

Speaking up Against Texas Primacy on Carbon Capture and Storage (CCS)

June 19, 2025

TEXAS CCS COMMUNITY ADVOCACY COALITION



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Agenda

EPA Public Notice on primacy

Overview of the Carbon Capture and Storage (CCS)

Why we're opposing primacy in Texas

What you can do

Writing Comments- How to

Q&A

Writing Comments- Now you!



Image: Elizabeth Conley for Houston Chronicle

EPA has opened a rulemaking to grant the Railroad Commission of Texas Class VI primacy.

Virtual public hearing: July 24th 5 PM - 8 PM

Public comments due on or before August 1st

Details at the EPA public notice:

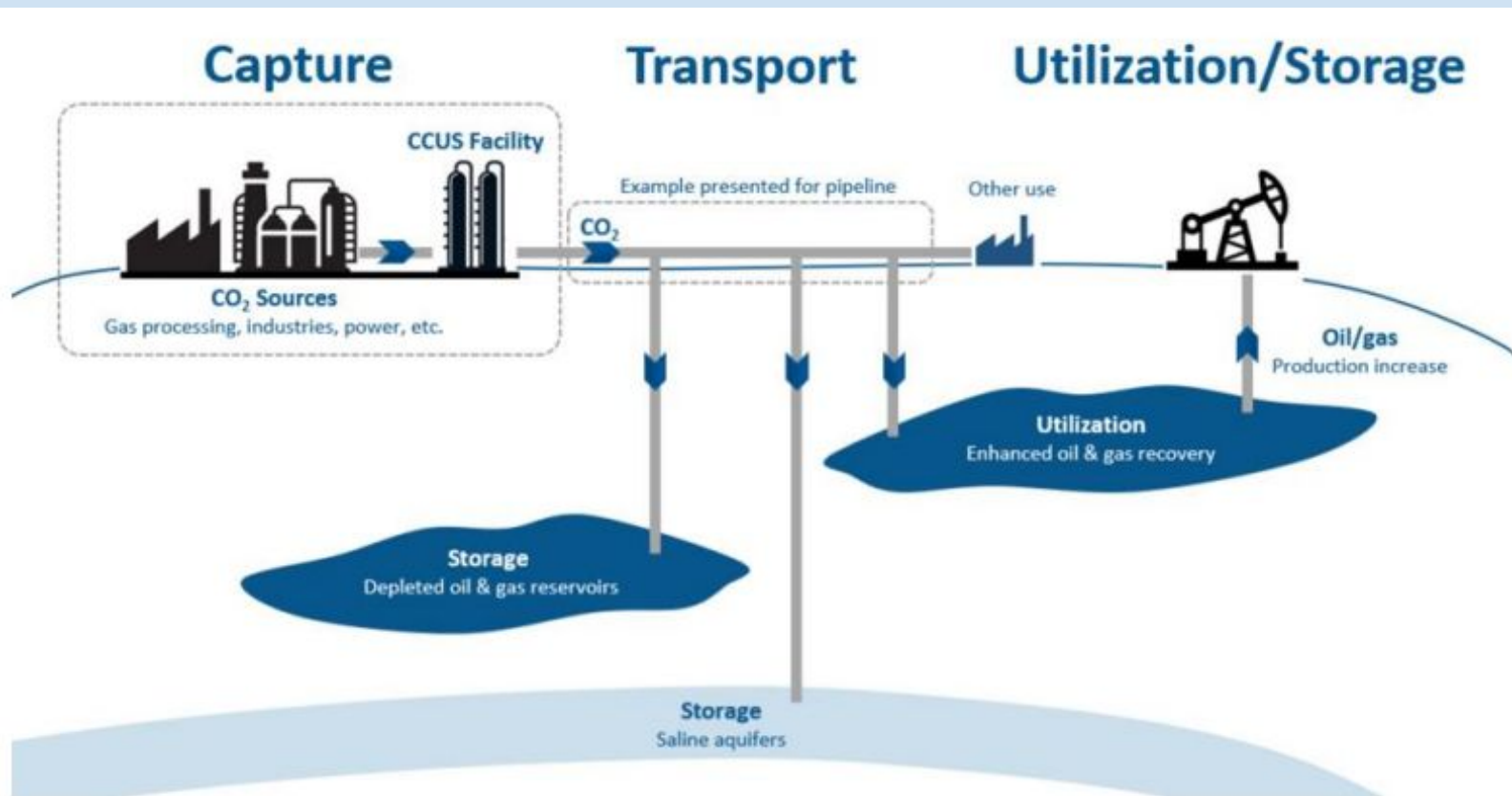


What is CC(U)S?

Carbon **C**apture, (**U**se) & **S**torage

Carbon **C**apture, (**U**tilization) & **S**equestration

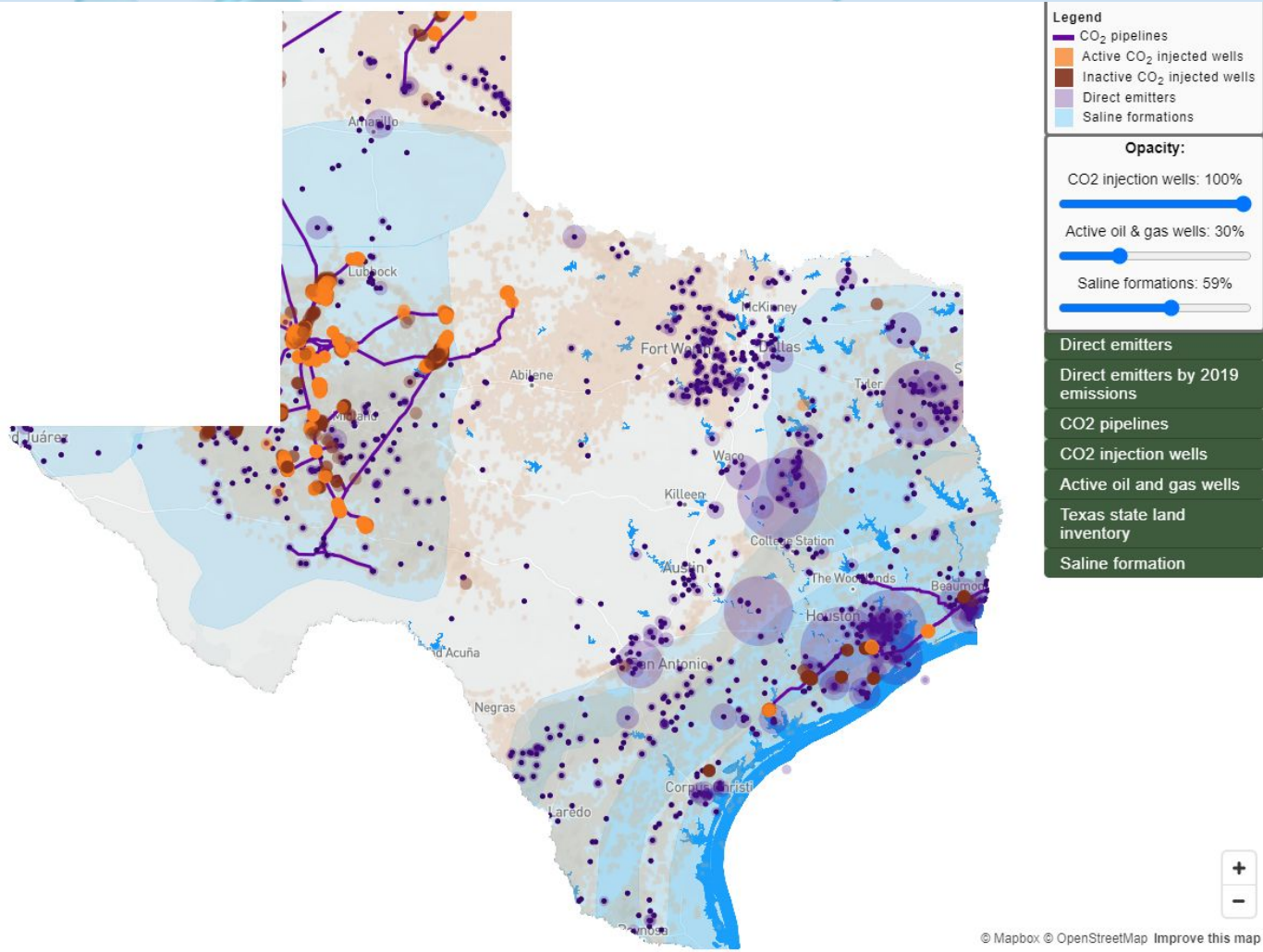
Carbon capture is a technology that promises to trap carbon dioxide emissions from sources like power plants and industrial processes to prevent them from entering the atmosphere and contributing to climate change.



Source: IEEFA, Carbon Capture in the Southeast Asian Market Context. 2022.

Texas CCS Map

Map: Baker Institute for
Public Policy, Rice University



What is CCS primacy and why we're opposing it in Texas

Primacy means that a state or tribal government has the authority to enforce and manage a federal program instead of the federal government doing it.

Geyser-like Well Blowouts

Orphaned well blowout likely caused by a Class II injection well EOR waterflood, April 2019.



Photos courtesy Molly Rooke



Crane County, TX

Photo: Texas Monthly, 01/12/2022

Undocumented wells are not in the RRC's database, but can become pathways for groundwater contamination.

Leaking wells



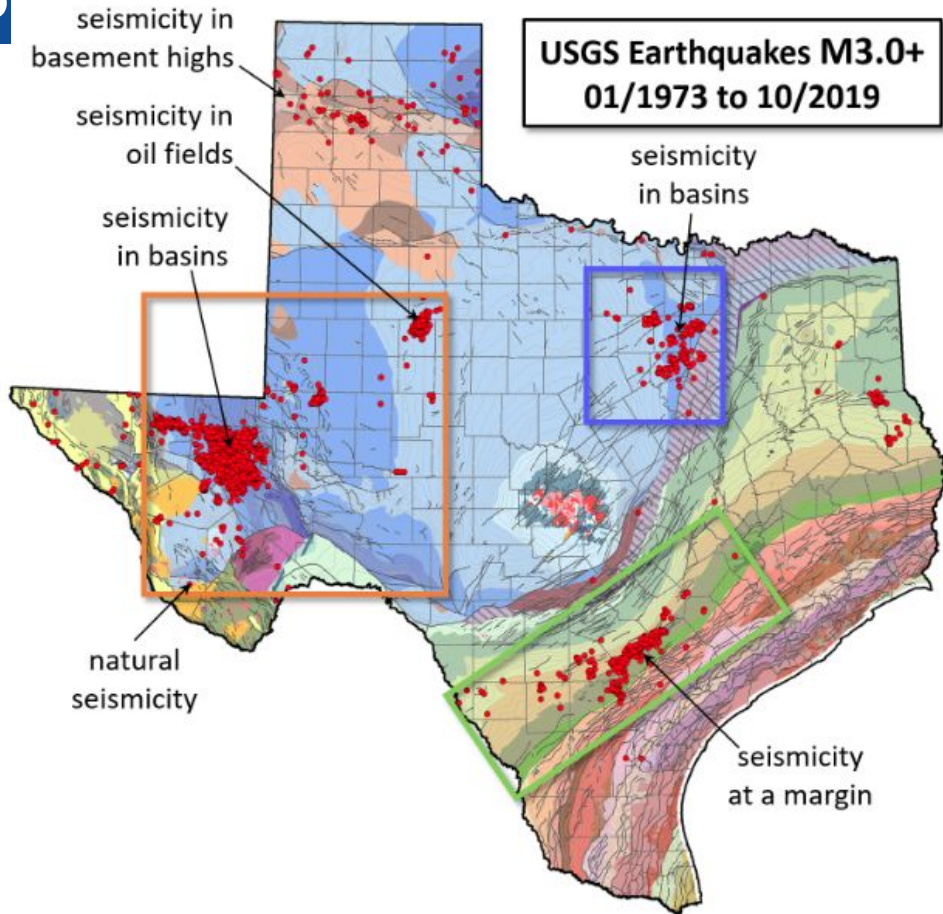
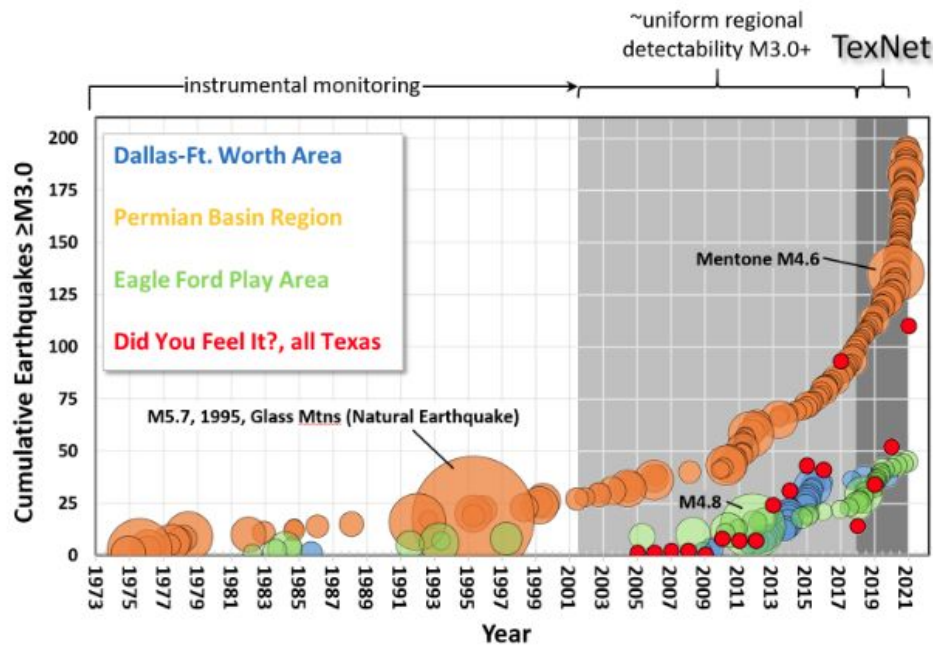
Ward and Crane Counties, TX

The Estes 24 well, with a red bucket and rock placed atop the well to control the spraying fluids. Photo: Watt, Ashley. @sand_frac. [Twitter](#). June 13, 2021. Accessed on Dec. 7, 2021.

Inactive wells

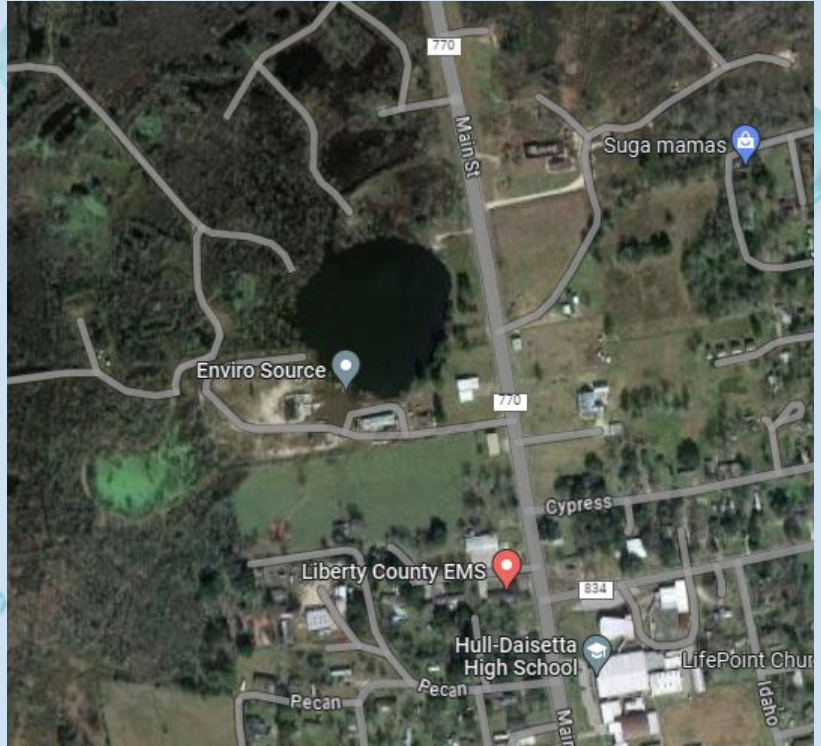
- *Unplugged, have an active operator*
- *Potential pathway for groundwater contamination*

Earthquake Trends

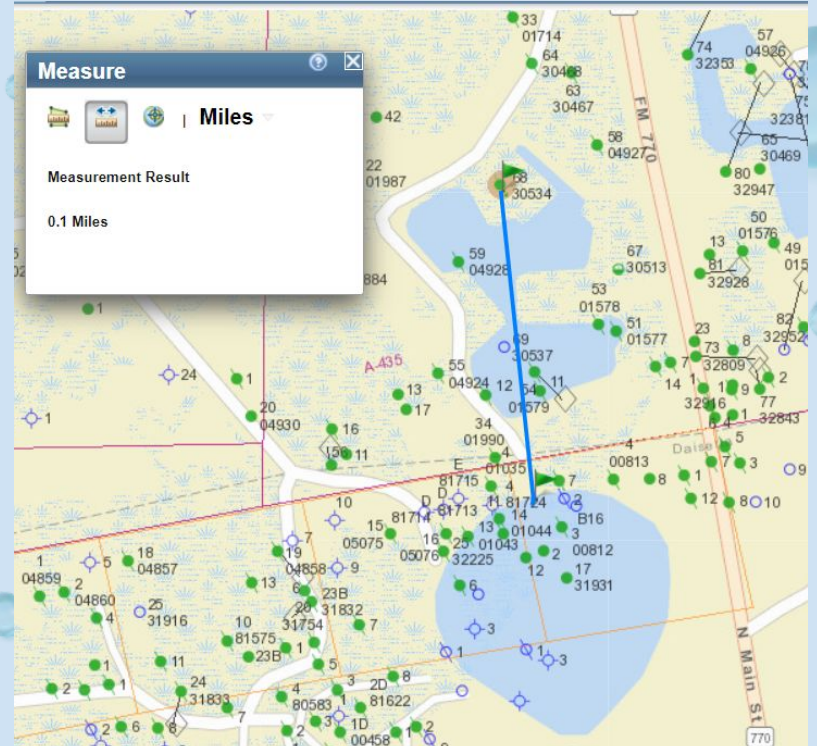


Sinkholes

Daisetta, TX



Screenshot from Google Earth



Screenshot from RRC public GIS viewer

Pipeline Rupture

Texas-based operator

Denbury Gulf Coast Pipeline Rupture.
February 22, 2020.
Satartia, Mississippi

Source: [PHMSA](#)



Figure 2: Vehicle is Parked on HWY 433 - The White is Ice Generated by the Release of CO₂ - The Blue Arrow Points North (Aerial Drone Photograph Courtesy of the Mississippi Emergency Management Agency)

**If the TX RRC can't properly manage
70-year old oil and gas wells, and is
mismanaging Class II wells,
what will happen to carbon dioxide
injection wells of the future?**

What you can do

- Attend the upcoming EPA virtual public hearing:
 - Thursday July 24, 2025
 - 5 pm - 8 pm Central Time
- Submit written comments
 - Deadline: August 1, 2025 at 11:59 PM
- Recruit other voices and volunteers



How to give verbal public comment

- **Live:** Deliver spoken comments at the virtual public hearing on Thursday, July 24th, from 5 PM to 8 PM Central Time.
 - To register:
 - Fill out the form at the QR code below, or contact the public hearing team by email at UICprimacy@epa.gov.
 - *For language interpretation or special accommodations, please pre-register for the hearing and describe your needs by July 17, 2025.*

EPA Virtual Public Hearing Registration Form:



How to submit written public comments

- **Online:** Federal eRulemaking Portal: <https://www.regulations.gov/>. Follow the online instructions for submitting comments for Docket ID No. EPA-HQ-OW-2025-0157
- **Mail:** U.S. Environmental Protection Agency Region 6, Lisa Pham, Groundwater/UIC Section, Mail code: WDDG, 1201 Elm Street, Suite 500, Dallas, TX 75270-2102.
- **E-mail:** TXClassVI@epa.gov E-mail subject line: Texas Class VI Primacy Application - Docket ID No. EPA-HQ-OW-2025-0157.

Tips for effective verbal testimony

- Know your audience - in this case, the EPA. Frame your comments in a way that aligns with their jurisdiction— emphasize impacts to public water supplies, underground sources of drinking water, and technical compliance.
- Be clear and concise.
- Speak from experience.
- Include data when possible.
- Practice and time yourself. **You will have 3 minutes.**
 - *Rule of thumb: 1 page, double spaced, Times New Roman 12 pt font takes about 2 minutes to read aloud.*

Types of comments EPA is likely to consider

In scope

- Injection wells
- Groundwater-related issues
- Public water supply issues related to underground injection wells
- RRC's monitoring and enforcement history in the Underground Injection Control (UIC) well program
- RRC rules for carbon dioxide storage conforming to federal law

Out of scope

- Capture facilities
- Pipelines

Telling your story

5 min - Talk to a partner

- Talk about why you're concerned about CCS
 - How have you been affected?
 - What story do you want to tell?

3 mins - Write down your thoughts

Telling/writing your story and comments

5 min - Share with a different person
(other person just listens)

5 min - Switch

If you can't attend the July 24th virtual public hearing, Submit written or verbal comments today

Laptops available for written comments

Record verbal testimony using a cell phone.

To protect your privacy, don't share your name or address in your video or written testimony.

- Fill out the provided form, so your testimony can be transcribed and uploaded while protecting your personal information.

Federal Register Comment Form:



Q&A

Register for the EPA Virtual Public Hearing on July 24

Submit written comments by Aug 1

Resources and actions



linktr.ee/CCSTownHall