

CLASS VI UNDERGROUND INJECTION CONTROL PROGRAM DESCRIPTION

RAILROAD COMMISSION OF TEXAS

DRAFT

I. INTRODUCTION

As mandated by the Safe Drinking Water Act of 1974 (as amended), the United States Environmental Protection Agency (EPA) promulgated regulations establishing minimum requirements, technical criteria, and standards for State Underground Injection Control (UIC) programs to protect underground sources of drinking water (USDW). Under these regulations, the State of Texas received program implementation primacy in 1982 and has since operated an EPA-approved UIC program.

On December 10, 2010, EPA finalized minimum federal requirements under the Safe Drinking Water Act (SDWA) for underground injection of Carbon Dioxide (CO₂) establishing a new class of injection wells, Class VI. The Class VI rule is based on UIC regulatory framework, with modifications to address the unique nature of CO₂ injection. The purpose for the Class VI rule is to ensure that geologic storage of CO₂ is conducted in a manner that protects USDWs.

To gain primacy enforcement responsibility for Class VI injection wells, the Railroad Commission of Texas will demonstrate that its Class VI UIC program meets the minimum federal requirements.

This revised program description incorporates changes as required in federal regulations and is only an addendum to the current Texas UIC primacy authority. Nothing in this document in any way affects the current administration of the Class II program under section 1425 of the SDWA or the Class I, III, and Class V UIC programs under section 1422 of the SDWA. It does not change the lead agency program administration status nor the original intent of the UIC program.

The State's Class VI UIC program will be administered by the Oil and Gas Division of the Railroad Commission of Texas (Commission). This revision of the Texas 1422 UIC program is for the sole purpose of adding Class VI injection wells to the Texas 1422 UIC program.

II. OVERVIEW OF THE STATE UIC PROGRAM

A. Current status of Texas' UIC Program

The UIC program is an important part of the overall State groundwater protection strategy. With increasing groundwater demands and the impacts of energy development on groundwater, the control of subsurface injection is vital to maintaining the quality of the State's groundwater resources and to protect USDWs.

The State of Texas received Underground Injection Control (UIC) Program primacy under Section 1422 of SDWA for Classes I, III, IV, and V in 1982.

The lead agency of the Texas Section 1422 UIC program is the Texas Commission on Environmental Quality (TCEQ). As the lead agency, the TCEQ receives the annual program grant and coordinates the State 1422 UIC program, as designated by the Governor of the State. The TCEQ administers the UIC program for Class I, Class III (except for Brine Mining), Class IV and Class V (except geothermal return and *in situ* combustion of coal) injection well activities, except for those wells on Indian land, pursuant to section 1422 of the Safe Drinking Water Act (SDWA). Notice of the original approval for Class I, III, IV, and V wells was published in the Federal Register on January 6, 1982, and became effective February 7, 1982.

Texas received primacy for Class II wells under Section 1425 of SDWA on April 23, 1982, and designated the Railroad Commission of Texas as the lead agency to coordinate the state's SDWA Section 1425 UIC Program. The Railroad Commission administers the 1425 UIC program regulating Class II injection well activities and receives a separate program grant from the EPA to administer the 1425 UIC program.

The Railroad Commission also regulates Class V geothermal wells and injection wells for the *in situ* combustion of coal under a separate UIC program approved by EPA and published in the Federal Register on April 23, 1982.

The Railroad Commission also administers the 1422 UIC program regulating Class III Brine Mining injection well activities in the State of Texas, except for those wells on Indian lands. A program revision application for Class III brine mining wells was submitted by Texas and approved by EPA. Notice of that approval was published in the Federal Register on February 26, 2004; the effective date of this program is March 29, 2004.

The Railroad Commission has statutory authority to regulate Class VI injection well activities under Texas Water Code Chapter 27. Upon approval of primacy for Class VI wells, the Railroad Commission will have jurisdiction over the Class VI UIC Program and the authority to issue Class VI permits and administer and implement the Class VI UIC Program.

Each State agency is responsible for administering the State program for the injection wells under its jurisdiction including, but not limited to, reports, permits, monitoring, compliance, and enforcement actions.

The Railroad Commission of Texas and the Texas Commission on Environmental Quality have signed a Memorandum of Understanding (MOU) that outlines the respective responsibilities of each agency concerning regulation of Class VI wells. The current MOU reflects the statutes before they were amended by the 87th Texas Legislature in 2021, which split jurisdiction for the Class VI program between the two agencies. However, the Texas Legislature amended the statutes during the 87th Legislative Session (House Bill 1284) to consolidate jurisdiction for all anthropogenic geologic storage of carbon dioxide at the Railroad Commission. The agencies plan to amend the MOU to reflect current statutes. The current MOU is provided in the state's primacy application.

B. Overview of State Class VI UIC Program

Currently, there are no permitted Class I UIC injection wells for the purpose of geologic storage of carbon dioxide, nor are there any Class V injection wells permitted for experimental purposes. There are no Class VI injection wells permitted by EPA in Texas at this time.

The Commission has permitted numerous Class II enhanced recovery injection wells for which the authorized injected fluid is carbon dioxide. The Commission will review production data and information related to factors in 16 TAC §5.203 to evaluate the relative risk of endangerment of underground sources of drinking water and determine whether the increased risk warrants a transition from Class II to Class VI requirements.

The primary focus of the UIC program, promulgated under the authority of the SDWA is to protect USDWs. Under federal definition USDW means an aquifer or any portion of an aquifer that supplies any public water system or contains a sufficient quantity of ground water to supply a public water system and currently supplies drinking water for human consumption or contains fewer than ten thousand milligrams per liter total dissolved solids and is not an exempted aquifer.

Other than EPA approved expansions of aquifer exemptions for Class II enhanced recovery injection wells, new aquifer exemptions will not be issued for Class VI injection well activities. Even if an aquifer has not been specifically identified by the Commission, it is an underground source of drinking water if it meets the definition above.

The Texas Class VI program requires all operators applying to inject carbon dioxide for the purpose of geologic storage to obtain a permit to drill (deepen, convert, or reenter), and a permit to operate prior to commencement of injection activities. Permit applications will be reviewed by the Railroad Commission and issued in accordance with Texas Water Code Chapter 27 and 16 TAC Chapter 5. As a permitting requirement, all Class VI injection wells will be required to demonstrate and maintain mechanical integrity. The permit application requirements include, but are not limited to, a technical evaluation, an area of review and corrective action plan, a demonstration of financial responsibility, an emergency and remedial response plan, a proposed casing and cementing program, a testing and monitoring plan, a plugging plan, and a post-injection site care and facility closure plan.

The state's regulation, at 16 TAC §5.205 requires operators of Class VI wells to demonstrate and maintain financial resources to perform all required corrective action, plug the injection well, conduct post injection site care and site closure, and perform any needed emergency and remedial response. Agency staff with financial expertise will review the cost estimates provided by applicants to verify that they are sufficient to cover these activities and evaluate the financial instruments the applicant proposes to use to verify that they qualify and are appropriate.

The State statute and the Commission's rules prohibit the RRC from issuing a permit for the conversion of a previously plugged and abandoned Class I injection well, including any associated waste plume, to a Class VI injection well and require a Class VI injection well permit applicant to submit with the application a letter of determination from TCEQ concluding that drilling and operating an anthropogenic carbon dioxide injection well for geologic storage or

constructing or operating a geologic storage facility will not impact or interfere with any previous or existing Class I injection well, including any associated waste plume, or any other injection well authorized or permitted by the TCEQ.

Any phase of the geologic storage project may be inspected for compliance by the Commission's authorized agents. Injection activities may not commence until construction of the injection well is complete, a permit to operate has been obtained, and the storage facility is in full compliance.

Compliance monitoring will be conducted by the Commission. This monitoring will at a minimum include on-site inspections conducted by the Commission's authorized agents and a review of operating and monitoring reports submitted in compliance with reporting requirements pursuant to §5.207, relating to Reporting and Record-Keeping.

If the Commission determines that the storage operator is in violation of any permit condition or rule, appropriate enforcement action will be pursued by the Commission.

When a well is taken out of service it will be properly plugged and abandoned pursuant to §5.206(i), approved by the Commission as a monitoring well, or approved by the Commission for temporary abandonment.

Texas citizens are encouraged to actively participate in program development and the storage facility permit process through public comment and hearings. The Commission will give written notification to any States, Tribes, and Territories of any permit applications for geologic storage of carbon dioxide wherein the area of review crosses State jurisdiction boundaries, resulting in the need for trans-boundary coordination related to an injection operation.

III. AGENCY ORGANIZATION AND STRUCTURE

A. General Responsibilities

The Railroad Commission of Texas was created in 1890 pursuant to an amendment to Article X, Section 2, of the Texas Constitution for the primary purpose of regulating the railroad industry. It was the first regulatory agency authorized by the State of Texas.

Today's Commission, pursuant to statute and its adopted rules, regulates activities in the vital areas of energy, environmental protection, and public safety. These activities touch all citizens of the State of Texas in their day-to-day lives and are instrumental in ensuring the continued growth of the Texas economy. The fulfillment of statutory responsibilities delegated to the Railroad Commission is achieved under the direction of three Commissioners who are elected by popular vote of the citizenry of Texas to serve overlapping six-year terms. One Commissioner is elected at each general election every two years.

The mission of the Railroad Commission is to serve Texas by our stewardship of natural resources and the environment, our concern for personal and community safety, and our support of enhanced development and economic vitality for the benefit of Texans.

The objectives of the Railroad Commission are to encourage and promote the development, production, and utilization of oil and gas in the State in such a manner as will prevent waste, maximize economic recovery, and fully protect the correlative rights of all owners to the end that the landowners, the royalty owners, the producers, and the general public realize the greatest possible good from these vital natural resources.

The staff is divided into both regulatory and support divisions. Over 830 full-time employees make up the staff, with approximately one-third of them employed in the Commission's district offices. Under the direction of the three Commissioners, regulatory programs are carried out by four regulatory divisions: Oil & Gas, Surface Mining & Reclamation, Oversight & Safety, and Critical Infrastructure. The support divisions include the Communications, Financial Services, Office of General Counsel, Government Relations, Hearings, Information Technology Services, and Operations.

Figure 1 presents an organizational chart of the Railroad Commission of Texas.

Railroad Commission organizational chart attached as Exhibit A.

B. Specific Responsibilities

The Oil and Gas Division of the Railroad Commission will administer the Class VI UIC program upon approval by EPA. The four sections of the Oil and Gas Division will assist in carrying out the program: Planning and Administration, Administrative Compliance, Technical Permitting, and Field Operations. Each section or units within each section will perform different functions.

Organizational charts of the four sections of the Oil and Gas Division that will assist in carrying out the program are attached as Exhibit B.

Planning and Administration

Planning and Administration will assist in managing the budget for the program, as well as personnel matters. In addition, this section will provide records retention services.

Permitting

Drilling Permits is responsible for issuing drilling permits and codifying completion and plugging records for Class VI injection wells.

Injection-Storage Permits (UIC)

The UIC section will process permit applications, monitor permit compliance, and coordinate the Class VI UIC program. Specific duties will include reviewing permit applications, drafting and issuing permits, inspecting facilities, reviewing mechanical integrity tests and monitoring reports, taking appropriate enforcement action, and reviewing Class VI site closure, including plugging and abandonment of Class VI injection and monitoring wells.

1. Administer the rules and regulations as they pertain to subsurface injection.
2. Perform technical evaluations of injection well applications and prepare draft permits.
3. Issue, deny, amend, or cancel permits.

4. Witness, at the discretion of the permitting agency, any aspect of construction, testing, operation, and closure of injection well activities.
5. Perform on-site certification of permit requirements.
6. Review operation reports for permit or rule compliance.
7. Provide recommendations of compliance strategies and corrective action when violations occur.
8. Maintain a database of injection well information including quantity and quality of injected material, well construction, local geology, and the pertinent water resources that could be impacted.
9. Conduct public hearings or enforcement proceedings as required.
10. Respond to public inquiries and complaints regarding proposed or operating injection facilities.
11. Ensure that the regulated community and the public at large are informed about underground injection activities.
12. Initiate and pursue appropriate enforcement action when the permit or rule requirements are violated.
13. Maintain permit files including information on the geology and hydrology (e.g., depth, name, and quality of USDWs) in the vicinity of the injection wells along with other data submitted with the application.

Compliance

Compliance will be conducted by the Technical Permitting/UIC section and the Division's Field Operations. Field Operations consists of an Austin office and nine district offices. District office duties associated with the Class VI UIC program will include inspecting facilities, witnessing mechanical integrity tests verifying monitoring well sampling, monitoring compliance, taking appropriate enforcement action, and monitoring the plugging and abandonment of Class VI injection wells and associated monitoring wells.

Office of General Counsel

The Office of General Counsel will provide support to the Oil and Gas Division's UIC section by conducting hearings on permit applications and enforcement actions.

Program staff

The Oil and Gas Division has the technical expertise needed to evaluate permit applications and oversee geologic storage projects.

The duties and responsibilities for the Class VI UIC program will predominantly be handled by UIC staff. These duties will be divided initially among four (4) employees: two (2) Full time employees and two (2) parttime employees initially, expanding to four (4) full time employees or more as permitting activity levels warrant.

The Class VI UIC Manager (a geologist or engineer) will have a significant "hands-on" technical management role in the program, being responsible initially for conducting detailed aspects of the reservoir modeling and reservoir simulation technical review. Overall, management will also include supervising staff of geologists and engineers selected for the Class VI UIC team on the basis of their previous experience and expertise in reservoir modeling and simulation. The Class

VI UIC team will also require one (1) Administrative Technician I, who will be responsible for clerical duties, data and records management and archiving, and other support functions.

One (1) full-time geologist and one (1) part-time geologist with experience and expertise in reservoir modeling and one (1) full-time reservoir engineer and one (1) part-time reservoir engineer with experience and expertise in numerical reservoir simulation will be responsible for the day-to-day operations of the Class VI UIC program. Specific duties include the technical review of Class VI UIC permit applications, Class VI UIC Area of Review Delineation Plans and Reports (and the reservoir modeling and reservoir simulation provided in support of these), monitoring plans and reports, and mechanical integrity tests. Additional duties will include drafting and issuing permits, initiating appropriate enforcement action, inspecting facilities, preparing and reviewing reports, and compiling quarterly statistics for EPA.

The Administrative Technician will provide administrative assistance with projects and coordinate public information requests for Class VI UIC permits and permit applications.

Engineering Technicians located in the district offices will be responsible for performing site inspections, including witnessing well drilling, construction, and completion, and witnessing and validating mechanical integrity testing, etc....

The staffing and costs described above represent the current level of effort anticipated to be required to achieve the prescribed performance criteria with respect to scheduling of permit application reviews, inspections, compliance monitoring, and reporting to EPA. With growth of the program in Texas, additional resources will be devoted to the program to continue to meet or exceed requirements for program performance.

The Railroad Commission’s Class VI UIC program will be administered by the UIC Manager. The UIC manager will be a geologist or engineer able to supervise all tasks associated with the administration of the Class VI UIC program including, but not limited to permit evaluation, technical evaluation, onsite inspection, and compliance monitoring.

The reservoir geologist/reservoir engineer will have the necessary experience and expertise to review computer-generated reservoir models and reservoir simulations to determine the accuracy of the required computer-generated models. Selected geological and engineering staff under the UIC manager will be trained in the basics of computer reservoir modeling and simulation to enable a general understanding of the models received under the program.

Staff have in-house expertise (and access to outside contractors, if needed) with skills in the technical and policy areas relevant to evaluating Class VI permit applications, issuing Class VI permits, and overseeing geologic storage projects throughout their life span. The state plans to implement a “team” approach to permitting by dividing permit applications among staff with relevant areas of expertise. The table below identifies the sources of this expertise.

Expertise Area	In-House	Contractor
Site characterization, e.g., geologists, hydrogeologists, geochemists, and log analysts/experts to review site	√	

characterization data submitted during permitting and throughout the project duration.		
Modeling, e.g., hydrogeologists and environmental/reservoir modelers to evaluate area of review (AoR) delineation computational models during permitting and AoR reevaluations.	√	
Well construction and testing, e.g., well engineers, log analysts/experts, and geologists to review well construction information and operational reports on the performance of Class VI wells and review/evaluate testing and monitoring reports.	√	
Finance experts to review financial responsibility information during permitting and annual evaluations of financial instruments.	√	
Risk analysts to evaluate emergency and remedial response scenario probabilities and remediation cost estimates.		√
Policy/regulatory experts on the UIC Program and the Class VI Rule to evaluate compliance with Class VI Rule requirements.	√	
Enforcement/compliance, e.g., staff who can initiate and pursue appropriate enforcement actions when permit or rule requirements are violated.	√	
Inspectors including well engineers or log analysts/experts to inspect wells or witness construction activities, workovers, and/or mechanical integrity tests.	√	

Because of the extent and complexity of the information that must be reviewed in response to Class VI permit applications and evaluated throughout the operational and post-injection phases of a Class VI project, the Railroad Commission will have in-house staff or access to contractor support with the following technical expertise:

- Site characterization expertise (e.g., geologists, hydrogeologists, log analysts/experts, geochemists) to review site characterization data submitted during permitting and throughout the project duration as per 40 CFR 146.82, 146.83, 146.84, 146.87, 146.90, 146.93, 146.94 and 146.95.
- Modeling expertise (e.g., production/reservoir geologists/reservoir modelers) to evaluate AoR delineation computational modeling during permitting and AoR reevaluation modeling assessments throughout the project duration as per 40 CFR 146.84(b) and (e)(4). Familiarity and/or experience with Petrel or other similar reservoir modeling software.
- Reservoir Simulation expertise (e.g., experience with Eclipse, STOMP CO2, TOUGH2, GEM, Intersect or other numerical simulators used for modeling the movement of carbon dioxide and the associated pressure front at GS projects are integral to computational reservoir simulation data evaluation.
- Well construction and testing expertise (e.g., well engineers, log analysts/experts, geologists) to review well construction information and operational reports on the

performance of Class VI wells or witness and/or evaluate the results of mechanical integrity tests and testing and monitoring reports as per 40 CFR 146.86, 146.87, 146.88, 146.89, 146.90 and 146.92.

- Financial expertise to review the financial responsibility information during permitting and during annual evaluations of the qualifying financial instruments as per 40 CFR 146.85(e).
- Policy/regulatory expertise (i.e., experts on the UIC Program and the Class VI Rule) to evaluate compliance with Class VI Rule requirements.
- Risk analysis expertise to evaluate emergency and remedial response scenario probabilities and appropriate remediation cost estimates as per 40 CFR 146.94.

Estimated costs and sources of funding for implementing the program for the first two years.

The Railroad Commission anticipates that, during the first two years after approval of the state Class VI Program, three (3) permit applications will be submitted, including one (1) permit application in the first year and two (2) permit applications in the second year.

The Railroad Commission expects that reviewing Class VI permit applications will require six (6) months to issue a permit to drill and six months following the date all information is provided to issue authorization to inject.

Depending on the number of applications and permitted projects, the Commission estimates that subsequently running the Class VI Program will cost between \$300,000 and \$500,000 annually. These costs include the Class VI staff salary, contractor costs for the computer reservoir modeling software review, computer reservoir modeling software training, and all other indirect costs associated with the administration of the program.

The implementation of the Texas Class VI UIC program is funded through the Anthropogenic Carbon Dioxide Storage Trust Fund. In 2009, the Eighty-first Session of the Texas Legislature established the fund, which is a special fund in the State treasury. Fees collected by the Railroad Commission under Subchapter C-1, Chapter 27, Water Code, and penalties imposed for violations of that subchapter or rules adopted under that subchapter, and funds received by the Railroad Commission from financial responsibility mechanisms under §27.072, Water Code must be deposited to the credit of the fund. Penalties imposed for violations of Commission rules adopted under §382.502, H&SC, are also deposited to the credit of the Anthropogenic Carbon Dioxide Storage Trust Fund. The fund is an interest-bearing fund.

The Anthropogenic Carbon Dioxide Storage Trust Fund may be used by the Railroad Commission for: (1) permitting, inspecting, monitoring, investigating, recording, and reporting on geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (2) long-term monitoring of geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (3) remediation of mechanical problems associated with geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (4) repairing mechanical leaks at geologic storage facilities; (5) plugging abandoned anthropogenic carbon dioxide injection wells used for geologic storage; (6) training and technology transfer related to anthropogenic carbon dioxide injection and geologic storage; and (7) compliance and

enforcement activities related to geologic storage and associated anthropogenic carbon dioxide injection wells.

The fee amount is set in rule and based on the anticipated expenses that the Railroad Commission will incur in regulating the storage of anthropogenic carbon dioxide. The applicant must pay the fees, demonstrate that it has met the financial responsibility requirements, and provide the Railroad Commission with financial assurance as required under §5.205 (Fees, Financial Responsibility, and Financial Assurance). The applicant must demonstrate financial responsibility and resources for corrective action, injection well plugging, post-injection storage facility care and storage facility closure, and emergency and remedial response until the director has provided to the operator a written verification that the director has determined that the facility has reached the end of the post-injection storage facility care period.

The Commission anticipates that federal funds will be available to primacy States in the future.

Activity	Annual expenditures/Percent of budget
Permit application reviews and permit issuance.	30%
Project oversight/review of operating data and testing and monitoring data and reports.	35%
Inspections/witnessing construction or tests.	5%
Data management.	5%
Enforcement/compliance-related activities.	10%
Program oversight/administration.	15%

IV. STATE UI PERMITTING PROCESS

A. Class VI Injection Well Permitting

Texas' Class VI regulations requires all operators seeking to inject carbon dioxide for the purpose of geologic sequestration to obtain a Class VI permit to construct or convert a well and gain approval to operate prior to commencing injection activities. Class VI permit applications will be reviewed by staff of the Railroad Commission and issued in accordance with Subchapter B of Chapter 5.

The UIC section is responsible for the technical evaluation of Class VI injection well permit applications and drafting of permit provisions for Class VI wells.

State statutes prohibit the Railroad Commission from issuing a permit under this subchapter for the conversion of a previously plugged and abandoned Class I injection well, including any associated waste plume, to a Class VI injection well. (§27.043(b), Texas Water Code)

In addition, the State statutes require a person making an application to the Railroad Commission for a permit under this subchapter to submit with the application a letter of determination from the TCEQ concluding that drilling and operating an anthropogenic carbon dioxide injection well for geologic storage or constructing or operating a geologic storage facility will not impact or

interfere with any previous or existing Class I injection well, including any associated waste plume, or any other injection well authorized or permitted by the TCEQ. (§27.0461, Texas Water Code)

Currently, there are no permitted Class I UIC injection wells for the purpose of geologic storage of carbon dioxide. There is one (1) Class V experimental technology well. There are no Class VI injection wells permitted by EPA in Texas at this time.

The agency will review the state's UIC inventory and identify Class V experimental technology wells at projects that are no longer experimental but will continue to inject carbon dioxide for GS. The Railroad Commission will contact the operators of these wells and inform them that they must cease injection or apply for a Class VI permit within one (1) year of state program approval.

The Commission has permitted numerous Class II enhanced recovery injection wells for which the authorized injected fluid is carbon dioxide. The Commission will evaluate information about Class II carbon dioxide enhanced recovery wells (e.g., carbon dioxide injection and production data or information related to the other factors at §5.201(b)(2) and identify whether any projects are approaching risk thresholds. If such increased risk is present, the Commission will contact the operators of these wells and inform them that they must apply for a Class VI permit. Agency staff will provide information about the state's Class VI regulation and about applying for a Class VI permit pursuant to §5.201(d). Permitting of these wells will be conducted as described in Section 3 (Permitting Procedures) above.

The UIC section maintains a current database of injection wells on a networked computer system. Class VI injection wells will be included and identified as such in the system.

Operators of Class II enhanced recovery wells may apply to expand the areal extent of Class II aquifer exemptions. Such requests must be submitted concurrently with Class VI permit applications, pursuant to §5.201(g). If any such request is received, the Commission will evaluate the application to determine that the area of the proposed expansion is sufficiently large to contain the carbon dioxide plume and pressure front and was determined in a manner that is consistent with the AoR modeling required under §5.203(d) and whether the request meets the criteria at 40 CFR §146.4. Following this evaluation and a determination that the proposed expansion of the areal extent of the aquifer exemption meets the requirements at 40 CFR §144.7(d) and §146.4, the Railroad Commission will forward the request to the EPA regional office. No designation of an expansion of the areal extent of a Class II enhanced recovery aquifer exemption for geologic sequestration injection will be final unless approved by the EPA Administrator as a program revision.

Other than EPA-approved expansions of the areal extent of existing Class II aquifer exemptions, no aquifer exemptions will be issued for Class VI injection-related activities.

The state's regulation at 16 TAC §5.201(f) incorporates by rule the federal regulation allowing operators of Class VI wells seeking to inject into non-USDWs that lie above or between USDWs to apply for and receive injection depth waivers. The operator must apply for an injection depth waiver at the time they submit the Class VI permit application.

B. Required Information for Geologic Sequestration Facility Permit

When the Railroad Commission receives a permit application, staff will review the application for completeness to determine if it contains all the information outlined in §5.203, relating to application requirements.

C. Permit Review and Public Comment

After confirming that all the required information was submitted with the permit application, agency staff will review the Class VI permit application using the following multi-step process.

First, staff will perform a technical review to determine that the submitted data is accurate and of high quality, has undergone appropriate quality assurance procedures, is representative of the project and the site, and is sufficiently complete to support a full technical evaluation.

Staff will then perform a full technical evaluation of the submitted information to support the decision on the suitability of the site per the requirements at §5.206(a)(1). This includes an evaluation of the geologic system, the well, and the proposed operations to ensure that the project will be protective of USDWs.

The UIC Manager will notify the applicant whether the application is technically complete or deficient and will request any necessary additional information. As needed throughout the permit application review process, agency staff will discuss the application with the operator to ensure that needed information is provided as expeditiously as possible. If the requested information in a deficient application is not received by a specified date, the application will be returned unless the UIC Manager extends the date.

Upon timely receipt of the necessary information, the UIC manager will notify the applicant that the application is complete.

Upon completion of the permit application evaluation, the UIC Manager will tentatively determine whether to prepare a draft permit or to deny the application.

If an application is denied administratively, an administrative denial notice will be mailed to the applicant and the applicant will have the right to a hearing on request. The notice of administrative denial will be subject to the same procedures as a draft permit listed in §5.204.

If the UIC Manager prepares a draft permit, the UIC Manager will also prepare a fact sheet summarizing the project and issue a public notice of the comment period and a public hearing according to procedures listed in §5.204.

Chapter 5 establishes procedures for public participation in the permitting process. Section 5.2031 requires the Commission to prepare a draft permit when it tentatively decides to issue, modify, revoke and reissue, or terminate a permit. Notice will be given to persons listed in §5.204(a)(3) when the Commission prepares a draft permit or administratively denies a permit application or when a hearing is requested.

The Railroad Commission will also notify any states, tribes or territories within the area of review of the geologic sequestration project and document the results of this consultation, pursuant to §5.204(a)(3)(A)(i)(III). See Section 12 (Transboundary Notification and Documentation Procedures) for additional information on procedures for this notification.

The Railroad Commission will identify whether any portions of the AoR encompass an environmental justice (EJ) or Limited English Proficiency (LEP) area using the most recently published U.S. Census Bureau American Community Survey data. If the AoR includes an EJ or LEP community, the Railroad Commission will require that enhanced public outreach activities to these communities is conducted. Efforts to include EJ and LEP persons in public involvement activities in such cases will include: published meeting notice in English and the identified language(s) (e.g., Spanish); comment forms posted on the webpage and available at public meeting in English and the alternate language; interpretation services accommodated upon request; translation of any comments made during any comment period in the alternate language; and to the extent possible, public meeting/hearing venues near public transportation.

The Commission will hold a public hearing when (1) an operator or affected person requests a hearing; (2) the Commission finds on the basis of requests, a significant degree of public interest in a draft permit; or (3) at the Commission's discretion. Under §5.204(c)(2)(B), a hearing may be held in the public interest whenever there is a significant degree of public interest or the application presents significant or unique policy issues that are appropriate for determination by the Commission. An opportunity for receipt of public comment is provided at a hearing held in the public interest. A person is allowed to make comment at the hearing regardless of whether he or she would have standing as a party.

The rule provides 30 days for public comment on the draft permit. Handwritten comments received on comment forms during the comment period will be entered into an Excel file. All comments will be recorded verbatim. The staff will develop summaries of each comment period that includes meeting documentation and a comment response matrix or content summarizing frequent comments and responses.

During the public comment period, any interested person may submit written comments on the draft permit or the storage facility permit application. All comments will be considered in making the final decision and will be addressed when a storage facility permit is issued.

The Commission will hold a public hearing on the storage facility permit application and draft permit. Notice of the public hearing will be published in a newspaper of general circulation in Austin, Texas, and in a newspaper of general circulation in the county where the land affected or some part thereof is situated at least 30 days prior to the hearing. The public notice will include information about the length of the comment period, contact person, and the address and phone number of the Commission, so interested parties can request copies of the storage facility permit application and the draft permit.

After completion of the public hearing and review of public comments, the Railroad Commission will make a final permitting decision and, if appropriate, issue a Class VI permit. The Commission will issue a response to all formal comments received during the hearing process.

The permit will authorize the applicant to construct the injection well or convert an existing well to Class VI.

Following well drilling/conversion and completion activities, the permit applicant will submit information that the Commission will consider in determining whether to approve operation of the injection well. If the information provided meets all the requirements at §5.205, relating to permit standards, the Commission will authorize the applicant to inject carbon dioxide.

To evaluate the absence of significant leaks, operators of Class VI wells must, following an initial annulus pressure test, continuously monitor injection pressure, rate, injected volumes, pressure on the annulus between tubing and long-string casing, and annulus fluid volume, pursuant to §5.206(c)(2)(E).

At least once per year, operators must use an approved tracer survey or a temperature or noise log to determine the absence of significant fluid movement pursuant to §5.203(h)(1)(D). The Commission may require additional or alternative tests if the results presented by the operator are not satisfactory to demonstrate mechanical integrity. The Commission expects to review the results of three (3) MITs from Class VI well operators each year during the first two years after approval of the state Class VI program.

A Class VI injection well has mechanical integrity if there is no significant leak in the casing, tubing, or packer; and there is no significant fluid movement into an USDW through channels adjacent to the well bore. To evaluate the absence of significant leaks the storage operator will, following an initial annulus pressure test, continuously monitor injection pressure, rate, injected volumes, pressure on the annulus between tubing and long-string casing, and annulus fluid volume.

To evaluate mechanical integrity, the storage operator will apply methods and standards generally accepted in the industry. When the storage operator reports the results of mechanical integrity tests to the Commission, the storage operator will include a description of the test and the method used. In order to properly evaluate mechanical integrity, the Commission will review monitoring and other test data submitted since the previous evaluation.

The Commission may require additional or alternative tests if the results presented by the storage operator are not satisfactory to the Commission to demonstrate mechanical integrity.

The operator of a Class VI well must prepare, maintain, and comply with a testing and monitoring plan to verify that the geologic sequestration project is operating as permitted and is not endangering USDWs. The testing and monitoring plan must be submitted with the permit application for Director approval, and must include a description of how the operator will meet the requirements. Testing and monitoring must include the information identified in 16 TAC §5.203(j).

The operator must comply with the requirements identified in 16 TAC §5.206(j)(3)(D)&(E) and 16 TAC §5.206(j)(5) for plugging and abandonment.

The operator of a Class VI well must comply with the requirements identified in 16 TAC §5.206(j) for PISC and site closure plan..

V. STATE COMPLIANCE MONITORING PROGRAM

All Class VI permits are required to include a provision that requires the permittee to allow the Director, or an authorized representative of the director, during normal working hours, to enter the premises of a regulated facility, or where the records are kept and inspect the facilities, review and copy reports and records, collect fluid sample for analyses, measure and record water levels, and perform any other function authorized by law or regulation.

The Railroad Commission's oil and gas regulatory program makes strategic use of a variety of monitoring and enforcement tools supported by Texas statutes and Commission rules. These tools work in concert to incentivize compliance and ensure violations are promptly resolved. The Commission continues to strengthen related tracking and reporting systems, which should provide data that can demonstrate the effectiveness of the Commission's monitoring and enforcement activities.

The Oil and Gas Division monitors oil and gas operations in the state through the efforts of both the program offices in Austin and the ten district offices, each assigned to one of three regional districts. A district map is available on the Commission's website. Comprehensive permitting and reporting requirements enable the Commission to track the compliance status of oil and gas operations. In addition, the 173 inspectors as of February 28, 2021, are assigned throughout the state's oil and gas producing regions.

Beyond the organization report, Commission rules establish additional permitting, testing, monitoring, and reporting requirements for different types and stages of oil and gas operations. Examples of these requirements include certificates of compliance, drilling permits, completion reports, production reports, production tests, well integrity tests, and injection monitoring reports. The Commission uses the information gathered through these requirements to track operations around the state and ensure they remain in compliance with Commission rules, permits, and orders.

Inspectors use the Inspection, Compliance, and Enforcement (ICE) system to document inspections of oil and gas facilities electronically. The ICE system was implemented in 2015, allowing inspectors to record violations by rule number at the well level. ICE allows for tracking of well/lease inspection and violation history, and gives inspectors access to current operator, facility, and compliance information while onsite. Regardless of the reason for inspection, such as a complaint or a mechanical integrity test, the inspector will check for compliance with all applicable Commission rules and record the findings in ICE.

Compliance monitoring will, at a minimum, include on-site inspections conducted by authorized agents of the Railroad Commission and a review of operating and monitoring reports submitted in compliance with §5.207, relating to Reporting and record-keeping, to verify that the construction, completion, operation, maintenance, and site closure of geologic sequestration

projects are performed according to approved plans and specifications and meet all permit and regulatory requirements.

The state's compliance monitoring program includes the following activities:

- Reviewing plans and reports (e.g., well completion reports, test results, workover reports) submitted by operators.
- Conducting site inspections to verify or witness construction, operation, and testing/maintenance procedures. Site inspections will be conducted by the agency's authorized agents.
- Investigating complaints alleging improper construction, completion, operation, or maintenance of a GS project.
- Performing compliance monitoring (e.g., reviewing monitoring, operating and maintenance data) to verify compliance with permit conditions, regulations and any other conditions or stipulations.
- Conducting annual inspections and compliance follow-up inspections of GS projects.

Plan Review

The Commission will verify that the storage facility construction, completion, operation, maintenance, and closure procedures are performed according to approved plans and specifications and meet all permit or regulatory requirements.

Verification of Class VI injection well activities is accomplished by reviewing appropriate plans and reports, performing on-site inspections, responding to complaints, and, where necessary, referring noncompliance to legal counsel for appropriate enforcement action. Review of plans and reports may include but are not restricted to:

1. Revisions to construction plans filed after permit issuance.
2. Well completion reports including results of required logging and other testing.
3. Results of injectivity and pump tests, mechanical integrity tests, and any other required tests.
4. Bottomhole pressure reports and updated evaluations of the effects of injection on the injection zone, including fluid volume, injection rate, and injection pressure data.
5. Workover plans and workover reports describing construction or maintenance.
6. Revisions to plugging plan and reports of completion of plugging, and other site closure activities.
7. Any other plans or test results connected with the proper construction, operation, and maintenance of the well and associated surface facilities.

Site Inspections

Site inspections will be conducted by the Commission's authorized agents. The inspections will be conducted at the discretion of the Commission for all permitted CO₂ storage facilities to:

1. Determine the probability of a violation and indicate problems that may be causing or lead to violations.
2. Assist in identification of existing problems or prevent potential problems from developing.
3. Update the Commission records on the facility and verify operational procedures.
4. Maintain a regulatory presence with the storage operator and all landowners impacted by the project.

Site inspections to verify or witness construction, operation, and maintenance procedures may be conducted as necessary when certain construction operations begin, or in response to a complaint or other indication that a problem may exist. Construction elements and testing that may be witnessed by the Commission and its authorized agents, include:

1. All drilling operations
2. Setting and cementing surface casing.
3. Cementing long string casing.
4. Well logging and coring operations.
5. Pressure testing of tubing and casing.
6. Formation pressure tests, injectivity tests, or pump tests.
7. Installation and maintenance of instrumentation.
8. Work required by any corrective action plan.
9. Well workovers.
10. Placement of monitoring wells or other equipment.
11. Any plugging procedures.
12. Mechanical Integrity testing.

Annual inspections will consist of the following activities:

1. Observations of injection site, facilities, and monitoring wells.
2. Review of records to determine history of performance and compliance.
3. Evaluation of the operation and maintenance of the storage facility.
4. Review of all Class VI permit conditions.
5. Review of all site-specific permit conditions.

In addition, geologic storage facilities may be inspected at any time by the Commission and its authorized agents.

Site inspections and examination of storage operator records will be conducted under the authority of §27.071 (relating to power to enter property) and §27.072 (relating to power to examine records), Chapter 27, Texas Water Code.

Complaints

The public is encouraged to report problems or concerns with oil and gas activity through the Commission's complaint procedures. The Commission gives high priority to the timely investigation and resolution of complaints.

These complaints come from a variety of sources, including operators, mineral owners, surface owners, government agencies, and members of the public. Complaints are accepted in a variety of formats, including phone calls, emails, letters, social media, or visits to the district offices.

Complaints involving potential violations of the Commission's rules are investigated by the appropriate District Office. The investigation involves an inspection that is documented in the ICE system. Any violations identified are addressed through the Commission's enforcement procedures.

Complaints involving an imminent threat to public health and safety or the environment are investigated immediately. Other pollution-related complaints are investigated within 24 hours. Complaints not involving pollution or safety are investigated within 72 hours.

Complaints alleging improper construction, completion, operation, or maintenance at a storage facility will be investigated by the Commission. Response to complaints may consist of:

1. Establishing the nature and authenticity of the complaint.
2. Reviewing appropriate records, reports, and files.
3. Establishing contact with the operator to verify the complaint and discuss corrective action.
4. Performing a site inspection to determine if a problem exists.
5. Referring the complaint, after verification through appropriate investigation and documentation to legal counsel.

The complainant receives written updates on the progress of the investigation and any related enforcement action. The complainant is also notified when the complaint is closed. A complaint is closed when the District Office determines that the well or other facility is operating in compliance with the rules or any violations have been corrected. In the event the matter is referred to the Office of General Counsel-Legal Enforcement Section (Legal Enforcement), the District Office notifies the complainant to contact that section for further information.

VI. ENFORCEMENT PROCEDURES

Any person violating Subchapter B of Chapter 5, any condition of a Class VI permit, or any rule or order of the Railroad Commission is subject to enforcement action. The Railroad Commission is responsible for initiating, pursuing, and resolving enforcement actions.

Enforcement proceedings may result in modification, revocation and reissuance, or cancellation of any permit issued under authority of the UIC Program.

The Railroad Commission will attempt to handle all minor violations through informal means, such as correspondence between agency staff and the alleged violator. The agency's primary concern will be those violations that may have significant effects on the environment or may endanger USDWs.

If further enforcement action is required, the state may seek civil penalty up to \$5,000 for each day of noncompliance and for each act of noncompliance under §27.101, Texas Water Code.

Any person violating Chapter 5, any condition of a permit, or any rule or order of the Commission is subject to enforcement action. The Commission is responsible for initiating, pursuing, and resolving formal enforcement actions.

Before conducting any operation under the Commission's jurisdiction, a company must file an organization report providing basic information on the company and its principals (Form P-5). Along with this report, the company must provide financial security conditioned that the operator will plug wells and clean up pollution in accordance with Commission rules, permits, and orders. The organization report and associated financial assurance must be renewed annually.

The Commission uses the information provided with the organization report to identify and track the operations of the company within the state. For example, the Commission verifies compliance with the inactive well requirements (16 Texas Administrative Code §3.15) annually upon renewal of the organization report and suspends a company, the principals, and any other company regulated by the Commission that has common principals' authority to operate if the company does not achieve compliance. Non-compliant principals are barred from renewal for seven years. Non-compliant entities are barred indefinitely. Once compliance is achieved, the organization report can be renewed. A company without a current organization report may not conduct operations in Texas.

Compliance and enforcement actions for violations of some permitting or reporting requirements may be initiated by the UIC Unit. In these instances, inspectors assist by monitoring the status of compliance efforts in the field.

If a district office or the UIC Unit is unsuccessful in obtaining compliance through other mechanisms, or if the severity or willfulness of a violation warrants further action, the Oil and Gas Division will refer the matter to Legal Enforcement. Legal Enforcement may subsequently file a complaint seeking administrative penalties and other enforcement actions through a Commission order.

The following paragraphs briefly describe the enforcement mechanisms available to the Commission. These mechanisms may be used individually or in combination, sequentially or simultaneously, as appropriate to achieve a timely, full, and fair resolution.

Notices of violation

Except for certain violations that may be resolved quickly through a phone call, the district office will formally notify the operator of a violation in writing via U.S. Mail or as an attachment to an e-mail. Notification of a violation will specify a deadline for compliance. Shortly after the deadline for compliance, the inspector will return to the location to verify compliance. This follow-up inspection is called a back check.

Seals/severances

The designated operator of any well in the state must file a certificate of compliance (Form P-4). By filing this certificate, the operator certifies that the lease is being operated in compliance with Commission rules, permits, or orders. If the Commission identifies a violation on the lease, the Commission may cancel the certificate of compliance. *See* Tex. Nat. Res. Code Ann. §§91.701-91.707.

Before cancelling the certificate, the Commission must provide the operator notice of the violation and at least 10 calendar days to achieve compliance or request a hearing. The district office provides this notice by issuing a "notice of intent to cancel the P-4."

The action of cancelling a certificate of compliance is commonly described as "severing a lease" or "issuing a pipeline severance." In practice, a seal or severance is the most effective enforcement tool available to the Commission. Once the certificate of compliance is cancelled, the operator must cease operations on the lease. As a result, the operator suffers an immediate

revenue impact and may not resume operations until the lease is returned to compliance and the operator pays a \$750 reconnection fee.

Permit actions

Commission rules authorize the agency to modify, suspend, or terminate a permit based on violations of Commission rules, permits, or orders. Unless agreed to by the permit holder and authorized to be handled administratively, these actions will be taken through Commission order after notice and opportunity for hearing.

Administrative penalties

The Commission has statutory authority to assess administrative penalties for violations related to safety or the prevention or control of pollution. *See* Tex. Nat. Res. Code Ann. §§ 81.0531-81.0533. The Commission may assess up to \$10,000 per day per violation. The Commission may also assess penalties for \$1,000 per day for non-safety or pollution related violations. In determining the amount of the penalty, the Commission considers relevant factors including the seriousness of the violation and the operator's history of compliance. The Railroad Commission's Statewide Rule 107 (16 Texas Administrative Code § 3.107) provides guidelines for the assessment of penalties for various types of violations.

Under §27.1011 of the Texas Water Code (relating to Administrative Penalty), if a person violates the provisions of Chapter 27 or a rule, order, license, permit, or certificate issued under Chapter 27, the person may be assessed a civil penalty by Commission. The penalty may not exceed \$10,000 a day for each violation. Each day a violation continues may be considered a separate violation for purposes of penalty assessments. In determining the amount of the penalty, the Commission must consider the permittee's history of previous violations of this chapter, the seriousness of the violation, any hazard to the health or safety of the public, and the demonstrated good faith of the permittee or person charged.

Loss of authority to operate

The Commission may refuse to accept an organization report (Form P-5), may sever a certificate of compliance (Form P-4), and may revoke a permit if: (1) the organization remains non-compliant with an outstanding order finding a violation; or (2) a person who holds a position of ownership or control in the organization has, within the preceding seven years, held a position of ownership or control in another organization that has an outstanding order finding a violation during the period of ownership or control. Rejection of an organization report under this authority precludes an organization from conducting oil and gas operations within the State of Texas except as necessary to ensure public safety and protect the environment. The Commission tracks outstanding violations to ensure organizations and their officers and owners are held accountable under this authority. (*See* Tex. Nat. Res. Code Ann. §91.114.) When an Enforcement Order has been issued and the operator has not complied with that order, the statute prohibits the Commission from accepting Organization Report renewals (Form P-5), certain permit applications (including Drilling Permits among others) and requests for Certifications of Compliance and Transportation Authority (Form P-4) for any wells it may operate. The statute also applies to the individuals in control of the company: any other companies controlled by a tagged person are similarly barred from filing with the Commission. The restrictions imposed by §91.114 effectively bar that company (and those who control it) from continuing those activities

beyond the current P-5 year as an “Active” organization report is required for a company to conduct operations subject to the Commission’s jurisdiction.

The district offices closely monitor violations identified through inspections until they are resolved. They may use one or more of the available enforcement mechanisms depending on the nature of the violations and how quickly they are resolved. They may escalate the enforcement response, if necessary, to achieve compliance, or if the severity or willfulness of the violation warrants further action. If necessary, the District Offices may escalate the enforcement process by referring violations to Legal Enforcement.

Prior to taking formal enforcement action the Commission may:

- Notify the alleged violator of deficiencies and such written notice may require corrective action.
- Draft and issue a notice of violation to the alleged violator.
- A Class VI UIC well may be physically sealed after the director approves the seal-in. A seal order is issued when an operator continues to inject after the operator has been warned concerning violations. The seal is not removed until all violations have been corrected.
- Issuance of a letter detailing recommendations for corrective action and establishing a compliance period in which action will be taken.

The Commission may pursue formal enforcement action:

- **Administrative Penalties:** The Commission may assess administrative penalties of up to \$10,000 a day for each violation.
- **Civil Penalties:** The Commission is authorized to sue to recover civil penalties of up to \$5,000 for each day of noncompliance and for each act of noncompliance.

Other Enforcement Mechanisms: The Injection Well Act provides for Criminal penalties and injunctive relief.

- Issuance of an administrative order by the Commission specifying corrective action and compliance schedule.
- Signing of a stipulation between the Commission and the alleged violator establishing a compliance schedule for corrective action.
- Conducting an administrative hearing (formal or informal) pursuant to Texas Government Code Chapter 2001.

Any enforcement proceedings may result in modification, revocation and reissuance, or termination of any permit issued under authority of the Class VI UIC program.

The Railroad Commission will attempt to handle all minor violations through informal means or through use of correspondence between technical staff and the alleged violator. The Commission will have, as its main concern, those violations which may have significant effects on the environment of the State and which may endanger valuable resources, such as USDWs.

4. Permit, Permit Applications, Reporting and Manifest Forms

The Railroad Commission will use the EPA’s GSDT portal for accepting Class VI applications.

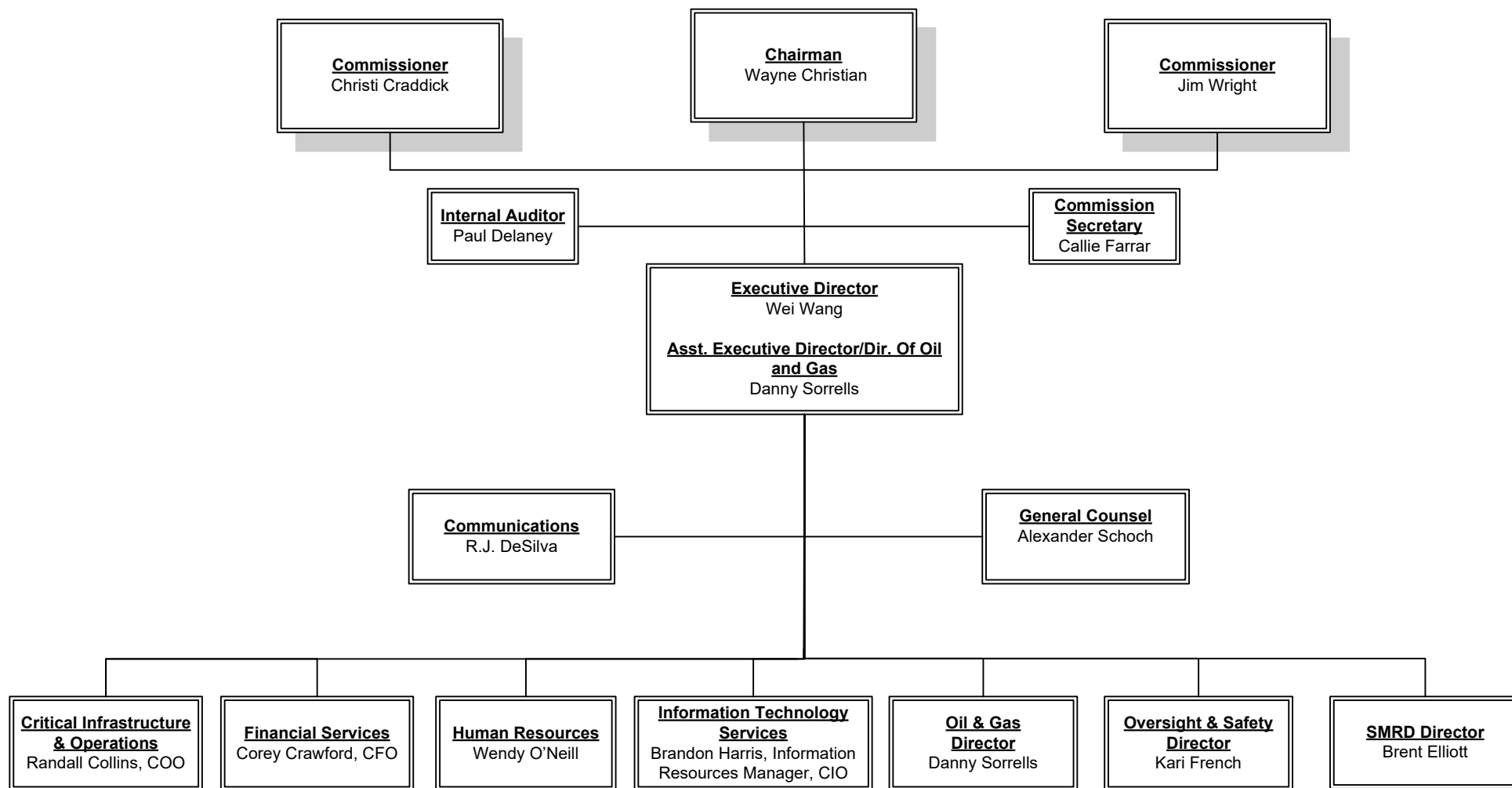
Exhibit A

Railroad Commission of Texas Organizational Charts

April 2022

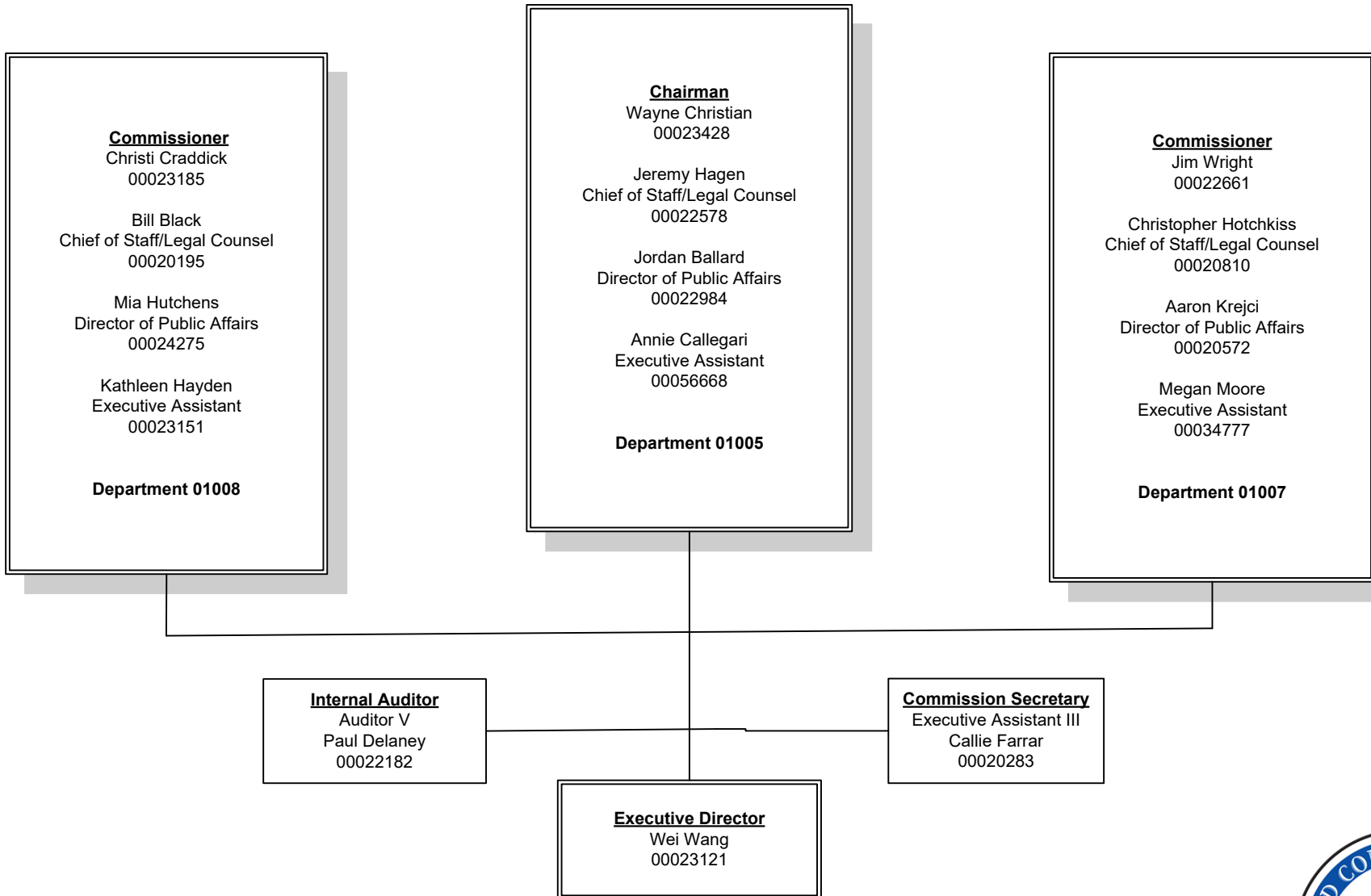


The Railroad Commission of Texas – Overview



Commissioners' Offices

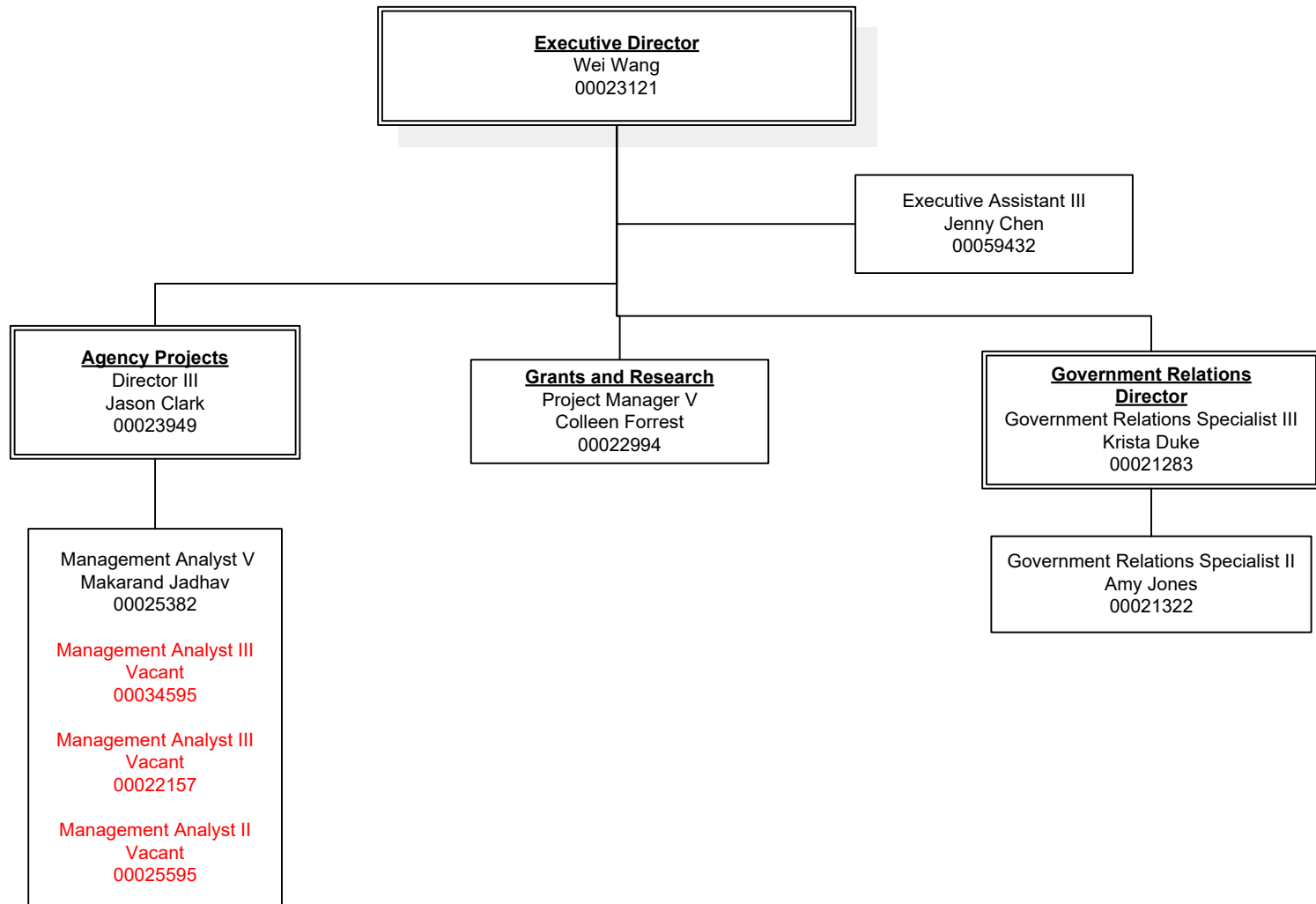
April 2022



Executive Office

April 2022

Department 13010 – Executive Office

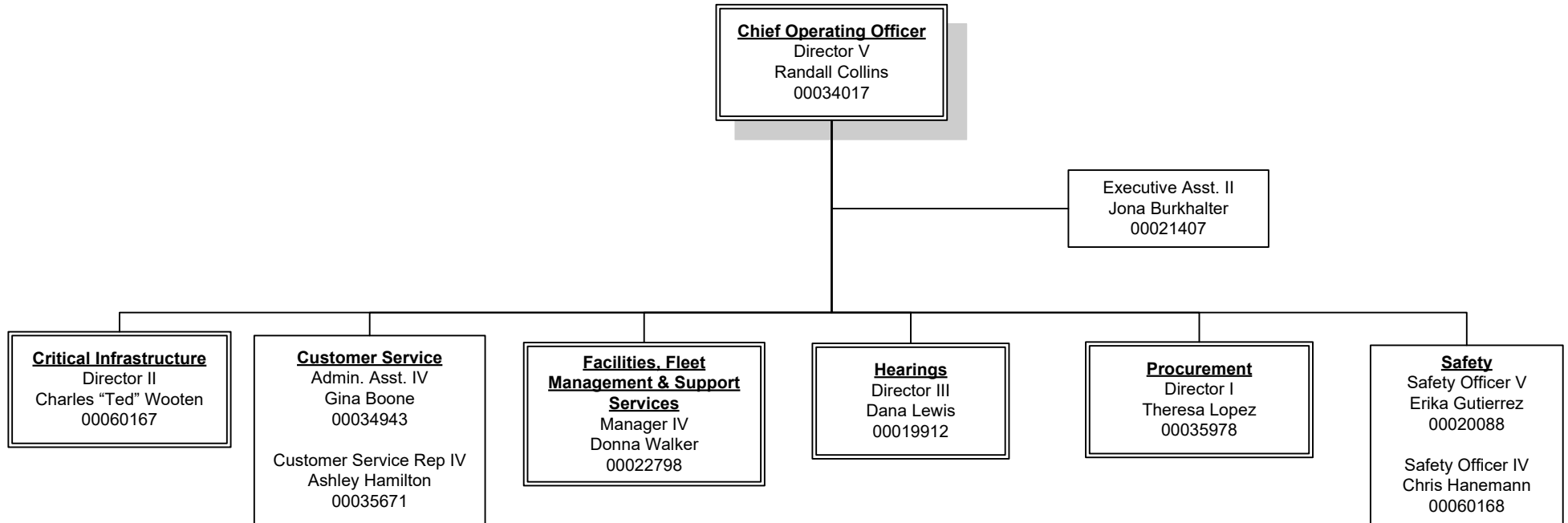


Operations Division

April 2022

Department 02122 - Operations

Department 02129 - Operations Customer Service

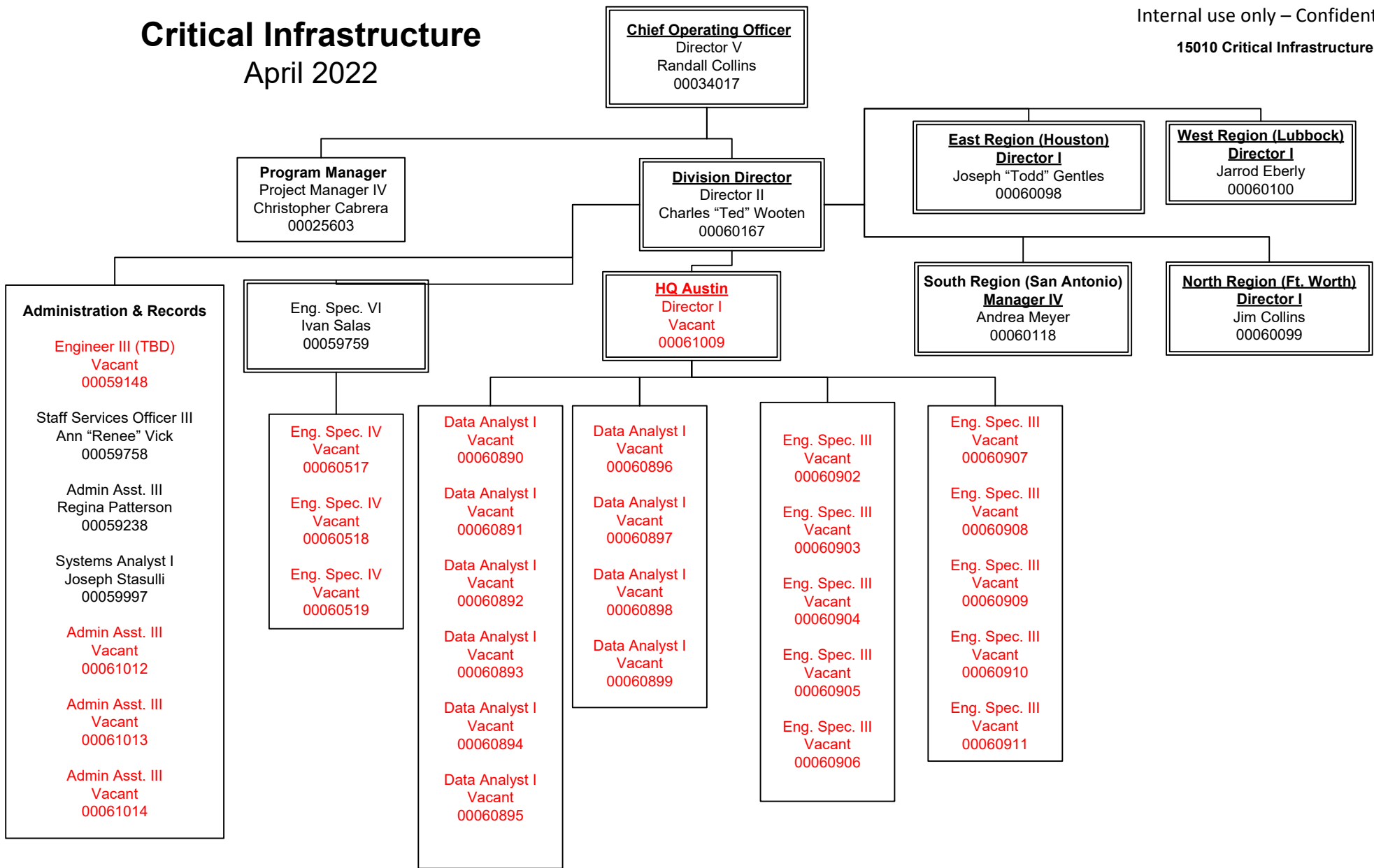


Critical Infrastructure

April 2022

Internal use only – Confidential

15010 Critical Infrastructure

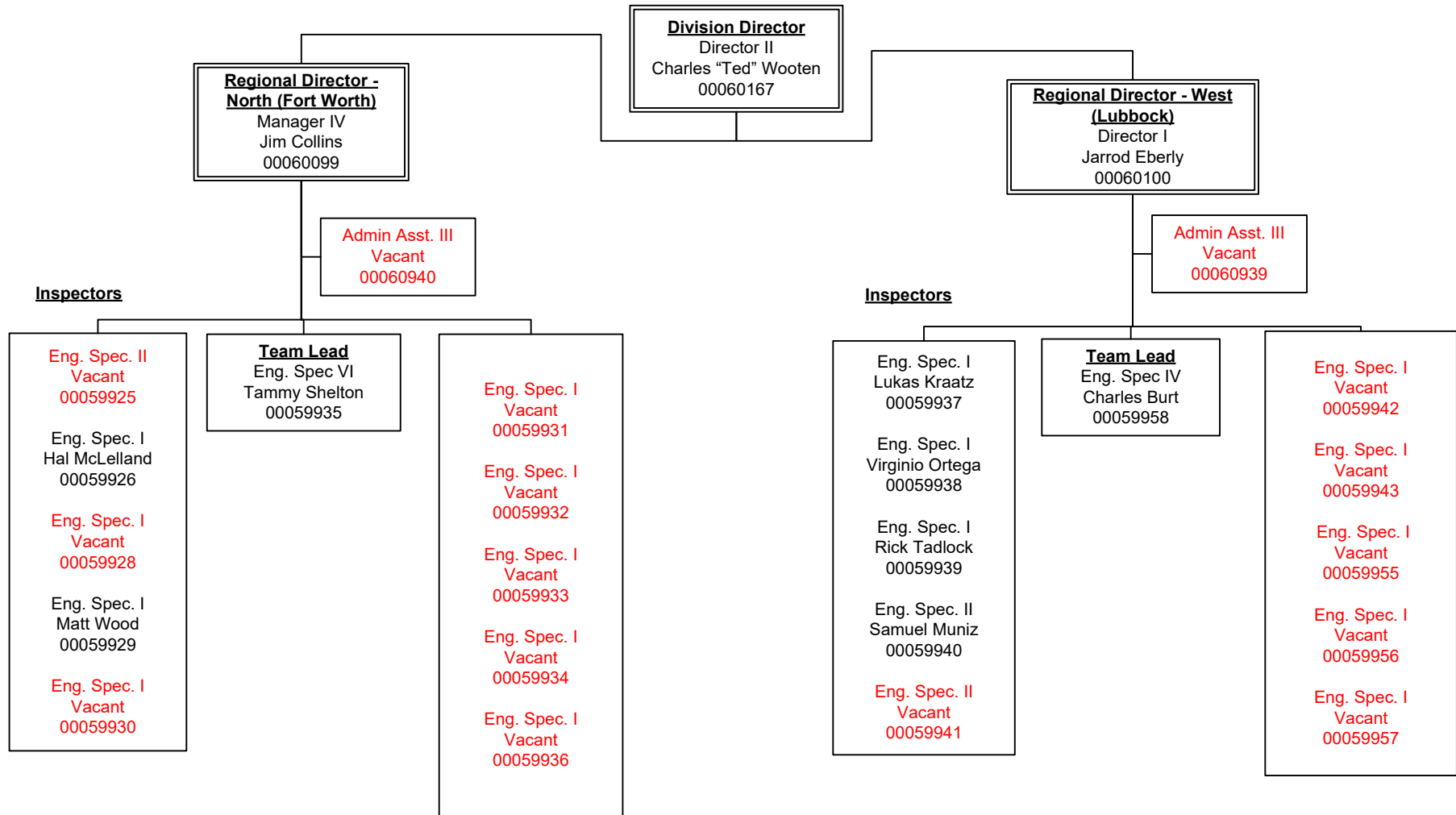


Critical Infrastructure North and West Regions

April 2022

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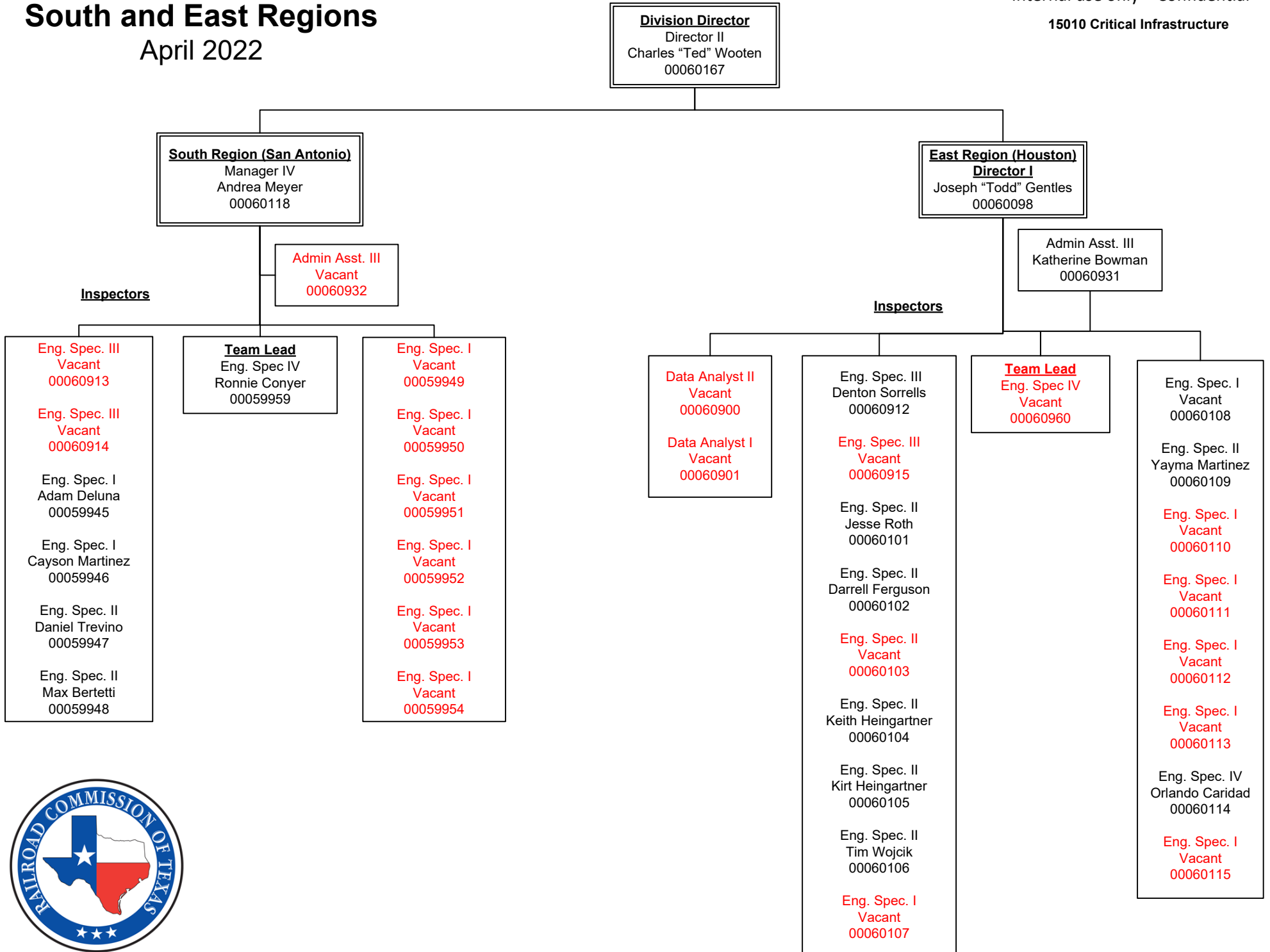


Critical Infrastructure South and East Regions

April 2022

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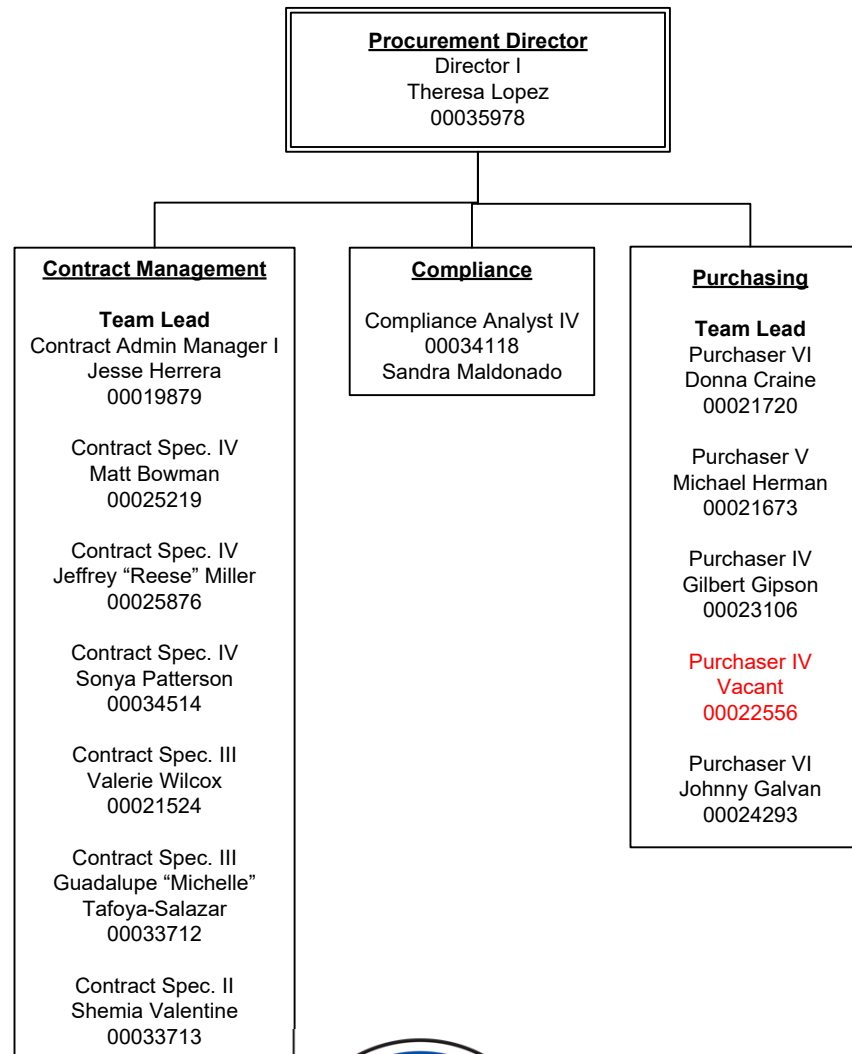
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Procurement Division

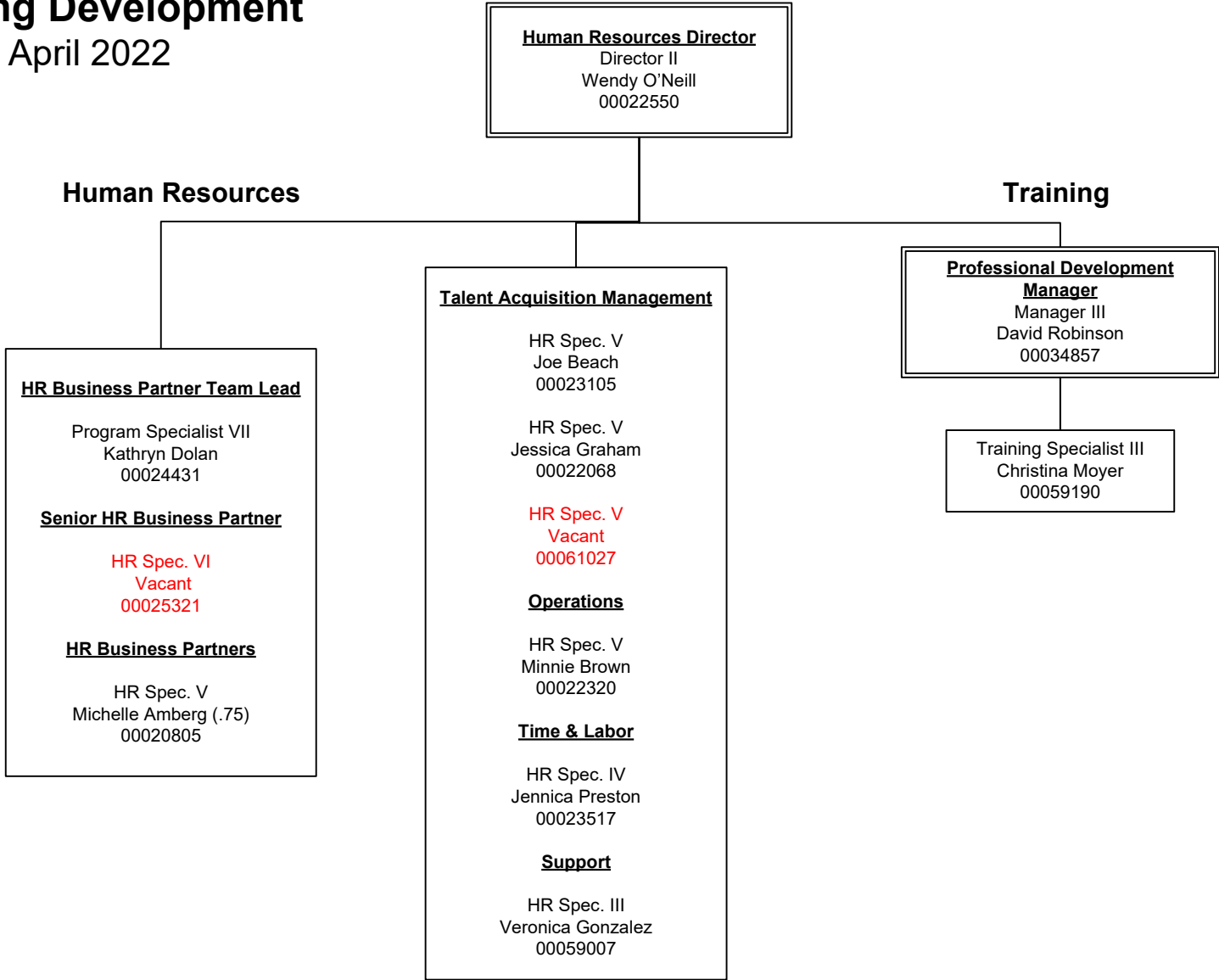
April 2022

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Department 02130 – Procurement



Human Resources & Training Development

April 2022



Facilities & Support Services

April 2022

Internal use only – Confidential

Department 02128 – Ops Facilities & Support Services

Facilities and Support Services Manager
Manager IV
Donna Walker
00022798

Property Managers

Fleet Manager II
Steven Stiles
00019582

Fleet Manager II
Lynn Sladek
00023537

Support Services

Program Spec. III
Tommy Maldonado
00022881

Program Spec. II
Uniquia Thompson
00024382

Program Spec. II
Juan Ruelas Guzman
00020949

Accounting

Accountant IV
Jennifer Garcia
00020088



Hearings Division April 2022

Hearings Division Director
 Director III
 Dana Lewis
 00019912

Manager III
 Tiffany Humberson
 00061139

Manager IV
 Carmen Calderon
 00020323

Administrative Law Judges

Master Admin Law Judge I
 John Dodson
 00024325

Admin Law Judge III
 Ezra Johnson
 00023263

Admin Law Judge III
 Jennifer Cook
 00023642

Admin Law Judge III
 Kristi Reeve
 00022013

Admin Law Judge II
 Adam Taylor
 00022886

Admin Law Judge II
 Ryan Rutledge
 00024512

Admin Law Judge II
 Brennan Foley
 00022734

Admin Law Judge II
 Bridgette Tomasetti
 00022022

Admin Law Judge II
 Mandy Patel
 00024530

Legal Assistant

Legal Asst. V
 Joseph Menefe
 00023775

Program Specialist

Program Spec. V
 Sandra Morris
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Docket Services

Program Spec. II
 Melissa Stovall
 00023331

Program Spec. I
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Legal Assistants

Legal Asst. III
 Sandra Frazier
 00020225

Legal Asst. III
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Legal Assistant III
 Sharon Koren
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Legal Asst. IV
 Megan Schimcek
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Legal Assistant III
 Sarah Halterman
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Technical Examiners

Eng. Spec. VI
 Petar Buva
 00020192

Eng. Spec. VI
 Ashley Correll
 00023396

Eng. Spec. V
 Tariq Ali
 00025224

Financial Examiner V
 Rose Ruiz
 00022396

Financial Examiner V
 James Currier
 00020112

Eng. Spec. VI
 Austin Gaskamp
 00021257

Eng. Spec. VI
 John Moore
 00023051

Env. Protection Spec. V
 Tim Walter
 00035699



Communications

April 2022

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Director III
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00024262

Spokesperson
Information Specialist V
Andrew Keese
00020099

Communication Specialist
Program Specialist VII
Michelle Banks
00022227

Public Outreach
Information Spec. IV
Clinton "Scott" Sroufe
00021647

Web Administration
Web Administrator III
Phil Pettit
00023508

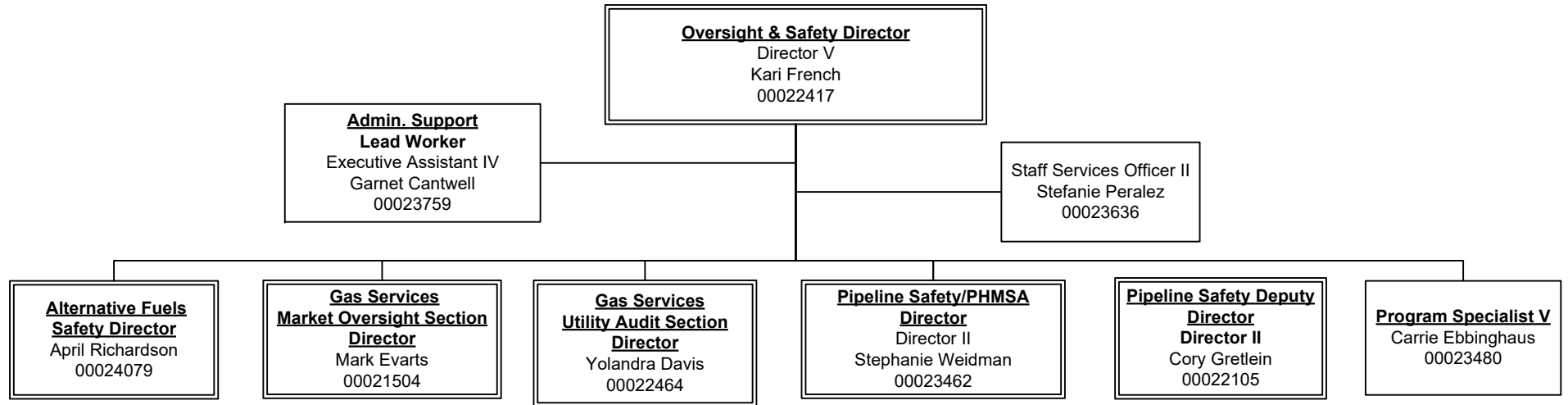
Web Administrator II
Ken Holman
00025877

Digital Media Manager
Information Specialist IV
Nick Kraynok
00021891



Oversight & Safety – Overview

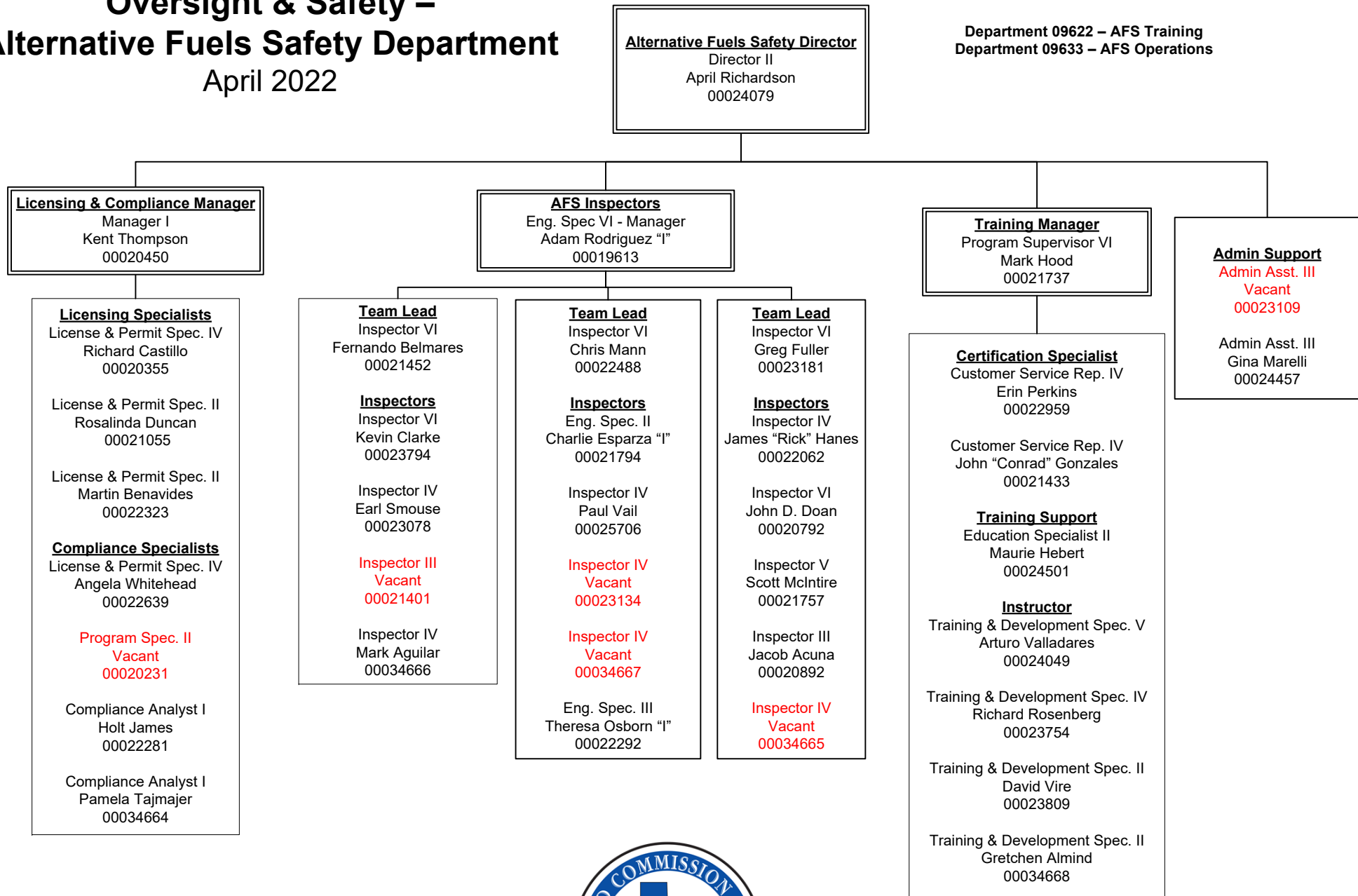
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Oversight & Safety – Alternative Fuels Safety Department

April 2022

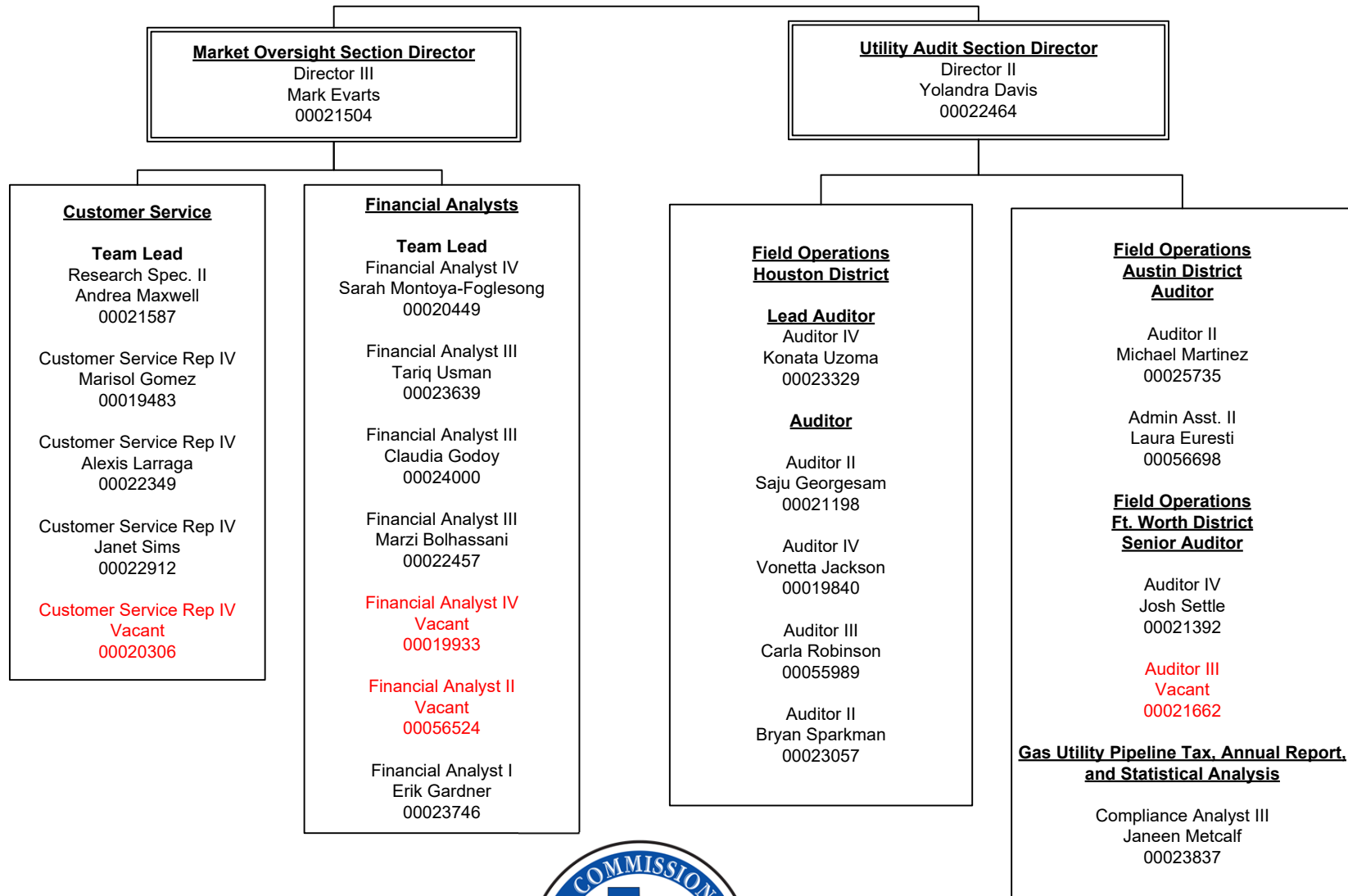
Department 09622 – AFS Training
Department 09633 – AFS Operations



Oversight and Safety – Gas Services Department

April 2022

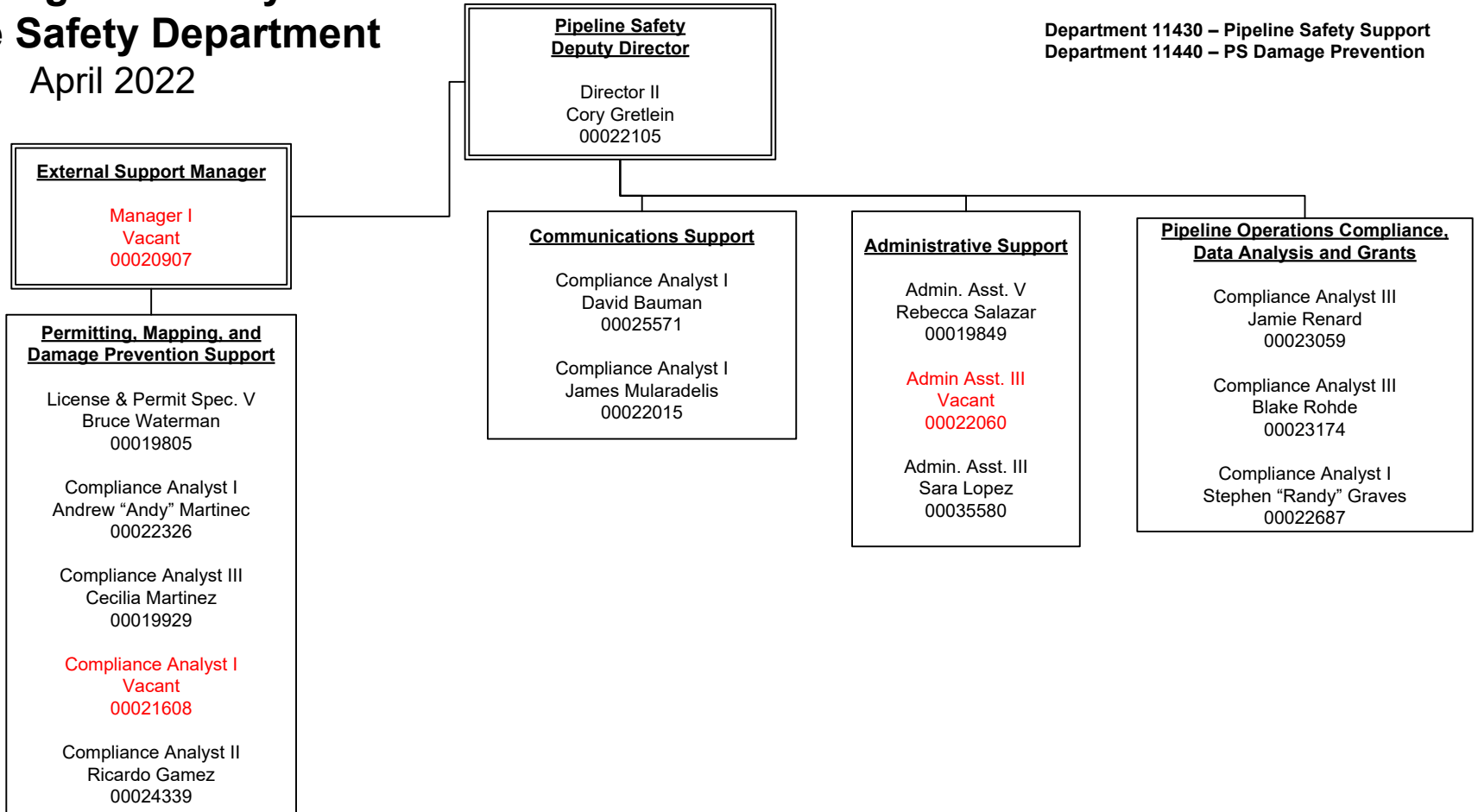
Department 06511 – Gas Services Market Oversight
Department 06521 – Gas Services Audit



Oversight & Safety - Pipeline Safety Department

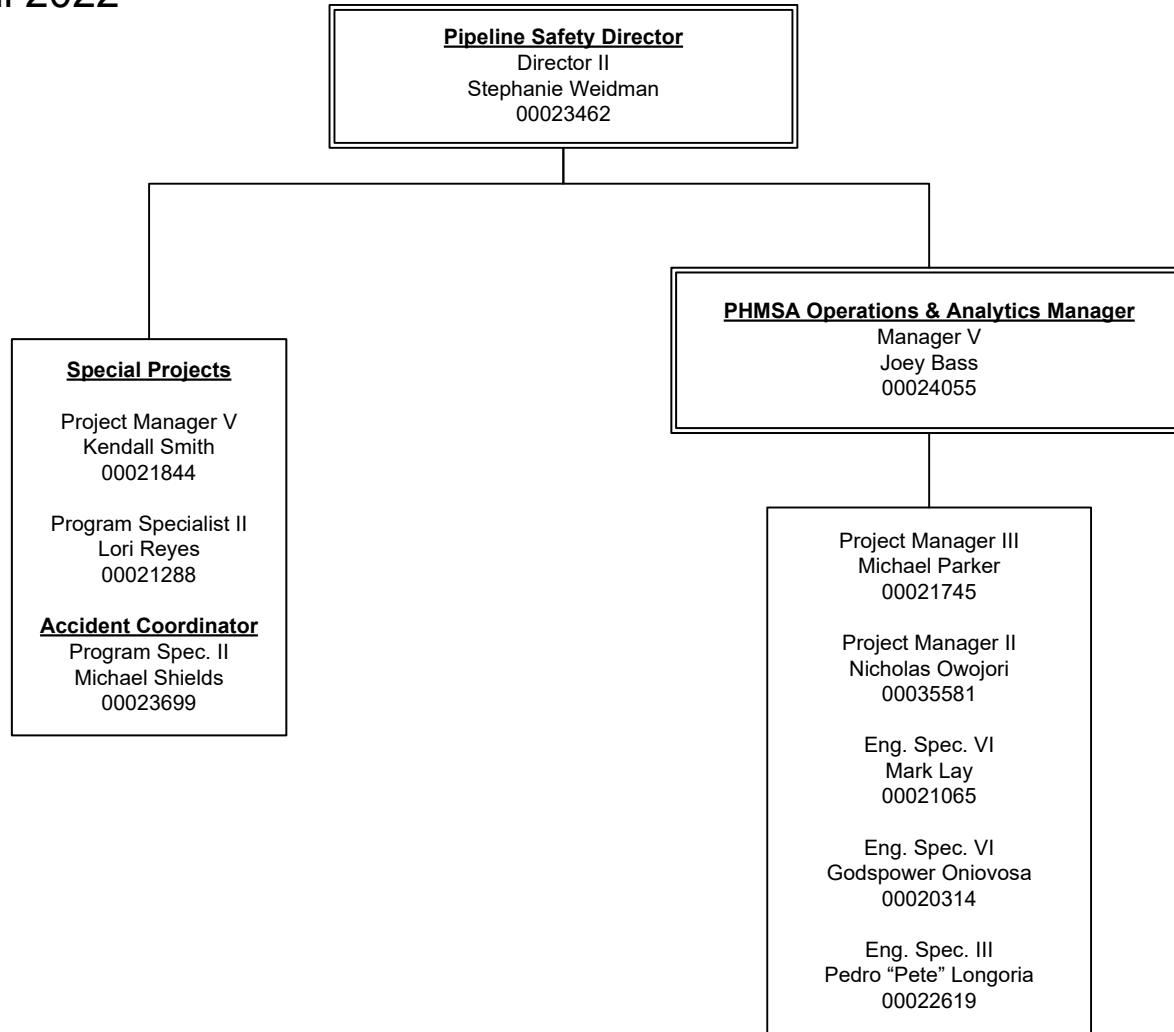
April 2022

Department 11430 – Pipeline Safety Support
Department 11440 – PS Damage Prevention



Oversight & Safety Pipeline Safety Field Operations April 2022

Department 11420 – Pipeline Safety OGRC



Oversight & Safety Pipeline Safety Field Operations

April 2022

Department 11420 – Pipeline Safety OGRC

Pipeline Safety Director
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Ft. Worth Region Manager
Manager III
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Houston Region Manager
Manager V
Samuel Copeland
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Kilgore Region Manager
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**Austin
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00022838
Jonathan Saucedo “I VI”
00020398
Michael Nuernberg “I VI”
00023615
Luis Garcia “I IV”
00022576
Macey Damron “I V”
00021765
Mario Solis “I IV”
00025272
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Eng. Spec. VI
Jeremy Dudik “I”
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Eng. Spec VI
Kevin Colteryahn “I”
00022024
Cesar Salinas “I IV”
00025360
Phillip Landtiser “I VI”
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Sean Dyer “I V”
00025359
Vacant “I IV”
00025361
Jon Harrison “I V”
00035539
Steven Paul Harris “I IV”
00024534

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Steve Burnett “I V”
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Derek Lawrence “I VI”
00024806
Eng. Spec VI
Joe Rusk “I”
00024004
Michael Smith “I V”
00023028
Davis Abney “I V”
00020053

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Rodney Garrison “I V”
00020215
Amy Barrett “I IV”
00023877
Johnny “Jay” Satterfield “I
V”
00025357
Juan “Michael” Valdez “I V”
00025719
Edward “Bill” Brown “I IV”
00019878
Jose “Joey” Cabezuela “I
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Eng. Spec. VI
Isaac Monrreal “I”
00024319
Jennifer Delacruz “I VI”
00022857
Eng. Spec. VI
Evon Boothe “I”
00019994
Kenneth Donald “I IV”
00023408
Eng. Spec. VI
William Dean “I”
00023701
James Minter “I VI”
00022474
Christopher Sylvester “I
IV”
00024361
Priscilla Alfred “I VI”
00022041
Charles Tetteh “I IV”
00025574
Aaron Terrones Quiroz “I
V”
00023719

**Houston
P/L Inspectors**
Kennedy Kiprotich
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00021550
Mark Herrin
Eng. Spec. V “I”
00020600
Kyle Metcalf “I V”
00019756
Eng. Spec VI “I”
Peter Morka
00024123
Eng. Spec VI “I”
Rayford Pemberton
00023416
Samuel Nkrumah-Agyeefi “I
IV”
00025356

Admin. Support
Admin Asst. VI
LaDonna Leal
00021975

**Kilgore
P/L Lead Inspector**
Program Specialist VII
Vacant “I”
00025720

Kilgore P/L Inspectors
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00021674
Blaine Jacobs “I Eng. Spec.
VI”
00022535
William Thomason “I Eng. Spec
VI”
00019562
Eng. Spec. VI “I”
Carlos Jaime “I V”
00025358
Henry McWhorter “I V”
00025191
Jorge Cerda-Leyva “I V”
00020837
Ross Richardson “I V”
00025575
Joshua Snowdy “I V”
00035538
Quirino “Nuno” Selvera “I V”
00025202



Office of General Counsel

April 2022

Department 05013 – Legal Enforcement
 Department 05009 – General Law

General Counsel
 General Counsel IV
 Alexander Schoch
 00024012

Office Manager
 Program Spec. VII
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 Attorney IV
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 Scott Larson
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Attorney III
 Patrick Shelton
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Attorney III
 Vacant
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Attorney II
 Vacant
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Attorney I
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 Investigator VII
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 00019516

Attorney IV
 Elaine Moore
 00023963 (.6 FTE)

Attorney II
 Vacant
 00023144

Attorney II
 Adam Aldrete
 00022651

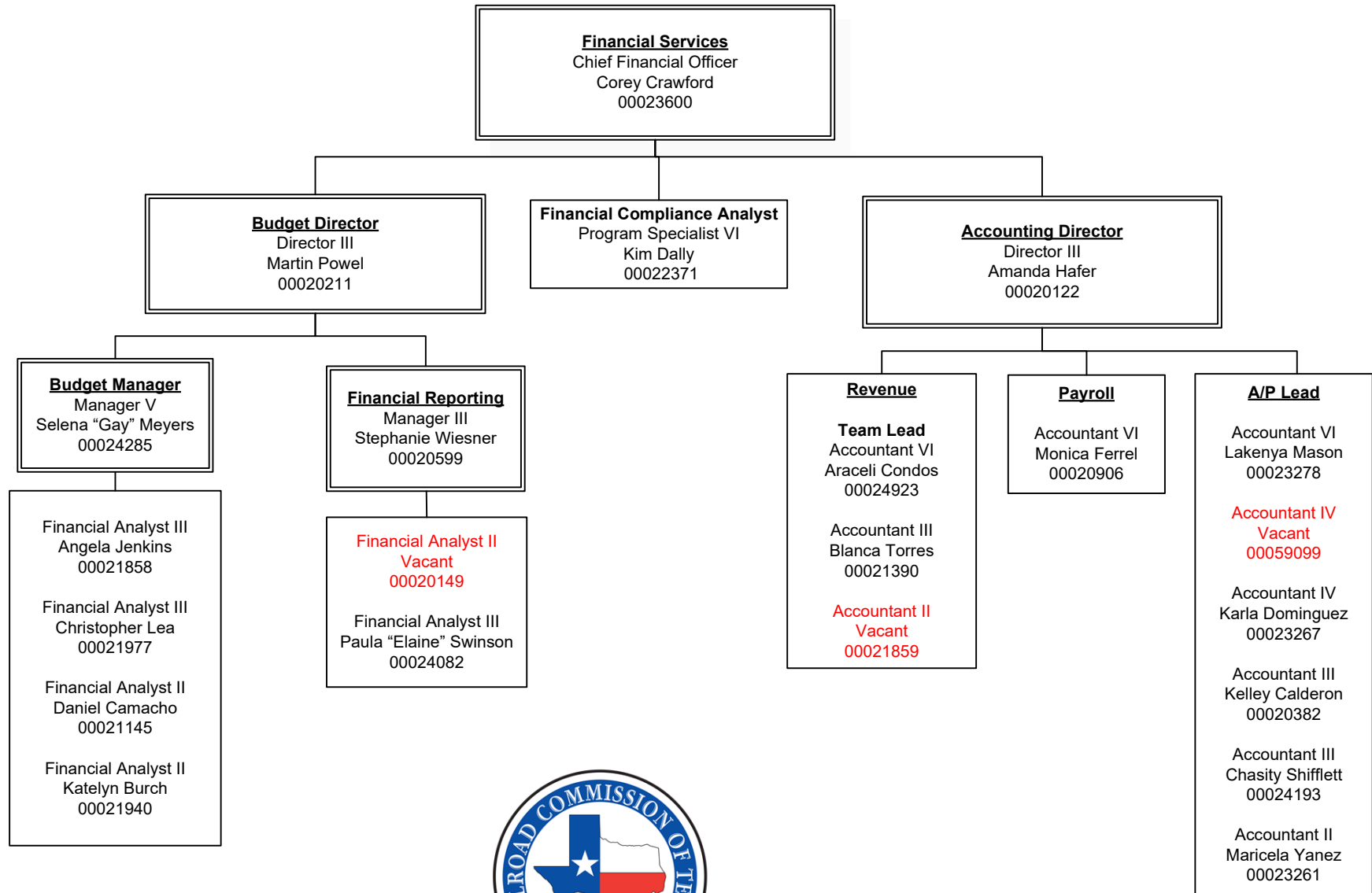
Attorney II
 Hailey Wolf
 00024412



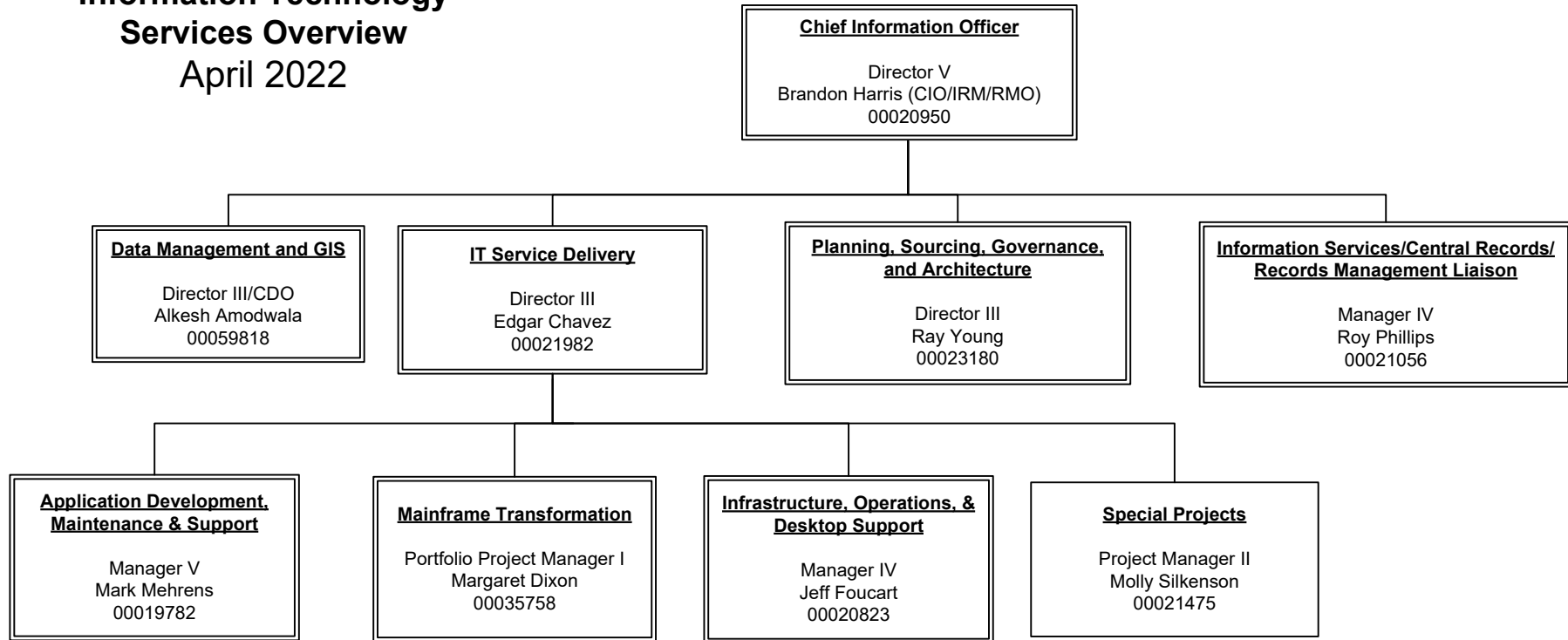
Financial Services

April 2022

Department 04010 – Financial Services



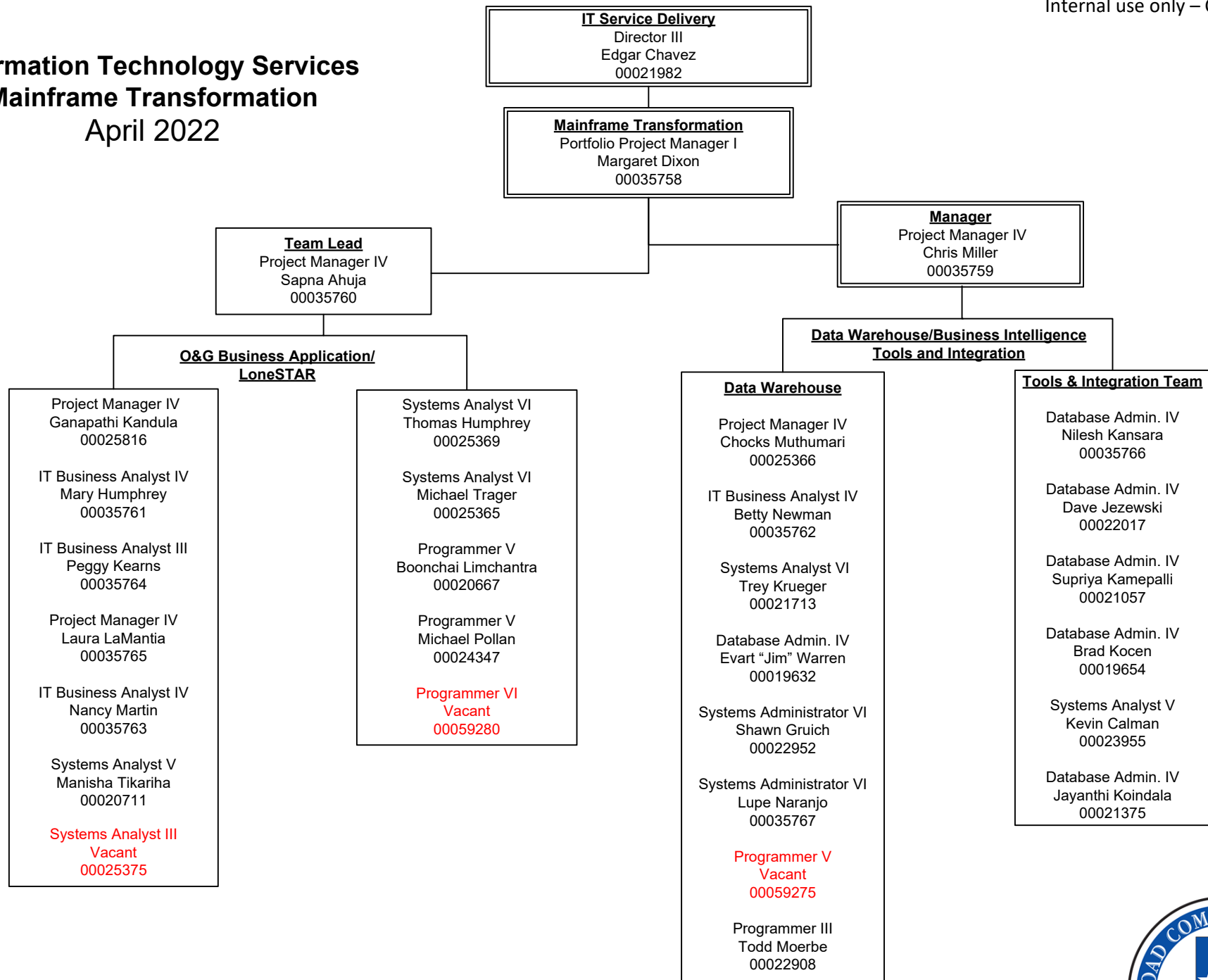
Information Technology Services Overview April 2022



Department 08132 – Inspect/Enforce Track & Report
Department 08133 – Information Technology
Department 08139 – ITS Information Services
Department 08140 – Mainframe Transformation



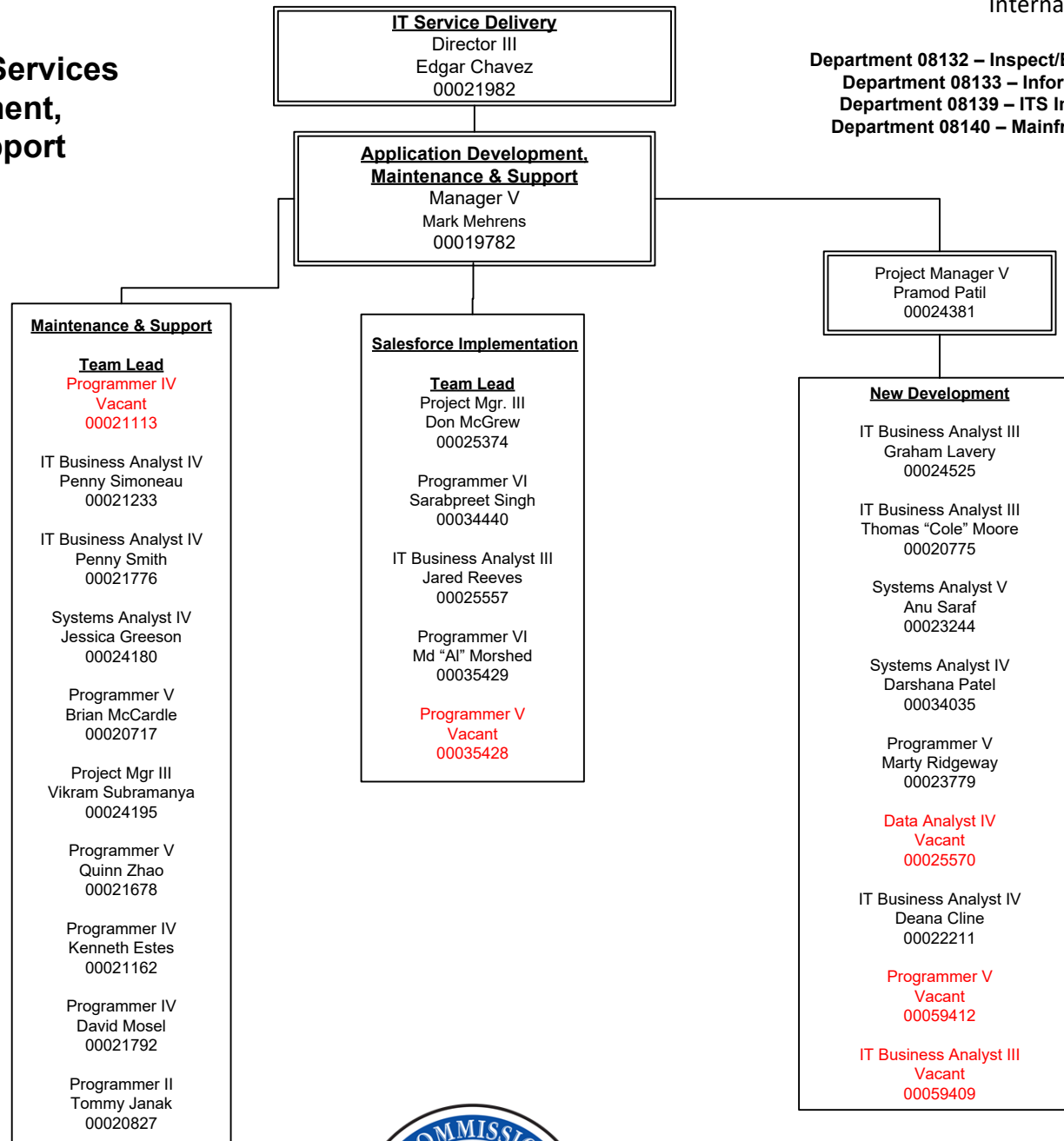
Information Technology Services Mainframe Transformation April 2022



Information Technology Services
Application Development,
Maintenance, and Support

April 2022

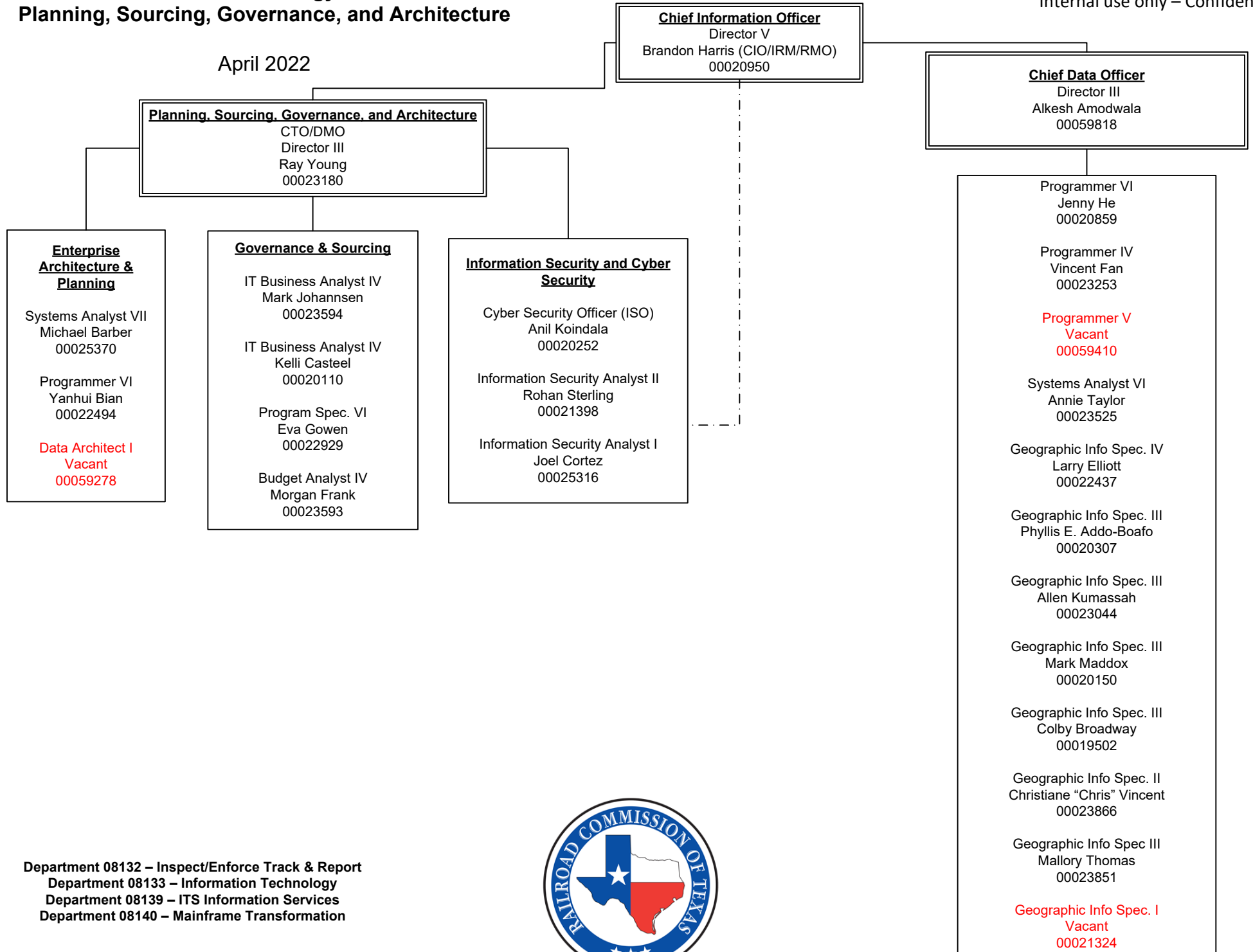
Department 08132 – Inspect/Enforce Track & Report
Department 08133 – Information Technology
Department 08139 – ITS Information Services
Department 08140 – Mainframe Transformation



**Information Technology Services
Planning, Sourcing, Governance, and Architecture**

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Department 08132 – Inspect/Enforce Track & Report
 Department 08133 – Information Technology
 Department 08139 – ITS Information Services
 Department 08140 – Mainframe Transformation

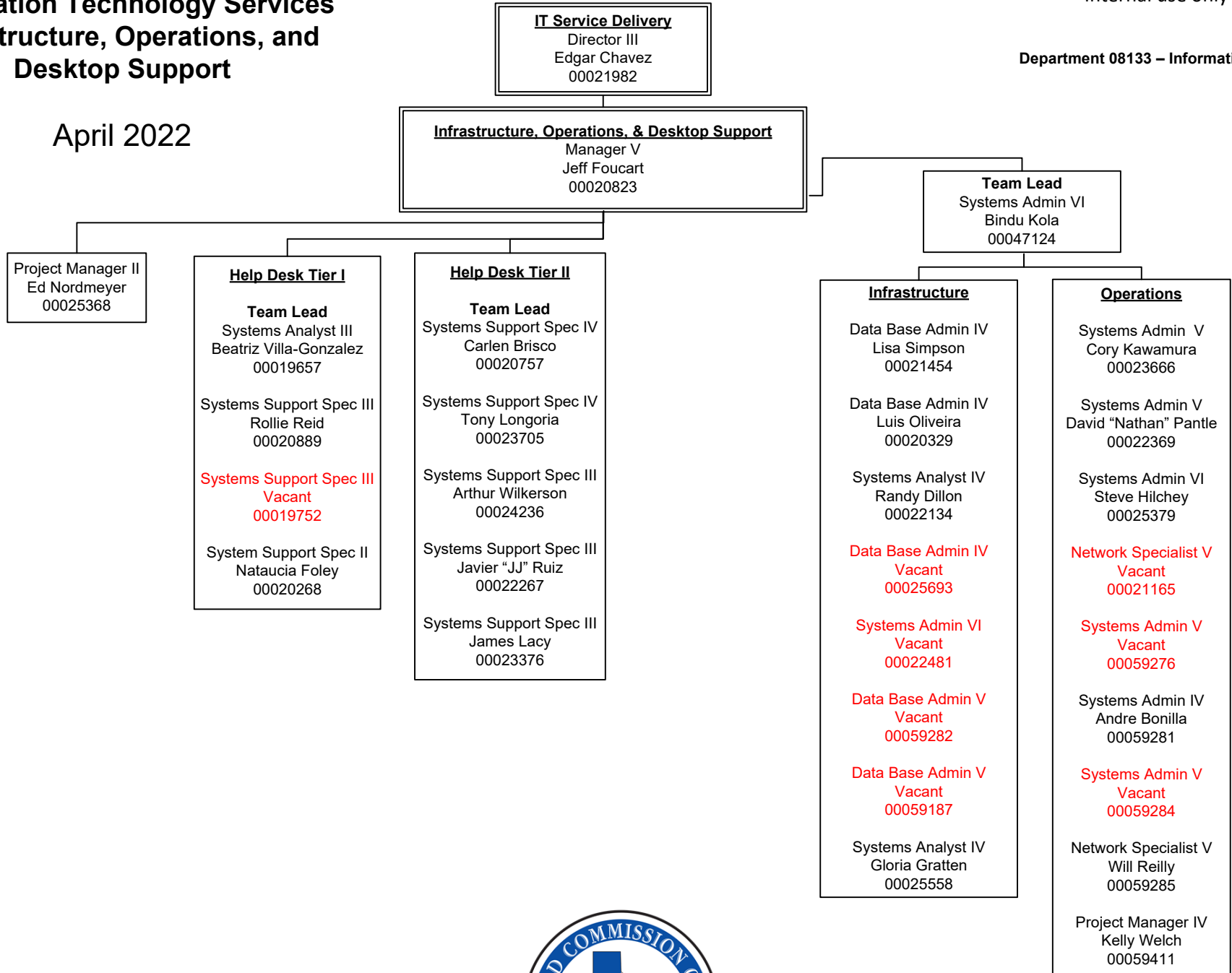


**Information Technology Services
Infrastructure, Operations, and
Desktop Support**

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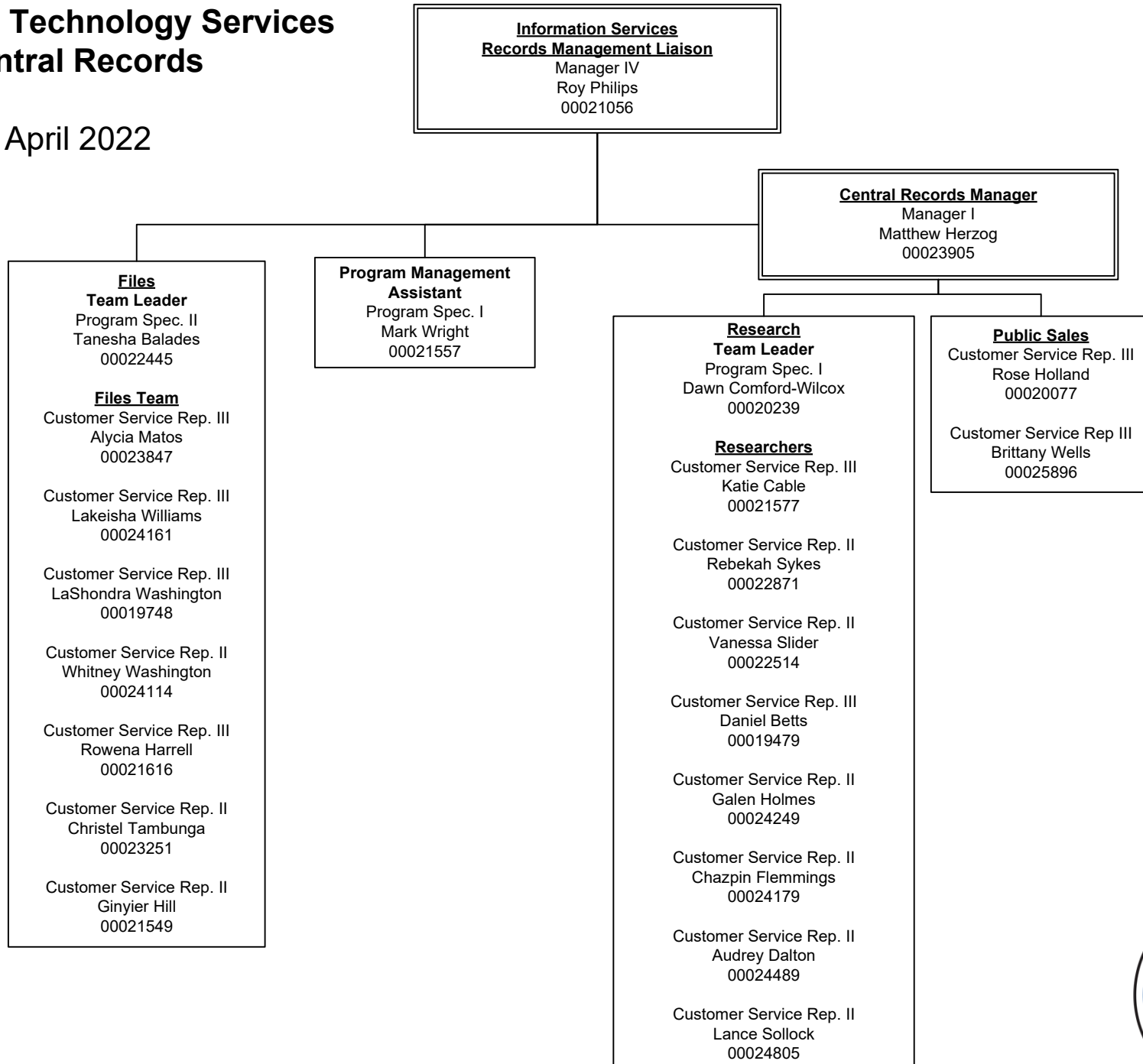
Department 08133 – Information Technology

April 2022



Information Technology Services Central Records

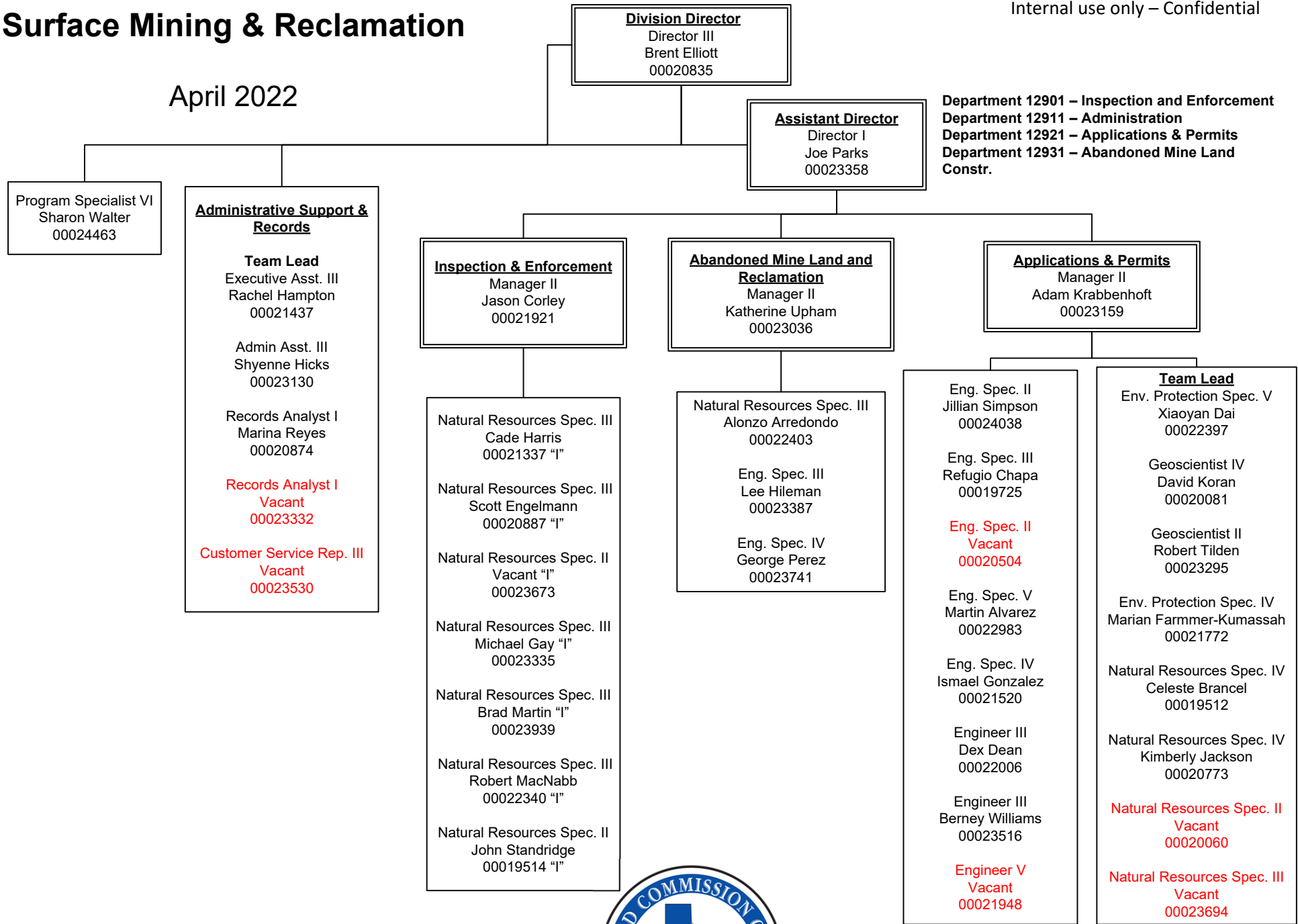
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Surface Mining & Reclamation

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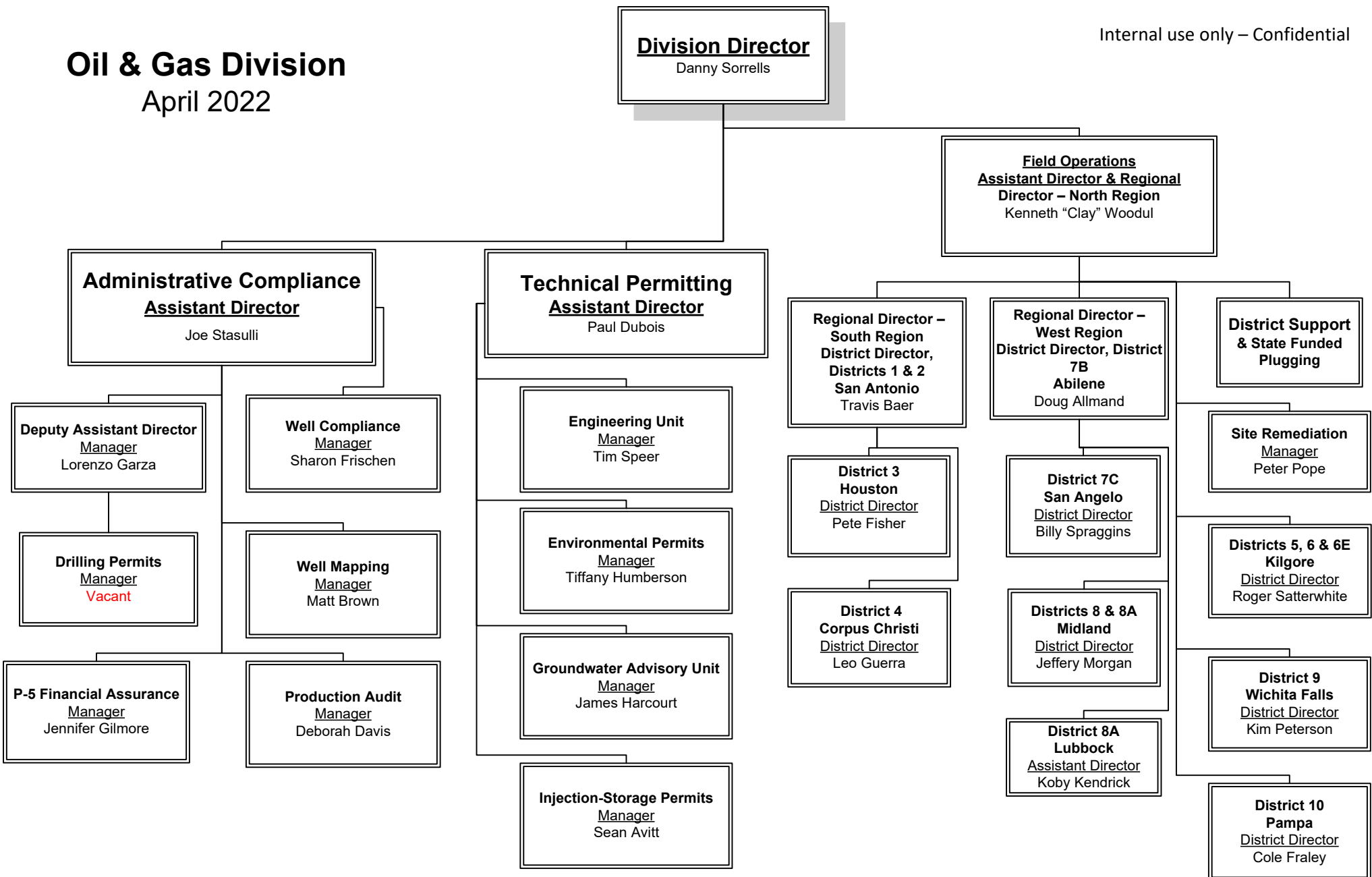
April 2022



Oil & Gas Division

April 2022

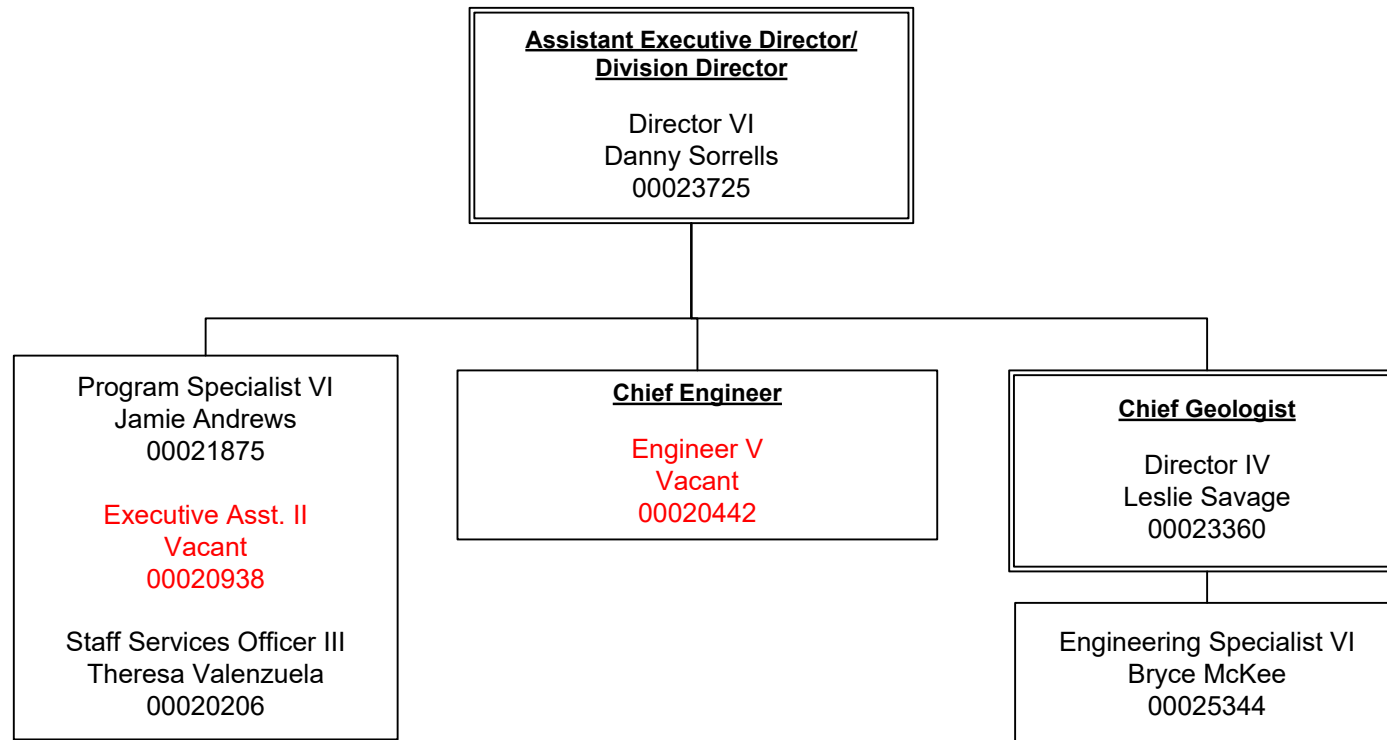
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Oil & Gas Division
Planning / Administration
April 2022

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Department 10220 – Oil & Gas Program Support

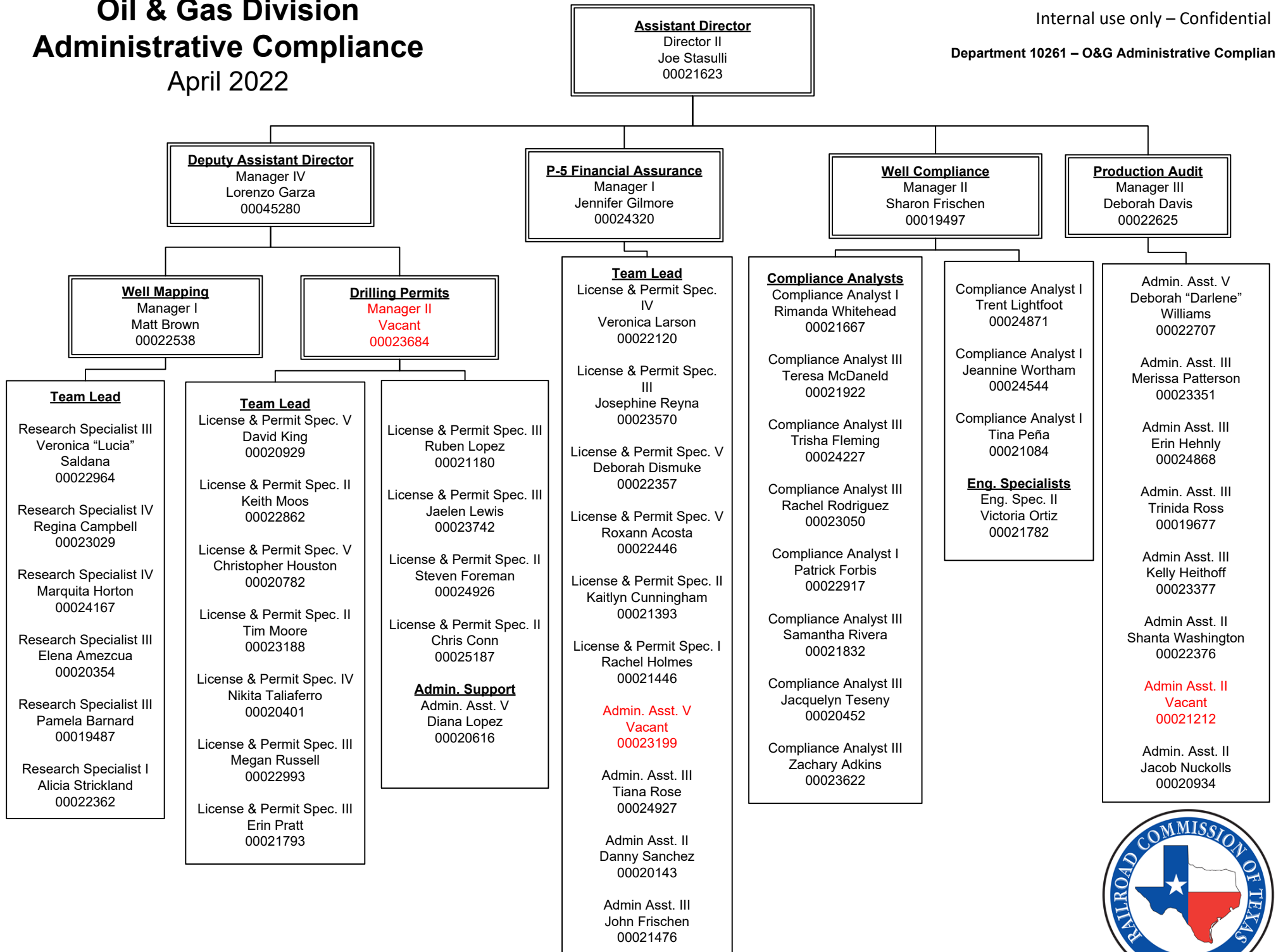


Oil & Gas Division Administrative Compliance

April 2022

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Department 10261 – O&G Administrative Compliance



Oil & Gas Division Technical Permitting

April 2022

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Department 10241 – O&G Technical Permitting

Assistant Director

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Paul Dubois
00025812

Groundwater Advisory Unit

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James Harcourt
00020767

Eng. Spec III
Vacant
00020836

Injection-Storage Permits (UIC)

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Sean Avitt
00020760

Permitting – Tech

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Ricardo Rosso
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Environmental Permits

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Vacant
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Geoscientist IV
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00024058

Geoscientist IV
Stephan Paetzold
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Geoscientist III
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Geoscientist II
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Geoscientist IV
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Geoscientist II
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Permitting - Admin

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Megan Askew
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Eng. Spec. I
Aaron Lejeune
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Eng. Spec. I
James Andres
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Eng. Spec I
Vacant
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Eng. Spec. V
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Eng. Spec. II
Nicole Moore
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Eng. Spec. II
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Eng. Spec. II
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Eng. Spec. IV
Vacant
00060929

Eng. Spec. II
Vacant
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Vacant
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Eng. Spec. II
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Eng. Spec. II
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Heidi Pelkey
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Eng. Spec. II
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Eng. Spec. III
Katherine Linford
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License & Permit Spec. I
Jason Hollinger
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00019814

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00047192

Eng. Spec. III
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Eng. Spec II
Connor Albrecht
00022368

Eng. Spec. II
Kenneth "Weston" Cassady
00023968

Eng. Spec. II
Roseanna Edson
00024925

Eng. Spec. II
Nathan Nattin
00019854

Eng. Spec. II
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Sandra Dunfield
00024018

Admin. Asst. II
Lizana Villman
00035520

Admin. Asst. II
Annette Coe-Brooks
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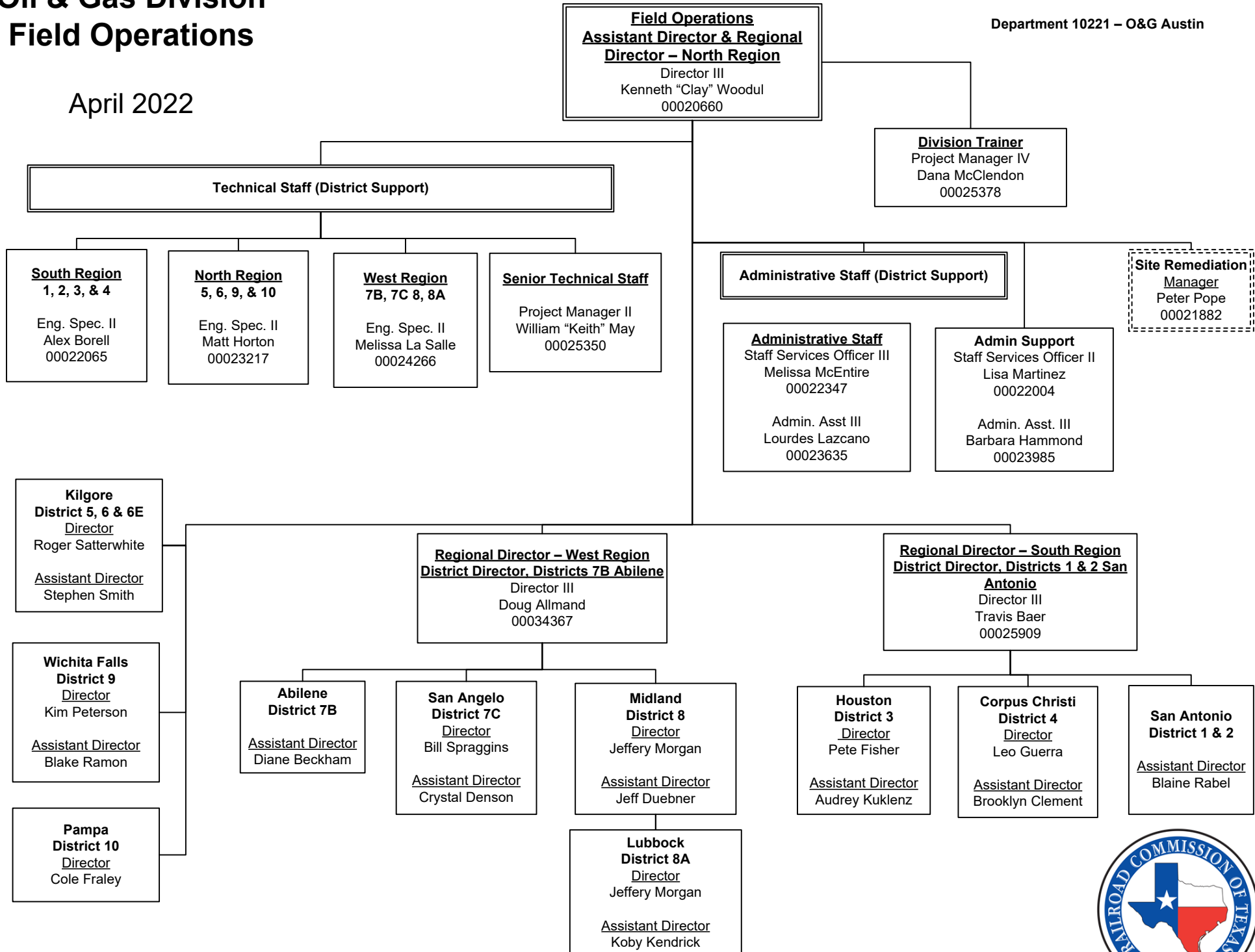


Oil & Gas Division Field Operations

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Oil & Gas Division Field Operations/Site Remediation

Department 10221 – O&G Austin

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