

Stakeholder Input for the Fiscal Year 2027 Oil and Gas Monitoring and Enforcement Plan

The following are comments received by the Railroad Commission concerning stakeholder input for the *Fiscal Year 2027 Oil and Gas Monitoring and Enforcement Plan*. Email addresses of members of the public have been redacted (blacked out) in accordance with the Public Information (Open Records) Act, Texas Government Code, sec. 552.137, except (1) where the member of the public has affirmatively consented to the release of such comments, as expressly authorized by Government Code sec. 552.137(b); or (2) where the e-mail address appears “on a letterhead, coversheet, printed document, or other document made available to the public,” as expressly authorized by Texas Government Code sec. 552.137(c)(4).

Genie Mitchell

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas’ mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
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5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.

7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Genie Mitchell

Fort Davis, TX 79734-4069



Genie Mims

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Sincerely,

Genie Mims

Houston, TX 77018-3120



Dennis Friedel

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Sincerely,

Dennis Friedel

Dallas, TX 75208-5334



Beth Francell

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Sincerely,

Beth Francell

Fort Davis, TX 79734-4105



Pamela Vangiessen

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Pamela Vangiessen

Houston, TX 77009-7326



Richard Stark

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Sincerely,

Richard Stark

Porter, TX 77365-4827



Erick Mann

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

AmCorCoUSA.com has a Solution!

I'm fighting for people that are and have been taken advantage of mentally, physically, emotionally and so much more besides illegal incarceration for 6 months!

Could you sustain what these families are and have gone through????

Remember Erin Brokovich?

I'm up against this same situation in DAYTON, LIBERTY COUNTY, TEXAS 200 families on 55 acres with an Oil Spill and in some areas as deep as 3 ft pure raw oil. The RRC said, "oh this is normal!"

They the TCEQ All lied under Oath in a Court of Law!

Two infants died many children have had open lesions families with a Rash over their bodies, Agriculture animals dead.

I can go on, the Courts and local Authorities are all CROOKED there's been Corruption, Collusion with Impunity!

My story has been covered by News media KPRC CHNL 2 and Media has been told to Bury the Story, No Longer give Any coverage or the Journalist would be FIRED! UNIVISION TV Covered the Story!

So much for Compliance sustainability integrity! We have a Solution Amcor Sorbe!

The RRC came out to the location to take a look at the damage and her reply was, ""Nothing to see here, looks perfectly normal1""

Really?

You tell me after viewing this short video this is Normal!

<https://share.icloud.com/photos/02bi4woWnP3Gj6LUdT2LCvjzA>

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Erick Mann

Houston, TX 77056



Vince Mendieta

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Vince Mendieta

Austin, TX 78715-0726



Steven Collins

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff. Wells which have been inactive for more than 10 years will never be restored to active status. Moreover, many of the thousands of old inactive wells will become orphan wells when the operator ceases operations, leaving the taxpayers of Texas with the plugging cost and the landowner with a decaying wellbore which threatens the precious sources of groundwater.
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Sincerely,

Steven Collins

Jacksboro, TX 76458



Herbert Boone

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Sincerely,

Herbert Boone

Bullard, TX 75757-8519



Sara Spikes

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Sincerely,

Sara Spikes

Beaumont, TX 77713



Larry Linenschmidt

Distinguished Commissioners,

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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

8. Enforce the Lone Star Infrastructure Protection Act so that our critical oil and gas infrastructure is protected from the control of China and other adversarial countries, since substantial portions of our oil and gas infrastructure have been purchased from Chinese-controlled companies. Increase cybersecurity in oil and gas infrastructure.

9. Increase winterization of natural gas production, storage, and transportation to ensure availability during extreme weather events, which are occurring in Texas with increasing frequency.

10. Require all components of oil and gas infrastructure to be adequately prepared for extreme weather to avoid methane and other pollutant leaks during extreme weather events.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Larry Linenschmidt

Austin, TX 78759-5130



Becky Smith

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Sincerely,

Becky Smith

Houston, TX 77098-2561



Douglas Cormier

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Sincerely,

Douglas Cormier

Beaumont, TX 77713



Anthony D'Souza

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Sincerely,

Anthony D'Souza

Houston, TX 77004-1000



Marilyn Yanke

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We own Sections 1 and 2, BBB & C, Moore County and Hutchinson County Texas. When we bought these two sections in 2021, there were 54 oil well sites concentrated mostly on Section 2. Two sprinklers, 124 acres each, had 5 sites within the circle. These wells had not pumped in many years, most were shut in, some still had signage from previous owners, some had not been checked in person for an entire year, pump jacks were broken, parts lying out in the cultivated area of the fields. In these five years, they have plugged 4 wells, there are unused, leaking tank batteries still setting around. We have lost at least 3 Angus calves from their negligence. Scout's idea of cleaning up an oil spill, if we don't catch them in the act, it to throw a little dirt on it.

We need better rules and we need enforcement of all the rules! The worst rule currently is where an oil company get a new 10 year window to plug shut-in wells every time they buy or trade a property!

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Marilyn Yanke

Sunray, TX 79086-2207



LC

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Sincerely,

LC

Corpus Christi, TX 78411



Pat Vassilakidis

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Pat Vassilakidis

Houston, TX 77006-3027



Mary Thornton

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6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Mary Thornton

Fort Worth, TX 76111-5958



Helena Marie Dobay

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
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The Texas Railroad Commission has lost sight of its mission: protecting Texans. Instead, it's become a pay-to-play playground for oil and gas insiders. The next person to hold office as the Texas Railroad Commissioner must restore integrity, accountability, and common sense. We need to have better safety protocols and accountability in order to prevent disasters like the West explosion and the Deep Horizon oil rig explosion and leak. Solar and wind energy cost less for consumers and are safer. The growth of data centers that use so many water and power resources also harms consumers. Rather than focusing on

profits for the oil and gas companies, the Texas Railroad Commission must concentrate on efficiency, fairness, safety, and environmental protection.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Helena Marie Dobay

San Antonio, TX 78209-3440



Galea Galea

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Galea Galea

Houston, TX 77020-8808



Thomas Rollinson

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Thomas Rollinson

Houston, TX 77007-8021



Barbara Alexander

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

Listen to the input provided to the District Offices. Replace older District employees with younger, less entrenched employees. Yes - they are available and eager to help bring the RRC to modern times.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Barbara Alexander

Anson, TX 79501



Matt Rota

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Matt Rota

New Orleans, LA 70112-1698



Jane Van Praag

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Jane Van Praag

Bartlett, TX 76511-4561



Bridget Lois Jensen

Three decades ago, I worked as a geophysicist for a DOE geopressure-geothermal project. I wanted to get information about disposal wells near ours and went to the TX Railroad Commission to get that information. This first encounter with the agency proved to be very frustrating as I found that there was not much of a monitoring program in place. I appreciate that there is now an opportunity for public input since there wasn't a venue for that back then.

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Bridget Lois Jensen

Houston, TX 77019-3704



ma w

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

ma w

Lubbock, TX 79413

[REDACTED]

Adrian Shelley

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Adrian Shelley

Austin, TX 78701-2787



Toni Snidow

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Toni Snidow

Pflugerville, TX 78660-3457

[REDACTED]

J. DeHon

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

J. DeHon

Canyon Lake, TX 78133-5259



Don McCown

As a Texas mineral owner, I am writing in concurrence with comments submitted by Commission Shift. Specifically, please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Don McCown

Fort Davis, TX 79734



Lucinda Channon

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Lucinda Channon

Fort Worth, TX 76123-1476



Kelly Crunk

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Kelly Crunk

Kerrville, TX 78028-1753



Glenn Goddard BS PhD PD ScM Col

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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VERITAS (1636)!!! HARVARD SPH ScM 1987. GPA 3.46

DISCIPLINA PRAESIDIUM CIVITATIS (1883)!!! HOOK EM HORNS!!!

Sincerely,

Glenn Goddard BS PhD PD ScM Col

San Antonio, TX 78247

[REDACTED]

Dorothy Kraemer

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Dorothy Kraemer

Pflugerville, TX 78660-4707



Mona Goodpasture

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Sincerely,

Mona Goodpasture

Dallas, TX 75227-1454



Rachel Fickey

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Rachel Fickey

Palestine, TX 75803-6854



KATHRYN DAVIDSON

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Sincerely,

KATHRYN DAVIDSON

Austin, TX 78731-2615



Peter Monie

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.

2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Peter Monie

San Antonio, TX 78232-1561



Austin Perez

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.

2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Austin Perez

Houston, TX 77089-2480



Sara Draper

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.

2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Sara Draper

Houston, TX 77006-3329



Elaine Robbins

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.

2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Elaine Robbins

Austin, TX 78757-2312



David Cole

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety for everyone, which is not a partisan issue, but a health issue.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception (an environmental disaster) requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and gas leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity and nepotism shouldn't be a way to avoid responsibility.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes. Fracking has already apparently damaged the stability of geological strata in some communities.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

David Cole

Dallas, TX 75240-5420

[REDACTED]

Erick Mann

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Erick Mann

Houston, TX 77057-1000



Malva McIntosh

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Malva McIntosh

Georgetown, TX 78626-6237



Carolyn Croom

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Carolyn Croom

Austin, TX 78757-2103



Alfredo Davila

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Alfredo Davila

Converse, TX 78109-3798

[REDACTED]

Terry Lopez

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Terry Lopez

Meadows Place, TX 77477-1813



Gayland Taylor

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Gayland Taylor

Mansfield, TX 76063-4068



Maxine Rebeles

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Maxine Rebeles

Laredo, TX 78046



Mark Bedgood

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Mark Bedgood

Corsicana, TX 75110-8504



Debra Montez Felder

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Debra Montez Felder

San Antonio, TX 78253-5448



Karen Snooks

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Karen Snooks

Desoto, TX 75115



Margaret Morin

As a native Texan of seven decades (and a fourth generation Texan), I strongly believe in protecting the integrity, cleanliness, and safety of Texas lands, waters, wildlife, and

ecosystems. Texas is THE LAND, it is not a political party or special interest group. Therefore, I strongly urge the Railroad Commission to immediately enact more robust and responsible, and stronger and completely transparent processes responsive and responsible to the needs of all Texans (not just special interests) to maintain and protect the integrity of Texas land, water, wildlife, and ecosystems, and NOT just that of business interests.

As such, please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

I sincerely and ardently hope to see the above suggestions meaningfully incorporated into the Plan. Thank you.

Sincerely,

Margaret Morin

Round Rock, TX 78664-4049



Margaret Duran

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety. Once these resources are tainted or gone, it is very difficult to mitigate or replace them. Please be forward looking and acting on the following recommendations:

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
3. Publish information on spills and leaks in a central database available online.
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.
7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Margaret Duran

Corpus Christi, TX 78413-2523



Robin Schneider

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO₂ leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Robin Schneider

Austin, TX 78704-5644



Charles Martin

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before. Current actions are not cleaning up the air.
3. Publish information on spills and leaks in a central database available online. Public needs to know who is destroying the environment
4. Improve transparency of complaints, inspections, and violations. Publish a database of facility-linked complaints with descriptions and violation histories.
5. Ensure thorough and systematic facility inspections. Develop processes ensuring inspectors consistently and systematically check all components at a facility. Communicate inspector shortfalls to the legislature, as inspecting wells on a 5-year cycle is insufficient.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training

materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I want to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Charles Martin

Leander, TX 78641-8540



ma w

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

ma w

Lubbock, TX 79413



Doug Hoover

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training


materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Doug Hoover

Denison, TX 75020-7115



Michelle Iskra

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Michelle Iskra

Cedar Park, TX 78613



Margaret Hill

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Sincerely,

Margaret Hill

Austin, TX 78748-2425



Ronald Carmon

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Sincerely,

Ronald Carmon

Beaumont, TX 77713-2932



DeDe Murton

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Sincerely,

DeDe Murton

Cross Roads, TX 76227-3896



Andy Escobar

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Sincerely,

Andy Escobar

Houston, TX 77065



Claire Johnson

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Sincerely,

Claire Johnson

Houston, TX 77080



R.K. and Linda Entrekin

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Sincerely,

R.K. and Linda Entrekin

Houston, TX 77043-4533



CL Hitchcock

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes STEWARDING NATURAL RESOURCES AND THE ENVIRONMENT AND PROTECTING PERSONAL AND COMMUNITY SAFETY.

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Sincerely,

CL Hitchcock

Sugar Land, TX 77479-1522



Melissa Parra

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Sincerely,

Melissa Parra

Houston, TX 77036



Anna loera

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Anna loera

Kingwood, TX 77345-1345



Michelle E Smith

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Sincerely,

Michelle E Smith

Lubbock, TX 79413-3916



Erick Mann

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Sincerely,

Erick Mann

Houston, TX 77057-1000



E C Marullo

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E C Marullo

Fort Worth, TX 76110-3448



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Also proper and Correct Product used to Absorb and Clean Up the Toxic Spill...Not Bentonite (“kitty litter!”) Cheapest product possible but Never “absorbs!”

Sincerely,

Erick Mann

Houston, TX 77057-1000



Edwar Martinez

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Sincerely,

Edwar Martinez

Mansfield, TX 76063



Mark Blandford

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Sincerely,

Mark Blandford

Amarillo, TX 79124-2309



Jennifer Quick

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Sincerely,

Jennifer Quick

Arlington, TX 76012-2275



Charles Foreman

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Sincerely,

Charles Foreman

Arlington, TX 76011-2244



Robert Knoll

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Sincerely,

Robert Knoll

Poteet, TX 78065-3672



Lourdes Rodríguez

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Lourdes Rodríguez

Austin, TX 78723-2108



Katherine Homan

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Sincerely,

Katherine Homan

Dallas, TX 75208-2335



Gene Collins

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Sincerely,

Gene Collins

Odessa, TX 79764-1235



Sarah Meador

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Sincerely,

Sarah Meador

Kyle, TX 78640-9613



Austin Sweeney

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Sincerely,

Austin Sweeney

Austin, TX 78745-5491



Dede Griffin

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Sincerely,

Dede Griffin

Dickinson, TX 77539



Azul Vasavilbazo

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Sincerely,

Azul Vasavilbazo

El Paso, TX 79912-1703

[REDACTED]

Harvey Hild

It's time to stop polluting our atmosphere and start using wind and solar energy.

Sincerely,

Harvey Hild

Marion, TX 78124-1663

[REDACTED]

Jason Hale

Hi [REDACTED]

I'm a lifelong Texan, I've been following these issues for a while, and I think Commission Shift has been doing great work. I think they want the RRC to succeed at their mission and I think that what they advocate for would improve the lives of all Texans. Please do what you can to incorporate their recommendations.

Respectfully,

Jason Hale

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Jason Hale

Corpus Christi, TX 78411-3059



Henry Ewert

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Sincerely,

Henry Ewert

Austin, TX 78748-2573



Gregory Kay

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Sincerely,

Gregory Kay

Cypress, TX 77433-4712



Greg Sells

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Sincerely,

Greg Sells

Austin, TX 78741-6942



Lauren Ivy Chiong

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Lauren Ivy Chiong

Ft Worth, TX 76110-1707



Patricia Richards

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Sincerely,

Patricia Richards

Arlington, TX 76017-5919



Michael Bonagurio

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Sincerely,

Michael Bonagurio

Austin, TX 78727-3933



Peter Monie

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Sincerely,

Peter Monie

San Antonio, TX 78232-1502



Lauren Tatarsky

I am a mineral right owner and accountable regulations for the oil industry matter to me! Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Lauren Tatarsky

Ann Arbor, MI 48108-2026



Sarah Burgess

I am a coastal Texas resident who cares deeply for the healthy air and healthy water for all people to have access to. I have seen firsthand the negative consequences on human health when there is lack of stewarding our natural resources. The Texas economy depends on healthy communities and improved transparency of consequences for bad actors who are violating the right to a healthy community. Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Sarah Burgess

Galveston, TX 77550



Leigh Brown

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Leigh Brown

Fischer, TX 78623



James OFlaherty

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Sincerely,

James OFlaherty

Grapevine, TX 76051-2637



Cathy Sikes

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Sincerely,

Cathy Sikes

Humble, TX 77346-3626



Schuyler Wight

I respectfully submit the following comments:

The RRC needs to develop more robust well integrity testing protocols. Companies large and small cheat on their well testing. Last year, Oxy was caught falsifying H5 tests on their inactive wells.

Many people rely on well testing in their course of business. Landowners, royalty owners, working interest owners, other government agencies, etc. These tests are essential to ensure that the environment is protected, ie: groundwater, surface water, and soil. These tests need to be conducted with the highest degree of accuracy. The RRC only witnesses a small % of the tests, <20%. Currently, the only way to ensure that the test is accurate is to witness it.

landowners need to be in the loop on when the tests are scheduled and have the right to be onsite when the test is conducted. This is a private property rights issue because the oil operator does not have the right to pollute or destroy the land surface. The only way that landowners can ensure that their property is not being polluted is to be on site when testing is conducted. Currently, there is nothing in the rules allowing landowners to be notified, much less onsite when the tests are taking place.

The test uses a paper form that is easily fabricated. There have been numerous cases of oil companies caught falsifying the tests.

1. Several years ago, a company testing for Aghorn operating was convicted and forced to pay a fine to the EPA for cheating on tests.
2. PO&G was turning in false tests back in 2019 on an injection well. If the pumper hadn't been fired and pissed off at the company, the RRC would have never known about it.
3. Oxy has been falsifying tests for years here in west Texas. They were caught at it and will probably face no fine or sanctions.

The RRC needs to levy serious fines and sanctions when they catch a company cheating on well testing.

We cannot afford to play games with our groundwater and surface. When pollution happens, it is permanent.

Schuyler Wight

Daniel Roark

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
2. Demonstrate that RRC flaring rule enforcement is preventing waste. Currently, the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before.
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7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO₂ leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Daniel Roark

Farmers Branch, TX 75234-2156



Julia Austin

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Julia Austin

Austin, TX 78722-1021



Kathleen Bryson

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Kathleen Bryson

Kerrville, TX 78028-6421



Mitchell Kobus

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Mitchell Kobus

Plano, TX 75025



Hayley Landry

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Including methane metrics in the Monitoring and Enforcement Strategic Plan is required under HB 1818. Without measurable data, there's no way to track progress or hold operators accountable.

I lastly urge the Commission to require utility companies to locate and eliminate methane leaks and to prioritize repairing or retiring aging pipelines instead of defaulting to full replacement projects. Complete replacement is often the most expensive path — and those costs end up on the backs of ratepayers. Targeted leak detection and repair can be faster, cheaper, and more effective at reducing emissions and improving safety.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Hayley Landry

Fresno, TX 77545-7914



Harry Dorsey

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Harry Dorsey

Arlington, TX 76011-7133



Leslie Frederick

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Leslie Frederick

Houston, TX 77009-1344



Tai Moran

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Sincerely,

Tai Moran

Laredo, TX 78040-5806



Lillian Snider

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Lillian Snider

Abilene, TX 79605-1609



Madeleine West

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Madeleine West

Durham, NC 27704-1754



Robert Milton Bohmfalk

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Sincerely,

Robert Milton Bohmfalk

Seguin, TX 78155-3260



Lynn Yinger

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Lynn Yinger

Azle, TX 76020



Brenda Wyrick

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Sincerely,

Brenda Wyrick

Frisco, TX 75036-6538



Carroll Dartez

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Carroll Dartez

Houston, TX 77057-4205



Jonathan Warren

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Jonathan Warren

Galveston, TX 77550-3208



Francis Blake

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

I strongly support the following recommendations for action:

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Francis Blake

Houston, TX 77006-1358



Joanie Steinhaus

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

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Sincerely,

Joanie Steinhaus

Galveston, TX 77550-6257



William Forbes

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

William Forbes

Nacogdoches, TX 75963-3136



Martin Kühnemundt

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Sincerely,

Martin Kühnemundt

Fort Worth, TX 76133



Alyssa Wallace

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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Alyssa Wallace

Schertz, TX 78108-2047



Phoe Beckett

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6. Exercise additional scrutiny and discretion when considering well transfers to companies owned or controlled by family members of barred operators. The commission should do everything it can to prevent fraudulent activity.

7. Conduct outreach to members of the public, local elected officials, and emergency responders in places where Class VI carbon injection wells are proposed. Develop training materials for the public to identify and respond to warning signs of CO2 leaks from pipelines or subsurface plumes.

Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Phoe Beckett

Georgetown, TX 78628-8985



Minnah Zaheer

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Sincerely,

Minnah Zaheer

Austin, TX 78737



Ed Davis

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Sincerely,

Ed Davis

Huntsville, TX 77320-3008



Drew Middleton

To Whom It May Concern,

I am submitting this comment regarding Strategy 3.2.1 – Oil and Gas Well Plugging and Remediation.

I would like to express concern over the current approach to plug verification and recommend that bond logs be required as a standard component of plugging operations.

At present, many wells are plugged using trial-and-error methods, including injection tests or screen-out tests, without sufficient diagnostic data. This approach introduces uncertainty regarding plug placement, zonal isolation, and long-term integrity. In many cases, operators are effectively working without a clear understanding of downhole conditions, which increases the likelihood of ineffective plugs, rework, or future remediation.

Requiring a cement bond log (CBL) or equivalent evaluation tool would provide a clear, data-driven roadmap for operators. Specifically, bond logs:

- Confirm cement placement and quality

- Identify channels or voids that compromise isolation
- Allow precise targeting of remediation efforts
- Reduce reliance on blind injection testing

From a cost perspective, while bond logs introduce an upfront expense, they significantly reduce overall plugging costs by minimizing failed attempts, unnecessary fluid usage, repeated mobilizations, and long-term environmental risk. In practice, this shifts operations from reactive to proactive, improving both efficiency and outcomes.

In addition, standardized use of bond logs would improve consistency across operators and enhance regulatory confidence in plug integrity, particularly in aging or high-risk wells.

In summary, requiring bond logs as part of the plugging process would:

- Improve plug reliability and environmental protection
- Reduce total lifecycle costs of plugging operations
- Provide operators with actionable data rather than relying on trial-and-error methods

Thank you for the opportunity to provide input on this matter. I appreciate your consideration and would be glad to provide further detail if needed.

Sincerely,

Drew Middleton

Wireline Manager

Espinoza Wireline Services LLC

[REDACTED] <mailto:[REDACTED]>

618 US Hwy 385 N, Seminole, TX 79360

Nicholas Pence

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Sincerely,

Nicholas Pence

Crockett, TX 75835-1766



Kate Mathis

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Sincerely,

Kate Mathis

Kyle, TX 78640



Patricia Keck

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Sincerely,

Patricia Keck

Leander, TX 78641-1982



Schuyler Wight

I respectfully submit comments on the RRC's monitoring enforcement plan for 2027.

The Railroad commission has no teeth to enforce their rules:

Over the last 18 months, I have documented instances where companies have flouted the rules and there has been no legal enforcement by the Railroad commission.

Walbet oil company filed a false W3 form stating they plugged a well and the well was obviously not plugged. The RRC did make them plug the well, but the false filing was ignored.

PO&G oil company has a well that they left flowing at surface with an open, unauthorized, unlined pit. This well was reported to the RRC in Dec 2025, and the commission refuses to require them to maintain surface control of the well, nor do they require them to line and register the pit.

Oxy USA has been falsifying H5 well testing for years. They were caught red handed falsifying H5 tests, and the RRC refuses to fine them or sever their production.

The core of the problem is the cozy relationship that the oil companies have with the commissioners. They fund the commissioner's campaigns with wheelbarrows of money, giving them a conflict of interest when it comes to enforcing the rules and regulations.

Why have rules if you are not going to enforce them?

The oil companies know that when it comes to it, they don't have to abide by the rules to protect the environment, so they brazenly violate them without consequence.

Part of the mission of the RRC is to protect the environment. Landowners depend on them to help protect their land and groundwater. There are scads of documented cases of groundwater and soil pollution that are not being prosecuted by the Railroad commission.

Schuyler Wight

Aguedys WHITTAKER

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Houston, TX 77083-5350



Ross Pumfrey

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Sincerely,

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Austin, TX 78736-3312



Stephen Ball

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Pearland, TX 77581



Ed Davis

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Sincerely,

Ed Davis

Huntsville, TX 77320



Daniel Roark

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Sincerely,

Daniel Roark

Farmers Branch, TX 75234-2156



Jimmy Hosch

A close friend has old oil wells on her ranch. She reported a leak coming from one of those old wells and received absolutely no response from the Railroad Commission to her request to plug the old well. Action was taken only after she reported the incident to her local newspaper. This experience is typical of your historical concern and protection of the Texas environment. All we are asking is reasonable behavior from your office that does not require publicly shaming you.

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Sincerely,

Jimmy Hosch

Dallas, TX 75248-5436



E C Marullo

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would consider not monitoring and regulating and protecting our environment and communities all for the sake of money .

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E C Marullo

Fort Worth, TX 76110-3448



Mary Lee Johns

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Sincerely,

Mary Lee Johns

Houston, TX 77084-2322



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John Chalmers

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Sincerely,

John Chalmers

Buchanan Dam, TX 78609-4365

Judy Gyllenband

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Judy Gyllenband

Amarillo, TX 79108-2885



Kate H

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Kate H

San Antonio, TX 78245-9111



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Thank you for your attention. I hope to see these suggestions meaningfully incorporated into the Plan.

Sincerely,

Judith Collard

San Antonio, TX 78232-4916



Chris Mendoza

Please consider incorporating the following Action items into FY 2027 Oil and Gas Monitoring and Enforcement Plan. Considering stakeholder feedback is essential to

Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety.

1. Track and report the number of plugging operations and well integrity tests that RRC staff witness. Reporting on these activities can help to prevent fraud, protect groundwater, and demonstrate whether the agency needs more staff.
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Sincerely,

Chris Mendoza

Dallas, TX 75237



Rita Nealon

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Sincerely,

Rita Nealon

San Antonio, TX 78203-2318



Bob and Pam Zeller

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Sincerely,

Bob and Pam Zeller

Roanoke, TX 76262



Nicole Ray

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Sincerely,

Nicole Ray

Austin, TX 78745-4345



Amber Abascal

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Sincerely,

Amber Abascal

San Antonio, TX 78232-3509



Michael Solis

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Sincerely,

Michael Solis

League City, TX 77573-4647



Val Brumby

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Sincerely,

Val Brumby

San Antonio, TX 78229-4735



Mark Brown

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Sincerely,

Mark Brown

San Antonio, TX 78216-7905



Francis Blake

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Sincerely,

Francis Blake

Houston, TX 77006-1358



J. N. Passty

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J. N. Passty

San Antonio, TX 78203-2027



Judith Zwarun

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Sincerely,

Judith Zwarun

Austin, TX 78751-2022

Adriana Paredes

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Sincerely,

Adriana Paredes

Schertz, TX 78108-3440



Georgia Couch

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Sincerely,

Georgia Couch

Greenville, TX 75401

[REDACTED]

Luke Bross

[RRC Note: Attachment to follow at conclusion of document.]

Hello,

Please see the attached comments for the Fiscal Year 2027 Plan. These comments are specifically related to 3.1.1 Oil and Gas Monitoring and Inspections and 3.2.1 Oil and Gas Well Plugging and Remediation.

Thank you for the opportunity to submit comments.

Thank you,

-Luke

405.642.7070

Virginia Palacios

[RRC Note: Attachment to follow at conclusion of document.]

Please see attached Commission Shift's comments on the FY 2027 Monitoring and Enforcement Plan.

Thank you,

Virginia Palacios

Executive Director

Pronouns: she/her

(512) 791-1973

[REDACTED] <mailto:[REDACTED]>

212 Flores Ave.

Laredo, Texas 78040



Cyrus Reed

[RRC Note: Attachment to follow at conclusion of document.]

Cyrus Reed (he-him), PhD

Legislative and Conservation Director

Lone Star Chapter, Sierra Club

 <mailto:

6406 IH-35, Suite 1806

Austin, Texas 78752

512-888-9411 (office)

512-740-4086 (cell)

@cyrustx (twitter)

www.sierraclub.org/texas <<http://www.sierraclub.org/texas>>

www.texascleanenergyscorecard.com <<http://www.texascleanenergyscorecard.com>>

Thank you to the Commission for the opportunity to comment on the Fiscal Year 2027 Oil and Gas Division Monitoring and Enforcement Strategic Plan. This process provides an opportunity to better align enforcement priorities with the operational realities of modern oil and gas operations. We appreciate the Commission's focus on monitoring and enforcement activities, as it supports the vast majority of operators who operate safely and in accordance with industry best management practices. We also recognize that the Commission does not have unlimited resources, and we encourage prioritization that ensures public safety and protects soil and groundwater. EPEC's comments are intended to assist the Commission in achieving its stated goals.

More broadly, we believe transparency drives efficient markets. When a market is transparent and relevant information is readily accessible, landowners and operators are better positioned to make informed decisions regarding their land and operations.

As an active participant in the oil and gas sector, a professional with over two decades of experience, a small business owner, and a mineral owner, I have observed how regulators impact day-to-day operations in the field and how they can also, often unintentionally, create imbalances that effectively choose winners and losers. Accordingly, the following are our recommendations.

Clarification of PBR Activities, Minor Permit Thresholds, and Inter-Site Waste Transfer

a. Transportation of waste from one site to another should not be allowed unless it is authorized by a minor permit or is for a legitimate recycling purpose. Solids are not contemplated to be transferred from pit to pit under Chapter 4. This applies to reserve pits and Schedule A pits, which are single-well pits, and should not be confused with Schedule B pits, which are separately permitted facilities designed for centralized waste management.

Recommendation: Ensure that if and when waste is transferred, it is properly tracked. If waste from a Schedule A pit is transferred to another Schedule A pit, documentation of the request to the district office, the district office's approval, the name of the approving staff, and the reasoning for the transfer should all be recorded and accessible.

b. Under §4.110, definition (82), a Schedule A pit is defined as being associated with a single well and located at the same well site. §4.111(d) reinforces that waste disposed into a reserve pit must be generated on the same site. Chapter 4 does not contemplate a Schedule A pit serving multiple wells or multiple pads. If multiple wells on a pad use separate pits, each must be registered individually. Commingling waste from multiple wells into a single pit should constitute a violation unless prior written authorization grants an exemption. This is distinct from Schedule B pits, which are permitted to receive waste from multiple sources.

Recommendation: Ensure that commingling of waste is not occurring without proper documentation.

c. §4.102(g) prohibits managing oil and gas wastes in any manner that violates Commission rules. This includes pits constructed before Chapter 4 that are causing soil pollution. Registration alone does not protect a pit from enforcement action if pollution is occurring. The rule should be interpreted to prohibit pollution regardless of whether it reaches surface or groundwater. Recommendation: Ensure that old (pre-Ch. 4) Schedule A pits are closed within the time required by rule.d. The term "cessation of drilling operations" in §4.114(3)(A) should be understood to refer to

the end of drilling on the specific well associated with the pit. Since pits are defined as being associated with a single well, the closure clock begins once drilling stops on that well, not after the pad is fully developed, which can stretch for months or even years. Operators must not delay closure based on ongoing pad activity unless the pit is formally reclassified.

Recommendation: Ensure that Schedule A pits begin the closure process at the cessation of drilling and not at the end of pad development.

Required Activities Without Required Submittal

These are activities required by rule but do not require submission of documentation unless requested. Operators should retain evidence for compliance and inspection purposes. These are activities that are also commonly in violation of current rules.

a. Liners on all scheduled pits that are damaged or torn may compromise containment and increase pollution risk. Closure activities should ensure liner integrity is addressed in accordance with manufacturer technical specifications and standards.

Recommendation: Visually inspect pit liners during all inspections to prevent containment breaches before they occur.

b. EPA Method 9095B (Paint Filter Liquids Test) is required to verify that pit contents meet dewatering requirements. Visual confirmation at the surface is insufficient. Operators should document that waste meets paint filter standards throughout the full waste profile, not just the upper layers.

Recommendation: Inspect Schedule A pits during the closure process to ensure paint filter standards are achieved.

Prohibited Practices Under Chapter 4

a. Trenching and burying pit contents without proper closure constitutes an unauthorized release. §4.114 prohibits the unauthorized release of oil and gas waste, including releases resulting from the physical breach or cutting of pit sidewalls. Operators must report such releases to the District Office within 24 hours and take corrective action.

Recommendation: Inspection staff should document and report all instances of trenching, burying, or other intentional breaches of Schedule A pit containment that constitute a violation.

b. Intentionally breaching the sidewall of a Schedule A pit to drain fluids into adjacent soil is not an acceptable dewatering method and is a regulatory violation.

Recommendation: Inspection staff should document and report all instances of intentional breaches of Schedule A pit sidewalls for the purpose of dewatering.

Pit Registration Requirements for Schedule A Reserve Pits

a. Registration should include a USGS floodplain map or, if unavailable, an equivalent topographic map to confirm pit location relative to flood risk.

b. While Chapter 4 does not specify a particular data source for groundwater depth, the rule contemplates that the shallowest recorded depth beneath the pit will be used. It is recommended that operators submit the source of their groundwater data during registration as a best management practice.

Documentation Operators Should Report for Each Schedule A Pit

a. Report the shallowest depth to groundwater at the site. This supports compliance with pit siting and liner requirements.

Recommendation: This data should be reported along with pit location, capacity, and name.

b. Operators should also regularly sample pit contents to ensure the proper closure timeline (6,100 chloride test).

Recommendation: Operators should report anticipated chloride levels, or a reasonable range, with Schedule A pit registrations.

Closure Timelines and Reclassification

a. Closure timelines under §4.114(3)(A) are function-based. The timeline is tied to the most recent use of the pit, not the original waste type or when it was placed. If a Schedule A reserve pit is used during drilling and contains high-chloride waste (>6,100 mg/L), the operator may assume they have 365 days to close the pit under Closure 2. However, if the pit is reclassified for completion operations and used as such, even without removing or isolating the original drilling waste, the entire pit becomes subject to the stricter closure standard.

- Dewatering within 30 days of well completion
- Backfill and compaction within 120 days of well completion

Enforcement is tied to current use, as registered on the EP-1. If a pit is listed as a completion pit, the stricter closure timeline applies regardless of the waste composition. Operators who fail to segregate waste or properly manage reclassification risk noncompliance.

Recommendation: Operators should remove or stabilize reserve pit waste before reclassification. Alternatively, new pits should be registered for completion use. EPS guidance should clarify that closure deadlines reset upon reclassification and that legacy waste is not exempt from new timelines. Statewide Rules and Field-Level Implementation

a. A recurring issue in the implementation of Chapter 4 rules is the divergence between statewide regulatory requirements and field-level application. District offices routinely make real-time decisions to address site-specific conditions, including granting variances or allowing alternative practices. While this flexibility is necessary, it can result in informal exemptions that are not consistently documented or tracked. This creates a situation where the effective regulatory baseline differs from district to district and even operator to operator, and limits the ability to audit, replicate, or evaluate these decisions.

Recommendation: The Commission should allocate resources to ensure that all field-level

variances or exemptions are documented in writing, including technical justification, that these decisions are centrally tracked and accessible, and that district offices are supported with sufficient staffing and tools to document these actions in real time.

Other items

Landowner Consent, and Minor Permit Triggers

The Commission's rules provide a comprehensive framework for managing oil and gas waste. The effectiveness of this framework depends on consistent, transparent, and technically grounded enforcement. The Commission can significantly enhance the reliability and defensibility of its enforcement program while maintaining the flexibility necessary to address real-world operating conditions. Thank you for the opportunity to contribute.

Luke Bross



405.642.7070





212 Flores Ave.
Laredo, TX 78040

April 16, 2026

[REDACTED]
Railroad Commission of Texas
1701 N. Congress
Austin, Texas 78701

Dear [REDACTED]

Thank you for your attention to Commission Shift's input on the FY 2027 Oil and Gas Monitoring and Enforcement Plan. Collecting stakeholder feedback is essential to Railroad Commission of Texas' mission, which includes stewarding natural resources and the environment, and protecting personal and community safety. With this in mind, please consider incorporating the following Action Items into the FY 2027 Oil and Gas Monitoring and Enforcement Plan.

[Goal 1: Accurately demonstrate the Commission's oil and gas monitoring and enforcement activities.](#)

[Action Item 1: Conduct, track, and report RRC witnessing of well plugging and testing](#)

[Action Item 2: Demonstrate waste prevention](#)

[Action Item 3: Collect and publish more information on spills and leaks](#)

[Action Item 4: Enhance reporting of complaints, inspections, and violations](#)

[Goal 2: Strategically use the oil and gas monitoring and enforcement resources of the Commission to ensure public safety and protect the environment.](#)

[Action Item 1: Ensure that facility inspections are thorough and systematic](#)

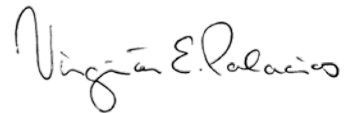
[Action Item 2: Scrutinize well transfers from barred operators](#)

[Action Item 3: Expand public outreach on carbon dioxide injection](#)

[Action Item 4: Respond promptly to leaks and issue enforcement actions in a timely manner](#)

We greatly appreciate your attention to our comments on past Monitoring and Enforcement Plans, and your incorporation of our suggestions to those plans. Thank you for taking the time to carefully review and consider our recommendations.

Sincerely,

A handwritten signature in black ink that reads "Virginia E. Palacios". The signature is written in a cursive style with a large initial "V".

Virginia E. Palacios
Executive Director

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

Action Item 1: Conduct, track, and report RRC witnessing of well plugging and testing

RRC should witness more plugging operations and tests, and demonstrate that it does so by tracking and reporting such data. Track when RRC staff witness plugging operations, H-5 pressure tests, and H-15 fluid level or mechanical integrity tests and report the number of witnessed tests out of the total number of tests operators report each year. Tracking and reporting the percentage of these activities that are witnessed gives the public and the legislature a sense of whether more RRC staff are needed to improve public safety and reduce fraudulent plugging and testing.

Having RRC staff witness well plugging is very important because some landowners report that previously plugged wells were not correctly plugged. Additionally, some landowners have reported evidence that the H-5 and H-15 tests operators submitted were fraudulent. Proper plugging and well testing are necessary to protect groundwater. Although Commission Shift has heard anecdotes of the percentage of well plugging and testing that the RRC witnesses, we are not aware that the RRC tracks this data systematically.

Action Item 2: Demonstrate waste prevention

Demonstrate that enforcement of the RRC flaring rule is preventing waste. Commission Shift research has documented that the RRC approves almost all flaring rule exception requests (permits), does not enforce permit limits, and is on track to allow more flaring than ever before this decade. The RRC has a statutory duty to prevent waste that it is either not meeting or is not demonstrating.

RRC should deny flaring permits more often

RRC denied only 32 flaring permits from May 2021 through December 2022.¹ According to Commission Shift research, "For 20 of the 32 denied permits, the Railroad Commission

¹ Andrew Wheat, "Permission Granted: Texas Oil and Gas Regulators on Track to Allow More Flaring Waste Than Ever," Commission Shift, September 2024. p. 23
<https://commissionshift.org/news/permission-granted-new-report-on-flaring-reveals-texas-oil-and-gas-regulators-on-track-to-allow-more-flaring-waste-than-ever/>

granted the same operator another flaring permit for the very same property before the end of the year in which the denial occurred.” When rule exceptions are too easy to get, the exception becomes the rule. RRC should use its monitoring and enforcement resources to provide quarterly reports of the total number of flaring permits approved, denied, and extended. Flaring enforcement staff should deny flaring permits more often, so that flaring becomes the exception it was meant to be to prevent waste and protect public health.

Verify that lease numbers are on flaring permits

Commission Shift’s research found that only 23% of the flaring permits issued in four South Texas counties (Dimmit, La Salle, McMullen, and Webb) had lease numbers that matched operators’ production reports.² The Commission should verify that lease numbers are included on all flaring permits it issues. RRC cannot verify compliance with flaring permit limits unless it can match a lease’s reported disposition of gas with the lease number on the permit.



RRC should enforce permit limits

The agency needs to develop a procedure to detect when operators vent or flare without a permit, or exceed their permit volume or duration limits, and issue violations accordingly. This could be done with a data analysis procedure run routinely.

From August 2015 to December 2022, the agency issued 798 flaring violations.³ Two-thirds of these violations involved flaring without a permit, yet the agency did not categorize any of these as “major violations.” The definition of “major violation” includes “deliberate disregard of Commission rules and regulations.”⁴ The remaining violations were for venting

² Lyke, B and Wheat, A. March 2025. “Comparing Railroad Commission of Texas Flaring Permit Volumes with Satellite Observations and Company-Reported Data” Commission Shift. p. 5. <https://commissionshift.org/resources/reports/#flaring>

³ Wheat. September 2024. p. 23.

⁴ Railroad Commission of Texas. June 17, 2025. FY 2026 Oil & Gas Monitoring and Enforcement Plan.

without the appropriate separation and flaring equipment, generally related to hydrogen sulfide.

Commission Shift's research sample in four south Texas Counties found that 5,085 leases tied to 51 operators reported flaring and venting volumes even though they did not have a permit.⁵ Three operators were responsible for releasing 15% of the volume, or nearly 900 million cubic feet (MMcf) of gas.

In the four counties, seven out of 65 leases in 2022 reported gas releases that exceeded their permitted volumes.⁶ This figure is small because the RRC typically allows operators to vent and flare volumes of gas that are four to five times higher than what the operators actually need. Still, the agency should have a data analysis procedure set up to automatically detect when operators are exceeding the volumes allowed in their permits.

Importantly, a recent analysis from RMI and Purvis Advisors found that 40% of oil wells report no venting or flaring, a physical impossibility.⁷ Consistent with Commission Shift's findings, the study estimates that operators wasted 3 – 4.5 times more gas than they reported.

RRC should reduce the number and volume of releases it permits

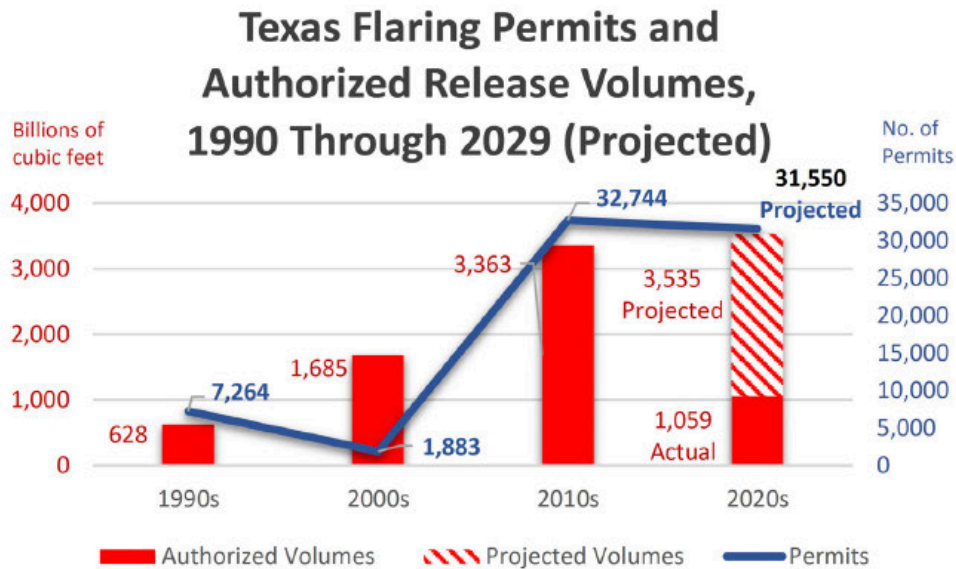
The average flaring permit issued by the RRC in 2022 authorized lower release volumes than in prior years. However, the high number of permits the agency issues puts RRC on track to authorize a higher volume of flaring in this decade than ever before.⁸

⁵ Lyke and Wheat. March 2025. p. 5.

⁶ Lyke and Wheat. March 2025. p. 6.

⁷ Purvis, Dwayne, Kevin Gauthier, Deborah Gordon, Carmela Chaney, Lauren Schmeisser, and Cayla Calderwood. 2026. *Drilling Down on Methane Loss*. RMI and Purvis Advisors. <https://rmi.org/drilling-down-on-methane-loss/>.

⁸ Wheat, A. September 2024. p. 1 real-timeThe leaks at orphaned wells and include an estimate of cleanup costs leaks at orphaned wells and include an estimate of cleanup costs 4



Action Item 3: Collect and publish more information on spills and leaks

Railroad Commission publishes a compilation of data found in [H-8 Loss Reports](#) on an annual basis. This database should be available with real-time updates.

Operators have left the facility description on Form H-8 blank in many cases and have not provided adequate remarks about where the spills occurred, or they provided spill volumes in the comments instead of the correct section on the form. RRC needs to follow up with operators to complete these forms or issue violations and penalties for incomplete forms. RRC should visit spill sites and collect soil and groundwater characterization samples before and after cleanup. Additionally, the RRC needs to ensure each and every leak in reportable quantities is reported.

In a state the size of Texas, with 278,629 active producing wells as of December 31, 2025, it is apparent that not all spills are reported, if only 273 incidents are reported for the entire year. The RRC H-8 Loss Report, which should track all crude oil, gas well liquids, or associated products like produced water, indicates a summary total of 37,349 barrels spilled, with 15,002 barrels recovered, and 22,347 barrels unrecovered for all crude, produced water, gas well liquids, and combined fluid totals reported, lube oil, and oil based mud.

The RRC H-8 report does not record a single leak for midstream operations, and appears to offer no attempt to estimate volumes for known high-profile leaking wells, such as recent blowouts,⁹ or the leak for which the Commission is suing the operator for \$7 Million in recovery fees, largely to cover hauling costs for the multiple trunk volumes of water coming from the well.¹⁰ There are so many known emergency wells that the legislature has designated \$100 million in response and remediation costs.

This database does not appear to track spills associated with orphaned wells under the RRC's care. RRC inspectors should also file their own spill reports when they respond to reports of leaks on orphaned wells, and should include an estimate of the actual cost of cleanup in a searchable database.

Comparatively, New Mexico, which had approximately 49,200 active oil and gas wells as of January 2026, documented significantly more material losses even though they have a well count that is approximately 20% the size of Texas'.¹¹ New Mexico OCD provides a searchable database to track spill materials, spill causes, spill sources, and whether spills will or are expected to reach watercourses or impact groundwater.¹² The database also allows spills to be filtered by operator or facility, by location, and provides latitude and longitude information, as well as impacted townships. In 2025, New Mexico recorded 932 produced water spills, with 163,061 barrels spilled and 104,071 barrels recovered, for a total of 75,870 barrels unrecovered. They also recorded 393 crude oil spills with a total of 16,577 barrels spilled, 10,057 barrels recovered, and 6,520 barrels unrecovered. They also track spills, each with its own respective total spill volumes, of motor oil, diesel, condensate, hydrogen sulfide, drilling mud fluids, gelled brine (fracturing fluids), flared natural gas, and more.

⁹ Martinez, C. N. R., Alejandra. (2024, October 10). "Should we be worried?": Another well blowout in West Texas has a town smelling of rotten eggs. *The Texas Tribune*.

<https://www.texastribune.org/2024/10/10/west-texas-well-blowout-oil-gas-railroad-commission/>

¹⁰ \$7M Texas oil well blowout sparks unique fight with Houston company. (n.d.). Retrieved April 13, 2026, from

<https://www.houstonchronicle.com/business/energy/article/railroad-commission-waterbridge-toxic-well-blowout-21955215.php>

¹¹ ShaleXP. (n.d.). *New Mexico Oil and Gas Data Summary*. Retrieved April 13, 2026, from

<https://www.shalexp.com/new-mexico>

¹² New Mexico Energy, Minerals, and Natural Resources. (n.d.). *OCD Permitting—Spills*. OCD Permitting Spill Search. Retrieved April 13, 2026, from

<https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/data/spills/Spills.aspx>

Even a decade ago, the RRC better documented spills and leaks, with a total of 1595 reported incidents. RRC must set the expectation that each and every leak of reportable quantities is reported. Importantly, the RRC should follow the lead of New Mexico and have the form indicate if the spill has reached watercourse or impacted ground water.

Action Item 4: Enhance reporting of complaints, inspections, and violations

Improve the public complaints database

RRC currently maintains a database of inspections and violations, but it does not link those to complaints. RRC should publish a database of complaints, linked to the relevant facility, including a description of the complaint, and the facility's history of violations, as does the Texas Commission on Environmental Quality (TCEQ).¹³ Notably, the TCEQ's WACI Tracker includes the following features, among others:

- Ability to search by one attribute, such as County, returning a full list of complaints applicable to that attribute.
- Narrative descriptions of the complaint received.
- Whether the complaint is open or closed, and the priority of the complaint
- Investigation data and a list of violations associated with the complaint and investigation

Map rule section changes for waste management

Additionally, the commission continues to issue violations for groundwater protection and waste management rules in Chapter 3 that have since been moved to Chapter 4. It would be helpful for RRC to prepare a table mapping how these chapters compare to one another in the FY 2027 Monitoring and Enforcement Plan for the purposes of reporting the number of rule violations for each section. An update on the progress of implementing the new waste management rules would also be a helpful addition to the Plan.

Send a copy of complaints to the complainant

Please update the [General Complaint Form](#) so that submitters can receive an emailed copy of their complaint.

¹³ Texas Commission on Environmental Quality. Track Status of Complaints (WACI Tracker). Retrieved from: <https://www.tceq.texas.gov/compliance/complaints/waci>

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

Action Item 1: Ensure that facility inspections are thorough and systematic

The RRC's goal was to complete over 460,000 inspections at 88,000 facilities in 2025 with less than 200 inspectors. Simple math demonstrates that inspectors would likely have less than an hour for each inspection. This is not enough time to complete a rigorous inspection. RRC should explain what it counts as an inspection, and how it is that inspection times can be so short. If some inspections are simply paperwork inspections and not field inspections, the number of inspections in each category should be reported in the Annual Monitoring and Enforcement Plan.

The agency should develop processes to ensure that field inspectors are consistently and systematically checking all components at a facility for compliance. The RRC must communicate shortfalls in inspector capacity to the legislature. Many community members feel that inspecting wells on a 5-year cycle is insufficient. RRC should aim to conduct inspections more frequently.

Action Item 2: Scrutinize well transfers from barred operators

The commission should exercise additional scrutiny and use all discretion in the agency's power when considering well transfers to companies owned or controlled by family members of barred operators. If facilities are being transferred to family members in name only, barred operators may evade their duty to pay penalties or remediate pollution by illegally continuing to operate under a family member's name. The commission should do everything in its power to prevent this fraudulent activity.

Action Item 3: Expand public outreach on carbon dioxide injection

Continue to conduct public outreach in locations where Class VI carbon injection wells and pipelines are proposed, making sure to include local elected officials, and emergency responders. Education about carbon dioxide injection wells and pipelines is still needed. As a part of the RRC's outreach efforts, the agency should allow the public to subscribe to an email list to get more information about public educational events, permit activities, and safety information. RRC should develop training materials for the public to learn how to identify warning signs of CO₂ leaks from pipelines or subsurface plumes and how to respond.

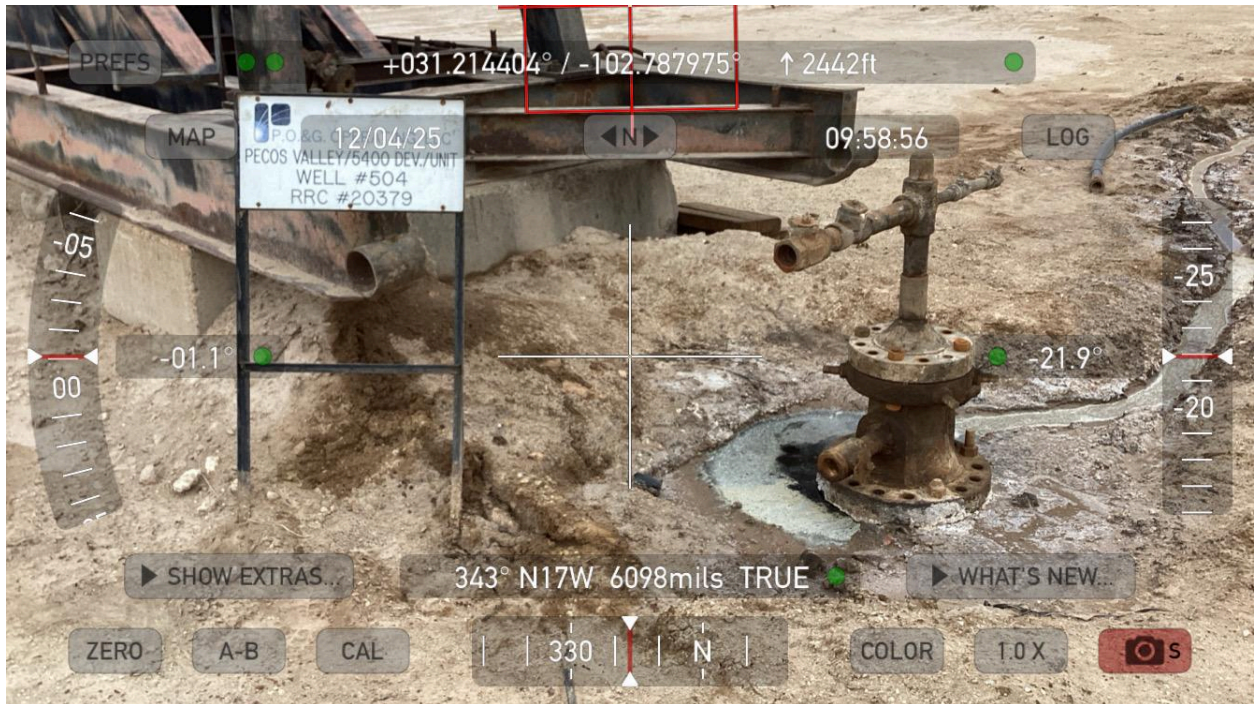
Action Item 4: Respond promptly to leaks and issue enforcement actions in a timely manner

The Railroad Commission gives operators too much time after receiving a Notice of Violation to come into compliance. The agency should use a consistent timeframe and not allow operators to continue to make excuses before escalating the violation to an enforcement action.

As an example, a December 4, 2025 complaint made by a Pecos County landowner was still not inspected by December 31, 2025 (see photos below). This eventually resulted in a notice of violation to P.O.&G. Operating LLC on January 7, 2026 (see attachment). This included soil contamination with chlorides affected by a produced water leak measuring "approximately 25 feet by 25 feet by an unknown depth" according to the RRC's investigation report. This spill was not reported on the 2025 H8 database. Another violation at the site indicated a subsurface produced water leak. Nearly four months after the initial complaint, an inspection conducted on March 30, 2026 revealed that the company had not come into compliance with any of its violations, yet the follow-up letter sent to the company was identical to the January 7th letter, but noted a date of reinspection scheduled for May 2026. The operator's failure to reach compliance after the first reinspection on March 30, 2026 should have resulted in an Enforcement Action, not a repeated reinspection.

Direct pollution of soil and subsurface leaks pose a threat to groundwater supplies and should be considered the highest-priority violations for RRC to respond to. RRC must clean

up the sites and issue enforcement actions and penalties as soon as possible in situations like these.





Attachments:

1. Letter from RRC to Schuyler Wight sent January 7, 2026
2. Letter from RRC to Schuyler Wight sent March 31, 2026
3. TCEQ Web Access to Complaint Information (WACI) Search Page
4. TCEQ WACI Example 1: Complaint 453863
5. TCEQ WACI Example 2: Complaint 431922

JIM WRIGHT, CHAIRMAN
CHRISTI CRADDICK, COMMISSIONER
WAYNE CHRISTIAN, COMMISSIONER



DANNY SORRELLS
DIRECTOR, OIL AND GAS DIVISION
JEFFERY MORGAN
DISTRICT DIRECTOR

RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

January 7, 2026

P.O.&G. Operating, LLC (631506)
5847 San Felipe St Ste 3200
Houston, TX 77057-3187

Initial Report

Wight, Schuyler Complaint No. 5707

Pecos Valley /5400 Dev./ Unit (08-20379) Lease

Well No.(s): 504

Pecos Valley (Devonian 5400)

Pecos County, Texas

Notification No. 487988

Inspection I.D.(s) 1575699

On December 4, 2025, the Railroad Commission of Texas District 08 Office was contacted by Schuyler Wight concerning operations on the subject lease. Mr. Wight's concern was a leaking well and pollution. On December 9, 2025, an inspection of the lease was conducted by Jimmy Hernandez with the Commission. The following was observed:

SWR 4.103(a): At well no. 504, oil and produced water pollution measuring approximately 25 feet by 25 feet by unknown depth. Water sample tested and chloride levels measured approximately 65,185 parts per million (ppm).

Any leaks or failed equipment must be repaired or replaced to prevent future pollution. In accordance with SWR 91 the operator is instructed to immediately pick up and properly dispose of all freestanding fluid, delineate, and remediate the pollution. It is recommended that the operator refer to the cleanup guidance posted on the commission internet website.

SWR 4.103(d): At well no. 504, unpermitted workover pit measuring approximately 15 feet by 5 feet by unknown depth with produced water.

No person may maintain or use any pit for storage of oil field fluids or for storage or disposal of oil and gas wastes without obtaining a permit to maintain or use the pit. Discontinue use and obtain a permit through the Environmental Permits department in Austin. Provide the pit registration number to the District office via midland@rrc.texas.gov. Attach this letter to the email.

SWR 13: Well no. 504 is leaking produced water from below the ground surface.
All well control equipment shall be in good working condition at all times.
Any failed equipment must be repaired or replaced. The well must be shut-in and secured to maintain control at all times.

Page 2
Wight, Schuyler Complaint No. 5707
January 7, 2026

Commission records indicate the operator is in the process of plugging the well. The plugging notification number is 476937.

A reinspection is scheduled for the week of January 26, 2026. A certified letter is being mailed to the operator this date. **Please direct any questions regarding this complaint to erik.hanson@rrc.texas.gov.**

Erik Hanson

Erik Hanson
Engineering Specialist
District 08

- Deputy Assistant District Director AA
- Assistant District Director RS
- District Director JM

Schuyler Wight
Box 433
Goldsmith, TX 79741



RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

March 31, 2026

P.O.&G. Operating, LLC (631506)
5847 San Felipe St Ste 3200
Houston, TX 77057-3187

Status Update

Wight, Schuyler Complaint No. 5707

Pecos Valley /5400 Dev./ Unit (08-20379) Lease

Well No.(s): 504

Pecos Valley (Devonian 5400)

Pecos County, Texas

Notification No. 487988

Inspection I.D.(s) 1632891

On March 30, 2026, an inspection of the lease was conducted by Jimmy Hernandez with the Commission. The following was observed:

SWR 4.103(a):At well no. 504, oil and produced water pollution measuring approximately 25 feet by 25 feet by unknown depth. Water sample tested and chloride levels measured approximately 65,185 parts per million (ppm).

Any leaks or failed equipment must be repaired or replaced to prevent future pollution. In accordance with SWR 91 the operator is instructed to immediately pick up and properly dispose of all freestanding fluid, delineate, and remediate the pollution. It is recommended that the operator refer to the cleanup guidance posted on the commission internet website.

SWR 4.103(d):At well no. 504, unregistered workover pit measuring approximately 15 feet by 5 feet by unknown depth with produced water.

No person may maintain or use any pit for storage of oil field fluids or for storage or disposal of oil and gas wastes without obtaining a permit to maintain or use the pit. Discontinue use and obtain a permit through the Environmental Permits department in Austin. Provide the pit registration number to the District office via midland@rrc.texas.gov. Attach this letter to the email.

SWR 13: Well no. 504 is leaking produced water from below the ground surface. **All well control equipment shall be in good working condition at all times. Any failed equipment must be repaired or replaced. The well must be shut-in and secured to maintain control at all times.**

Page 2

Wight, Schuyler Complaint No. 5707

March 31, 2026

Commission records indicate the operator is in the process of plugging the well. The plugging notification number is 476937.

A reinspection is scheduled for the week of May 4, 2026..**Please direct any questions regarding this complaint to brian.nelson@rrc.texas.gov.**

Brian Nelson

Brian Nelson
Engineering Specialist
District 08

- Deputy Assistant District Director AA
- Assistant District Director RS
- District Director JM

Schuyler Wight
Box 433
Goldsmith, TX 79741

Search for the Status of a Complaint

Fill in the information in the form below to search for the complaint(s) of interest to you. You may search by complaint tracking number or by a combination of criteria.

Search by Complaint Tracking Number

Complaint Tracking Number:

Search by Other Criteria

Please provide at least one search criteria to identify the complaint(s) of interest to you.

Date search limitations: A Date Range search may not return data for complaints received prior to November 25, 2002. Please use another search parameter to retrieve those complaints. Also, because of short delays in entering data, a complaint may not be entered until a few days after it is actually received. If you have trouble finding a complaint, try searching a wider date range.

Received Date Range: To (MM/DD/YYYY)

CN: (CN+9-digits)

Customer Name:

RN: (RN+9-digits)

Regulated Entity Name:

County:

- ALL--
- ANDERSON
- ANDREWS
- ANGELINA
- ARANSAS

Region:

Program:

Use Full Wildcard for name fields

TCEQ Web Access to Complaint Information

Complaint Status - Complaint 453863

Complaint Information

Complaint Tracking #: 453863
Complaint Received Date: 02/24/2026
Number Complaining: 1
Status: REFERRED
Status Date: 03/02/2026
Nature: MUNICIPAL NON-INDUSTRIAL
Frequency: PAST
Duration: ESTIMATED
Media: WASTE
Program: MUNICIPAL SOLID WASTE - HIGH LEVEL
Priority: Within 14 Calendar Days
Effect: PROPERTY
Receiving Water Body:
Regulated Entity: RN104048327 GENERIC INCIDENT ZIP CODE 78041
Customer: CN601065006 RAILROAD COMMISSION OF TEXAS
Location: LAREDO 78041
County: WEBB

Complaint Description, Comment and Action

Description: On February 24, 2026, the Laredo Regional Office received a complaint alleging approximately 7,000 barrels of oil field waste and drilling waste from Escondido Rig #37 were disposed at an unauthorized site located at 21142 US-83, Laredo, Texas.

Comment: This complaint has been referred to the Railroad Commission of Texas. Contact information for the agency is (361)242-3113.

Action Taken: On March 10, 2026, this matter was referred to the Railroad Commission of Texas (RRC).

Investigation Information

This incident was referred to another entity. No investigation report was generated.

[▲ Back to top](#)



SIERRA CLUB

LONE STAR CHAPTER

April 16, 2027

Oil and Gas Strategic Plan Comments

Oil and Gas Division

Railroad Commission of Texas

P.O. Box 12967

Austin, Texas 78711-2967

Submitted via public_comment@rrc.texas.gov.

Dear Commissioners and Commission staff:

The Lone Star Chapter of the Sierra Club is pleased to offer these brief comments in response to the Texas Railroad Commission's plans to, as required by law, to establish an annual plan to use oil and gas monitoring and enforcement resources strategically to ensure public safety and protect the environment. The State's Oil and Gas Monitoring and Enforcement Strategic Plan is a key public document that not only provides key data for past years, but also sets out strategies and goals for the upcoming year. The requirement was a key provision of the last sunset bill in 2017 which required development of the strategic plan and an opportunity for public input. We do acknowledge and appreciate additions made to the plan in recent years to include new programs related to the cleanup of damaged lands and other programs outside of the traditional monitoring and enforcement in the oil and gas production and well remediation and plugging divisions of the agency.

As stated in the announcement, for FY 2027, “the Commission seeks stakeholder feedback to inform the development of action items under two established goals that will address the full scope of oil and gas monitoring and enforcement activities:

Goal 1: Accurately demonstrate the Commission’s oil and gas monitoring and enforcement activities

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

We would note as we have in previous years, that this enforcement plan is limited to oil and gas activities (including well plugging) but the Commission should consider going beyond this narrow scope and also consider publishing an annual monitoring and enforcement plan for pipelines and pipeline safety, even though there does not appear to be a statutory requirement to do so.

We are in agreement with the two basic goals of this plan, “to accurately demonstrate the Commission’s oil and gas monitoring and enforcement activities;” and “to strategically use the oil and gas monitoring and enforcement resources of the Commission to ensure public safety and environmental protection.” We do believe that the annual report should continue to outline an inspector’s responsibilities, disseminate data related to revenue fees and flaring data, and especially the attention to orphan wells including federal funding. Our understanding is that there is still federal funding available under the Bipartisan Infrastructure Act for Texas that has not been rescinded and ensuring that the 2027 Plan includes measures on oil plugging and remediation related to these aspects are important. We think that separately reporting goals and responses related to federal funding is important.

We offer the following comments to identify areas in which the monitoring and enforcement goals could be better met.

I. The Railroad Commission should set aggressive goals for the number of inspections conducted during the year.

The Railroad Commission (“RRC”) reports in its previous *Annual Oil and Gas Division Monitoring and Enforcement Plan for the 2026 Fiscal Year* (“draft plan”) that, “The Commission anticipates that it will perform 425,000 inspections during fiscal year 2026. This number represents the total number of oil and gas well and facility inspections performed by District Office staff and documented by an inspection report.”

This is a significant improvement over totals during the early 2020s, and shows that the investment made by the legislature is paying off in higher levels of inspections. We hope the Commission will commit to a similar level in 2027 with the goal of inspecting onshore wells and facilities at least once every two years, or if possible, every single year. With the addition of new technologies, like the drone usage discussed in previous reports, and the potential for more federal money from the Bipartisan Infrastructure Bill, more inspections should be able to occur annually. It would be useful in the report to detail how many inspectors are actually currently in employment at the agency in addition to providing information on how many could be employed by the agency to the extent there are positions not filled.

II. The Railroad Commission should provide more disaggregated data available to the public, including data on major violations, comments, and flaring.

More detailed enforcement data is available and should be made available both in the *Annual Monitoring and Enforcement Plan* and available online to the public. Action by the legislature as part of SB 1 continues to require some quarterly reporting, and the RRC should assure that both aggregated and disaggregated data is included in the *FY 2027 Annual Oil and Gas Division Monitoring and Enforcement Plan*.

The plan should provide sufficient information on violations that occurred the previous year nor in the preceding years. For example, the plan should clearly identify any repeat major violations during previous fiscal years. We would suggest that the Commission should provide at least seven years of data on repeat violations so stakeholders can see whether enforcement efforts are occurring.

The plan should also include an appendix on major violations. The Commission has previously defined a Major Violation to be one in which there is “a safety or pollution related violation that causes a significant impact to public safety and/or the environment, is accompanied by conditions that indicate a significant impact to public safety and/or the environment is imminent, or is the result of deliberate disregard of Commission rules and regulations related to public safety or environmental protection.” Given the severity of what is considered a major violation (e.g., drilling a well without a permit, surface management of waste without a permit, operation of a disposal or fluid injection well without a permit, etc.), comprehensive data should be provided to the public on repeated major violations within the past seven years, rather than just the preceding year. As required by the Texas Natural Resources Code, the Commission is required to show the oil and gas monitoring and enforcement activities over time. However, plans from previous years, only show monitoring and enforcement data for the previous fiscal year, making comparisons difficult. Having a chart showing year to year enforcement data would be useful for the public and the Legislature. We would also note the report does not have any information on severance actions taken.

The plan should also continue to include detailed information on complaints and the complaint resolution process. Still, in addition to complaint data, the report should state total penalties levied per violation and violation type, and repeat violations going back seven years. Previous plans only include the number of oil and gas complaints received and the number of oil and gas complaints resolved within the last year, which in 2026 was between 400 and 500. The RRC Complaint webpage is also similarly lacking in information. Unlike the TCEQ, which logs complaints and publishes them anonymously, the RRC handles complaints at the field office level. The appendix does outline the complaint procedures, but little actual information or data within the draft plan is focused on complaints. With twelve oil & gas office locations throughout the state and no online database of complaints available to the public, the complaint process lacks transparency. The RRC needs to include more detailed complaint data within the draft plan at a minimum, including complaint totals per district, number of formal and informal complaints, and information on complaint resolution.

Finally, the RRC should consider updating and improving inspections and policy around venting and flaring and provide more information in the enforcement report itself. Still, studies indicated that trillions of cubic feet of natural gas in the Texas Permian Basin has been flared since 2013. A recent report commissioned by the Environmental Defense Fund indicates that it is likely that flaring in recent years is actually twice what the EPA was projecting, due largely to “superpollution” events. While the RRC has taken steps over the last few years to better regulate flaring and measure the amount of flaring, those steps have not been incorporated into the goals and data provided in the strategic plan. The RRC should include data outlining monitoring and enforcement strategy for flaring within Texas, as well as further goals and actions that the Commission will undertake to regulate and reduce flaring.

III. The Railroad Commission should include plans to update the minimum penalties for violations.

In addition to more comprehensive data, the draft plan should encourage the Commission to review and update the RRC’s penalty matrix, and other aspects of the RRC’s Statewide Rule 107, Penalty Guidelines for Oil and Gas Violations. With regards to penalties, the RRC should increase its penalty matrix so that fines and penalties incentivize polluters to update and maintain their facilities. For many years, the Sierra Club has called on the legislature to raise caps on administrative penalties, but even though the Legislature has failed to take action, that does not prevent the Commission from updating penalty policy within existing statutory limits.

Previous plans have outlined the number of violations during the previous fiscal year, per rule by subsection. From reviewing the high number of violations related to prohibited disposal methods into watercourses and drainage ways, failure to plug, and to report the location and existence of infrastructure, it seems obvious that penalties are too low to deter violations. Simply put, the Commission's penalties for pollution violations are far too small to ensure compliance and deterrence of future lawbreakers. Small fines for operating without a permit, for example, means it becomes part of the cost of business for oil and gas companies, and it is time to revise the level of fines both at the Commission, and at the Texas Legislature, which should raise the maximum penalties—last adjusted in 1983 — from \$10,000 to \$25,000.

Legislation filed in 2025 has sought to address this issue but did not move out of committee. We call on the RRC to take similar steps to those outlined in the legislation to increase the minimum level of administrative penalties that may be imposed by the RRC for various permit violations. The Commission should address this as part of this annual report, and set a goal to review its penalty matrix and consider updates through a public process.

IV. The Railroad Commission should provide more comprehensive outreach to Limited English Proficiency populations.

The upcoming plan and public input from the Texas Railroad Commission needs to address the existence and needs of Limited English Proficiency (LEP) populations within Texas. A Limited English Proficient (LEP) individual is someone who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. Other agencies within Texas, like the Texas Commission on Environmental Quality, include alternate language resources for LEP individuals including translated regulatory guidance publications, translated webpages, and guidance on how to submit complaints, problems, and participate in the environmental permitting process.

This is particularly important because Texas has an LEP population of 14 percent. Some regions of the state directly impacted by oil and natural gas extraction, such as the counties in the Eagle Ford shale region of South Texas, have significantly higher LEP populations, with percentages as high as 36 percent. Providing this plan in an accessible format, such as offering the plan and other RRC data in Spanish, would enable LEP individuals an opportunity to stay informed of RRC enforcement and monitoring strategy, as well as create an opportunity for more meaningful engagement.

V. The Plan should include a section on wells plugging opportunities from federal funds

While it is ultimately the legislature that approves funding for the agency, in recent years, funding has been allocated from the DOI through the bipartisan infrastructure bill. We hope that the plan will include a separate section on this funding, and the enforcement and monitoring goals related to the federal programs. We do very much appreciate the Commission

including information on its website of this federal funding but it should be incorporated in the FY 2027 plan.

VI. The Railroad Commission should provide more stakeholder outreach opportunities.

The Sierra Club appreciates this opportunity and recognizes that the Commission is seeking input before publication of the plan. More opportunities for stakeholder engagement, both with regard to this plan as well as for general matters, should be provided by the RRC. Educational opportunities for industry operators about Commission rules and processes, including presentations at industry events and regulatory forums are of course necessary, but the stakeholder participation process is almost entirely digital. We expect there to be an opportunity to also comment upon the publication of the draft plan, as required by the 85th Legislature House Bill 1818. Additional forums and meetings should be directed towards stakeholders impacted by the oil and gas industry, including educational opportunities on how to file complaints, the role of the Railroad Commission as a regulatory authority in Texas, and further opportunities for stakeholder engagement.

Furthermore, the RRC should provide information on how the draft plan is created and public comments considered and implemented into the annual plan. As required by HB 1818, the Oil and Gas Division Monitoring and Enforcement Strategic Plan requires the RRC to “seek input from stakeholders when developing each annual plan.” However, there is no publicly available information that outlines how the RRC incorporates stakeholder comments, suggestions, and critiques from the draft plan into the final plan. Given that the window between the deadline for comments, April 16th, and the date that the RRC must publish the final plan, July 1st, is approximately three months, the RRC should outline how comments from stakeholders will be incorporated into the final plan. Additionally, the RRC should make available the comments submitted today, as well as any comments submitted on the draft plan or outline

the content of submitted comments, rather than simply listing the number of comments received within the final plan.

VII. The Railroad Commission should further implement new technology when monitoring wells and facilities.

The Sierra Club is supportive of the action items that implement new technology, such as drones, to assess leaks and spills. However, this plan fails to mention that strategy, even though it was part of an important effort in 2021 that led to some initial efforts to use drone technology to find leaking infrastructure.

Given that this plan was created due to a directive by the Texas Legislature “to assess the most effective use of [the Railroad Commission’s] limited resources,” this technology is an ideal method of increasing effective monitoring at large or hard to reach locations. The use of drones for visual inspections of leaks and spills, as well as evaluating emergency situations, should be further implemented within the RRC monitoring program. However, more data should be collected and provided to the public in the annual draft plan on this type of inspection method, including number and type of site inspected by drone, percent of drone inspections resulting in violations, and data collected via drone versus on-site inspector collection. If the Commission failed to conduct such inspections in recent years, then it should state so, and what plans it has in 2027 to use this technology. We do understand that attempts to put specific authorization for the use of drones in oil and gas inspections has failed to be approved at the legislature, but we still think the issues should be addressed.

VIII. Produced Water Issues Should Be Addressed

The Legislature provided an additional \$7.5 million and employees to design a water management and data tool. While this is not necessarily related to enforcement and inspection we believe it may make sense to include as a goal the more accurate assessment of water management, and the enforcement thereof as we have had some high profile cases where

produced water has been illegally dumped on Texas lands with no authorization from the Commission or TCEQ.

In addition, through passage of SB 1145, authorization for land application of produced water outside the oil field is switching from the Commission to the TCEQ but the plan could address how this transition will occur.

The Plan should address these aspects.

IX. Conclusion

We thank you for the opportunity to submit comments on the Railroad Commission plans to publish an *Annual Oil and Gas Division Monitoring and Enforcement Plan for Fiscal Year 2027*, and welcome the opportunity to discuss these comments, as well as participate in public engagement opportunities, such as public hearings focused on this plan. Please feel free to contact the Sierra Club with any questions.

Respectfully submitted April 16, 2026.

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