

Comments on the FY 2025 Monitoring and Enforcement Plan

For the FY 2025 Monitoring and Enforcement Plan, the Commission sought stakeholder feedback prior to developing the plan. The Commission received comments from Commission Shift and 97 individuals. The Commission appreciates the participation of these commenters.

The comments that are relevant to the Monitoring and Enforcement Plan are copied below with the Commission's response noted in blue. The Commission received several comments that did not relate to the Monitoring and Enforcement Plan. Those comments are not included in this document.

Commission Shift

Enclosed are Commission Shift's suggestions for the 2025 Oil and Gas Monitoring and Enforcement Plan. We appreciate that you are accepting suggestions in advance of drafting the plan this year. We hope to see our suggestions included in the plan. Please reach out to me for any clarifying questions or feedback. Thank you for your consideration,

Goal 1: to accurately demonstrate the Commission's oil and gas monitoring and enforcement activities.

Rebuild trust with the public through meaningful public engagement

RRC needs to rebuild trust with the public. Meaningful public engagement requires two-way dialogue. RRC should educate, listen, clarify, and ultimately incorporate the feedback it gets from the public into its rules, internal procedures, and decision-making.

API recently published Recommended Practice 1185 Pipeline Public Engagement (RP 1185). This RP contains many useful frameworks for public engagement that are applicable to all kinds of oil and gas infrastructure. Appendix C, in particular, offers a variety of engagement methods for consideration. Commission Shift recommends that RRC consider ways that these tools and principles can be incorporated at the RRC to rebuild trust with the public.

Commission response: The Commission appreciates this comment. The Commission will review the American Petroleum Institute's (API's) RP 1185 as one of the resources to aid in the development of our Class VI public engagement plans.

Deploy the Office of Public Engagement to hold public hearings throughout the state

Make use of the Office of Public Engagement to support public engagement for commission activities including public hearings for permit applications, rulemakings, and the Monitoring and Enforcement Plan rollout. The webpage for the Monitoring and Enforcement Plan, for example, doesn't have enough context or information to show the public how the budget structure works or what kinds of items they should suggest. A workshop would have been helpful for this process.

The 2024 Plan promised that the Office would "engage with the public through direct outreach and education to facilitate greater understanding of RRC processes and solicit broader

participation in matters before the RRC.” Commission Shift and members of the public asked for in-district public hearings in the CO2 rulemakings, and the informal draft comment period for the waste pits rule. But RRC has not deployed the Office of Public Engagement to provide those hearings.

Additionally, neither staff members’ names nor a contact number are listed on the RRC webpage for the Office of Public Engagement (we checked the following pages: Communications, Enforcement Activities, Complaints, Contact Us) even though they are supposed to “act as liaisons to members of the public affected by and interested in Commission proceedings.” We hope to see changes implemented as soon as possible to empower commission staff to engage the public.

Commission response: The Office of Public Engagement assists the public in navigating Commission proceedings of all types and further enhances public access to Commission information. Please note that the office’s role is to help navigate the public through proceedings; not hold public hearings.

The office serves as liaison to the citizens of Texas in addressing their questions and concerns and ensuring excellent customer responses. When the public submits inquiries and complaints using the *Contact Form* available under “General Information” on the Contact Us webpage on the Commission’s website at <https://www.rrc.texas.gov/contact-us>, the office is responsible for responding or coordinating a response. The office is also responsible for responding to any inquiries or complaints submitted on the *General Complaints* form available on the Complaints webpage on the Commission’s website at <https://www.rrc.texas.gov/complaints/>. The office may also be reached by emailing Publicassist@rrc.texas.gov. Please note that this email address was removed from the Commission website and replaced with the forms to better facilitate customer service.

Budget structure information is available via the Commission’s legislative appropriation requests, financial reports and operating budgets which are available on the Commission’s website at <https://www.rrc.texas.gov/resource-center/reports-and-publications/>. If further guidance is needed, the office will be happy to help.

Demonstrate compliance activities related to surface waste facility reports

Commission response: The Environmental Permits and Support (EPS) Unit reviews applications for permits for various surface waste management activities. The latest state budget provided funding for new staff in the EPS Unit. The Commission has seen a significant workload increase over the last year following the enactment of legislation that encourages the recycling of fluid waste for beneficial purposes. Fluid oil and gas waste is waste containing salt, brine, hydraulic fracturing fluid, or other fluids that are the result of drilling for oil or gas.

EPS established a Compliance team in 2023 to focus on post-permitting matters related to facilities that are regulated by EPS. The goal of EPS Compliance is to assist EPS’ review of required reporting and coordination of inspections with District Office staff to ensure compliance

with Commission rules, orders, and permits issued by EPS. There are 5 (4 technical and 1 administrative) full-time employees in the EPS Compliance team that are responsible for compliance.

In 2023, a total of 477 permit applications were submitted to EPS and a total of 369 permits were issued.

Explain how surface waste facility quarterly reports are reviewed to ensure compliance.

Commission response: The process for reviewing surface waste management facility quarterly reports to ensure compliance consists of the following activities.

- Review quarterly reports and data submitted to determine if the facility is operating in accordance with the permit.
- If discrepancies are found or required data is missing, a Request for Additional Data (RAD) letter is sent to the Operator.
- If permit violations are found, a Notice of Violation (NOV) letter is sent to the Operator.
- Commission staff reviews responses to RAD or NOV letters to determine if the facility is compliant with the permit.
- If the Operator fails to provide the requested information, the Commission may pursue further actions up to and including a referral to enforcement or initiating suspension, modification, or cancellation of the permit.

Report comprehensive data on Statewide Rule 32 venting and flaring rule exceptions

Report the number of SWR 32 exceptions granted in the fiscal year, by number of days granted for the exception (90 days; 180 days; 180 days but limited to 5 days/mo; or permanent). Report the number of exceptions that were renewed. Report the number of exception denials, and the reasons why the exceptions were eventually approved, if applicable. Explain how the commission uses available data to determine noncompliance with SWR 32 on a routine basis. Demonstrate progress in reducing the total volume of casinghead gas flared and vented over time.

Commission response: The requested information is in the attached spreadsheets. The data show that the amount of gas flared in Texas from June of 2019 to August of 2023 has decreased from 19.32 Bcf to 11.83 Bcf. The percent of gas flared as a percentage of gas produced decreased from 2.33 % to 1.14%.

The Commission uses this information to determine noncompliance with SWR 32. The Commission's inspectors verify whether a facility at which flaring is occurring has the proper authority, either under SWR 32 or through a SWR 32 exception. The volume of gas flared must also be reported on the operator's production reports. In addition, the FY2024-2025 budget included funding for the Commission to purchase additional FLIR cameras to increase inspection

capabilities in districts. The cameras have been used by the Commission for more than 10 years to detect emissions from wells and other oil and gas facilities during inspections.

Goal 2: to strategically use the oil and gas monitoring and enforcement resources of the Commission to ensure public safety and protect the environment.

Develop a plan to eliminate orphaned wells and sites that are older than 20 years.

The first step to eliminating orphaned wells is to prevent lingering inactive wells that still have active operators. RRC must use all of its powers to compel operators to plug inactive wells aged over 20 years before they degrade so much that a viable plug becomes impossible. Aging inactive wells are more likely to be potential conduits for pollution than they are to have a potential future economic use. Less than 2% of the inactive well population is reactivated each year. Waiting for these wells to become orphaned wells pushes ever-greater costs onto the broader population of oil and gas operators who will eventually be responsible for paying for the increasing costs of orphaned well plugging. More importantly, delaying well plugging increases risks of pollution, which can harm drinking water supplies and infringe on private property rights by preventing landowners from enjoying their property in perpetuity.

The plan should include an analysis of

- the rate of change in the number of inactive wells each year over a period of ten years
- projections of the number of wells that can be plugged by operators each year with specific interventions by RRC.

One action the RRC can take is to more carefully scrutinize inactive well transfers, and prevent transfer of wells that are noncompliant with SWR 15. Along these lines, RRC should use its resources to hire more staff to enforce inactive well plugging requirements.

Commission response: Once the Commission has approved the *Form P-4, Producer's Transportation Authority and Certificate of Compliance* transferring operatorship, the prior operator will no longer be responsible for compliance with these provisions.

The acquiring operator has 6 months from the date of Form P-4 approval to bring any inactive wells into compliance with SWR §3.15. The operator may comply by plugging the well, returning the well to active operation, or by applying for and being granted a plugging extension on the well. Until the acquiring operator has brought the well into compliance with SWR 15, the Commission may not approve any further transfers of the inactive well to a subsequent operator. Following the expiration of the 6-month period after transfer, if any transferred well remains out of compliance with SWR 15, the Commission may, after notice and opportunity for hearing, revoke the operator's Organization Report.

The number of inactive unplugged wells peaked at 167,000 in Nov. 2022 and then came down to 149,000 in March 2023, where it essentially stayed all year. The number of inactive wells operators plugged per month was surprisingly consistent (600 - 800 per month), which could indicate that the number of operator-plugged wells are a function of enforcement staff capacity at RRC.

Finally, RRC should evaluate its current rate of well orphaning, and report total well-plugging expenditures necessary over the next 10 years in order to reduce the orphaned well count to 1,000, while considering projected rates of new orphaned wells and ensuring that no orphaned well has been inactive longer than 20 years.

Commission response: The definition of an orphaned well is a well for which production of oil or gas or another activity under the jurisdiction of the Commission has not been reported to the Commission for the preceding 12 months, and for which the Commission-approved Organization Report (Form P-5) has been delinquent over one year. The Commission tracks the number of known orphaned wells, which is a dynamic number that changes daily and is affected by the health of the oil and gas industry, or the lack thereof. This measure is an indicator of liability for use of state managed funds.

The Inactive Well Aging Report (“IWAR”) is a listing of wells carried on the Commission’s proration schedules that are considered “Inactive” under Statewide Rule 14. For each well (among other information) the listing includes the length of inactivity. The IWAR data is updated monthly, prior to the 10th day of each month. The entire inactive well population is available for download monthly in both Excel format and delimited text format, at <https://www.rrc.texas.gov/oil-and-gas/compliance-enforcement/hb-2259-hb-3134-inactive-well-requirements/inactive-well-aging-report-iwar/>

The Commission compiles a list of all orphaned wells, which is available on its website at <https://www.rrc.texas.gov/oil-and-gas/research-and-statistics/well-information/orphan-wells-12-months/>. A review of the latest data indicates that, out of a total of 8580 orphaned wells, approximately 570 (6.64%) wells have operators for which the P-5 has been inactive for more than 20 years.

In addition, the Commission considers the age of the well in its Well Plugging Prioritization (<https://www.rrc.texas.gov/media/3hjhjroj/well-plugging-prioritization.pdf>).

The plan should include an analysis of

- the rate of change in the number of inactive wells each year over a period of ten years
- projections of the number of wells that can be plugged by operators each year with specific interventions by RRC.

Commission response: Information regarding the rate of change in the number of inactive wells each year over a period of ten years can be found in the Commission’s Oil Field Cleanup Program Annual Report for Fiscal Year 2023 (<https://www.rrc.texas.gov/media/0cbnxuhk/oilfield-cleanup-program-annual-report-fiscal-year-2023.pdf>).

The Commission inspects each inland well at least once every five years, and each offshore well is inspected at least once every two years. The Commission tracks the percentage of wells not inspected in the last five years through the Commission’s Inspection, Compliance, and Enforcement (ICE) system. The percentage of the total well population not inspected in the last

5 years measures how efficiently the Commission's district office staff conducts inspections of all completed oil and gas wells.

The Commission's state managed well plugging program works to eliminate the safety and environmental risks associated with abandoned wells. The Commission uses a priority methodology to rank wells for plugging to ensure that those wells posing the greatest threat to public safety and the environment are plugged first. The plugging methodology includes four primary categories with more than 27 risk factors. Within each factor are multiple subfactors with an assigned weight dependent on its potential to affect human health and the environment. These methodologies ensure that those wells posing the greatest threat to public safety and the environment are plugged. Orphan wells are prioritized on a scale of 1 – 4, with 1 being the highest priority for plugging. Priority 1 poses the greatest potential risk to public or environmental safety.

The Commission also tracks the percentage of Active Well Operators with Inactive Wells. This measure is the percentage of active well operators for whom more than 25% of their wells are inactive. An inactive well is a well that is not currently producing and is not identified as an active service type well. An operator who begins to accumulate a large percentage of inactive wells as compared to active wells begins to pose a potential risk of leaving behind abandoned unplugged wells. As long as an operator has a large percentage of active wells, it is unlikely that the operator will abandon unplugged wells. This measure is a general indication of whether additional regulations might be necessary to require all operators to more expeditiously plug their inactive wells after a certain period of inactivity.

The Commission also tracks the number of shut-in/inactive wells. This measure is the total count of all wells that have had no reported production, disposal, injection. This number is the sum of the count of inactive wells carried on the oil schedule and the count of inactive wells carried on the gas schedule as of the last month of the reporting period. A large number of inactive wells indicates a potential threat to the Oil and Gas Regulation and Cleanup Fund should those wells become orphaned in the future. This measure provides a general indication of whether additional regulations might be necessary to require all operators to more expeditiously plug their inactive wells after a certain period of inactivity.

The Commission tracks the average number of oil and gas well and facility inspections performed by district office staff and documented by a work report during the reporting period. This measure is generated monthly from the ICE system by an automated report that provides the total number of oil and gas well and facility inspections performed during the reporting period and the total number of district office staff performing the inspections. The report determines the average number of inspections performed by dividing the total inspections by the total number of district office staff performing the inspections.

The average number of oil and gas well and facility inspections performed measures how efficiently the Commission's district office staff conducts the inspections. The number also measures the level of activity for the Commission's district office staff. This measure serves as a management tool to predict future inspection performance.

The Commission continues to develop information technology solutions, tools, and processes to enable easier access to records that concern various oil and gas exploration and development, determination of responsibility for the proper plugging of abandoned wells, applications to inject water into reservoirs for enhanced oil and gas production, and prevention and control of oil and gas pollution.

The Commission relies on data tools to manage inspections, allowing staff to prioritize future inspections and track compliance. The Commission collects, maintains, and makes available to the public enormous amounts of information and data depending on agency systems and processes that operate with the highest level of efficiency and accessibility. This requires vigilance in continuous review and updating of its systems related to data collection and data management in the field and at headquarters. The agency endeavors to make data more transparent by making it both more readily available and more usable by regulated industries and the public. Data transparency initiatives include the following:

- Digitize records to help the agency continue its transparency initiatives with historical documents. The Commission was budgeted \$1.9 million to create online access to millions more archived documents. Approximately 5 million documents from district offices throughout the state will be imaged so that the public can access the documents online without needing to travel.
- Modernize the Commission's Public Geographic Information System (GIS) Map Viewer to allow agency staff to use GIS data to create more intricate map views and produce data sets customized for specific business functions, while providing better visibility of GIS data for the public, increase data reliability, and allow users to download the data for their specific needs.
- Use the Commission's data warehouse and the Texas Open Data Portal (ODP) to modernize the Commission's existing legacy data download capability called Extended Web Access (EWA). The Commission will provide data from the agency's data warehouse to the ODP, enabling more data from more systems available than currently supported by EWA. The ODP's technology will also provide access to this data on the Commission's website so that consumers can continue to access data from a location they are accustomed to using.
- Make viewing records and downloading associated data more efficient by moving to a single interface for reporting both data and records. Leveraging the Texas Open Data Portal's mechanism to download data, the Commission will provide a single location that allows users to download records and associated data. Currently, users go to different locations on the Commission website to download data and records. This simpler and more transparent approach will increase data and record downloads and provide Commission with a single system to track downloads with expanded reporting capabilities.
- Provide real-time access to some of the Commission's reportable data by using the current data platform's sharing technologies.
- Employ modern Data Science technology and techniques to make data determinations that are more predictive, descriptive, or anticipatory. As these new paradigms increase in use, the agency will have the ability to make some non-confidential data available to the public from these determinations.

Update Class II permitting standards to prevent risks to public safety and groundwater resources This biennium (2024 - 2025), the legislature appropriated funds to the RRC for UIC Modeling. These funds also allow for RRC to “quickly implement statutory and regulatory requirements associated with seismic events.”

RRC should open a rulemaking to update its Class II injection well permitting standards. It is clear that the many incidents across Texas related to Class II wells are occurring because the Class II rules are not rigorous and do not consider the intensity of dynamic subsurface activities in Texas including hydraulic fracturing and multiple types of underground injection wells.

Commission response: In 2013, the Commission amended Statewide Rule 9 (Disposal Wells) and Rule 46 (Fluid Injection into Productive Reservoirs) to require a seismic survey for disposal well permit applications and to clarify that the Commission may modify, suspend or terminate a permit if injection is likely to be or determined to be contributing to seismic activity. The Commission also hired a seismologist to assist technical staff in reviewing applications and permits. In accordance with the Commission’s Seismicity Response Plan, the Commission’s State Seismologist may designate a Seismic Response Area and may require a seismic response plan. Further, Commission staff note that available evidence indicates that large magnitude induced seismicity in Texas is most commonly caused by deep injection disposal. Within these areas, deep disposal has been reduced or completely stopped (e.g, Gardendale Midland-Odessa) according to a seismic response plan, reducing seismicity. An interested person may petition the Commission for rulemaking in accordance with 16 TAC § 1.301.

In addition, the Commission’s Class II injection well rules provide sufficient flexibility for the Commission to include additional conditions in permits to address localized issues.

With the recent IRS 45Q tax credits, the federal government is unleashing widespread commercial development of CCS in Texas. Most of that new development will take place in Class II wells used for enhanced oil recovery (EOR), because it is more profitable than potential Class VI injection. Because of these federal incentives, we are expecting major growth in Class II injection, beyond the limited CO₂ injection that has already been taking place in Texas. The combination of unplugged wells and increased carbon dioxide (CO₂) injection poses increased threats to groundwater supplies in Texas. When CO₂ mixes with water, it creates a strong acid called carbonic acid. RRC should consider these new risks and consider planning for a potential rulemaking on Class II injection in 2025.

Commission response: Carbon sequestration in Class II wells is not prohibited by either the federal or state UIC regulations. Carbon dioxide is sequestered in association with injection of carbon dioxide for the purpose of enhancing the recovery of hydrocarbons. In addition, carbon dioxide and other waste gases generated during processing of natural gas are often disposed of in Class II injection wells. However, if the well is no longer used for the primary purpose of enhanced oil or gas recovery or disposal of waste gases from natural gas processing, or there is an increased risk to Underground Sources of Drinking Water (USDW), the well will be transitioned to the Class VI program. Certain factors will be considered by the Directors of the Class II and Class VI programs when determining whether a transition is necessary, including: an increase in reservoir pressure, an increase in injection rates, decrease in reservoir production

rates, suitability of the Area of Review (AOR) delineation, and quality of well plugs within the AOR, 16 TAC §5.201.

Prepare the public and first responders for CO2 pipeline incidents

Carbon dioxide has different properties than natural gas (methane), and sinks when it is released. CO2 leaks can cause standing plumes that displace oxygen. A Texas-based pipeline operator was responsible for a CO2 pipeline rupture in Mississippi that caused dozens of people to go to the hospital with symptoms of hypoxia. Some of those people have chronic short-term memory loss. With the proposed construction and expansion of CCUS projects, including CO2 pipelines, the people of Texas have a right to know the risks associated with this infrastructure, and be invited to participate in a coordinated emergency response strategy to help prevent unnecessary fatalities or injuries. RRC should plan to deliver in-district training and public education sessions throughout the state.

Commission response: The Commission agrees that emergency response is important. The state Class VI regulations include requirements regarding emergency response. Section 5.203(l) requires that an applicant for a Class VI injection well permit submit an emergency and remedial response plan. The emergency and remedial response plan must account for the entire area of review and must include a safety plan. The safety plan must include emergency response procedures; provisions to provide security against unauthorized activity; carbon dioxide release detection and prevention measures; instructions and procedures for alerting the general public and public safety personnel of the existence of an emergency; procedures for requesting assistance and for follow-up action to remove the public from an area of exposure; provisions for advance briefing of the public within the area of review on subjects such as the hazards and characteristics of carbon dioxide; the manner in which the public will be notified of an emergency and steps to be taken in case of an emergency; if necessary, proposed actions designed to minimize and respond to risks associated with potential seismic events, including seismic monitoring; and includes a description of the training and testing that will be provided to each employee at the storage facility on operational safety and emergency response procedures to the extent applicable to the employee's duties and responsibilities.

The operator must train all employees before commencing injection and storage operations at the facility. The operator must train each subsequently hired employee before that employee commences work at the storage facility. The operator must hold a safety meeting with each contractor prior to the commencement of any new contract work at a storage facility. Emergency measures specific to the contractor's work must be explained in the contractor safety meeting. Training schedules, training dates, and course outlines must be provided to Commission personnel upon request for the purpose of Commission review to determine compliance.

The Commission will review the applicant's proposed emergency and remedial response plan to determine if the plan is adequate to protect the public.

The issue of carbon dioxide pipelines is beyond the scope of this plan. However, Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations at 49 Code of Federal Regulations Section 195.440 (relating to Public Awareness) require each pipeline operator to develop and implement a written continuing public education program that follows the guidance

provided in the American Petroleum Institute's (API) Recommended Practice 1162, "Public Awareness Programs for Pipeline Operators." The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: (1) use of a one-call notification system prior to excavation and other damage prevention activities; (2) possible hazards associated with unintended releases from a carbon dioxide pipeline facility; (3) physical indications that such a release may have occurred; (4) steps that should be taken for public safety in the event of a carbon dioxide pipeline release; and (5) procedures to report such an event.

The regulations further require that the program include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations; that the program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports carbon dioxide; and that the program be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area. The operator's program documentation and evaluation results must be available for periodic review by federal, state and other appropriate regulatory agencies.

In addition, the PHMSA has announced that it is taking steps to implement new measures to strengthen its safety oversight of carbon dioxide pipelines around the country and protect communities from pipeline failures. To strengthen carbon dioxide pipeline safety, PHMSA is initiating a new rulemaking to update standards, including requirements related to emergency preparedness, and response, and is conducting research to strengthen pipeline safety of carbon dioxide pipelines.

With respect to training and public education sessions, the Commission's Office of Public Engagement has been developing an outreach plan to provide general information regarding geologic storage of carbon dioxide, which will also include information regarding the characteristics of carbon dioxide, and safety requirements for carbon dioxide pipelines.

OTHER COMMENTERS

The following individuals provided comments similar to Commission Shift's. The Commission's responses to Commission Shift's comments, included above, also address the comments from these individuals. Comments reflecting different concerns than those copied above are included below.

1. Barbara Alexander
2. Ms. Carolyn Atkins
3. Mr. Bo Baggs
4. Mr. Stephen Ball
5. Oliver Bernstein

6. Ranjana Bhandari
7. Ernest Braun
8. Scott Brinkman
9. Mr. Dale Bulla
10. Becky Bullard
11. Michael Bueno
12. Ms. Betty Burton
13. Payton Campbell
14. Dr. Craig Campbell
15. Elida Castillo
16. Ms. Mary Celaya
17. Gary Chapman
18. Mr. Anthony D'Souza
19. Sandra Donnelly
20. Janet Dudding
21. Hawk Dunlap
22. Mrs. Margaret Duran
23. Alicia Espinoza
24. Dr. Gerald Edwards
25. 25. Amber England
26. Delia Enriquez
27. Rev. Jan Ekstedt
28. Kristin Flores

29. Russ Gamber
30. Iris Gonzalez
31. Mrs. Christine Guldi
32. Mr. Jamie Hannan
33. James Hannan
34. Linda Hanratty
35. Ms. Margaret Henkels
36. Dr. Patrick Herndon
37. Dr. James Herndon
38. Dr. Olive Hershey
39. Eli Hilbert
40. Katherine Homan
41. A. Ryland Howard
42. Stacey Hulsey
43. Nancy Hynes
44. Mr. Lucas Jasso
45. Dawn Johnston
46. Dr. Suzanne Kairo
47. Jim Klein
48. Lisa Liu
49. Mr. Gera Marin
50. Jim Marston
51. Michael Martin

52. Francisco Martinez
53. Mr. Don McCown
54. Ms. Pamela Meyer
55. Michael Mooney
56. Mr. Tai Moran
57. Dr. Craig Nazor
58. Mr. and Mrs. Thomas Nieland
59. Patrick Nye
60. Mr. Blake O'Quinn
61. Ms. Lydia Ozuna
62. Susan Pantell
63. Ronald Parry
64. Earl Peck
65. Ms. Janette Prukop
66. Ms. Joan Quenan
67. Dr. Vanessa Quezada
68. Jennifer Quick
69. Lee Reaves
70. Geoffrey Reeder
71. Collin Rees
72. Crystal Rios
73. Ms. Robin Roberts
74. Mrs. Kimmy Robinson

75. Mrs. Martha Rogers

76. Molly Rooke

77. Mr. Valentin Ruiz

78. Mr. Ian Sandland

79. Robin Schneider

80. Mr. Gregory Sells

81. Becky Smith

82. Ed Soph

83. Mr. Wayne Stalsworth

84. Ms. Joanie Steinhaus

85. Mr. Todd Sullivan

86. Aly Tharp

87. David Todd

88. Ms. Emily Thomas

89. Mr. James Turk

90. Mr. Matt Weldon

91. Kate Wickham

92. Mr. Dallas Windham

93. Frank Wissler

94. Ira Yates

Collect as much data as possible about the volume and quality of all produced water. Beneficial use of produced water will require knowing which areas have any particular advantage or disadvantage for beneficial use. Acquiring this information now will facilitate implementation when safe processes are approved.

The Commission is a participant in the Texas Produced Water Consortium (TXPWC), which was established on June 18, 2021 by Senate Bill 601. The purpose of the TXPWC is to bring

together information and resources to study the economics and technologies related to beneficial uses of produced water, including environmental and public health considerations. Texas Tech University, in coordination with the Government Agency Advisory Council and the Stakeholder Advisory Council, serves as administrative oversight for TXPWC.

The consortium will also develop an economic model for using produced water in a way that is economic and efficient and protects public health and the environment. The consortium will provide guidance for establishing produced water permitting and testing standards and will suggest changes to law and administrative rules to better enable the use of produced water.

The Texas Produced Water Consortium Report to the Texas Legislature 2022 (<https://www.depts.ttu.edu/research/tx-water-consortium/downloads/22-TXPWC-Report-Texas-Legislature.pdf>) states that “developing a better understanding of the characteristics of the produced water in a specific region of interest will be integral to achieving an economical and technologically feasible approach to treating produced water for beneficial use that is protective of public health and the environment.”

For more information on the consortium or to express your interest in becoming a member, reach out to txpwc@ttu.edu.

95. Berenice Zamora

96. Sharcl23@everyactioncustom.com (No name provided)

97. José David García, Petroleum Engineer

I am writing to present a research proposal concerning a matter of critical importance to our environment and energy sector. My name is José David García, a Venezuelan national with over 8 years of experience in the oil industry. I hold degrees in both Higher University Technician in Petroleum and Petroleum Engineering, and for the past four years, I have specialized in equipment operations for the production and rehabilitation of oil wells.

At present, I am deeply engaged in a national investigative endeavor centered around the issue of abandoned oil and gas wells in the state of Texas. These wells represent a significant environmental hazard, contributing substantially to the emission of pollutants into our atmosphere, particularly methane, exacerbating the global warming crisis.

While efforts are underway by the current administration to address this pressing concern through a \$4.7 billion fund as part of a broader infrastructure overhaul, it is evident that the allocated resources may fall short of adequately resolving the issue. Moreover, there are identified gaps within state laws governing oil production that could potentially permit continued well abandonment by industry entities.

Given the swiftly evolving nature of this situation and the escalating volume of methane emissions resulting from the neglect of these wells by operating companies, immediate action is imperative. These companies routinely shutter valves and abandon wells for extended periods, leading to the gradual release of methane through these openings.

The primary objective of this research initiative is to advocate for the adoption of advanced technology utilizing Coiled Tubing equipment, offering a more efficient approach to well abandonment. This method entails the insertion of a continuous pipe to the well's depths, facilitating the controlled injection of cement into targeted areas. Such precision significantly reduces operational, material, and execution costs, with completion achievable within 24 to 48 hours, as opposed to the conventional 7-day timeframe.

This investigative undertaking is slated for execution within the Montgomery District of Spring, Texas, specifically within the Yegua field, where three abandoned wells have been earmarked as pilot sites. The outcomes of this pilot program will inform a nationwide implementation strategy across all oil fields, aimed at mitigating surface emissions and advocating for regulatory measures to deter reckless well abandonment practices, thus combatting climate change.

Crucial insights provided by the Texas Railroad Commission (RRC) have underpinned the formulation of this research proposal, offering invaluable data on well status, drilling history, completion, and production.

The selected wells for this investigative endeavor utilizing Coiled Tubing equipment are as follows:

- Well Name: Harris Ida 2
- Well Name: Hilliard Y2
- Well Name: Tyra Lewis 1

[Commission response: The Commission appreciates this information.](#)