



**Public Input of Virginia E. Palacios  
Executive Director of Commission Shift  
Railroad Commission of Texas Open Meeting  
August 18, 2026**

Commission Shift appreciates the Office of Public Engagement's Listening Sessions, and we're looking forward to the September session. I would also like to congratulate the Office of Public Engagement and Railroad Commission staff who helped to host an excellent Railroad Commission Regulatory Conference in July.

While these are positive experiences with public engagement at the Railroad Commission, we've had some other challenges reaching key agency representatives over the past few months and I want to reiterate our requests for in-district public hearings for rulemakings and remote Public Input at Open Meetings.

First, the Railroad Commission has not held in-district public hearings for rulemakings over the past several years, although this is something that the commission has done in the past (see p. 3). Former staff in the Office of Public Engagement told me that the Hearings Division was responsible for hosting public hearings for rulemakings. I was also told that the Hearings Division likely didn't have money for in-district public hearings. When I reached out to the Hearings Division this year to talk about the agency's Legislative Appropriation's Request (LAR), I was told that the LAR would be available to the public once it is approved and submitted. In other words, there wasn't a transparent public comment process that would allow us to contribute suggestions to the agency-wide strategic plan or the LAR to solve the problem.

As you know, Commission Shift has been requesting that the RRC allow remote Public Input at Open Meetings; that is, allowing members of the public to call in to provide Public Input, instead of having to present themselves in person. Attending Open Meetings in person can be costly for members of the public who live in oil and gas producing regions, because it requires gas money, an overnight hotel stay, and missing work. The Texas Commission on Environmental Quality already allows virtual public participation at their meetings.<sup>1</sup> The Railroad Commission should, too.

In previous Open Meetings, Railroad Commissioners argued that remote Public Input is unnecessary because the commissioners are available to meet with people virtually outside of open meetings. I have sent emails, called, and left voicemails to request meetings with commissioners, and my messages were either not returned or I was directed to meet with the commissioner's staff. I've only met with one commissioner so far. Scheduling separate, personal meetings with commissioners is not a good substitute for remote Public Input at Open Meetings.

Finally, Commission Shift had previously been told by the Office of Public Engagement that we should invite the agency to attend our public events or hold meetings with some of the communities that have issues we've been raising in Open Meetings. We requested Railroad Commission staff to participate in a recent event we held, and while the Office of Public Engagement forwarded our request to commission leadership, we never received confirmation that RRC staff members would attend.

In summary, Commission Shift is requesting that the agency allow remote Public Input at its Open Meetings and host in-district public hearings for rulemakings.

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<sup>1</sup> See: TCEQ Commissioner's Agendas, then "Registration Form." Accessed on Aug. 17, 2026.  
Retrieved from: [https://www.tceq.texas.gov/agency/decisions/agendas/comm/comm\\_agendas.html](https://www.tceq.texas.gov/agency/decisions/agendas/comm/comm_agendas.html)

**For reference, past in-district public hearings and workshops on rulemakings:**

In 2002, the commission directed its staff to make a concerted effort to move Statewide Rule 8 into Chapter 4 and to adopt significant rule changes like those being contemplated today. In addition to seeking feedback from industry—and before the proposed rules were approved for publication in the Texas Register—the commissioners also directed staff to hold a series of workshops for informal public comment, which included a six-city tour (Midland, Wichita Falls, Houston, Kilgore, Austin, and Amarillo). A total of 188 people attended these meetings, including industry, landowners, groundwater conservation districts and others. Written comments were also solicited and 120 comments in total were received. Ex. A, 27 Tex. Reg. 4264-4265 (May 17, 2002). The commission found the feedback so valuable that many comments were incorporated into the proposal published in the Texas Register.

And more recently, in 2012, when the commission contemplated much narrower changes to Chapter 4's commercial recycling rules, the commission posted the draft proposed amendments online for informal comment and held a public workshop before the draft was proposed for publication in the Texas Register. Ex. B, 37 Tex. Reg. 7555 (Sept. 28, 2012).