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Railroad Commission of Texas, Thank you for once again giving the public the opportunity to provide comment on the Annual Oil & Gas Division Monitoring and Enforcement Plan for 2023. The importance of protecting the health and safety of the public and the environment is the driving factor behind this plan's existence. These vary issues are also of utmost importance to members of the public as well as employees of the state of Texas that have experienced adverse health effects caused by operators that are bad actors in the industry in which you over see. The priorities highlighted in this plan need to be instilled in every RRC employee, including the three elected commissioners and emphasized by every manager to all of their subordinate's agency wide. This plan needs to be read by ALL agency employees annually and expectations set by managers on the procedures and protocols that are very clearly defined. Unless this document is fully understood and followed by every employee in the agency, this plan is useless. Please see my comments below.

Pg. 8-9 Inspections

The focus of inspections should be on full all-inclusive quality inspections instead of an increase in the quantity of inspections completed on a year over year comparison basis. Performance targets and the ""aggressive approach"" should be weighted less than it appears to be emphasized in this plan.

Inspectors doing inspections and staff reviewing reports and required documents need to be educated and adequately trained in ALL aspects of permit/law compliance to be able to accurately determine full compliance, not just a few chosen obvious/easy requirements

Checklists for onsite inspections need to be permit specific and contain EVERY permit condition.

Data Reviewers/Technical Permitters reviewing information contained in reports need to be properly trained and know all permit requirements so assure non-compliance issues are discovered, addressed, and remedied immediately.

When a member of the general public reports an emergency, just as this plan states, it needs to be responded to immediately.

Compromised inspectors will also never help achieve the goals outlined in this plan.

Pg. 11 Complaints

The plan states, ""the public is encouraged to report problems or concerns" yet when contact is made with the district office they act as if they are doing you a favor by even accepting your phone call, this behavior/attitude discourages communication with the public not encourage it as stated above. Also, all complaints especially emergency complaints need to be taken seriously. The plan states ""Complaints involving an imminent threat to public health and safety or the environment are investigated immediately."" Deviation from this claim is evident in my personal historical experience and should never happen.

Complainants should be informed of formal versus informal complaint options upfront.

After-hour complaints made by complainants, should at the very least, receive an immediate return phone call by RRC staff, not just communication with an uninformed answering service employee.

The oil and gas industry operates 24 hours a day, 7 days a week, 365 days a year, so should this vital regulatory agency.

Complainants should always receive written updates.

I made a formal complaint 4-13-2021 and 7-8-2021 and did not receive a formal response until 2-2022 after me using this plan's own words to push staff into responding to my complaints.

Pg. 14 Procedures This section should also include monitoring violations by staff in Austin in conjunction with district offices. Active participation and communication between district offices as Austin staff is pertinent to effectively work together to remedy violation issues.

Pg. 31 Appendix D: Receiving Complaints

Every complaint made to the RRC should be assigned a complaint ID number and investigated accordingly, not just complaints that result in violations. If an inspection is conducted as a result of a complaint, a complaint number needs to be assigned. All complaints with complaint numbers should be visible to the general public via the RRC website

Complaints should never be ""inadvertently neglected.""

Pg. 32 Appendix D: Complaint Procedures

Subsequent Action

The procedures laid out in this section should be followed to a ""T"" with little to no deviations, especially #2 at the bottom of the page. ""Following the inspection, the District Office staff member should write a brief complaint letter, including all information received from the complainant, violations found during the inspection and initial action taken. The complaint letter should be mailed to the complainant and filed under the assigned complaint letter.""

Pg. 34 Common Complaints

Jurisdiction- RRC staff needs to listen to complaints and look at the bigger picture when a complaint contains verbiage, such as ""odor"" that would toss it to a different agency for enforcement. In my case because we used the word ""odor"", the RRC automatically took a hands-off approach. It is agreed that odors are within the jurisdiction of TCEQ, however, the waste itself that causes noxious odors are supposed to be under the complete jurisdiction of the RRC. We asked numerous times for the RRC to look into the waste being accepted at a facility because we felt the waste was not under the jurisdiction of the RRC. RRC staff continuously turned a blind eye and refused to look into what waste was actually being received and never looked at it to assure full compliance. If a big picture approach would have taken place instead of deflection, non-compliance would have been discovered in a timely matter and members of the general public as well as employees of the state of Texas would not have experience adverse health effects.

In conclusion, all employees including those with tenure need continuous training. This agency needs to be working for the safety of the general public and not covering up the facts to ensure the success of an out of compliance operator. Inspectors and over-sight staff need the proper training and tools to do their job with high expectations set and enforced with consequences just like you set for operators. I look forward to being able to openly communicate with the RRC to help make this agency and the oil

and gas industry in Texas the best globally. I appreciate your time and for allowing the public to submit these comments. Thanks, Tara Jones "