



RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

Oxy Low Carbon Ventures (OLCV) Brown Pelican CO2 Sequestration Project in Ector County, Texas – Response to Public Comments Received Regarding Amended Draft Permit

Starting on June 17th, for three consecutive weeks the Texas Railroad Commission (RRC) published notices of the Oxy Low Carbon Ventures (OLCV) Brown Pelican Class VI UIC Facility draft amended permit in *The Odessa American* newspaper, soliciting comments from interested and affected parties. The public comment period began on June 17, 2026, and closed at 11:59 p.m. CST on July 31, 2026. The public was able to submit comments online on the RRC [website](#), via electronic mail to 'SIP@rrc.texas.gov', and by United States Mail at: Railroad Commission of Texas, Oil and Gas Division, Technical Permitting, Attn: Special Injection Permits Unit, P. O Box 12967, Austin, Texas 78711-2967.

In response to the public notices published, the RRC received comments from a total of 195 entities that did not support the project. There were 190 copies of an identical form letter opposing the amended permit for the OLCV Brown Pelican Class VI UIC Project; the RRC will respond to these comments as a group. Additionally, below the RRC responds individually to the comments from five (5) entities that were not supportive.

Comments and Responses

1. Comment received from 190 people between 07/22/26 thru 07/31/26 responded to as a group:

Dear Rob Castillo,

I am writing to formally submit my comments regarding the Oxy Low Carbon Ventures (OLCV) Brown Pelican Class VI permit application, tracking number 59502. The Railroad Commission must consider the safety risks and threats to drinkable sources of water this facility poses to the surrounding environment and to communities across Texas, and exercise their ability to deny this permit in its current form. Please consider the following suggestions to strengthen environmental protections, and I look forward to your response:

Site Characterization.

- Include neighboring aquifers in the monitoring program. At the injection site, the Pecos Valley and Santa Rosa Member of the Dockum Aquifer are considered underground sources of drinking water (USDWs). The Texas Aquifer Study in 2016 shows that the Dockum Aquifer, Edwards Trinity Aquifer, and the Ogallala Aquifer all communicate with each other.

Area of Review.

- Improve the geologic model by running more scenarios than the minimum and maximum cases, using site specific petrophysical data, and including local faults and natural fractures. The injection site is adjacent to active oil producing fields, public water wells, a place of worship, and a cemetery. The surrounding wells can act as migration pathways for the CO₂ into drinking water sources and/or the surface, and need to be completely plugged with CO₂-resistant cement if abandoned.

Well Construction.

- Include CO₂ Capture Technology as part of the permit application. The capturing, filtering, transporting, and injection of CO₂ is a multiple-step process where at each step, there is a potential for mistakes, operational losses, and failure. Capturing and filtering equipment requires large volumes of freshwater and produces hazardous waste that is currently not regulated under this permit or any other permit.

Testing & Monitoring.

- CO₂ stays in solution within the injection zone, meaning that after injection stops, the CO₂ will be in constant contact with the wellbore in perpetuity. OLCV must continue monitoring the wellbore for as long as people are utilizing the surrounding USDWs.

Post Injection Site Care.

- Update state rules to account for Post Injection Site Care. Current state rule 16 (TAC §5.206(k)(2)) is subjective in deciding when a site no longer poses an endangerment to the USDW, and the regulation should include specific data points or metrics to pinpoint this decision.

Emergency and Remedial Response Plan (ERR).

- CO₂ is a colorless, odorless gas that is denser than air, meaning it can displace oxygen leading to oxygen deprivation and an inability for first responders to access the leakage site.

- Require the permit applicant to have emergency and remedial response personnel training that is maintained on the same schedule as other safety training and personal protective equipment on-site for a CO₂ leak to the atmosphere/aquifer. This training needs to extend to first responders and be tracked by the RRC Special Injection Program Unit.

Financial Responsibility.

- Require the un-redacted inclusion of the financial assurance appendices and the financial assurance cost estimates on the permit application. Additionally, OLCV needs to provide evidence of market comparisons of the costs and inflation to ensure they are accurately predicting their financial responsibility.

Thank you for your attention. I hope these suggestions are considered in your decision

Response

Site Characterization:

OLCV conducted a rigorous characterization of the hydrogeology in their project area, and thoroughly documented the occurrence, 3D spatial distribution in the subsurface, and the geologic characteristics of all underground sources of drinking water (USDWs) in and around the project area. The Groundwater Advisory Unit of the Texas RRC confirmed the depth data for USDWs.

OLCV is required to monitor the freshwater aquifer immediately above the confining layer. Monitoring of this aquifer will provide the earliest indication in the event of a loss of containment of the CO₂ storage reservoir.

All Class VI UIC permit applicants are required to conduct site characterization that includes an assessment of the geologic, hydrogeologic, geochemical, and geomechanical properties of the proposed geologic storage site to ensure that Class VI wells are located in suitable formations for geologic storage of CO₂. Subsurface site characterization includes using petrophysical logging to collect information on porosity, fluid saturations, mineralogy, formation geochemistry, geomechanical properties, etc., and calibrating these data using actual laboratory measurements of these parameters in sidewall and whole cores. Injectivity testing is conducted, and laboratory permeability analysis of sidewall and whole core samples are used to establish a porosity-permeability transformation function. Geomechanical properties like Young's Modulus and Poisson's Ratio are collected (for example using dipole sonic petrophysical logging tools), to understand preexisting stress conditions in the storage reservoir. Also, Step-Rate Tests were conducted to establish a quantifiable fracture pressure for the injection reservoir, which is then used to calculate a maximum allowable (not to exceed) injection pressure, which cannot exceed 90 percent of the determined fracture pressure. The RRC will include this limitation as an enforceable permit condition. Class VI injection operations are not allowed to create fractures in the storage reservoir or overlying confining layers.

Area of Review:

OLCV explored a range of scenarios in their modeling and simulation runs. After collecting site-specific subsurface geologic and petrophysical site characterization data for their proposed Class VI UIC project area, OLCV constructed several geocellular models representing a probabilistic range of uncertainties of key injection reservoir

parameters, and providing a sensitivity analysis of these parameters, using input data taken from actual site characterization parameters for their specific project site.

The applicant conducted computational multiphase fluid flow simulations of the proposed San Andres injection reservoir. Applicants typically show a probability distribution of predicted fluid flow behavior of the injected supercritical CO₂ plume within the injection reservoir and the predicted associated pressure response of fluids in this injection reservoir over the duration of the CO₂ injection period and post-injection monitoring period (until the CO₂ plume and pressure response is predicted to have become stabilized, i.e. no longer growing).

The resulting modeled pressure response and fluid flow simulations were used to calculate a minimum threshold reservoir pressure (often referred to in EPA guidance documents as the “critical pressure”), below which there is insufficient pressure in the injection reservoir to push fluids vertically upward into the nearest/deepest overlying USDW (defined as formation water having a salinity of 10,000 milligrams per liter (mg/L) of Total Dissolved Solids). Shown in map view looking down from above, the maximum areal extent of this minimum threshold pressure is drawn as a pressure isobar (contour line) surrounding the injector well or wells. The Area of Review (AoR) is the subsurface three-dimensional extent of the CO₂ stream plume and the associated pressure front, as well as the overlying formations, any underground sources of drinking water overlying an injection zone along with any intervening formations, and the surface area above that delineated region.

All wellbores penetrating the top of the injection reservoir within the project AoR (which might allow vertical fluid communication), including both active and plugged and abandoned (P&A’ed) oil and gas wells, were located by the applicant. These wells (2) were properly plugged and abandoned using premium CRA bridge plugs (a type of downhole mechanical isolation tool used in oil and gas completions to temporarily seal off a section of the wellbore, allowing operations in one zone while blocking flow from another) and premium cement formulated specifically for use in CO₂ applications.

For any Class VI UIC project, an applicant must identify the location, orientation, and properties of known or suspected transmissive faults or fractures that may transect the confining zone within the AOR and a determination that such faults or fractures would not compromise containment., The applicant must characterize the confining zone(s) including a demonstration that it is free of transmissive faults, fractures, and micro-fractures and of appropriate thickness, permeability, and integrity to impede fluid (e.g., CO₂, formation fluids) movement. This is most often accomplished by using high-resolution three-dimensional seismic data to locate and map the three-dimensional configuration of these geologic features in the subsurface. If a fault or fracture zone is identified in an applicant’s AoR, the applicant must provide an assessment of the sealing capacity of the fault.

OLCV conducted a rigorous characterization of the hydrogeology in their project area, and thoroughly documented the occurrence, 3D spatial distribution in the subsurface, and the geologic characteristics of all freshwater aquifers (USDWs) in and around their project area. USDW depth data were confirmed independently by the Groundwater

Advisory Unit of the Texas RRC. No transmissive faults were found within the OLCV BRP AoR.

Class VI applicants, must provide a comprehensive project area map showing all human habitations, water wells, barns, roads, pipelines, schools, churches, cemeteries, etc. in and around their AoR.

Well Construction:

CO₂ capture technology, like the OLCV / 1PointFive Stratos Direct Air Capture (DAC) unit in Ector County, is not part of the RRC regulatory purview. The goal of the RRC's Class VI Underground Injection Control Program is to protect underground sources of drinking water (USDWs) from potential contamination from the geologic storage of CO₂ and to ensure that the injected CO₂ is contained within the permitted storage reservoir. The Texas Commission on Environmental Quality regulates air emissions to protect air quality.

Testing & Monitoring:

CO₂ mixed in the correct proportions with subsurface formation water can, in typically more distal areas around the fringe of an injected CO₂ plume, form carbonic acid which is corrosive to "regular" carbon steel well casing (for example carbon steel L-80), and may cause some dissolution of Ordinary Portland Cement (OPC) used to form a cement sheath around well casing that has been run into a wellbore during well construction during drilling. In addition, OPC used for well plugging and abandonment can also react to carbonic acid solution in the subsurface. Class VI UIC (carbon sequestration) wells are required to be constructed using corrosion resistant alloy (CRA) casing, typically having a much higher than normal chromium (Cr) content in the metallurgical alloy, and likewise are required to use specially formulated well cement and plugging cement that is non-reactive to carbonic acid / CO₂.

In addition, several mechanisms, including capillary trapping, dissolution, and mineralization, that trap CO₂ in deep geological formations, contribute to the long-term storage of the injected CO₂. Capillary trapping occurs when injected CO₂ is immobilized in the pore spaces of the rock due to capillary forces. The CO₂ becomes trapped as it encounters water in the formation, which prevents it from migrating upward. This is a primary method of ensuring that CO₂ remains contained within the geological formation. Dissolution is a process in which CO₂ dissolves into the saline water present in the rock formations. As the CO₂ dissolves, it reduces the pressure in the formation and can lead to increased stability of the stored CO₂. Mineralization is a trapping mechanism in which the injected CO₂ reacts with minerals in the geological formation to permanently form solid carbonate minerals. Mineralization can occur naturally over time or can be enhanced through specific geological conditions

OLCV is required to monitor the Brown Pelican site throughout the Post-Injection Site Care and Closure (PISC) period until they can demonstrate through substantial evidence, that the CO₂ plume and pressure front have stabilized in the subsurface, i.e., show that the CO₂ plume and pressure front have stopped expanding and has become

static, and that the geologic storage project will no longer pose a risk of endangerment to USDWs. This is required for all Class VI UIC projects in Texas.

Post Injection Site Care & Closure Plan:

Section 5.206(k)(2) pertains to Permit Conditions for Post Injection Site Care and Closure, is representative of Federal rules found in 40 CFR Subpart H, (i.e. [§ 146.84\(c\)\(1\)](#) and other sections). More specific requirements for the 'Post-injection storage facility care and closure plan' can be found in 16 TAC §5.203 (m), which details with more specificity the criteria for site closure documentation.

Section 5.203(m)(7) requires that the applicant include in its application consideration and documentation of:

- the results of computational modeling performed pursuant to delineation of the AOR;
- the predicted timeframe for pressure decline within the injection zone, and any other zones, such that formation fluids may not be forced into any USDWs, and/or the timeframe for pressure decline to preinjection pressures;
- the predicted rate of CO₂ plume migration within the injection zone, and the predicted timeframe for the stabilization of the CO₂ plume and associated pressure front;
- a description of the site-specific processes that will result in CO₂ trapping including immobilization by capillary trapping, dissolution, and mineralization at the site;
- the predicted rate of CO₂ trapping in the immobile capillary phase, dissolved phase, and/or mineral phase;
- the results of laboratory analyses, research studies, and/or field or site-specific studies to verify the required information;
- a characterization of the confining zone(s) including a demonstration that it is free of transmissive faults, fractures, and micro-fractures and of appropriate thickness, permeability, and integrity to impede fluid (e.g., CO₂, formation fluids) movement;
- the presence of potential conduits for fluid movement including planned injection wells and project monitoring wells associated with the proposed geologic storage project or any other projects in proximity to the predicted/modeled, final extent of the CO₂ plume and area of elevated pressure;
- a description of the well construction and an assessment of the quality of plugs of all abandoned wells within the AOR;
- the distance between the injection zone and the nearest USDWs above and/or below the injection zone; and
- any additional site-specific factors required by the director.

Section 5.206(k), relating to Permit conditions for post-injection storage facility care and closure, requires that, following cessation of injection, the operator must continue to conduct monitoring as specified in the approved plan until the director determines that the position of the CO₂ plume and pressure front are such that the geologic storage facility will not endanger USDWs. Prior to authorization for storage facility closure, the

operator must demonstrate to the director, based on monitoring, other site-specific data, and modeling that is reasonably consistent with site performance that no additional monitoring is needed to assure that the geologic storage facility will not endanger USDWs. The operator must demonstrate, based on the current understanding of the site, including monitoring data and/or modeling, all of the following:

- the estimated magnitude and extent of the facility footprint (the CO₂ plume and the area of elevated pressure);
- that there is no leakage of either CO₂ or displaced formation fluids that will endanger USDWs;
- that the injected or displaced fluids are not expected to migrate in the future in a manner that encounters a potential leakage pathway into USDWs;
- that the injection wells at the site completed into or through the injection zone or confining zone will be plugged and abandoned in accordance with these requirements; and
- any remaining facility monitoring wells will be properly plugged or are being managed by a person and in a manner approved by the director.

Emergency & Remedial Response Plan:

The rules require the applicant to develop and maintain an Emergency and Remedial Response Plan, which must account for the entire AoR. This plan must describe actions to be taken to address escape from the permitted injection interval or movement of the injection fluids or formation fluids that may cause an endangerment to underground sources of drinking water during construction, operation, closure, and post-closure periods. The plan must also include a safety plan that includes emergency response procedures; provisions to provide security against unauthorized activity; CO₂ release detection and prevention measures; instructions and procedures for alerting the general public and public safety personnel of the existence of an emergency; procedures for requesting assistance and for follow-up action to remove the public from an area of exposure; provisions for advance briefing of the public within the AOR on subjects such as the hazards and characteristics of CO₂; the manner in which the public will be notified of an emergency and steps to be taken in case of an emergency; and a description of the training and testing that will be provided to each employee at the storage facility on operational safety and emergency response procedures to the extent applicable to the employee's duties and responsibilities. This plan must be updated as necessary.

Financial Responsibility:

The applicant did submit un-redacted information regarding financial assurance to the RRC as required. However, Texas Government Code §552.110 provides exceptions to public disclosure under the Public Information Act (PIA) for:

1. Trade secrets — defined broadly to include all forms of business, scientific, technical, economic, or engineering information, such as formulas, designs, processes, financial data, or customer/supplier lists, if the owner has taken reasonable measures to keep it secret and it meets the economic value test.

2. Commercial or financial information where disclosure would cause substantial competitive harm.

The Office of the Attorney General for the state of Texas (OAG) plays a key role in enforcing public disclosure under the Public Information Act. Please see <https://www.texasattorneygeneral.gov/open-government/members-public/overview-public-information-act> for more information.

The purpose of financial responsibility is to ensure that there will be sufficient funds to fully cover specified costs. Because geologic storage projects occur over long time frames (i.e., decades), it is important to recognize that costs projected over extended periods are inexact. Uncertainty may exist for future prices. Price changes may be due to inflation, relative price changes, or changes in technology. For this reason, the Texas Class VI regulations require reevaluation of costs to account for changes in cost over time.

The financial assurance cost estimates for a Class VI permit application must be prepared and sealed by Professional Engineer licensed in Texas. The Professional Engineer who prepares the Financial Assurance Demonstration must consider market comparisons of the costs and inflation to ensure they are accurately predicting the financial responsibility covering four (4) areas of the Class VI UIC Project. The applicant must demonstrate financial responsibility for:

- 1) Corrective Action on Wells in the AoR: Corrective action on wells in the AoR presents some uncertainty in terms of when it will occur and how much it will cost because it will depend on ongoing and subsequent AoR reevaluations. Corrective action will most likely occur within a 20- to 30-year period.
- 2) Injection Well Plugging: Injection well plugging occurs later in a geologic storage project's lifecycle, and most likely will take place over a period of weeks, not years.
- 3) Post-Injection Site Care and Site Closure: Post-injection site care and closure occurs last in the geologic storage project's lifecycle, lasting for at least 50 years unless an alternative timeframe has been approved.
- 4) Emergency and Remedial Response: Emergency and remedial response events are uncertain in terms of if and when these events will occur, but they have the potential to occur over the entire course of the geologic storage project's lifecycle.

2. Comment Received from Joel Hamm on 07/24/26

I am writing to formally submit my comments and protest regarding the Oxy Low Carbon Ventures (OLCV) Brown Pelican Class VI permit application, tracking number 59502. The Railroad Commission must consider the safety risks and threats to drinkable sources of water this facility poses to the surrounding environment and to communities across Texas, and exercise their ability to deny this permit in its current form. There are many safety concerns and mineral rights concerns regarding this venture, but my main concern is that this is a scam and money grab by big oil companies and corporations. This does not create new wealth, nor does it benefit the environment. It is all tax payer money in the form of tax credits . As far as I know, all the money comes from government, our tax dollars. All for no benefit to anyone but big corporations. According to the CO2 Coalition there is no excess of CO2 in the atmosphere. There is much evidence that we do not have excess CO2. In fact more CO2 would be beneficial to plant growth such as crops. Please stop this scam on the American people.

Response

The primary objective of the Class VI UIC permitting process in Texas is consideration and prevention of any safety risks or threats to underground sources of drinking water, that any underground carbon sequestration facility might pose to the surrounding environment and to human communities.

Regarding your concerns about mineral rights, the RRC has no authority or jurisdiction over lease agreements, mineral rights, or royalty matters. Although the RRC lacks jurisdiction over these private legal matters, our agency does have some resources regarding mineral rights and royalties available to the public on our website found [here](#).

Additional links regarding Class VI permitting at the Federal and State level can be found below:

- EPA Class VI: <https://www.epa.gov/uic/class-vi-wells-used-geologic-sequestration-carbon-dioxide>
- RRC Class VI <https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/injection-storage-permits/co2-storage/>
- RRC Chapter 5: https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=5&interface=VIEW_TAC&part=1&title=16

3. Comment Received from Irina Kopponen on 07/22/26

My request is that the Texas Railroad Commission will ensure that requirements and best practices set up by EPA for Class VI Wells are followed for this Oxy Low Carbon Ventures (OLCV) project to ensure permanent containment.

Requirements include:

- 1) ensuring that injection is into a suitable formation that that will contain the CO2 permanently. Injecting into an actively producing oil and gas reservoir does not meet the requirements of a suitable formation for permanent sequestration.*
- 2) Ensuring proper well design including CO2 resistant materials of construction, such as CO2 resistant concrete and metallurgy that is corrosion resistant with CO2 and the other injected wastes.*
- 3) Ensuring monitoring throughout active life +50-year post-injection monitoring obligation. Active life + default 50 years post-injection care sounds like a long time, but it is not a long time for CCS and 50-year time horizon is almost nothing for geological time. Selecting minimum of 50 years makes sense only because 50 years is end of life for mechanical components that will require action to prevent failures. A shorter post-injection monitoring period is not acceptable as it will leave the next generation to clean up a mess that will by then be another unsurmountable environmental and financial challenge. RRC should ensure that permit application and permit clarifications are available to the public to show that the above requirements are met for Class VI well requirements.*

Response

Title 16, Part 1, Chapter 5 of the Texas Administrative Code lists the regulatory requirements for carbon sequestration in the State of Texas. One of the primary requirements for Texas being granted regulatory and enforcement primacy by the United States Environmental Protection Agency (EPA) in December 2025, was that the Texas' Class VI Program regulating carbon sequestration must be at least as stringent as the Federal regulations. EPA determined that Texas met that burden.

The federal rules at 40 CFR §146.93, relating to Post-Injection Site Care and site closure, require that the operator continue to conduct monitoring for at least 50 years following cessation of injection. However, the director may approve, in consultation with EPA, an alternative timeframe other than the 50-year default, if the operator can demonstrate during the permitting process that an alternative timeframe is appropriate and ensures non-endangerment of USDWs. The federal rules require that the demonstration be based on significant, site-specific data and information and contain substantial evidence that the project will no longer pose a risk of endangerment to USDWs at the end of the alternative post injection site care timeframe. Current Commission rules do not include a 50-year default post injection site care period. To meet the minimum federal requirements, §5.203(m) includes the data and information required to make a demonstration that an alternative timeframe is appropriate and

ensures non-endangerment of USDWs. If the monitoring period is performance-based (i.e., no endangerment of USDWs), a specific time frame is artificial. The subsection requires additional effort for each Class VI permit application, but would provide a more appropriate, site-specific post injection site care timeframe.

4. Comments Received from Litzy Chavana representing the Texas Carbon Capture Utilization Storage (CCUS) Community Advocacy Coalition on 07/30/26

Full comment from, Litzy Chavana representing the Texas Carbon Capture Utilization Storage (CCUS) Community Advocacy Coalition, attached here.

Response:

The RRC received a letter dated July 30, 2026, detailing a list of objections to the OLCV Brown Pelican Class VI UIC Permit from Litzy Chavana representing the Texas Carbon Capture Utilization Storage (CCUS) Community Advocacy Coalition and the Raices Collab Coalition.

The original OLCV Brown Pelican Class VI UIC Permit application was approved by the EPA on April 7th, 2025.

On October 16, 2024, the RRC published in the *Odessa American* Newspaper, a Notification to the Public of a Draft Class VI UIC Permit for the OLCV Brown Pelican carbon sequestration project. The RRC held a Public Meeting at the Odessa Marriott Hotel and Conference Center, 305 East 5th St., Odessa, Texas 79761 on November 19th, 2024, to receive additional public comments regarding the Draft Class VI UIC Permit for the OLCV Brown Pelican carbon sequestration project. In addition, the RRC held a virtual meeting on Wednesday, November 20th, 2024.

After responding to all of the Public Comments that were received regarding the Draft Class VI UIC Permit for the OLCV Brown Pelican carbon sequestration project in Ector County Texas, the RRC issued Class VI UIC Permit Number 55294. This Class VI UIC Permit became effective on October 16, 2025.

Subsequent to the approval of both Federal and State of Texas Class VI UIC permits, and based on newly obtained fracture pressure data, Oxy applied for an amendment to Permit 55294, requesting an increase in the maximum surface injection pressure (MSIP) from 1,100 psig to 2,342 psig an increase in rate from 600 to 1,040 metric tons per day for the 1CS well. An increase in the MSIP from 1,800 psig to 3,202 psig and a decrease in rate from 1,500 to 1,196 metric tons per day for the 2CS well. Lastly, an increase in the MSIP from 1,100 psig to 1,568 psig and an increase in rate from 600 to 676 metric tons per day for the 3CS well.

The comments dated July 30, 2026, address elements of the original Class VI UIC permit application submitted by OLCV and the draft permit prepared for that application, after extensive review by RRC technical staff. None of these comments were specific to

the proposed permit amendments. All other aspects of the Class VI UIC Permit Number 55294, have already been commented on by the public and responded to by the Director.

The latest opportunity for public comment which opened on June 17, 2026, and ended at 11:59 PM on July 31, 2026, pertains specifically to amending MSIP and rates for all three wells in the project in light of new fracture pressure data measured by OLCV in recent geomechanical testing. The proposed amendments to the operating conditions and parameters are the only differences in the amended Draft Permit.

Comment Received from Litzy Chavana on 07/30/26

Dear Commissioners,

*My name is Litzy Chavana, I'm the Chief Of Operations at The Raices Collab Project. I am writing to formally submit my comments regarding the Oxy Low Carbon Ventures (OLCV) Brown Pelican Class VI permit application, tracking number 59502. I respectfully urge The Railroad Commission to **oppose** the permit request for the three injection wells for geologic storage of carbon dioxide.*

I ask The Railroad Commission to consider the safety risks and threats to drinkable sources of water this facility poses to the surrounding environment and to communities across Texas, and exercise their ability to deny this permit in its current form. Please consider the following suggestions to strengthen environmental protections.

Site Characterization

At the injection site, the Pecos Valley and Santa Rosa Member of the Dockum Aquifer are considered underground sources of drinking water (USDWs). The Texas Aquifer Study in 2016 shows that the Dockum Aquifer, Edwards Trinity Aquifer, and the Ogallala Aquifer all communicate with each other. This will not only affect one aquifer. If contaminated, this will be an enormous threat to a network of aquifers and Texans drinking water.

Administrative

A 30-day comment period is not a sufficient amount of time to give community members a chance to thoroughly review all aspects of the proposed permits. I respectfully request that the RRC extend their comment periods to a minimum of 60 days to effectively receive meaningful public research and input.

*Texas is a large beautiful state. We must preserve and protect it's groundwater before it is too late. Thank you for considering my comments and hope that you consider my request to **deny** this permit application.*

Litzy Chavana

Chief Of Operations

The Raices Collab Project

Response

Please see the response above to comments from Litzy Chavana representing the Texas Carbon Capture Utilization Storage (CCUS) Community Advocacy Coalition and the Raices Collab Coalition.

Comments Received from Alexis Iwasiw of Commission Shift on 07/31/26

Full comment from, Alexis Iwasiw of Commission Shift, attached here.

Response

Please see the response above to comments from Litzy Chavana representing the Texas Carbon Capture Utilization Storage (CCUS) Community Advocacy Coalition and the Raices Collab Coalition.