REGION 6
DALLAS, TX 75270

September 18, 2024

Danny Sorrells
Director, Oil and Gas Division
Railroad Commission of Texas
Post Office Box 12967
Austin, Texas 78711-2967

Dear Mr. Sorrells:

This letter transmits EPA's end-of-year evaluation (EOY) of the Texas Underground Injection Control (UIC) program implemented by the Railroad Commission of Texas (RRC) for State Fiscal Year 2023.

The Railroad Commission continues to embrace challenges in the UIC program and adjust to future opportunities in a changing energy environment and increasing interest in climate change mitigation. . We appreciate the continued attention to issues related to permitting disposal wells in seismically active areas of the Permian Basin and the continued attention on problematic areas in Texas resulting in a consistent system for evaluating seismic hazards near disposal wells and application of appropriate permitting conditions. We also note your efforts toward continued improvement of data reporting and record keeping at the Commission through special grants. There has been increasing public interest in orphaned or purging oil and gas wells. I encourage continued close collaboration between our respective staffs in resolving these concerns.

EPA encourages the Railroad Commission to continue to work with other state agencies such as the Bureau of Economic Geology and Texas Water Development Board as well as engaging operators to address areas of public concern and resolving citizen complaints. While some of the emergent issues may not be directly injection related, the RRC should continue to assess the possible contribution of injection activity. I am requesting that EPA Region 6 be included in the evaluation of the conceptual models around problem areas and that the information also be shared with the public.

We thank you and your staff for your efforts in the implementation of this challenging program. If you wish to discuss any aspect of this EOY evaluation, please call me at (214) 665-6647, or you or your staff

may contact Mr. James R. Brown at (214) 665-3175. If your staff have specific questions about UIC grant performance, please contact Mr. Michael Vaughan at (214) 665-7313 or Mr. Arnold Bierschenk at (214) 665-7435 for questions regarding EPA's program oversight.

Sincerely,

RANDALL RUSH

Digitally signed by RANDALL RUSH
Date: 2024.09.18 14:06:16 -05'00'

Troy C. Hill, P.E.
Director
Water Division

Enclosures

cc: Paul Dubois, Assistant Director, Technical Permitting, w/encl.
Ivan Salas, RRC UIC Manager, w/encl.