



To: Colleen Forrest

Dear Ms. Forrest,

Thank you for the opportunity this year to submit written comments in advance of your publication of the draft 2025 Oil and Gas Monitoring and Enforcement Plan (“the Plan”). Texas’ energy landscape is changing rapidly. Meanwhile, the Railroad Commission (RRC) has failed to provide sufficient resources and public engagement for impacted communities for years. Our state is at a critical juncture that requires a new framework for monitoring and enforcement. Please consider incorporating the following suggestions into the Plan.

- More funds for monitoring and enforcement. Many safety and pollution events could be prevented by having more inspectors on the ground, as well as additional staff to process violations and enforcement actions. For example, RRC data shows that oil and gas operators plug a consistent number of inactive wells each month, which indicates that well plugging is likely dependent on the number of RRC enforcement staff. Hiring more staff to enforce inactive well plugging requirements can help to reduce orphaned wells. With expanded capacity and improved oversight, we can put Texans to work while protecting our precious water resources - ensuring future prosperity for us all.
- Carbon dioxide education for public & first responders. Carbon dioxide (CO₂) has different properties than natural gas (methane). With the proposed construction and expansion of carbon capture and storage projects, including CO₂ pipelines, the people of Texas have a right to know the risks associated with this infrastructure, and be invited to participate in a coordinated emergency response strategy to help prevent unnecessary fatalities or injuries.
- Legitimate public engagement. The public must have a seat at the table with the ability to inform the decisions that affect their lives. Public engagement is a two-way street. This means that the agency should educate the public, check for clarity, listen to feedback, and respond to questions. Feedback from the public should be incorporated into final rules and permitting decisions. To meet this need, the RRC should expand its capacity for local public hearings related to rule changes or permitting, include options for virtual public input at Open Meetings and for public hearings, and offer translation and interpretation on a regular basis. Longer periods of time to give input on proposed rules and documents would help ensure that folks are able to be well-informed and thoughtful in their participation.

Thank you for considering these suggestions. We appreciate that the agency has modified its structure for receiving comments on the Plan this year, and we hope to see our suggestions meaningfully incorporated into the draft Plan.