



**Public Input of Julie Range
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What assures us that the practice of injecting produced water from hydrocarbon extraction into Class II saltwater disposal wells is safe? And at what point do we change course when it becomes apparent something is wrong? I've been wondering this since I saw the SMU study that linked a 2022 vintage geyser to saltwater disposal fluids from 12 miles away.^{1,2}

I expect many share these concerns as leaking wells continue to appear. To get a better handle on this, the Railroad Commission is investing in better IT infrastructure that will allow it to track produced water, and you have assembled an underground injection well investigation team. Thank you for taking these steps. I'm hopeful they will help us understand and mitigate these problems. Please make the team's work, and the data collected readily available to the general public.

Justin Nobel recently published a story in DeSmog and Rolling Stone that uncovers early concerns that proved prescient about wastewater injection³. At a 1971 symposium in Houston, USGS hydrologist Robert Stallman was concerned that injecting large amounts of liquid waste underground would result in pollution of groundwater and surface water, changes to the

¹ *Investigation of Oil Well Blowouts Triggered by Wastewater Injection in the Permian Basin, USA - Karanam—2024—Geophysical Research Letters—Wiley Online Library*. (n.d.). Retrieved February 19, 2026, from <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2024GL109435>

² Tribune, B. D. B., Inside Climate News, and Carlos Noguera Ramos, Texas. (2024, August 7). Study Links Permian Blowouts With Wastewater Injection. *Inside Climate News*.

<https://insideclimatenews.org/news/07082024/permian-basin-oil-well-blowouts-linked-with-wastewater-injection/>

³ Nobel, J. (n.d.). *The Oil Industry's Latest Disaster: Trillions of Gallons of Buried Toxic Wastewater—DeSmog*. Retrieved February 19, 2026, from

<https://www.desmog.com/2026/02/12/the-oil-industrys-latest-disaster-trillions-of-gallons-of-buried-toxic-wastewater/>

permeability of rocks, cave-ins, earthquakes, and contamination of underground oil and gas deposits. We are seeing all these detrimental impacts today.

Some say treatment and beneficial reuse are the solution, but safe scale-up is too slow. We don't want to trade one problem for another.

We are witnessing the results of a slow-building phenomenon we set in motion by pumping billions of gallons of toxic, contaminated water underground and pressurizing the subsurface. At that same symposium, USGS hydrologist John Ferris noted that water eventually escapes the injection zone and “engulf[s] everything in its inexorable migration towards the discharge boundaries of the flow system,” which might be faulty old oil, gas, or water wells.⁴ He believed contamination “would become apparent at ever-increasing distances from the injection site.”⁵

So what are we going to do about the pollution-filled plumes we've injected that may eventually become apparent? I don't know the answer to that, but I propose it's time to update the rules for all Class II injection wells. You created stronger permitting guidelines for the Northern Delaware basin in response to local negative impacts. But current injection rules are inadequate to protect groundwater statewide. It's time to base our statewide rules on modern science, and stop ignoring what scientists have seen coming for decades.

In a state spending \$1 billion per year to ensure a steady supply of fresh water, it's past time we ensure our injection rules protect the fresh groundwater we have.

⁴ Ibid.

⁵ Ibid.