



**Public Input of Julie Range  
Policy Manager of Commission Shift  
Railroad Commission of Texas Open Meeting  
April 29, 2025**

Thank you for allowing Commission Shift and the public to provide input for the 2026 Oil and Gas Monitoring and Enforcement Plan in advance of its drafting. The plan is both a roadmap and a reflection of the commission's priorities. We appreciate you incorporating some of our feedback into the 2025 plan. Today, I want to share a few suggestions we have for the 2026 plan.

First, we think the commission's resources should be used to increase accessibility for rural Texans. In our work with rural communities, we find that having public engagement teams readily available in district offices would be beneficial. These teams could quickly respond to complaints and provide information at public meetings, particularly those related to permitting activities. Offering a virtual option for public input during Open Meetings could allow some remote communities to share their concerns directly with you in this public forum. Still, many rural communities lack reliable internet access, and support from district offices could help bridge that gap. Also, sharing information in multiple languages will improve accessibility.

Next, we want to ensure the public and first responders are prepared for carbon dioxide pipeline incidents. With primacy authority for Class VI carbon dioxide injection wells imminent, it is imperative that you prepare for the risks through in-district training and public education sessions as part of the permitting process. The commission and communities should collaborate to develop a robust, coordinated emergency response strategy.

Third, we recommend that the commission clarify its procedures for addressing air quality violations. That is, what process does the commission follow to determine whether a facility keeps its operating permit if it violates air quality standards?

Commission Shift published two reports in the past year examining RRC flaring data. The data revealed that many permits are missing lease numbers and other identifying information. This makes it difficult to track differences between operator-reported venting and flaring volumes and limits defined in permits. We recommend the commission set up a flaring permits database that automatically compares production report volumes to the permit's allowed volume and duration, and then automatically flags discrepancies. Additionally, issuing enforcement actions for violations ensures that the rules are taken seriously.

Finally, thank you for adding the Administrative Compliance and Technical Permitting Divisions to the 2025 Plan.

At the end of the day, we hope you keep people front and center in your monitoring and enforcement decisions. They are the ones impacted by wastefully vented gases, new sinkholes, or polluted aquifers. Clean air and water are essential to sustaining our Texas economy and our people.