From:	Julie Range
To:	Rules Coordinator
Cc:	Virginia Palacios
Subject:	Request for public hearings & comment period extension re: Amend §§3.15 and 3.58 re: Senate Bill 1150 (89th Legislative Session, 2025)
Date:	Friday, October 16, 2026 1:58:39 PM

CAUTION: This email originated from outside of the Railroad Commission of Texas. Do NOT click links or open attachments from unknown sources without first confirming the message is legitimate. If you believe this to be a malicious and/or phishing email, please contact the ITS Help Desk at 512-463-7229. Do not respond to or forward the email, click on any links or open any attachments without guidance from the Help Desk

Dear Rules Coordinator:

Commission Shift appreciates the opportunity to comment on changes to §§3.15 and 3.58. However, the current comment period length and lack of scheduled public hearings do not "give all interested persons a reasonable opportunity to submit data, views, or arguments, orally or in writing," contrary to Tex. Govt Code 2001.029(a).

Commission Shift thus requests that:

(1) the Commission extend the comment period to November 23rd at 5 pm; and
(2) the Commission hold in-person and virtual public hearings.

We request the in-person and virtual public hearings be held in the evenings in the week before the close of the comment period to maximize public participation. We also request that the Railroad Commission of Texas provide 2 weeks' notice of public hearings and offer translator & translation services, as it did for the waste rulemaking.

Commission Shift is a nonpartisan non-profit focused on reforming oil and gas oversight in Texas by building public support to hold the Railroad Commission of Texas accountable to its
mission in a shifting energy landscape. We have met with numerous community members and
groups affected by this rule, and providing ample opportunity for these groups and individuals to digest the proposed rule and develop comments will make for a better rule.

Such a wide-ranging rule should have a longer deadline, and the current comment period is shorter than the typical 30-day post-Registrar publication comment period for most rulemakings. In fact, it is a week shorter than the comment period for the CCS rulemaking filed the same day, which follows the typical 30-day pattern.

Although the RRC has a statutory deadline to complete the rules by the end of December,

this deadline should not limit the public's ability to offer comments. Please update the timeline and process for submitting comments on the formal rulemaking to provide sufficient opportunity for the public to offer their assessment of the proposed rules.

Thank you for your consideration,

Julie Range

--
Julie Range
Policy Manager
Pronouns: she/her
(512) 589-5274
jrange@commissionshift.org

