

Neta Rhyne, Texas

After reviewing the Railroad Commission of Texas' (RRC) Plan on oil & gas monitoring and enforcement, and in consideration of my personal experiences protesting permitting of SWDs in a "historic" seismic active area, it is evident that seismicity is not a priority for the RRC.

A seismic response plan it's not highlighted nor included in your goals. The RRC's has clear authority to regulate saltwater disposal well activity and can address seismic activity according to Title 16 of the Administrative Code Rule 3.9 (6)(A)(vi) and 3.46 (d)(1)(f).

Numerous studies suggest a direct connection to the increase of seismic activity to injection wells yet the RRC has greatly limited its response to classified small or limited areas as Seismic Response Area (SRA) in which then the RRC will act by either stopping permits, injection or reducing it. In view of the fact seismic activity is expanding in the Northern Culberson-Reeves Area, Stanton, and Gardendale and the earthquakes are increasing in frequency and intensity I ask the for the commissions to expand the SRAs and for your plan to be clear and concise.

In addition, it is important to point out that there is a conflict of interest in having the operators produce the data that will guide the RRC's decision on establishing SRAs, specially without a clear channel of public input on the issue. The RRC's monitoring and enforcement plan denotes the number of complaints you have received and the attempt to follow through with House Bill 1818 (85th Legislature) to seek input from stakeholders but did not include a plan of action. Your plan does not include any actual attempt to develop a better process for public input on public matters of your mission "to serve Texas by our stewardship of natural resources and the environment, our concern for personal and community safety, and our support of enhanced development and economic vitality for the benefit of Texans." The protection of the environment and concern for personal and community safety are above and before support and development of economic vitality. When will the RRC make sure this priority is part of the efficiency which should highlight serving Texans and not the industry of oil and gas alone?

Goal number 2 makes an attempt to bring attention to public safety and protection of the environment but while addressing well inspection it emphasizes "visual." Can we not really include seismic tools around the state (monitored by the state), and or tools of emission measures on the drones?

My family and I live and operate tourist-based businesses in Toyahvale, Texas located in Reeves County. With the onslaught of the oil and gas activity in this area and the increase in earthquakes, the seismic activity has become an area of concern. On March 26, 2020 our home was damaged by a 5.0 Earthquake which was reported to have "shook" the Big Bend area of western Texas. The quake epicenter was approximately 60 miles northwest of Toyahvale, about 27 miles west of Mentone, Texas, and was located 3 miles below the surface. Residents of El Paso, about 175 miles west of the reported epicenter, felt the quake, which was originally rated at 4.7 magnitude.

The March 26, 2020 5.0 earthquake caused damaged to my home and as a result my family and I suffered economic harm. Those in the disposal well business claim this earthquake was caused by "fracking" yet the "experts" claim that the earthquakes in this active seismic zone have a direct link to disposal well activity.

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Per RRC's own admission the increase in seismic activity in west Texas is a direct result of disposal well activity.

The RRC can and should do better, you are obligated to protect Texans and our land and Texans like myself and my family are suffering the consequences of your failure to properly monitor and enforce the oil and gas industry.