



**Public Input of Julie Range
Policy Manager of Commission Shift
Railroad Commission of Texas Open Meeting
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As the Policy Manager for Commission Shift, my focus has been on ensuring abandoned wells are plugged. This is important for many reasons, but the most important is to protect our groundwater.

Last week, I attended the Produced Water Society's Permian Basin Conference. The conference focuses on the promise of cleaning up produced water for beneficial reuse, which sounds amazing. But the hurdles to safe deployment are great. Produced water is often toxic and dangerous until treated, tested, and proven otherwise. We are counting on TCEQ to set standards sufficient to protect our groundwater and our health. And we'll count on you to ensure operators are doing what is needed to meet those standards at all times.

A major hurdle to cleaning up produced water for beneficial reuse is the scale-up required. It will take a lot of money, energy, and infrastructure build-out to come anywhere close to cleaning up the estimated 33 million barrels of produced water Texas creates each day.¹ As Commissioner Craddick often points out, the Railroad Commission is really in the fluids business, because, for every barrel of oil pulled out of the ground, about five barrels of water come along.²

¹ Formont, Aliyah, Larry French. Innovating Texas' Water: Exploring the Potential for Produced Water. Texas Public Policy Foundation. November 2024.

https://www.texaspolicy.com/wp-content/uploads/2024/12/2024-11-BTT-Produced-Water-Primer-Formont-French_FINAL-1.pdf.

² Ibid.

I'm concerned about all this water, and your role in managing it. How you manage produced water, how you manage abandoned wells, and how you manage Class II disposal wells directly impacts our water in compounding ways.

Speakers at the conference discussed how we are filling up our available pore spaces, and in some areas of the state, we are running out. As these reservoirs fill and pressurize, the water is finding the path of least resistance through unplugged and poorly plugged wells. The combination of the abandoned well problem and the produced water disposal problem presents an expensive and hazardous risk. Leaking zombie wells quickly eat through taxpayer dollars to which we just put an extra \$100 million towards plugging. They also pollute groundwater around the state. And not just in the Permian Basin, where you recently released new guidelines for Class II disposal wells.

These new guidelines are a step in the right direction, but Class II injection rules need to be updated across the entire state. The rules are currently insufficient to protect groundwater.

Injected water goes far beyond the ¼-mile area of review. It can extend beyond the expanded 2-mile area of review you now require in the Permian. It makes its way into water wells, into aquifers, and into groundwater. The more produced water we keep pushing underground with insufficient oversight and planning, the more risk we take on.

After this open meeting, I'll head to the Texas Groundwater Summit, which is hosted by the Texas Alliance for Groundwater Districts. Groundwater districts need better collaboration from the Railroad Commission to keep groundwater safe. We don't have enough water, and Texas is putting billions of dollars toward ensuring future supplies. Please do a better job of protecting the supplies we have.