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**To:** [Rules Coordinator](#)  
**Subject:** State of Texas Underground Injection Control Program  
**Date:** Monday, July 31, 2023 4:51:04 PM

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Dear Rules Coordinator Leslie Savage,

As a Texan, I am concerned about the issue of carbon dioxide injection and the risk these projects pose to the health and safety of our land, water, and communities.

Injecting highly pressurized carbon dioxide waste deep into the earth can pose risks to our communities. Without consistent oversight, harmful materials like lead, arsenic, and strong acids can leak into underground sources of drinking water.

In the pursuit of obtaining carbon dioxide injection well permitting authority, the Railroad Commission of Texas has a responsibility to ensure the highest possible safety conditions for the people and places of Texas that will be impacted by this new carbon waste disposal technology. Please consider these suggestions for strengthening rules overseeing carbon dioxide injection wells, recommended by experts.

#### Mechanical integrity

The commission added a section to its rules that would allow facilities to continue to operate even if they fail a mechanical integrity test. This is a dangerous mistake. Facilities should not be allowed to continue operating if they fail a mechanical integrity test.

#### Plugging

The commission should require cement plugging from the bottomhole to surface to ensure the longest possible integrity of an unused wellbore and prevent subsurface water and gasses from migrating to the surface. Additionally, the commission ought to require that wells be plugged after a specific number of years of inactivity, rather than the current vague incentives to plug.

#### Environmental Justice

There are several opportunities for the RRC to incorporate meaningful provisions throughout the Chapter 5 rules other than simply requiring notice to certain communities. Addressing the legacy of environmental racism and the cumulative impacts of industrial development on susceptible communities means that the commission must require operators to plan and take actions to prevent and mitigate risks posed to these communities throughout the permit application process and during operation. These mitigation actions should be considered by the commission before a permit is approved.

#### Monitoring

The post-injection storage facility care (PISC) monitoring period is vague, and no minimum time period is defined. This could cause a scenario where commission will allow operators to stop monitoring their facilities, even as new drilling, production, and injection activity is taking place throughout the AOR. It seems that the commission is not considering how the facility's surroundings will change over long periods of time and the ways that underground sources of drinking water or access to minerals will be impacted.

#### Language accommodation

Please consider an alternative metric than "limited English- speaking households" to determine the presence of language accommodation needs in the Area of Review. The current definition of limited-English speaking households would fail to ensure language accommodation where it is needed, and create situations where children are expected to translate and interpret technical jargon for their households.

Geographic coordinates

There are areas where the commission could improve its data collection from permit applicants, in order to ensure that accurate geographic coordinates (i.e. latitude and longitude) are collected early on in the permit application process. Collecting accurate location information will help to prevent risks to groundwater later on.

We are relying on strong and responsible leadership from the RRC if CCUS projects are to come to Texas. Please consider these recommendations carefully. Thank you for your time and attention.

Sincerely,

Sincerely,  
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