



**Public Input of Virginia E. Palacios
Executive Director of Commission Shift
Railroad Commission of Texas Open Meeting
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First, I'd like to thank the Environmental Permits and Support staff for including Commission Shift in conference calls with industry associations and companies to discuss revisions to the waste management forms that were approved today. This is a welcome departure from how the process for Chapter 4 revisions started out in 2022, with no engagement of environmental groups or the public.

Last month, the Railroad Commission issued a [press release](#) applauding an [analysis](#) by S&P Global Commodity Insights reporting a 50% reduction in methane emissions per barrel of oil produced over a two year period. The study was conducted using [flyover data](#) collected by Insight M that covered more than 80% of the actively operating wells in the Permian Basin, as well as publicly available satellite data.

These results are promising, and I hope the reductions continue into future decades. But what if they don't? Will oil and gas operators continue to pay companies like Insight M to collect flyover data for them? Regulatory oversight of datasets like this would generate more public trust in the data over the long term. Additionally, this data should be produced statewide, not only in the Permian Basin.

It is worth noting that the S&P analysis focuses on unburned methane emissions, not flaring. We need to see efforts from regulators to significantly reduce both methane emissions and routine flaring. The Texas Methane and Flaring Coalition, made up of Texas-based industry associations

representing both major and independent oil and gas operators, has set a [goal to end routine flaring by 2030](#). Ending routine flaring is important, not only because of the climate warming emissions it generates, but also because of the health impacts it causes. In South Texas, far from the Permian Basin, studies have found that women in the Eagle Ford Shale living next to high rates of flaring experience [50% higher odds of pre-term birth](#). The role of the regulator in collecting and protecting flaring and emission data is important as it should provide an unconflicted view of industry operations that the public can trust.

Lastly, and on a completely different topic: I keep hearing from community members across the state who have spoken out against polluting operators that they have had their jobs threatened, or been told they would disappear if they continued to speak out. This kind of intimidation by leaders or workers at oil and gas companies is unacceptable. As elected officials leading the state's oil and gas industry, a statement from the Railroad Commissioners discouraging violent threats and intimidation could go a long way toward keeping Texas communities safe.