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The RRC regulates disposal of O&G exploration waste in landfills. The existing guidance is not protective of human health and the environment. It is embarrassing that Texas' little sister, Louisiana, has much better regulations governing oilfield waste disposal. The RRC needs to have properly trained, competent staff to review waste permit applications. During a recent, contentious permit hearing it was revealed that the technical staff missed basic errors in the permit application.

The RRC should revise the permit application process. During that contentious hearing mentioned previously, the applicant was allowed to submit one hundred changes to the application. While some might argue those changes only made the application better others would say those improvements should have been included from the beginning.

Once an application is submitted and the RRC's questions are answered no further changes should be allowed. In school, once you turn in your test, you can't go back to your seat and say "I thought of a better answer, let me change my paper." You certainly couldn't do that 100 times.