Monday, August 21, 2023 10:49:19 PM

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Comment From Rebellion Energy Solutions Regarding Title 43, NATURAL RESOURCES
Part XIX. Office of Conservation—General Operations Subpart 1. Statewide Order No. 29-B
Chapter 1. General Provisions
§137. Plugging and Abandonment

Rebellion Energy Solutions, a dedicated carbon credit developer that specializes in orphan well plugging and ecological restoration, commends Louisiana's commitment, under the visionary leadership of Governor John Bel Edwards, to take proactive steps toward curbing pollution and waste resulting from idle oil and gas wells. The proposed rules to reduce the risk of idle wells becoming orphaned – thus becoming the responsibility of the State – reflect a shared commitment to safeguarding our environment, enhancing job creation, and promoting responsible energy practices.

We fully support the state's efforts to address the issue of orphaned wells. These idle wells, left without proper closure, pose significant economic, environmental, and public health risks. Our experience in orphan well plugging underscores the potential liabilities associated with these wells if not addressed promptly. Requirements that further incentivize oil-and-gas companies to responsibly plug these inactive wells can mitigate environmental risks and also create numerous job opportunities throughout Louisiana.

The proposed rules align with our company's mission of responsible well closure and ecological restoration. They also echo the priorities set forth in Louisiana's Climate Action Plan. As a responsible industry stakeholder, we emphasize the importance of collaboration between the government, industry participants, and environmental organizations to achieve these shared goals. Our commitment to safeguarding the environment and public health aligns with Louisiana's vision of responsible well lifecycle completion.

In conclusion, we appreciate the opportunity to provide our enthusiastic support for Louisiana's proposed rules, which will undoubtedly result in less waste, reduced pollution, and increased job opportunities for the State. We applaud Governor Edwards' administration for its forward-thinking approach and willingness to address the challenges posed by orphan wells. As we stand on the brink of a transformative era for the energy industry, we believe that responsible well closure and ecological restoration will remain integral to Louisiana's sustainable development and prosperity.

Thank you for considering our perspective and expertise in this matter. We look forward to the continued collaboration between government, industry, and environmental advocates to achieve our shared goals.

Rebellion Energy Solutions

