



**Public Input of Julie Range  
Policy Manager of Commission Shift  
Railroad Commission of Texas Open Meeting  
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Commissioner Christian, we thank you for speaking to your concerns with carbon dioxide sequestration last month. You expressed interest in more public comment about these projects. You'll be pleased to know Commission Shift shares your concerns that carbon dioxide injection could contaminate groundwater and related pipelines pose real risk. These risks will only increase as we expand carbon capture and storage (CCS) development in Texas.

Last month I met with about seventy concerned members of Cheek, Texas about a proposed CCS project near their community. Many would like to share their concerns about being test subjects for the nascent rollout of large-scale carbon sequestration projects, but they do not have the luxury of taking a day off work nor the budget for travel expenses. It would be helpful if the Commission allowed remote public testimony so they could publicly share their concerns with you.

We listened to Jerry Briggs, the Warren County, Mississippi Emergency Services Director share the challenges first responders faced during the Denbury Gulf Coast Pipeline carbon dioxide pipeline rupture in Satartia. There are people who almost lost their lives and now suffer long-term health effects, and Mr. Briggs spoke of how difficult it was to locate victims and get them out of the dangerous asphyxiating plume that took hours to dissipate from the broken pipe.

I talked to the community about the risks posed by the combination of pressurized underground formations and unplugged and poorly plugged oil and gas wells. The community of Cheek is about a 10 minute drive from Spindletop, the birthplace of the Texas oil boom. Prospectors poked holes all over the area looking for oil in those early days, and odds are strong that not all these legacy wells are documented or properly plugged. And even known plugs have a lifespan and may fail with time.

I am concerned that as carbon dioxide pressurizes the saline aquifers these Class VI wells inject into, it will find pathways into fresh water aquifers or to the surface through unknown legacy wells and old plugs in poor condition. We've seen this happen across the state with Class II produced water disposal wells. As injection zones pressurize, it creates a pressure plume that tests the integrity of the aging infrastructure in its path. In the Permian Basin, this has resulted in geyser-like well blowouts and contaminated water wells. Some homesteaders must haul in water to have a safe drop to drink as the pressurized fluids find pathways into aquifers, their water wells and their surface ponds.

You have now been granted the power to oversee carbon sequestration projects. Please use that power to protect communities. Ensure they have the tools and knowledge to protect themselves. Ensure all old wells are replugged to modern standards. Require a robust search for undocumented legacy wells using optical gas imaging to look for leaking gases that often comes from these holes and magnetometers to look for old pipes that stretch into the bowels of the earth. And please consider that while there may be appropriate geological formations to inject into, saline aquifers in the same locations as early wildcatting fields or populated areas are not the best locations for the first full scale deployments of this new technology.