CLASS VI UNDERGROUND INJECTION CONTROL PROGRAM DESCRIPTION

RAILROAD COMMISSION OF TEXAS

DRAFT

I. INTRODUCTION

As mandated by the Safe Drinking Water Act of 1974 (as amended), the United States Environmental Protection Agency (EPA) promulgated regulations establishing minimum requirements, technical criteria, and standards for State Underground Injection Control (UIC) programs to protect underground sources of drinking water (USDW). Under these regulations, the State of Texas received program implementation primacy in 1982 and has since operated an EPA-approved UIC program.

On December 10, 2010, EPA finalized minimum federal requirements under the Safe Drinking Water Act (SDWA) for underground injection of Carbon Dioxide (CO₂) establishing a new class of injection wells, Class VI. The Class VI rule is based on UIC regulatory framework, with modifications to address the unique nature of CO₂ injection. The purpose for the Class VI rule is to ensure that geologic storage of CO₂ is conducted in a manner that protects USDWs.

To gain primacy enforcement responsibility for Class VI injection wells, the Railroad Commission of Texas will demonstrate that its Class VI UIC program meets the minimum federal requirements.

This revised program description incorporates changes as required in federal regulations and is only an addendum to the current Texas UIC primacy authority. Nothing in this document in any way affects the current administration of the Class II program under section 1425 of the SDWA or the Class I, III, and Class V UIC programs under section 1422 of the SDWA. It does not change the lead agency program administration status nor the original intent of the UIC program.

The State's Class VI UIC program will be administered by the Oil and Gas Division of the Railroad Commission of Texas (Commission). This revision of the Texas 1422 UIC program is for the sole purpose of adding Class VI injection wells to the Texas 1422 UIC program.

II. OVERVIEW OF THE STATE UIC PROGRAM

A. Current status of Texas' UIC Program

The UIC program is an important part of the overall State groundwater protection strategy. With increasing groundwater demands and the impacts of energy development on groundwater, the control of subsurface injection is vital to maintaining the quality of the State's groundwater resources and to protect USDWs.

The State of Texas received Underground Injection Control (UIC) Program primacy under Section 1422 of SDWA for Classes I, III, IV, and V in 1982.

The lead agency of the Texas Section 1422 UIC program is the Texas Commission on Environmental Quality (TCEQ). As the lead agency, the TCEQ receives the annual program grant and coordinates the State 1422 UIC program, as designated by the Governor of the State. The TCEQ administers the UIC program for Class I, Class III (except for Brine Mining), Class IV and Class V (except geothermal return and *in situ* combustion of coal) injection well activities, except for those wells on Indian land, pursuant to section 1422 of the Safe Drinking Water Act (SDWA). Notice of the original approval for Class I, III, IV, and V wells was published in the Federal Register on January 6, 1982, and became effective February 7, 1982.

Texas received primacy for Class II wells under Section 1425 of SDWA on April 23, 1982, and designated the Railroad Commission of Texas as the lead agency to coordinate the state's SDWA Section 1425 UIC Program. The Railroad Commission administers the 1425 UIC program regulating Class II injection well activities and receives a separate program grant from the EPA to administer the 1425 UIC program.

The Railroad Commission also regulates Class V geothermal wells and injection wells for the *in situ* combustion of coal under a separate UIC program approved by EPA and published in the Federal Register on April 23, 1982.

The Railroad Commission also administers the 1422 UIC program regulating Class III Brine Mining injection well activities in the State of Texas, except for those wells on Indian lands. A program revision application for Class III brine mining wells was submitted by Texas and approved by EPA. Notice of that approval was published in the Federal Register on February 26, 2004; the effective date of this program is March 29, 2004.

The Railroad Commission has statutory authority to regulate Class VI injection well activities under Texas Water Code Chapter 27. Upon approval of primacy for Class VI wells, the Railroad Commission will have jurisdiction over the Class VI UIC Program and the authority to issue Class VI permits and administer and implement the Class VI UIC Program.

Each State agency is responsible for administering the State program for the injection wells under its jurisdiction including, but not limited to, reports, permits, monitoring, compliance, and enforcement actions.

The Railroad Commission of Texas and the Texas Commission on Environmental Quality have signed a Memorandum of Understanding (MOU) that outlines the respective responsibilities of each agency concerning regulation of Class VI wells. The current MOU reflects the statutes before they were amended by the 87th Texas Legislature in 2021, which split jurisdiction for the Class VI program between the two agencies. However, the Texas Legislature amended the statutes during the 87th Legislative Session (House Bill 1284) to consolidate jurisdiction for all anthropogenic geologic storage of carbon dioxide at the Railroad Commission. The agencies plan to amend the MOU to reflect current statutes. The current MOU is provided in the state's primacy application.

B. Overview of State Class VI UIC Program

Currently, there are no permitted Class I UIC injection wells for the purpose of geologic storage of carbon dioxide, nor are there any Class V injection wells permitted for experimental purposes. There are no Class VI injection wells permitted by EPA in Texas at this time.

The Commission has permitted numerous Class II enhanced recovery injection wells for which the authorized injected fluid is carbon dioxide. The Commission will review production data and information related to factors in 16 TAC §5.203 to evaluate the relative risk of endangerment of underground sources of drinking water and determine whether the increased risk warrants a transition from Class II to Class VI requirements.

The primary focus of the UIC program, promulgated under the authority of the SDWA is to protect USDWs. Under federal definition USDW means an aquifer or any portion of an aquifer that supplies any public water system or contains a sufficient quantity of ground water to supply a public water system and currently supplies drinking water for human consumption or contains fewer than ten thousand milligrams per liter total dissolved solids and is not an exempted aquifer.

Other than EPA approved expansions of aquifer exemptions for Class II enhanced recovery injection wells, new aquifer exemptions will not be issued for Class VI injection well activities. Even if an aquifer has not been specifically identified by the Commission, it is an underground source of drinking water if it meets the definition above.

The Texas Class VI program requires all operators applying to inject carbon dioxide for the purpose of geologic storage to obtain a permit to drill (deepen, convert, or reenter), and a permit to operate prior to commencement of injection activities. Permit applications will be reviewed by the Railroad Commission and issued in accordance with Texas Water Code Chapter 27 and 16 TAC Chapter 5. As a permitting requirement, all Class VI injection wells will be required to demonstrate and maintain mechanical integrity. The permit application requirements include, but are not limited to, a technical evaluation, an area of review and corrective action plan, a demonstration of financial responsibility, an emergency and remedial response plan, a proposed casing and cementing program, a testing and monitoring plan, a plugging plan, and a postinjection site care and facility closure plan.

The state's regulation, at 16 TAC §5.205 requires operators of Class VI wells to demonstrate and maintain financial resources to perform all required corrective action, plug the injection well, conduct post injection site care and site closure, and perform any needed emergency and remedial response. Agency staff with financial expertise will review the cost estimates provided by applicants to verify that they are sufficient to cover these activities and evaluate the financial instruments the applicant proposes to use to verify that they qualify and are appropriate.

The State statute and the Commission's rules prohibit the RRC from issuing a permit for the conversion of a previously plugged and abandoned Class I injection well, including any associated waste plume, to a Class VI injection well and require a Class VI injection well permit applicant to submit with the application a letter of determination from TCEQ concluding that drilling and operating an anthropogenic carbon dioxide injection well for geologic storage or

constructing or operating a geologic storage facility will not impact or interfere with any previous or existing Class I injection well, including any associated waste plume, or any other injection well authorized or permitted by the TCEQ.

Any phase of the geologic storage project may be inspected for compliance by the Commission's authorized agents. Injection activities may not commence until construction of the injection well is complete, a permit to operate has been obtained, and the storage facility is in full compliance.

Compliance monitoring will be conducted by the Commission. This monitoring will at a minimum include on-site inspections conducted by the Commission's authorized agents and a review of operating and monitoring reports submitted in compliance with reporting requirements pursuant to §5.207, relating to Reporting and Record-Keeping.

If the Commission determines that the storage operator is in violation of any permit condition or rule, appropriate enforcement action will be pursued by the Commission.

When a well is taken out of service it will be properly plugged and abandoned pursuant to §5.206(i), approved by the Commission as a monitoring well, or approved by the Commission for temporary abandonment.

Texas citizens are encouraged to actively participate in program development and the storage facility permit process through public comment and hearings. The Commission will give written notification to any States, Tribes, and Territories of any permit applications for geologic storage of carbon dioxide wherein the area of review crosses State jurisdiction boundaries, resulting in the need for trans-boundary coordination related to an injection operation.

III. AGENCY ORGANIZATION AND STRUCTURE

A. General Responsibilities

The Railroad Commission of Texas was created in 1890 pursuant to an amendment to Article X, Section 2, of the Texas Constitution for the primary purpose of regulating the railroad industry. It was the first regulatory agency authorized by the State of Texas.

Today's Commission, pursuant to statute and its adopted rules, regulates activities in the vital areas of energy, environmental protection, and public safety. These activities touch all citizens of the State of Texas in their day-to-day lives and are instrumental in ensuring the continued growth of the Texas economy. The fulfillment of statutory responsibilities delegated to the Railroad Commission is achieved under the direction of three Commissioners who are elected by popular vote of the citizenry of Texas to serve overlapping six-year terms. One Commissioner is elected at each general election every two years.

The mission of the Railroad Commission is 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 objectives of the Railroad Commission are to encourage and promote the development, production, and utilization of oil and gas in the State in such a manner as will prevent waste, maximize economic recovery, and fully protect the correlative rights of all owners to the end that the landowners, the royalty owners, the producers, and the general public realize the greatest possible good from these vital natural resources.

The staff is divided into both regulatory and support divisions. Over 830 full-time employees make up the staff, with approximately one-third of them employed in the Commission's district offices. Under the direction of the three Commissioners, regulatory programs are carried out by four regulatory divisions: Oil & Gas, Surface Mining & Reclamation, Oversight & Safety, and Critical Infrastructure. The support divisions include the Communications, Financial Services, Office of General Counsel, Government Relations, Hearings, Information Technology Services, and Operations.

Figure 1 presents an organizational chart of the Railroad Commission of Texas.

Railroad Commission organizational chart attached as Exhibit A.

B. Specific Responsibilities

The Oil and Gas Division of the Railroad Commission will administer the Class VI UIC program upon approval by EPA. The four sections of the Oil and Gas Division will assist in carrying out the program: Planning and Administration, Administrative Compliance, Technical Permitting, and Field Operations. Each section or units within each section will perform different functions.

Organizational charts of the four sections of the Oil and Gas Division that will assist in carrying out the program are attached as Exhibit B.

Planning and Administration

Planning and Administration will assist in managing the budget for the program, as well as personnel matters. In addition, this section will provide records retention services.

Permitting

Drilling Permits is responsible for issuing drilling permits and codifying completion and plugging records for Class VI injection wells.

<u>Injection-Storage Permits (UIC)</u>

The UIC section will process permit applications, monitor permit compliance, and coordinate the Class VI UIC program. Specific duties will include reviewing permit applications, drafting and issuing permits, inspecting facilities, reviewing mechanical integrity tests and monitoring reports, taking appropriate enforcement action, and reviewing Class VI site closure, including plugging and abandonment of Class VI injection and monitoring wells.

- 1. Administer the rules and regulations as they pertain to subsurface injection.
- 2. Perform technical evaluations of injection well applications and prepare draft permits.
- 3. Issue, deny, amend, or cancel permits.

- 4. Witness, at the discretion of the permitting agency, any aspect of construction, testing, operation, and closure of injection well activities.
- 5. Perform on-site certification of permit requirements.
- 6. Review operation reports for permit or rule compliance.
- 7. Provide recommendations of compliance strategies and corrective action when violations occur.
- 8. Maintain a database of injection well information including quantity and quality of injected material, well construction, local geology, and the pertinent water resources that could be impacted.
- 9. Conduct public hearings or enforcement proceedings as required.
- 10. Respond to public inquiries and complaints regarding proposed or operating injection facilities.
- 11. Ensure that the regulated community and the public at large are informed about underground injection activities.
- 12. Initiate and pursue appropriate enforcement action when the permit or rule requirements are violated.
- 13. Maintain permit files including information on the geology and hydrology (e.g., depth, name, and quality of USDWs) in the vicinity of the injection wells along with other data submitted with the application.

Compliance

Compliance will be conducted by the Technical Permitting/UIC section and the Division's Field Operations. Field Operations consists of an Austin office and nine district offices. District office duties associated with the Class VI UIC program will include inspecting facilities, witnessing mechanical integrity tests verifying monitoring well sampling, monitoring compliance, taking appropriate enforcement action, and monitoring the plugging and abandonment of Class VI injection wells and associated monitoring wells.

Office of General Counsel

The Office of General Counsel will provide support to the Oil and Gas Division's UIC section by conducting hearings on permit applications and enforcement actions.

Program staff

The Oil and Gas Division has the technical expertise needed to evaluate permit applications and oversee geologic storage projects.

The duties and responsibilities for the Class VI UIC program will predominantly be handled by UIC staff. These duties will be divided initially among four (4) employees: two (2) Full time employees and two (2) parttime employees initially, expanding to four (4) full time employees or more as permitting activity levels warrant.

The Class VI UIC Manager (a geologist or engineer) will have a significant "hands-on" technical management role in the program, being responsible initially for conducting detailed aspects of the reservoir modeling and reservoir simulation technical review. Overall, management will also include supervising staff of geologists and engineers selected for the Class VI UIC team on the basis of their previous experience and expertise in reservoir modeling and simulation. The Class

VI UIC team will also require one (1) Administrative Technician I, who will be responsible for clerical duties, data and records management and archiving, and other support functions.

One (1) full-time geologist and one (1) part-time geologist with experience and expertise in reservoir modeling and one (1) full-time reservoir engineer and one (1) part-time reservoir engineer with experience and expertise in numerical reservoir simulation will be responsible for the day-to-day operations of the Class VI UIC program. Specific duties include the technical review of Class VI UIC permit applications, Class VI UIC Area of Review Delineation Plans and Reports (and the reservoir modeling and reservoir simulation provided in support of these), monitoring plans and reports, and mechanical integrity tests. Additional duties will include drafting and issuing permits, initiating appropriate enforcement action, inspecting facilities, preparing and reviewing reports, and compiling quarterly statistics for EPA.

The Administrative Technician will provide administrative assistance with projects and coordinate public information requests for Class VI UIC permits and permit applications.

Engineering Technicians located in the district offices will be responsible for performing site inspections, including witnessing well drilling, construction, and completion, and witnessing and validating mechanical integrity testing, etc....

The staffing and costs described above represent the current level of effort anticipated to be required to achieve the prescribed performance criteria with respect to scheduling of permit application reviews, inspections, compliance monitoring, and reporting to EPA. With growth of the program in Texas, additional resources will be devoted to the program to continue to meet or exceed requirements for program performance.

The Railroad Commission's Class VI UIC program will be administered by the UIC Manager. The UIC manager will be a geologist or engineer able to supervise all tasks associated with the administration of the Class VI UIC program including, but not limited to permit evaluation, technical evaluation, onsite inspection, and compliance monitoring.

The reservoir geologist/reservoir engineer will have the necessary experience and expertise to review computer-generated reservoir models and reservoir simulations to determine the accuracy of the required computer-generated models. Selected geological and engineering staff under the UIC manager will be trained in the basics of computer reservoir modeling and simulation to enable a general understanding of the models received under the program.

Staff have in-house expertise (and access to outside contractors, if needed) with skills in the technical and policy areas relevant to evaluating Class VI permit applications, issuing Class VI permits, and overseeing geologic storage projects throughout their life span. The state plans to implement a "team" approach to permitting by dividing permit applications among staff with relevant areas of expertise. The table below identifies the sources of this expertise.

| Expertise Area | In-House | Contractor |
|---|-----------|------------|
| Site characterization, e.g., geologists, hydrogeologists, | $\sqrt{}$ | |
| geochemists, and log analysts/experts to review site | | |

| characterization data submitted during permitting and | | |
|--|-----------|-----------|
| throughout the project duration. | | |
| Modeling, e.g., hydrogeologists and environmental/reservoir | V | |
| modelers to evaluate area of review (AoR) delineation | | |
| computational models during permitting and AoR | | |
| reevaluations. | | |
| Well construction and testing, e.g., well engineers, log | $\sqrt{}$ | |
| analysts/experts, and geologists to review well construction | | |
| information and operational reports on the performance of | | |
| Class VI wells and review/evaluate testing and monitoring | | |
| reports. | | |
| Finance experts to review financial responsibility information | $\sqrt{}$ | |
| during permitting and annual evaluations of financial | | |
| instruments. | | , |
| Risk analysts to evaluate emergency and remedial response | | $\sqrt{}$ |
| scenario probabilities and remediation cost estimates. | | |
| Policy/regulatory experts on the UIC Program and the Class | $\sqrt{}$ | |
| VI Rule to evaluate compliance with Class VI Rule | | |
| requirements. | | |
| Enforcement/compliance, e.g., staff who can initiate and | $\sqrt{}$ | |
| pursue appropriate enforcement actions when permit or rule | | |
| requirements are violated. | | |
| Inspectors including well engineers or log analysts/experts to | $\sqrt{}$ | |
| inspect wells or witness construction activities, workovers, | | |
| and/or mechanical integrity tests. | | |

Because of the extent and complexity of the information that must be reviewed in response to Class VI permit applications and evaluated throughout the operational and post-injection phases of a Class VI project, the Railroad Commission will have in-house staff or access to contractor support with the following technical expertise:

- Site characterization expertise (e.g., geologists, hydrogeologists, log analysts/experts, geochemists) to review site characterization data submitted during permitting and throughout the project duration as per 40 CFR 146.82, 146.83, 146.84, 146.87, 146.90, 146.93, 146.94 and 146.95.
- Modeling expertise (e.g., production/reservoir geologists/reservoir modelers) to evaluate
 AoR delineation computational modeling during permitting and AoR reevaluation
 modeling assessments throughout the project duration as per 40 CFR 146.84(b) and
 (e)(4). Familiarity and/or experience with Petrel or other similar reservoir modeling
 software.
- Reservoir Simulation expertise (e.g., experience with Eclipse, STOMPCO2, TOUGH2, GEM, Intersect or other numerical simulators used for modeling the movement of carbon dioxide and the associated pressure front at GS projects are integral to computational reservoir simulation data evaluation.
- Well construction and testing expertise (e.g., well engineers, log analysts/experts, geologists) to review well construction information and operational reports on the

- performance of Class VI wells or witness and/or evaluate the results of mechanical integrity tests and testing and monitoring reports as per 40 CFR 146.86, 146.87, 146.88, 146.89, 146.90 and 146.92.
- Financial expertise to review the financial responsibility information during permitting and during annual evaluations of the qualifying financial instruments as per 40 CFR 146.85(e).
- Policy/regulatory expertise (i.e., experts on the UIC Program and the Class VI Rule) to evaluate compliance with Class VI Rule requirements.
- Risk analysis expertise to evaluate emergency and remedial response scenario probabilities and appropriate remediation cost estimates as per 40 CFR 146.94.

Estimated costs and sources of funding for implementing the program for the first two years.

The Railroad Commission anticipates that, during the first two years after approval of the state Class VI Program, three (3) permit applications will be submitted, including one (1) permit application in the first year and two (2) permit applications in the second year.

The Railroad Commission expects that reviewing Class VI permit applications will require six (6) months to issue a permit to drill and six months following the date all information is provided to issue authorization to inject.

Depending on the number of applications and permitted projects, the Commission estimates that subsequently running the Class VI Program will cost between \$300,000 and \$500,000 annually. These costs include the Class VI staff salary, contractor costs for the computer reservoir modeling software review, computer reservoir modeling software training, and all other indirect costs associated with the administration of the program.

The implementation of the Texas Class VI UIC program is funded through the Anthropogenic Carbon Dioxide Storage Trust Fund. In 2009, the Eighty-first Session of the Texas Legislature established the fund, which is a special fund in the State treasury. Fees collected by the Railroad Commission under Subchapter C-1, Chapter 27, Water Code, and penalties imposed for violations of that subchapter or rules adopted under that subchapter, and funds received by the Railroad Commission from financial responsibility mechanisms under §27.072, Water Code must be deposited to the credit of the fund. Penalties imposed for violations of Commission rules adopted under §382.502, H&SC, are also deposited to the credit of the Anthropogenic Carbon Dioxide Storage Trust Fund. The fund is an interest-bearing fund.

The Anthropogenic Carbon Dioxide Storage Trust Fund may be used by the Railroad Commission for: (1) permitting, inspecting, monitoring, investigating, recording, and reporting on geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (2) long-term monitoring of geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (3) remediation of mechanical problems associated with geologic storage facilities and associated anthropogenic carbon dioxide injection wells; (4) repairing mechanical leaks at geologic storage facilities; (5) plugging abandoned anthropogenic carbon dioxide injection wells used for geologic storage; (6) training and technology transfer related to anthropogenic carbon dioxide injection and geologic storage; and (7) compliance and

enforcement activities related to geologic storage and associated anthropogenic carbon dioxide injection wells.

The fee amount is set in rule and based on the anticipated expenses that the Railroad Commission will incur in regulating the storage of anthropogenic carbon dioxide. The applicant must pay the fees, demonstrate that it has met the financial responsibility requirements, and provide the Railroad Commission with financial assurance as required under §5.205 (Fees, Financial Responsibility, and Financial Assurance). The applicant must demonstrate financial responsibility and resources for corrective action, injection well plugging, post-injection storage facility care and storage facility closure, and emergency and remedial response until the director has provided to the operator a written verification that the director has determined that the facility has reached the end of the post-injection storage facility care period.

The Commission anticipates that federal funds will be available to primacy States in the future.

| Activity | Annual expenditures/Percent of budget |
|--|---------------------------------------|
| Permit application reviews and permit | 30% |
| issuance. | |
| Project oversight/review of operating data and | 35% |
| testing and monitoring data and reports. | |
| Inspections/witnessing construction or tests. | 5% |
| Data management. | 5% |
| Enforcement/compliance-related activities. | 10% |
| Program oversight/administration. | 15% |

IV. STATE UI PERMITTING PROCESS

A. Class VI Injection Well Permitting

Texas' Class VI regulations requires all operators seeking to inject carbon dioxide for the purpose of geologic sequestration to obtain a Class VI permit to construct or convert a well and gain approval to operate prior to commencing injection activities. Class VI permit applications will be reviewed by staff of the Railroad Commission and issued in accordance with Subchapter B of Chapter 5.

The UIC section is responsible for the technical evaluation of Class VI injection well permit applications and drafting of permit provisions for Class VI wells.

State statutes prohibit the Railroad Commission from issuing a permit under this subchapter for the conversion of a previously plugged and abandoned Class I injection well, including any associated waste plume, to a Class VI injection well. (§27.043(b), Texas Water Code)

In addition, the State statutes require a person making an application to the Railroad Commission for a permit under this subchapter to submit with the application a letter of determination from the TCEQ concluding that drilling and operating an anthropogenic carbon dioxide injection well for geologic storage or constructing or operating a geologic storage facility will not impact or

interfere with any previous or existing Class I injection well, including any associated waste plume, or any other injection well authorized or permitted by the TCEQ. (§27.0461, Texas Water Code)

Currently, there are no permitted Class I UIC injection wells for the purpose of geologic storage of carbon dioxide. There is one (1) Class V experimental technology well. There are no Class VI injection wells permitted by EPA in Texas at this time.

The agency will review the state's UIC inventory and identify Class V experimental technology wells at projects that are no longer experimental but will continue to inject carbon dioxide for GS. The Railroad Commission will contact the operators of these wells and inform them that they must cease injection or apply for a Class VI permit within one (1) year of state program approval.

The Commission has permitted numerous Class II enhanced recovery injection wells for which the authorized injected fluid is carbon dioxide. The Commission will evaluate information about Class II carbon dioxide enhanced recovery wells (e.g., carbon dioxide injection and production data or information related to the other factors at §5.201(b)(2) and identify whether any projects are approaching risk thresholds. If such increased risk is present, the Commission will contact the operators of these wells and inform them that they must apply for a Class VI permit. Agency staff will provide information about the state's Class VI regulation and about applying for a Class VI permit pursuant to §5.201(d). Permitting of these wells will be conducted as described in Section 3 (Permitting Procedures) above.

The UIC section maintains a current database of injection wells on a networked computer system. Class VI injection wells will be included and identified as such in the system.

Operators of Class II enhanced recovery wells may apply to expand the areal extent of Class II aquifer exemptions. Such requests must be submitted concurrently with Class VI permit applications, pursuant to §5.201(g). If any such request is received, the Commission will evaluate the application to determine that the area of the proposed expansion is sufficiently large to contain the carbon dioxide plume and pressure front and was determined in a manner that is consistent with the AoR modeling required under §5.203(d) and whether the request meets the criteria at 40 CFR §146.4. Following this evaluation and a determination that the proposed expansion of the areal extent of the aquifer exemption meets the requirements at 40 CFR §144.7(d) and §146.4, the Railroad Commission will forward the request to the EPA regional office. No designation of an expansion of the areal extent of a Class II enhanced recovery aquifer exemption for geologic sequestration injection will be final unless approved by the EPA Administrator as a program revision.

Other than EPA-approved expansions of the areal extent of existing Class II aquifer exemptions, no aquifer exemptions will be issued for Class VI injection-related activities.

The state's regulation at 16 TAC §5.201(f) incorporates by rule the federal regulation allowing operators of Class VI wells seeking to inject into non-USDWs that lie above or between USDWs to apply for and receive injection depth waivers. The operator must apply for an injection depth waiver at the time they submit the Class VI permit application.

B. Required Information for Geologic Sequestration Facility Permit

When the Railroad Commission receives a permit application, staff will review the application for completeness to determine if it contains all the information outlined in §5.203, relating to application requirements.

C. Permit Review and Public Comment

After confirming that all the required information was submitted with the permit application, agency staff will review the Class VI permit application using the following multi-step process.

First, staff will perform a technical review to determine that the submitted data is accurate and of high quality, has undergone appropriate quality assurance procedures, is representative of the project and the site, and is sufficiently complete to support a full technical evaluation.

Staff will then perform a full technical evaluation of the submitted information to support the decision on the suitability of the site per the requirements at §5.206(a)(1). This includes an evaluation of the geologic system, the well, and the proposed operations to ensure that the project will be protective of USDWs.

The UIC Manager will notify the applicant whether the application is technically complete or deficient and will request any necessary additional information. As needed throughout the permit application review process, agency staff will discuss the application with the operator to ensure that needed information is provided as expeditiously as possible. If the requested information in a deficient application is not received by a specified date, the application will be returned unless the UIC Manager extends the date.

Upon timely receipt of the necessary information, the UIC manager will notify the applicant that the application is complete.

Upon completion of the permit application evaluation, the UIC Manager will tentatively determine whether to prepare a draft permit or to deny the application.

If an application is denied administratively, an administrative denial notice will be mailed to the applicant and the applicant will have the right to a hearing on request. The notice of administrative denial will be subject to the same procedures as a draft permit listed in §5.204.

If the UIC Manager prepares a draft permit, the UIC Manager will also prepare a fact sheet summarizing the project and issue a public notice of the comment period and a public hearing according to procedures listed in §5.204.

Chapter 5 establishes procedures for public participation in the permitting process. Section 5.2031 requires the Commission to prepare a draft permit when it tentatively decides to issue, modify, revoke and reissue, or terminate a permit. Notice will be given to persons listed in §5.204(a)(3) when the Commission prepares a draft permit or administratively denies a permit application or when a hearing is requested.

The Railroad Commission will also notify any states, tribes or territories within the area of review of the geologic sequestration project and document the results of this consultation, pursuant to §5.204(a)(3)(A)(i)(III). See Section 12 (Transboundary Notification and Documentation Procedures) for additional information on procedures for this notification.

The Railroad Commission will identify whether any portions of the AoR encompass an environmental justice (EJ) or Limited English Proficiency (LEP) area using the most recently published U.S. Census Bureau American Community Survey data. If the AoR incudes an EJ or LEP community, the Railroad Commission will require that enhanced public outreach activities to these communities is conducted. Efforts to include EJ and LEP persons in public involvement activities in such cases will include: published meeting notice in English and the identified language(s) (e.g., Spanish); comment forms posted on the webpage and available at public meeting in English and the alternate language; interpretation services accommodated upon request; translation of any comments made during any comment period in the alternate language; and to the extent possible, public meeting/hearing venues near public transportation.

The Commission will hold a public hearing when (1) an operator or affected person requests a hearing; (2) the Commission finds on the basis of requests, a significant degree of public interest in a draft permit; or (3) at the Commission's discretion. Under §5.204(c)(2)(B), a hearing may be held in the public interest whenever there is a significant degree of public interest or the application presents significant or unique policy issues that are appropriate for determination by the Commission. An opportunity for receipt of public comment is provided at a hearing held in the public interest. A person is allowed to make comment at the hearing regardless of whether he or she would have standing as a party.

The rule provides 30 days for public comment on the draft permit. Handwritten comments received on comment forms during the comment period will be entered into an Excel file. All comments will be recorded verbatim. The staff will develop summaries of each comment period that includes meeting documentation and a comment response matrix or content summarizing frequent comments and responses.

During the public comment period, any interested person may submit written comments on the draft permit or the storage facility permit application. All comments will be considered in making the final decision and will be addressed when a storage facility permit is issued.

The Commission will hold a public hearing on the storage facility permit application and draft permit. Notice of the public hearing will be published in a newspaper of general circulation in Austin, Texas, and in a newspaper of general circulation in the county where the land affected or some part thereof is situated at least 30 days prior to the hearing. The public notice will include information about the length of the comment period, contact person, and the address and phone number of the Commission, so interested parties can request copies of the storage facility permit application and the draft permit.

After completion of the public hearing and review of public comments, the Railroad Commission will make a final permitting decision and, if appropriate, issue a Class VI permit. The Commission will issue a response to all formal comments received during the hearing process.

The permit will authorize the applicant to construct the injection well or convert an existing well to Class VI.

Following well drilling/conversion and completion activities, the permit applicant will submit information that the Commission will consider in determining whether to approve operation of the injection well. If the information provided meets all the requirements at §5.205, relating to permit standards, the Commission will authorize the applicant to inject carbon dioxide.

To evaluate the absence of significant leaks, operators of Class VI wells must, following an initial annulus pressure test, continuously monitor injection pressure, rate, injected volumes, pressure on the annulus between tubing and long-string casing, and annulus fluid volume, pursuant to §5.206(c)(2)(E).

At least once per year, operators must use an approved tracer survey or a temperature or noise log to determine the absence of significant fluid movement pursuant to §5.203(h)(1)(D). The Commission may require additional or alternative tests if the results presented by the operator are not satisfactory to demonstrate mechanical integrity. The Commission expects to review the results of three (3) MITs from Class VI well operators each year during the first two years after approval of the state Class VI program.

A Class VI injection well has mechanical integrity if there is no significant leak in the casing, tubing, or packer; and there is no significant fluid movement into an USDW through channels adjacent to the well bore. To evaluate the absence of significant leaks the storage operator will, following an initial annulus pressure test, continuously monitor injection pressure, rate, injected volumes, pressure on the annulus between tubing and long-string casing, and annulus fluid volume.

To evaluate mechanical integrity, the storage operator will apply methods and standards generally accepted in the industry. When the storage operator reports the results of mechanical integrity tests to the Commission, the storage operator will include a description of the test and the method used. In order to properly evaluate mechanical integrity, the Commission will review monitoring and other test data submitted since the previous evaluation.

The Commission may require additional or alternative tests if the results presented by the storage operator are not satisfactory to the Commission to demonstrate mechanical integrity.

The operator of a Class VI well must prepare, maintain, and comply with a testing and monitoring plan to verify that the geologic sequestration project is operating as permitted and is not endangering USDWs. The testing and monitoring plan must be submitted with the permit application for Director approval, and must include a description of how the operator will meet the requirements. Testing and monitoring must include the information identified in 16 TAC §5.203(j).

The operator must comply with the requirements identified in 16 TAC §5.206(j)(3)(D)&(E) and 16 TAC §5.206(j)(5) for plugging and abandonment.

The operator of a Class VI well must comply with the requirements identified in 16 TAC §5.206(j) for PISC and site closure plan.

V. STATE COMPLIANCE MONITORING PROGRAM

All Class VI permits are required to include a provision that requires the permittee to allow the Director, or an authorized representative of the director, during normal working hours, to enter the premises of a regulated facility, or where the records are kept and inspect the facilities, review and copy reports and records, collect fluid sample for analyses, measure and record water levels, and perform any other function authorized by law or regulation.

The Railroad Commission's oil and gas regulatory program makes strategic use of a variety of monitoring and enforcement tools supported by Texas statutes and Commission rules. These tools work in concert to incentivize compliance and ensure violations are promptly resolved. The Commission continues to strengthen related tracking and reporting systems, which should provide data that can demonstrate the effectiveness of the Commission's monitoring and enforcement activities.

The Oil and Gas Division monitors oil and gas operations in the state through the efforts of both the program offices in Austin and the ten district offices, each assigned to one of three regional districts. A district map is available on the Commission's website. Comprehensive permitting and reporting requirements enable the Commission to track the compliance status of oil and gas operations. In addition, the 173 inspectors as of February 28, 2021, are assigned throughout the state's oil and gas producing regions.

Beyond the organization report, Commission rules establish additional permitting, testing, monitoring, and reporting requirements for different types and stages of oil and gas operations. Examples of these requirements include certificates of compliance, drilling permits, completion reports, production reports, production tests, well integrity tests, and injection monitoring reports. The Commission uses the information gathered through these requirements to track operations around the state and ensure they remain in compliance with Commission rules, permits, and orders.

Inspectors use the Inspection, Compliance, and Enforcement (ICE) system to document inspections of oil and gas facilities electronically. The ICE system was implemented in 2015, allowing inspectors to record violations by rule number at the well level. ICE allows for tracking of well/lease inspection and violation history, and gives inspectors access to current operator, facility, and compliance information while onsite. Regardless of the reason for inspection, such as a complaint or a mechanical integrity test, the inspector will check for compliance with all applicable Commission rules and record the findings in ICE.

Compliance monitoring will, at a minimum, include on-site inspections conducted by authorized agents of the Railroad Commission and a review of operating and monitoring reports submitted in compliance with §5.207, relating to Reporting and record-keeping, to verify that the construction, completion, operation, maintenance, and site closure of geologic sequestration

projects are performed according to approved plans and specifications and meet all permit and regulatory requirements.

The state's compliance monitoring program includes the following activities:

- Reviewing plans and reports (e.g., well completion reports, test results, workover reports) submitted by operators.
- Conducting site inspections to verify or witness construction, operation, and testing/maintenance procedures. Site inspections will be conducted by the agency's authorized agents.
- Investigating complaints alleging improper construction, completion, operation, or maintenance of a GS project.
- Performing compliance monitoring (e.g., reviewing monitoring, operating and maintenance data) to verify compliance with permit conditions, regulations and any other conditions or stipulations.
- Conducting annual inspections and compliance follow-up inspections of GS projects.

Plan Review

The Commission will verify that the storage facility construction, completion, operation, maintenance, and closure procedures are performed according to approved plans and specifications and meet all permit or regulatory requirements.

Verification of Class VI injection well activities is accomplished by reviewing appropriate plans and reports, performing on-site inspections, responding to complaints, and, where necessary, referring noncompliance to legal counsel for appropriate enforcement action. Review of plans and reports may include but are not restricted to:

- 1. Revisions to construction plans filed after permit issuance.
- 2. Well completion reports including results of required logging and other testing.
- 3. Results of injectivity and pump tests, mechanical integrity tests, and any other required tests.
- 4. Bottomhole pressure reports and updated evaluations of the effects of injection on the injection zone, including fluid volume, injection rate, and injection pressure data.
- 5. Workover plans and workover reports describing construction or maintenance.
- 6. Revisions to plugging plan and reports of completion of plugging, and other site closure activities.
- 7. Any other plans or test results connected with the proper construction, operation, and maintenance of the well and associated surface facilities.

Site Inspections

Site inspections will be conducted by the Commission's authorized agents. The inspections will be conducted at the discretion of the Commission for all permitted CO2 storage facilities to:

- 1. Determine the probability of a violation and indicate problems that may be causing or lead to violations.
- 2. Assist in identification of existing problems or prevent potential problems from developing.
- 3. Update the Commission records on the facility and verify operational procedures.
- 4. Maintain a regulatory presence with the storage operator and all landowners impacted by the project.

Site inspections to verify or witness construction, operation, and maintenance procedures may be conducted as necessary when certain construction operations begin, or in response to a complaint or other indication that a problem may exist. Construction elements and testing that may be witnessed by the Commission and it authorized agents, include:

- 1. All drilling operations
- 2. Setting and cementing surface casing.
- 3. Cementing long string casing.
- 4. Well logging and coring operations.
- 5. Pressure testing of tubing and casing.
- 6. Formation pressure tests, injectivity tests, or pump tests.
- 7. Installation and maintenance of instrumentation.
- 8. Work required by any corrective action plan.
- 9. Well workovers.
- 10. Placement of monitoring wells or other equipment.
- 11. Any plugging procedures.
- 12. Mechanical Integrity testing.

Annual inspections will consist of the following activities:

- 1. Observations of injection site, facilities, and monitoring wells.
- 2. Review of records to determine history of performance and compliance.
- 3. Evaluation of the operation and maintenance of the storage facility.
- 4. Review of all Class VI permit conditions.
- 5. Review of all site-specific permit conditions.

In addition, geologic storage facilities may be inspected at any time by the Commission and its authorized agents.

Site inspections and examination of storage operator records will be conducted under the authority of §27.071 (relating to power to enter property) and §27.072 (relating to power to examine records), Chapter 27, Texas Water Code.

Complaints

The public is encouraged to report problems or concerns with oil and gas activity through the Commission's complaint procedures. The Commission gives high priority to the timely investigation and resolution of complaints.

These complaints come from a variety of sources, including operators, mineral owners, surface owners, government agencies, and members of the public. Complaints are accepted in a variety of formats, including phone calls, emails, letters, social media, or visits to the district offices.

Complaints involving potential violations of the Commission's rules are investigated by the appropriate District Office. The investigation involves an inspection that is documented in the ICE system. Any violations identified are addressed through the Commission's enforcement procedures.

Complaints involving an imminent threat to public health and safety or the environment are investigated immediately. Other pollution-related complaints are investigated within 24 hours. Complaints not involving pollution or safety are investigated within 72 hours.

Complaints alleging improper construction, completion, operation, or maintenance at a storage facility will be investigated by the Commission. Response to complaints may consist of:

- 1. Establishing the nature and authenticity of the complaint.
- 2. Reviewing appropriate records, reports, and files.
- 3. Establishing contact with the operator to verify the complaint and discuss corrective action.
- 4. Performing a site inspection to determine if a problem exists.
- 5. Referring the complaint, after verification through appropriate investigation and documentation to legal counsel.

The complainant receives written updates on the progress of the investigation and any related enforcement action. The complainant is also notified when the complaint is closed. A complaint is closed when the District Office determines that the well or other facility is operating in compliance with the rules or any violations have been corrected. In the event the matter is referred to the Office of General Counsel-Legal Enforcement Section (Legal Enforcement), the District Office notifies the complainant to contact that section for further information.

VI. ENFORCEMENT PROCEDURES

Any person violating Subchapter B of Chapter 5, any condition of a Class VI permit, or any rule or order of the Railroad Commission is subject to enforcement action. The Railroad Commission is responsible for initiating, pursuing, and resolving enforcement actions.

Enforcement proceedings may result in modification, revocation and reissuance, or cancellation of any permit issued under authority of the UIC Program.

The Railroad Commission will attempt to handle all minor violations through informal means, such as correspondence between agency staff and the alleged violator. The agency's primary concern will be those violations that may have significant effects on the environment or may endanger USDWs.

If further enforcement action is required, the state may seek civil penalty up to \$5,000 for each day of noncompliance and for each act of noncompliance under §27.101, Texas Water Code.

Any person violating Chapter 5, any condition of a permit, or any rule or order of the Commission is subject to enforcement action. The Commission is responsible for initiating, pursuing, and resolving formal enforcement actions.

Before conducting any operation under the Commission's jurisdiction, a company must file an organization report providing basic information on the company and its principals (Form P-5). Along with this report, the company must provide financial security conditioned that the operator will plug wells and clean up pollution in accordance with Commission rules, permits, and orders. The organization report and associated financial assurance must be renewed annually.

The Commission uses the information provided with the organization report to identify and track the operations of the company within the state. For example, the Commission verifies compliance with the inactive well requirements (16 Texas Administrative Code §3.15) annually upon renewal of the organization report and suspends a company, the principals, and any other company regulated by the Commission that has common principals' authority to operate if the company does not achieve compliance. Non-compliant principals are barred from renewal for seven years. Non-compliant entities are barred indefinitely. Once compliance is achieved, the organization report can be renewed. A company without a current organization report may not conduct operations in Texas.

Compliance and enforcement actions for violations of some permitting or reporting requirements may be initiated by the UIC Unit. In these instances, inspectors assist by monitoring the status of compliance efforts in the field.

If a district office or the UIC Unit is unsuccessful in obtaining compliance through other mechanisms, or if the severity or willfulness of a violation warrants further action, the Oil and Gas Division will refer the matter to Legal Enforcement. Legal Enforcement may subsequently file a complaint seeking administrative penalties and other enforcement actions through a Commission order.

The following paragraphs briefly describe the enforcement mechanisms available to the Commission. These mechanisms may be used individually or in combination, sequentially or simultaneously, as appropriate to achieve a timely, full, and fair resolution.

Notices of violation

Except for certain violations that may be resolved quickly through a phone call, the district office will formally notify the operator of a violation in writing via U.S. Mail or as an attachment to an e-mail. Notification of a violation will specify a deadline for compliance. Shortly after the deadline for compliance, the inspector will return to the location to verify compliance. This follow-up inspection is called a back check.

Seals/severances

The designated operator of any well in the state must file a certificate of compliance (Form P-4). By filing this certificate, the operator certifies that the lease is being operated in compliance with Commission rules, permits, or orders. If the Commission identifies a violation on the lease, the Commission may cancel the certificate of compliance. *See* Tex. Nat. Res. Code Ann. §§91.701-91.707.

Before cancelling the certificate, the Commission must provide the operator notice of the violation and at least 10 calendar days to achieve compliance or request a hearing. The district office provides this notice by issuing a "notice of intent to cancel the P-4."

The action of cancelling a certificate of compliance is commonly described as "severing a lease" or "issuing a pipeline severance." In practice, a seal or severance is the most effective enforcement tool available to the Commission. Once the certificate of compliance is cancelled, the operator must cease operations on the lease. As a result, the operator suffers an immediate

revenue impact and may not resume operations until the lease is returned to compliance and the operator pays a \$750 reconnection fee.

Permit actions

Commission rules authorize the agency to modify, suspend, or terminate a permit based on violations of Commission rules, permits, or orders. Unless agreed to by the permit holder and authorized to be handled administratively, these actions will be taken through Commission order after notice and opportunity for hearing.

Administrative penalties

The Commission has statutory authority to assess administrative penalties for violations related to safety or the prevention or control of pollution. *See* Tex. Nat. Res. Code Ann. §§ 81.0531-81.0533. The Commission may assess up to \$10,000 per day per violation. The Commission may also assess penalties for \$1,000 per day for non-safety or pollution related violations. In determining the amount of the penalty, the Commission considers relevant factors including the seriousness of the violation and the operator's history of compliance. The Railroad Commission's Statewide Rule 107 (16 Texas Administrative Code § 3.107) provides guidelines for the assessment of penalties for various types of violations.

Under §27.1011 of the Texas Water Code (relating to Administrative Penalty), if a person violates the provisions of Chapter 27 or a rule, order, license, permit, or certificate issued under Chapter 27, the person may be assessed a civil penalty by Commission. The penalty may not exceed \$10,000 a day for each violation. Each day a violation continues may be considered a separate violation for purposes of penalty assessments. In determining the amount of the penalty, the Commission must consider the permittee's history of previous violations of this chapter, the seriousness of the violation, any hazard to the health or safety of the public, and the demonstrated good faith of the permittee or person charged.

Loss of authority to operate

The Commission may refuse to accept an organization report (Form P-5), may sever a certificate of compliance (Form P-4), and may revoke a permit if: (1) the organization remains noncompliant with an outstanding order finding a violation; or (2) a person who holds a position of ownership or control in the organization has, within the preceding seven years, held a position of ownership or control in another organization that has an outstanding order finding a violation during the period of ownership or control. Rejection of an organization report under this authority precludes an organization from conducting oil and gas operations within the State of Texas except as necessary to ensure public safety and protect the environment. The Commission tracks outstanding violations to ensure organizations and their officers and owners are held accountable under this authority. (See Tex. Nat. Res. Code Ann. §91.114.) When an Enforcement Order has been issued and the operator has not complied with that order, the statute prohibits the Commission from accepting Organization Report renewals (Form P-5), certain permit applications (including Drilling Permits among others) and requests for Certifications of Compliance and Transportation Authority (Form P-4) for any wells it may operate. The statute also applies to the individuals in control of the company: any other companies controlled by a tagged person are similarly barred from filing with the Commission. The restrictions imposed by §91.114 effectively bar that company (and those who control it) from continuing those activities

beyond the current P-5 year as an "Active" organization report is required for a company to conduct operations subject to the Commission's jurisdiction.

The district offices closely monitor violations identified through inspections until they are resolved. They may use one or more of the available enforcement mechanisms depending on the nature of the violations and how quickly they are resolved. They may escalate the enforcement response, if necessary, to achieve compliance, or if the severity or willfulness of the violation warrants further action. If necessary, the District Offices may escalate the enforcement process by referring violations to Legal Enforcement.

Prior to taking formal enforcement action the Commission may:

- Notify the alleged violator of deficiencies and such written notice may require corrective action.
- Draft and issue a notice of violation to the alleged violator.
- A Class VI UIC well may be physically sealed after the director approves the seal-in. A
 seal order is issued when an operator continues to inject after the operator has been
 warned concerning violations. The seal is not removed until all violations have been
 corrected.
- Issuance of a letter detailing recommendations for corrective action and establishing a compliance period in which action will be taken.

The Commission may pursue formal enforcement action:

- Administrative Penalties: The Commission may assess administrative penalties of up to \$10,000 a day for each violation.
- Civil Penalties: The Commission is authorized to sue to recover civil penalties of up to \$5,000 for each day of noncompliance and for each act of noncompliance.

Other Enforcement Mechanisms: The Injection Well Act provides for Criminal penalties and injunctive relief.

- Issuance of an administrative order by the Commission specifying corrective action and compliance schedule.
- Signing of a stipulation between the Commission and the alleged violator establishing a compliance schedule for corrective action.
- Conducting an administrative hearing (formal or informal) pursuant to Texas Government Code Chapter 2001.

Any enforcement proceedings may result in modification, revocation and reissuance, or termination of any permit issued under authority of the Class VI UIC program.

The Railroad Commission will attempt to handle all minor violations through informal means or through use of correspondence between technical staff and the alleged violator. The Commission will have, as its main concern, those violations which may have significant effects on the environment of the State and which may endanger valuable resources, such as USDWs.

4. Permit, Permit Applications, Reporting and Manifest Forms

The Railroad Commission will use the EPA's GSDT portal for accepting Class VI applications.

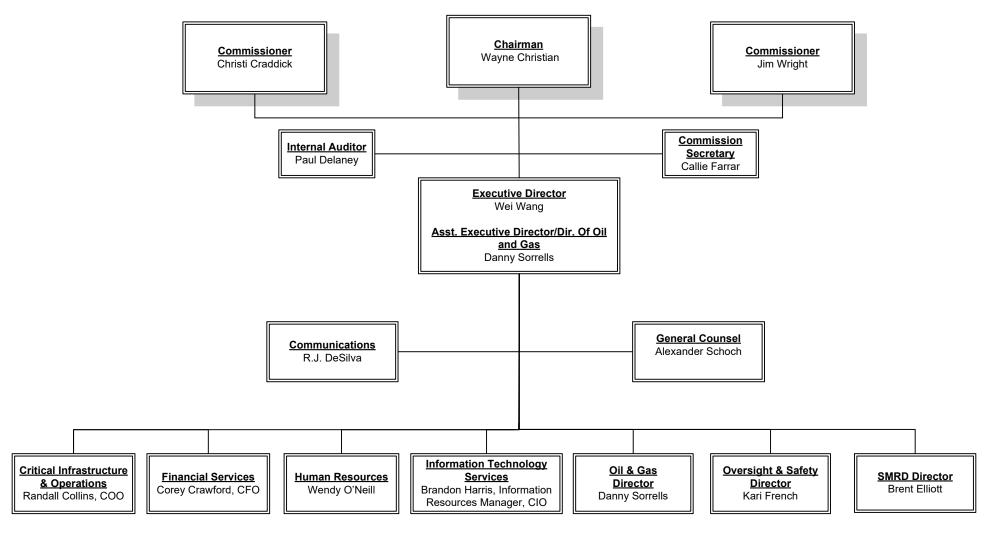
Exhibit A

Railroad Commission of Texas Organizational Charts

April 2022



The Railroad Commission of Texas - Overview





Commissioners' Offices

April 2022

Commissioner

Christi Craddick 00023185

Bill Black Chief of Staff/Legal Counsel 00020195

Mia Hutchens Director of Public Affairs 00024275

Kathleen Hayden Executive Assistant 00023151

Department 01008

Chairman

Wayne Christian 00023428

Jeremy Hagen Chief of Staff/Legal Counsel 00022578

Jordan Ballard Director of Public Affairs 00022984

Annie Callegari Executive Assistant 00056668

Department 01005

Commissioner

Jim Wright 00022661

Christopher Hotchkiss Chief of Staff/Legal Counsel 00020810

Aaron Krejci Director of Public Affairs 00020572

Megan Moore Executive Assistant 00034777

Department 01007

Internal Auditor

Auditor V Paul Delaney 00022182

Executive Director
Wei Wang
00023121

Commission Secretary
Executive Assistant III

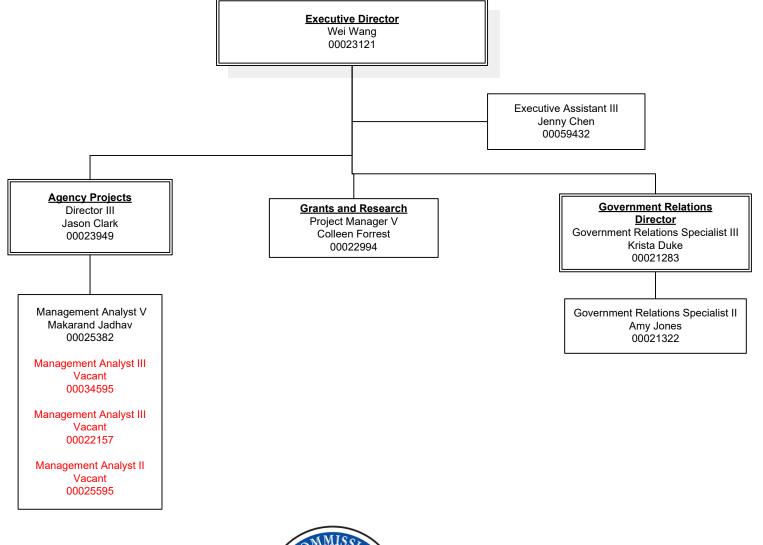
Callie Farrar 00020283



Executive Office

April 2022

Department 13010 - Executive Office

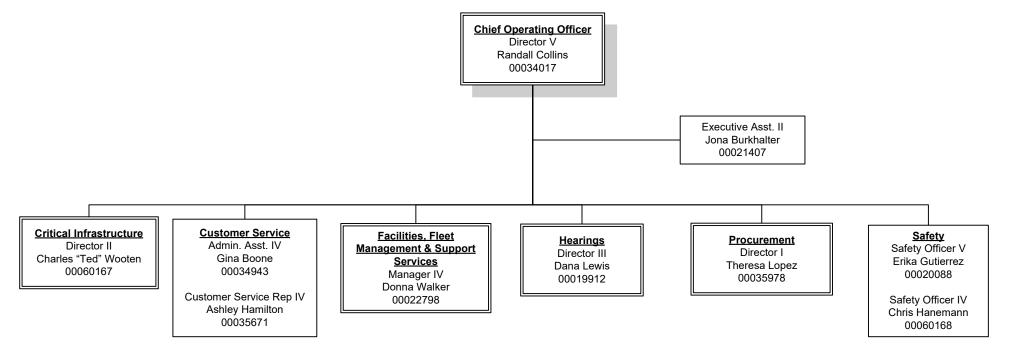




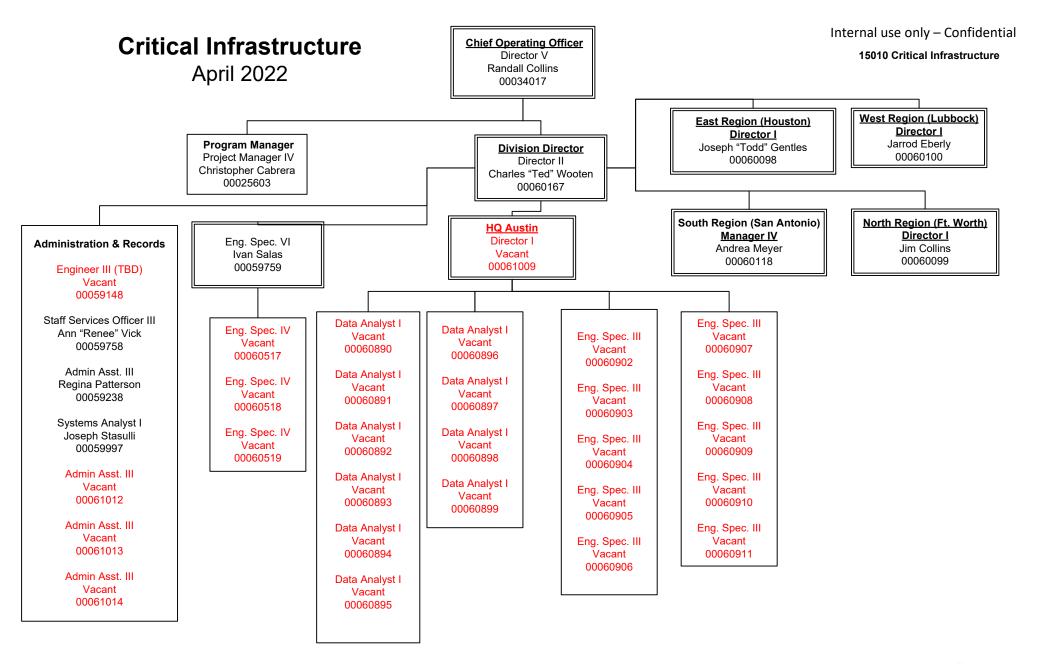
Operations Division

April 2022

Department 02122 - Operations Department 02129 - Operations Customer Service







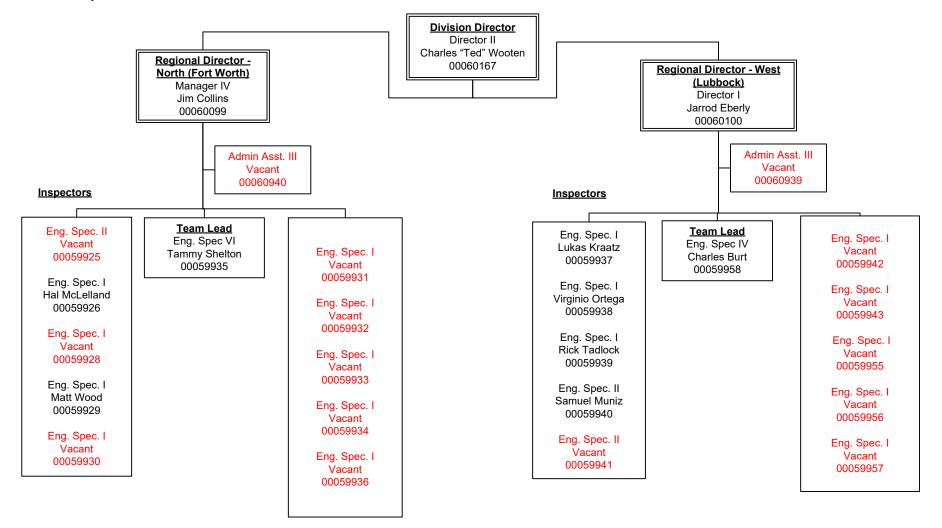


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15010 Critical Infrastructure

Critical Infrastructure North and West Regions

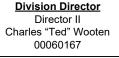
April 2022





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15010 Critical Infrastructure



April 2022

East Region (Houston) **Director I** Joseph "Todd" Gentles 00060098 Admin Asst. III

Inspectors

Eng. Spec. III Vacant 00060913

Inspectors

Eng. Spec. III Vacant 00060914

Eng. Spec. I Adam Deluna 00059945

Eng. Spec. I Cavson Martinez 00059946

Eng. Spec. II Daniel Trevino 00059947

Eng. Spec. II Max Bertetti 00059948

Team Lead Eng. Spec IV Ronnie Conyer

South Region (San Antonio)

Manager IV

Andrea Meyer

00060118

00059949 00059959 Eng. Spec. I

Admin Asst. III

Vacant

00060932

Vacant 00059950

Eng. Spec. I

Vacant

Eng. Spec. I Vacant 00059951

Eng. Spec. I Vacant 00059952

Eng. Spec. I Vacant 00059953

Eng. Spec. I Vacant 00059954

Data Analyst II Vacant 00060900

Data Analyst I Vacant 00060901

Eng. Spec. III **Denton Sorrells** 00060912

Eng. Spec. III Vacant 00060915

Eng. Spec. II Jesse Roth 00060101

Eng. Spec. II Darrell Ferguson 00060102

> Eng. Spec. II Vacant 00060103

Eng. Spec. II Keith Heingartner 00060104

Eng. Spec. II Kirt Heingartner 00060105

Eng. Spec. II Tim Wojcik 00060106

Eng. Spec. I Vacant 00060107

Team Lead Eng. Spec IV Vacant

00060960

Katherine Bowman

00060931

00060108 Eng. Spec. II Yayma Martinez

00060109

Eng. Spec. I

Vacant

Eng. Spec. I Vacant 00060110

Eng. Spec. I Vacant 00060111

Eng. Spec. I Vacant 00060112

Eng. Spec. I Vacant 00060113

Eng. Spec. IV Orlando Caridad 00060114

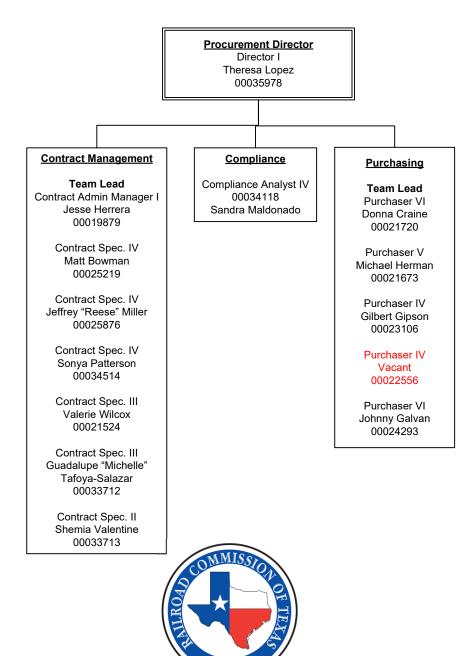
> Eng. Spec. I Vacant 00060115



Department 02130 - Procurement

April 2022

Procurement Division



Department 14010



April 2022

Human Resources Director

Director II Wendy O'Neill 00022550

Human Resources

Talent Acquisition Management

HR Spec. V Joe Beach 00023105

HR Spec. V Jessica Graham 00022068

> HR Spec. V Vacant 00061027

Operations

HR Spec. V Minnie Brown 00022320

Time & Labor

HR Spec. IV Jennica Preston 00023517

Support

HR Spec. III Veronica Gonzalez 00059007

Professional Development

Training

<u>Manager</u> Manager III David Robinson 00034857

Training Specialist III Christina Moyer 00059190



HR Business Partner Team Lead

Program Specialist VII Kathryn Dolan 00024431

Senior HR Business Partner

HR Spec. VI Vacant 00025321

HR Business Partners

HR Spec. V Michelle Amberg (.75) 00020805

Facilities & Support Services April 2022

Facilities and Support Services Manager

Manager IV Donna Walker 00022798

Property Managers

Fleet Manager II Steven Stiles 00019582

Fleet Manager II Lynn Sladek 00023537

Support Services

Program Spec. III Tommy Maldonado 00022881

Program Spec. II Uniquia Thompson 00024382

Program Spec. II Juan Ruelas Guzman 00020949

Accounting

Accountant IV Jennifer Garcia 00020088



Department 07701

Hearings Division

April 2022

Hearings Division Director

Director III Dana Lewis 00019912

Administrative Law Judges

Master Admin Law Judge I John Dodson 00024325

> Admin Law Judge III Ezra Johnson 00023263

> Admin Law Judge III Jennifer Cook 00023642

> Admin Law Judge III Kristi Reeve 00022013

Admin Law Judge II Adam Taylor 00022886

Admin Law Judge II Ryan Rutledge 00024512

Admin Law Judge II Brennan Foley 00022734

Admin Law Judge II Bridgette Tomasetti 00022022

Admin Law Judge II Mandy Patel 00024530

Legal Assistant

Legal Asst. V Joseph Menefe 00023775

Manager IV

Carmen Calderon 00020323

Program Specialist

Program Spec. V Sandra Morris 00023450

Docket Services

Program Spec. II Melissa Stovall 00023331

Program Spec. I Samantha Weaver 00024460

Legal Assistants

Legal Asst. III Sandra Frazier 00020225

Legal Asst. III Barbara LeBlanc 00020963

Legal Assistant III Sharon Koren 00047106

Legal Asst. IV Megan Schimcek 00023878

Legal Assistant III Sarah Halterman 00059124

Manager III

Tiffany Humberson 00061139

Technical Examiners

Eng. Spec. VI Petar Buva 00020192

Eng. Spec. VI Ashley Correll 00023396

Eng. Spec. V Tariq Ali 00025224

Financial Examiner V Rose Ruiz 00022396

Financial Examiner V James Currier 00020112

> Eng. Spec. VI Austin Gaskamp 00021257

Eng. Spec. VI John Moore 00023051

Env. Protection Spec. V Tim Walter 00035699



Department 03601- Communications

Communications April 2022

Communications Director

Director III RJ DeSilva 00024262

Spokesperson

Information Specialist V Andrew Keese 00020099

Communication Specialist

Program Specialist VII Michelle Banks 00022227

Public Outreach

Information Spec. IV Clinton "Scott" Sroufe 00021647

Web Administration

Web Administrator III
Phil Pettit
00023508

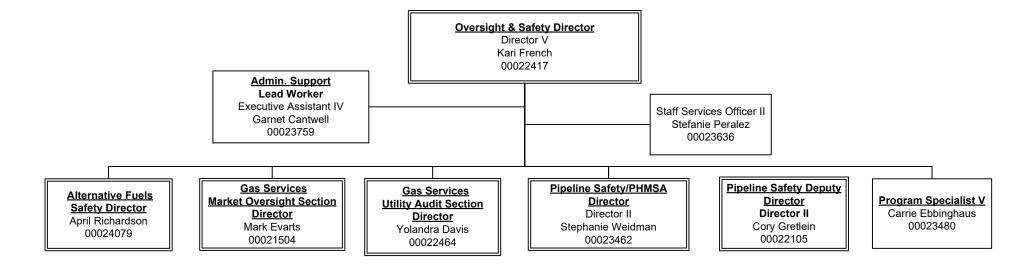
Web Administrator II Ken Holman 00025877

Digital Media Manager

Information Specialist IV Nick Kraynok 00021891



Oversight & Safety – Overview April 2022





Oversight & Safety – Alternative Fuels Safety Department April 2022

Alternative Fuels Safety Director

Director II April Richardson 00024079 Department 09622 – AFS Training Department 09633 – AFS Operations

Licensing & Compliance Manager

Manager I Kent Thompson 00020450

Licensing Specialists

License & Permit Spec. IV Richard Castillo 00020355

License & Permit Spec. II Rosalinda Duncan 00021055

License & Permit Spec. II Martin Benavides 00022323

Compliance Specialists

License & Permit Spec. IV Angela Whitehead 00022639

> Program Spec. II Vacant 00020231

Compliance Analyst I Holt James 00022281

Compliance Analyst I Pamela Tajmajer 00034664 **AFS Inspectors**

Eng. Spec VI - Manager Adam Rodriguez "I" 00019613

Team Lead

Inspector VI Fernando Belmares 00021452

Inspectors

Inspector VI Kevin Clarke 00023794

Inspector IV Earl Smouse 00023078

Inspector III Vacant 00021401

Inspector IV Mark Aguilar 00034666 Team Lead

Inspector VI Chris Mann 00022488

Inspectors

Eng. Spec. II Charlie Esparza "I" 00021794

> Inspector IV Paul Vail 00025706

Inspector IV Vacant 00023134

Inspector IV Vacant 00034667

Eng. Spec. III Theresa Osborn "I" 00022292 Team Lead

Inspector VI Greg Fuller 00023181

Inspectors

Inspector IV James "Rick" Hanes 00022062

> Inspector VI John D. Doan 00020792

Inspector V Scott McIntire 00021757

Inspector III Jacob Acuna 00020892

Inspector IV Vacant 00034665 **Training Manager**

Program Supervisor VI Mark Hood 00021737

Certification Specialist

Customer Service Rep. IV Erin Perkins 00022959

Customer Service Rep. IV John "Conrad" Gonzales 00021433

Training Support

Education Specialist II Maurie Hebert 00024501

Instructor

Training & Development Spec. V Arturo Valladares 00024049

Training & Development Spec. IV Richard Rosenberg 00023754

Training & Development Spec. II
David Vire
00023809

Training & Development Spec. II Gretchen Almind 00034668



Admin Support
Admin Asst. III
Vacant
00023109

Admin Asst. III Gina Marelli 00024457



Oversight and Safety – Gas Services Department

April 2022

Department 06511 – Gas Services Market Oversight Department 06521 – Gas Services Audit

Market Oversight Section Director

Director III Mark Evarts 00021504

Customer Service

Team Lead

Research Spec. II Andrea Maxwell 00021587

Customer Service Rep IV Marisol Gomez 00019483

Customer Service Rep IV Alexis Larraga 00022349

Customer Service Rep IV Janet Sims 00022912

Customer Service Rep IV Vacant 00020306

Financial Analysts

Team Lead

Financial Analyst IV Sarah Montoya-Foglesong 00020449

> Financial Analyst III Tariq Usman 00023639

> Financial Analyst III Claudia Godoy 00024000

> Financial Analyst III Marzi Bolhassani 00022457

> Financial Analyst IV Vacant 00019933

Financial Analyst II Vacant 00056524

Financial Analyst I Erik Gardner 00023746

Utility Audit Section Director

Director II Yolandra Davis 00022464

Field Operations Houston District

Lead Auditor

Auditor IV Konata Uzoma 00023329

Auditor

Auditor II Saju Georgesam 00021198

Auditor IV Vonetta Jackson 00019840

Auditor III Carla Robinson 00055989

Auditor II Bryan Sparkman 00023057

Field Operations Austin District Auditor

Auditor II Michael Martinez 00025735

Admin Asst. II Laura Euresti 00056698

Field Operations Ft. Worth District Senior Auditor

Auditor IV Josh Settle 00021392

Auditor III Vacant 00021662

Gas Utility Pipeline Tax, Annual Report, and Statistical Analysis

Compliance Analyst III Janeen Metcalf 00023837



Oversight & Safety Pipeline Safety Department April 2022

External Support Manager

Manager I Vacant 00020907

Permitting, Mapping, and Damage Prevention Support

License & Permit Spec. V Bruce Waterman 00019805

Compliance Analyst I Andrew "Andy" Martinec 00022326

Compliance Analyst III Cecilia Martinez 00019929

Compliance Analyst I Vacant 00021608

Compliance Analyst II Ricardo Gamez 00024339

Pipeline Safety Deputy Director

Director II Cory Gretlein 00022105

Communications Support

Compliance Analyst I

David Bauman

00025571

Compliance Analyst I

James Mularadelis

00022015

Administrative Support

Admin. Asst. V Rebecca Salazar 00019849

> Admin Asst. III Vacant 00022060

Admin. Asst. III Sara Lopez 00035580 Department 11430 – Pipeline Safety Support Department 11440 – PS Damage Prevention

<u>Pipeline Operations Compliance,</u> <u>Data Analysis and Grants</u>

Compliance Analyst III Jamie Renard 00023059

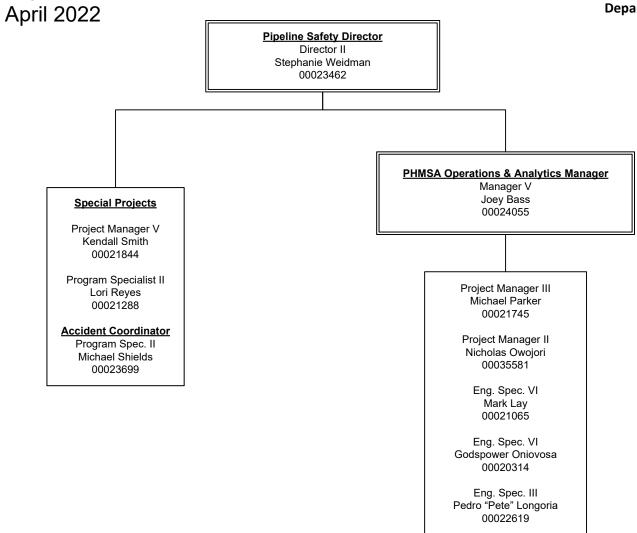
Compliance Analyst III Blake Rohde 00023174

Compliance Analyst I Stephen "Randy" Graves 00022687



Oversight & Safety Pipeline Safety Field Operations

Department 11420 - Pipeline Safety OGRC





Oversight & Safety Pipeline Safety Field Operations April 2022

Pipeline Safety Director

Director II Stephanie Weidman 00023462

Department 11420 - Pipeline Safety OGRC

Corpus Christi Region Manager

Manager V Steven Rios 00023840

<u>Austin</u>

P/L Inspectors

Christian Achonye – "I V" 00025572 Derek Garcia - "I V" 00020295

Corpus Christi P/L Inspectors Team Lead

Eng. Spec. IV Ronald Perez "I" 00022960

Joe Maldonado "I IV" 00022838

Jonathan Sauceda "I VI" 00020398

Michael Nuernberg "I VI" 00023615

Luis Garcia "I IV" 00022576

Macey Damron "I V"

00021765 Mario Solis "I IV"

00025272

Peter DeRobertis "I VI" 00020854

Alberto Hernandez – "I IV" 00019925

Ft. Worth Region Manager

Manager III Brad Cox 00019580

Fort Worth P/L Inspectors

Team Lead Eng. Spec. V

Gary Cummings "I" 00025573

Andy Glass "I IV" 00023730

Eng. Spec. VI

Jose Cheverez "I" 00020553

Eng. Spec. VI Jeremy Dudik "I"

00021866 Eng. Spec VI

Kevin Colteryahn "I"

Cesar Salinas "I IV" 00025360

Phillip Landtiser "I VI" 00024803

Sean Dyer "I V" 00025359

Vacant "I IV" 00025361

Jon Harrison "I VI" 00035539 Steven Paul Harris "I IV" 00024534

Admin. Support

Admin Asst. IV Dei Allen 00020079

Lubbock & Midland Regions

Manager Manager IV Larry Snelson 00023766

Houston Region Manager

Manager V Samuel Copeland 00020062

Kilgore Region Manager

Manager III Daniel Francis 00024397

<u>Lubbock</u> P/L Inspectors Team Lead

Eng. Spec VI Sam Hughes – "I" 00022874

Steve Burnett "I V" 00020487

Derek Lawrence "I VI" 00024806

Eng. Spec VI Joe Rusk "I" 00024004

Michael Smith "I V" 00023028

Davis Abney "I V" 00020053

Midland P/L Inspectors

Eng. Spec. VI Leo Mundine "I" 00019944

Rodney Garrison "I V" 00020215 Amy Barrett "I IV"

00023877

Johnny "Jay" Satterfield "I

00025357

Juan "Michael" Valdez "I V" 00025719

Edward "Bill" Brown "I IV" 00019878 Jose "Joev" Cabezuela "I

> IV" 00021367

Houston P/L Team Lead

Program Spec VI Keith Grimes "I" 00025721

<u>Houston</u>

P/L Inspectors
Lucie Sainvilus "I VI"

00022854 Eng. Spec. VI

Isaac Monrreal "I" 00024319

Jennifer Delacruz "I VI" 00022857

> Eng. Spec. VI Evon Boothe "I" 00019994

Kenneth Donald "I IV" 00023408

Eng. Spec. VI William Dean "I" 00023701

James Minter "I VI" 00022474

Christopher Sylvester "I

00024361 Priscilla Alfred "I VI"

00022041 Charles Tetteh "I IV"

00025574 Aaron Terrones Quiroz "I

00023719

Houston P/L Inspectors

Kennedy Kiprotich Eng. Spec VI "I" 00021550 Mark Herrin Eng. Spec. V "I"

00020600 Kyle Metcalf "I V" 00019756

Eng. Spec VI "I" Peter Morka 00024123

Eng. Spec VI "I"
Ravford Pemberton

00023416 Samuel Nkrumah-Agyeefi "I

IV" 00025356

Admin. Support

Admin Asst. VI LaDonna Leal 00021975

<u>Kilgore</u> P/L Lead Inspector

Program Specialist VII Vacant "I" 00025720

Kilgore P/L Inspectors

Justin Markham "I V" 00021674

Blaine Jacobs "I Eng. Spec.

00022535

William Thomason "I Eng. Spec VI"

00019562

Eng. Spec. VI "I" Carlos Jaime "I V"

arlos Jaime "I V 00025358

Henry McWhorter "I V" 00025191

Jorge Cerda-Leyva "I V" 00020837

Ross Richardson "I V" 00025575

Joshua Snowdy "I V" 00035538

Quirino "Nuno" Selvera "I V" 00025202



Office of General Counsel

April 2022

General Counsel

General Counsel IV Alexander Schoch 00024012

Special Counsel

Attorney IV

David Cooney

00020348

Rules Coordinator

Program Spec. VI

Kellie Martinec

00020158

Department 05013 – Legal Enforcement Department 05009 – General Law

Office Manager

Program Spec. VII Diane Scandurra 00023327

General Law Section

Legal Enforcement Section

Asst. General Counsel

Attorney V Megan Neal 00020194

Program Specialists

Program Specialist VI Timothy Poe 00024158 (.5 FTE)

Program Spec. II Terrence Frischen 00023293

Admin. Assistant

Admin Asst II Nicholas Stanley 00021750

Legal Assistants

Legal Asst. III Monica Banks 00023273

Legal Asst. III Bill Drury 00022249

Legal Asst. IV Becky Tate 00022943

Legal Asst. II Vacant 00021147

Legal Asst. II Marla Solano 00056604

Investigations

Investigator VII Mysti Doshier 00034964

Attorneys

Attorney III Laura Valdez 00019516

Attorney IV Elaine Moore 00023963 (.6 FTE)

> Attorney II Vacant 00023144

Attorney II Adam Aldrete 00022651

Attorney II Hailey Wolf 00024412

<u>Attorneys</u>

Attorney IV Kathy Keils 00020501

Attorney IV Natalie Dubiel 00021046

Attorney III Haley Cochran (.75 FTE) 00022956

> Attorney III Scott Larson 00023088

Attorney III Patrick Shelton 00025421

Attorney III Vacant 00056625

Attorney II Vacant 00021218

Attorney I Anna Harris 00020972

Attorney I Seth Boettcher 00033974

Attorney I David Stone 00020203

Admin Support

Legal Assistant IV Karen Sanchez 00020279

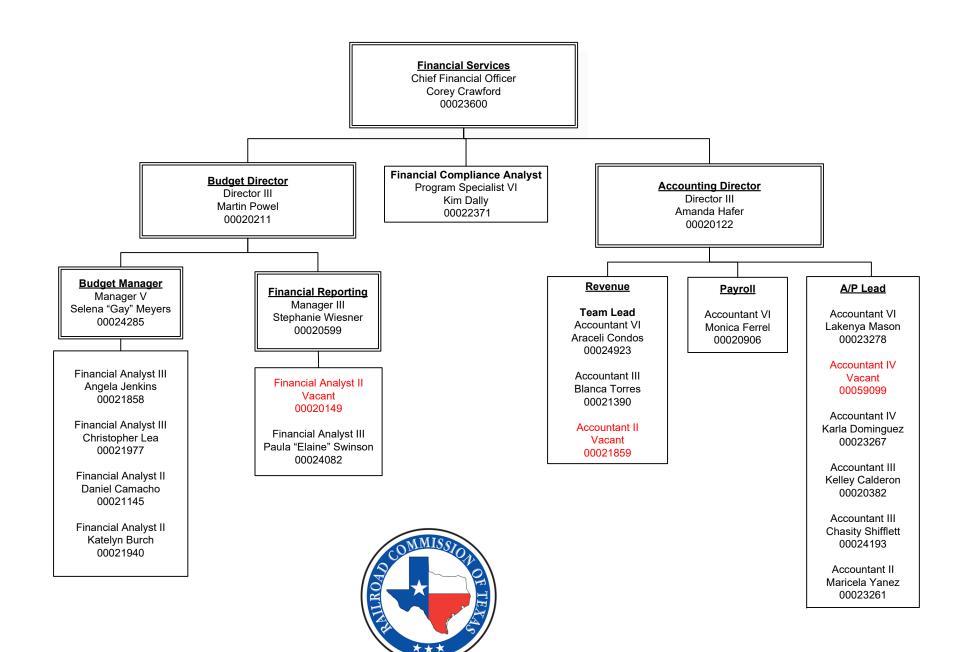
Staff Services Officer II Reshma Charles 00021560

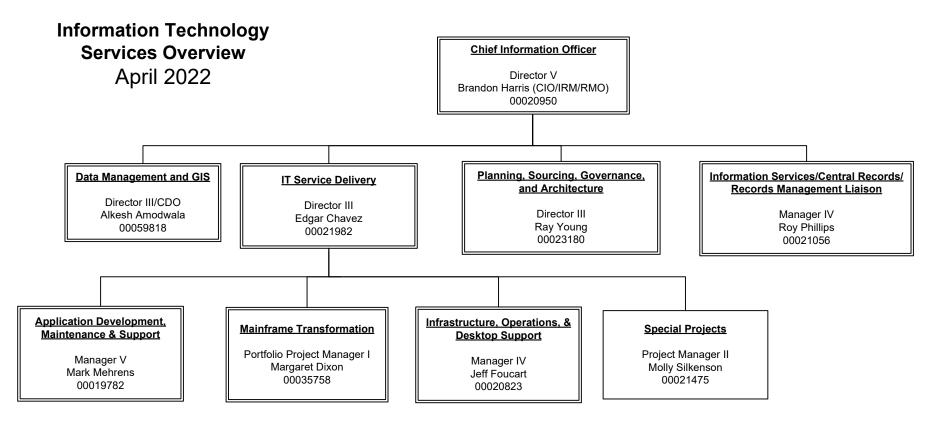


Financial Services

April 2022

Department 04010 - Financial Services





Department 08132 – Inspect/Enforce Track & Report Department 08133 – Information Technology Department 08139 – ITS Information Services Department 08140 – Mainframe Transformation



Information Technology Services Mainframe Transformation April 2022

Director III
Edgar Chavez
00021982

Mainframe Transformation

Portfolio Project Manager I Margaret Dixon 00035758

<u>Manager</u>

<u>Data Warehouse/Business Intelligence</u> <u>Tools and Integration</u>

Project Manager IV Chris Miller 00035759

O&G Business Application/ LoneSTAR

Team Lead

Project Manager IV

Sapna Ahuja 00035760

Project Manager IV Ganapathi Kandula 00025816

IT Business Analyst IV Mary Humphrey 00035761

IT Business Analyst III Peggy Kearns 00035764

Project Manager IV Laura LaMantia 00035765

IT Business Analyst IV Nancy Martin 00035763

Systems Analyst V Manisha Tikariha 00020711

Systems Analyst III Vacant 00025375 Systems Analyst VI Thomas Humphrey 00025369

Systems Analyst VI Michael Trager 00025365

Programmer V Boonchai Limchantra 00020667

> Programmer V Michael Pollan 00024347

Programmer VI Vacant 00059280

Data Warehouse

Project Manager IV Chocks Muthumari 00025366

IT Business Analyst IV Betty Newman 00035762

Systems Analyst VI Trey Krueger 00021713

Database Admin. IV Evart "Jim" Warren 00019632

Systems Administrator VI Shawn Gruich 00022952

Systems Administrator VI Lupe Naranjo 00035767

> Programmer V Vacant 00059275

Programmer III Todd Moerbe 00022908

Tools & Integration Team

Database Admin. IV Nilesh Kansara 00035766

Database Admin. IV Dave Jezewski 00022017

Database Admin. IV Supriya Kamepalli 00021057

Database Admin. IV Brad Kocen 00019654

Systems Analyst V Kevin Calman 00023955

Database Admin. IV Jayanthi Koindala 00021375



Department 08132 – Inspect/Enforce Track & Report Department 08133 – Information Technology Department 08139 – ITS Information Services Department 08140 – Mainframe Transformation

Department 08132 - Inspect/Enforce Track & Report

Department 08133 - Information Technology

Department 08139 – ITS Information Services Department 08140 – Mainframe Transformation

Information Technology Services Application Development, Maintenance, and Support

April 2022

Maintenance & Support

Team Lead

Programmer IV Vacant 00021113

IT Business Analyst IV Penny Simoneau 00021233

IT Business Analyst IV Penny Smith 00021776

Systems Analyst IV Jessica Greeson 00024180

> Programmer V Brian McCardle 00020717

Project Mgr III Vikram Subramanya 00024195

> Programmer V Quinn Zhao 00021678

Programmer IV Kenneth Estes 00021162

Programmer IV David Mosel 00021792

Programmer II Tommy Janak 00020827

IT Service Delivery

Director III Edgar Chavez 00021982

Application Development, Maintenance & Support

Manager V Mark Mehrens 00019782

Salesforce Implementation

Team Lead

Project Mgr. III Don McGrew 00025374

Programmer VI Sarabpreet Singh 00034440

IT Business Analyst III Jared Reeves 00025557

> Programmer VI Md "Al" Morshed 00035429

Programmer V Vacant 00035428 Project Manager V Pramod Patil 00024381

New Development

IT Business Analyst III Graham Lavery 00024525

IT Business Analyst III Thomas "Cole" Moore 00020775

Systems Analyst V Anu Saraf 00023244

Systems Analyst IV Darshana Patel 00034035

Programmer V Marty Ridgeway 00023779

Data Analyst IV Vacant 00025570

IT Business Analyst IV Deana Cline 00022211

> Programmer V Vacant 00059412

IT Business Analyst III Vacant 00059409



Information Technology Services Planning, Sourcing, Governance, and Architecture **Chief Information Officer** Director V Brandon Harris (CIO/IRM/RMO) April 2022 00020950 Planning, Sourcing, Governance, and Architecture CTO/DMO Director III Ray Young 00023180 **Governance & Sourcing Enterprise** Information Security and Cyber **Architecture &** Security IT Business Analyst IV **Planning** Mark Johannsen Cyber Security Officer (ISO) 00023594 Systems Analyst VII Anil Koindala Michael Barber 00020252 IT Business Analyst IV 00025370 Kelli Casteel Information Security Analyst II 00020110 Programmer VI Rohan Sterling Yanhui Bian Program Spec. VI 00021398 00022494 Eva Gowen 00022929 Information Security Analyst I Data Architect I Joel Cortez Vacant 00025316 **Budget Analyst IV** 00059278 Morgan Frank

00023593

Chief Data Officer

Director III Alkesh Amodwala 00059818

Programmer VI Jenny He 00020859

Programmer IV Vincent Fan 00023253

Programmer V Vacant 00059410

Systems Analyst VI Annie Taylor 00023525

Geographic Info Spec. IV Larry Elliott 00022437

Geographic Info Spec. III Phyllis E. Addo-Boafo 00020307

Geographic Info Spec. III Allen Kumassah 00023044

Geographic Info Spec. III Mark Maddox 00020150

Geographic Info Spec. III Colby Broadway 00019502

Geographic Info Spec. II Christiane "Chris" Vincent 00023866

Geographic Info Spec III Mallory Thomas 00023851

Geographic Info Spec. I Vacant 00021324

Department 08132 – Inspect/Enforce Track & Report Department 08133 – Information Technology Department 08139 – ITS Information Services Department 08140 – Mainframe Transformation



Information Technology Services Infrastructure, Operations, and Desktop Support

Director III
Edgar Chavez

Department 08133 - Information Technology

April 2022

Infrastructure, Operations, & Desktop Support

00021982

Manager V Jeff Foucart 00020823

Project Manager II Ed Nordmeyer 00025368

Help Desk Tier I

Team Lead

Systems Analyst III Beatriz Villa-Gonzalez 00019657

Systems Support Spec II Rollie Reid 00020889

Systems Support Spec III Vacant 00019752

System Support Spec II Nataucia Foley 00020268

Help Desk Tier II

Team Lead

Systems Support Spec IV Carlen Brisco 00020757

Systems Support Spec IV Tony Longoria 00023705

Systems Support Spec III Arthur Wilkerson 00024236

Systems Support Spec III Javier "JJ" Ruiz 00022267

Systems Support Spec III
James Lacy
00023376

00047124

Team Lead

Systems Admin VI Bindu Kola

<u>Infrastructure</u>

Data Base Admin IV Lisa Simpson 00021454

Data Base Admin IV Luis Oliveira 00020329

Systems Analyst IV Randy Dillon 00022134

Data Base Admin IV Vacant 00025693

Systems Admin VI Vacant 00022481

Data Base Admin V Vacant 00059282

Data Base Admin V Vacant 00059187

Systems Analyst IV Gloria Gratten 00025558

Operations

Systems Admin V Cory Kawamura 00023666

Systems Admin V David "Nathan" Pantle 00022369

Systems Admin VI Steve Hilchey 00025379

Network Specialist V Vacant 00021165

Systems Admin V Vacant 00059276

Systems Admin IV Andre Bonilla 00059281

Systems Admin V Vacant 00059284

Network Specialist V Will Reilly 00059285

Project Manager IV Kelly Welch 00059411



Information Technology Services Central Records

April 2022

Information Services Records Management Liaison

Manager IV Roy Philips 00021056

Program Management Assistant

Program Spec. I Mark Wright 00021557

Central Records Manager

Manager I Matthew Herzog 00023905

Files Team Leader

Program Spec. II Tanesha Balades 00022445

Files Team

Customer Service Rep. III Alycia Matos 00023847

Customer Service Rep. III Lakeisha Williams 00024161

Customer Service Rep. III LaShondra Washington 00019748

Customer Service Rep. II Whitney Washington 00024114

Customer Service Rep. III Rowena Harrell 00021616

Customer Service Rep. II Christel Tambunga 00023251

Customer Service Rep. II Ginyier Hill 00021549

Research Team Leader

Program Spec. I Dawn Comford-Wilcox 00020239

Researchers

Customer Service Rep. III Katie Cable 00021577

Customer Service Rep. II Rebekah Sykes 00022871

Customer Service Rep. II Vanessa Slider 00022514

Customer Service Rep. III
Daniel Betts
00019479

Customer Service Rep. II Galen Holmes 00024249

Customer Service Rep. II Chazpin Flemmings 00024179

Customer Service Rep. II Audrey Dalton 00024489

Customer Service Rep. II Lance Sollock 00024805

Public Sales

Customer Service Rep. III Rose Holland 00020077

Customer Service Rep III Brittany Wells 00025896



Internal use only - Confidential **Surface Mining & Reclamation Division Director** Director III **Brent Elliott** 00020835 **April 2022** Department 12901 - Inspection and Enforcement **Assistant Director** Department 12911 - Administration Director I Department 12921 - Applications & Permits Joe Parks Department 12931 - Abandoned Mine Land Constr. 00023358 Program Specialist VI **Administrative Support &** Sharon Walter Records 00024463 Abandoned Mine Land and **Applications & Permits** Team Lead Inspection & Enforcement **Reclamation** Manager II Executive Asst. III Manager II Manager II Adam Krabbenhoft Rachel Hampton Jason Corley Katherine Upham 00023159 00021437 00021921 00023036 Admin Asst. III Shyenne Hicks **Team Lead** 00023130 Eng. Spec. II Env. Protection Spec. V Natural Resources Spec. III Jillian Simpson Xiaovan Dai Records Analyst I Natural Resources Spec. III Alonzo Arredondo 00024038 00022397 Marina Reyes Cade Harris 00022403 00020874 00021337 "I" Eng. Spec. III Geoscientist IV Eng. Spec. III Refugio Chapa David Koran Records Analyst I Natural Resources Spec. III Lee Hileman 00019725 00020081 Vacant Scott Engelmann 00023387 00023332 00020887 "I" Eng. Spec. II Geoscientist II Eng. Spec. IV Vacant Robert Tilden Customer Service Rep. III Natural Resources Spec. II George Perez 00020504 00023295 Vacant Vacant "I" 00023741 00023530 00023673 Eng. Spec. V Env. Protection Spec. IV Martin Alvarez Marian Farmmer-Kumassah Natural Resources Spec. III 00022983 00021772 Michael Gay "I" 00023335 Eng. Spec. IV Natural Resources Spec. IV Ismael Gonzalez Celeste Brancel Natural Resources Spec. III 00021520 00019512 Brad Martin "I" 00023939 **Engineer III** Natural Resources Spec. IV Dex Dean Kimberly Jackson Natural Resources Spec. III 00022006 00020773 Robert MacNabb 00022340 "I" **Engineer III** Natural Resources Spec. II Berney Williams Vacant Natural Resources Spec. II 00023516 00020060 John Standridge

Engineer V

Vacant

00021948

Natural Resources Spec. III

Vacant

00023694

00019514 "I"

Internal use only - Confidential **Division Director** Oil & Gas Division Danny Sorrells April 2022 **Field Operations Assistant Director & Regional** Director - North Region Kenneth "Clay" Woodul **Administrative Compliance Technical Permitting Assistant Director Assistant Director** Regional Director -Regional Director -**District Support** Paul Dubois West Region Joe Stasulli South Region & State Funded District Director, District **District Director,** Plugging 7B Districts 1 & 2 Abilene San Antonio Doug Allmand Travis Baer **Engineering Unit Well Compliance Deputy Assistant Director** Site Remediation Manager Manager Manager <u>Manager</u> Tim Speer Sharon Frischen Lorenzo Garza Peter Pope **District 3 District 7C** Houston San Angelo **District Director District Director** Pete Fisher Billy Spraggins **Environmental Permits** Districts 5, 6 & 6E **Drilling Permits** <u>Manager</u> Kilgore Well Mapping Tiffany Humberson Manager **District Director** Manager Vacant Roger Satterwhite Matt Brown District 4 Districts 8 & 8A **Corpus Christi** Midland **District Director District Director** Leo Guerra Jeffery Morgan **Groundwater Advisory Unit** District 9 **Manager** P-5 Financial Assurance **Production Audit** Wichita Falls James Harcourt Manager **District Director** Manager Jennifer Gilmore Kim Peterson Deborah Davis **District 8A** Lubbock **Assistant Director** Koby Kendrick **Injection-Storage Permits** District 10 Manager Pampa Sean Avitt

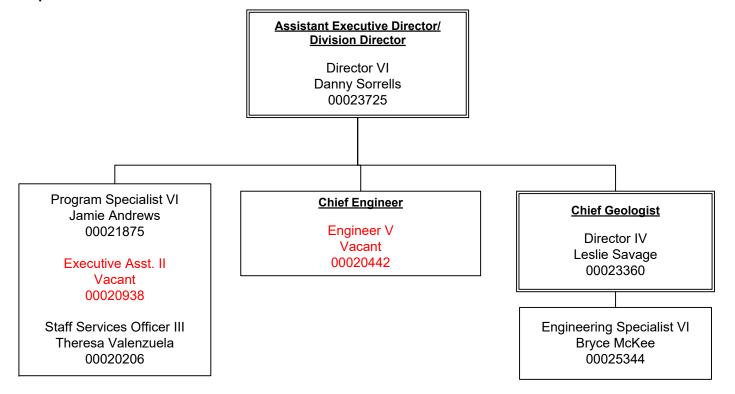


District Director
Cole Fraley

Oil & Gas Division Planning / Administration

April 2022

Department 10220 - Oil & Gas Program Support





Oil & Gas Division Administrative Compliance

April 2022

Assistant Director

Director II Joe Stasulli 00021623

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Department 10261 - O&G Administrative Compliance

Deputy Assistant Director

Manager IV Lorenzo Garza 00045280

P-5 Financial Assurance Manager I

Manager I Jennifer Gilmore 00024320

Well Compliance

Manager II Sharon Frischen 00019497

Production Audit

Manager III Deborah Davis 00022625

Well Mapping

Manager I Matt Brown 00022538

Drilling Permits

Manager II Vacant 00023684

Team Lead

License & Permit Spec. V David King 00020929

License & Permit Spec. II Keith Moos 00022862

License & Permit Spec. V Christopher Houston 00020782

License & Permit Spec. II Tim Moore 00023188

License & Permit Spec. IV Nikita Taliaferro 00020401

License & Permit Spec. III Megan Russell 00022993

License & Permit Spec. III Erin Pratt 00021793 License & Permit Spec. III Ruben Lopez 00021180

License & Permit Spec. III Jaelen Lewis 00023742

License & Permit Spec. II Steven Foreman 00024926

License & Permit Spec. II Chris Conn 00025187

Admin. Support

Admin. Asst. V Diana Lopez 00020616

Team Lead

License & Permit Spec. IV Veronica Larson 00022120

License & Permit Spec.
III
Josephine Reyna
00023570

License & Permit Spec. V Deborah Dismuke 00022357

License & Permit Spec. V Roxann Acosta 00022446

License & Permit Spec. II Kaitlyn Cunningham 00021393

License & Permit Spec. I Rachel Holmes 00021446

> Admin. Asst. V Vacant 00023199

> Admin. Asst. III Tiana Rose 00024927

Admin Asst. II Danny Sanchez 00020143

Admin Asst. III John Frischen 00021476

Compliance Analysts

Compliance Analyst I Rimanda Whitehead 00021667

Compliance Analyst III Teresa McDaneld 00021922

Compliance Analyst III Trisha Fleming 00024227

Compliance Analyst III Rachel Rodriguez 00023050

Compliance Analyst I Patrick Forbis 00022917

Compliance Analyst III Samantha Rivera 00021832

Compliance Analyst III Jacquelyn Teseny 00020452

Compliance Analyst III Zachary Adkins 00023622 Compliance Analyst I Trent Lightfoot 00024871

Compliance Analyst I Jeannine Wortham 00024544

Compliance Analyst I Tina Peña 00021084

Eng. Specialists

Eng. Spec. II Victoria Ortiz 00021782 Admin. Asst. V Deborah "Darlene" Williams 00022707

Admin. Asst. III Merissa Patterson 00023351

Admin Asst. III Erin Hehnly 00024868

Admin. Asst. III Trinida Ross 00019677

Admin Asst. III Kelly Heithoff 00023377

Admin Asst. II Shanta Washington 00022376

> Admin Asst. II Vacant 00021212

Admin. Asst. II Jacob Nuckolls 00020934



00024167 Research Specialist III Elena Amezcua 00020354

Team Lead

Research Specialist III

Veronica "Lucia"

Saldana

00022964

Research Specialist IV

Regina Campbell

00023029

Research Specialist IV

Marguita Horton

Research Specialist III Pamela Barnard 00019487

Research Specialist I Alicia Strickland 00022362

Oil & Gas Division Technical Permitting

April 2022

Assistant Director

Director III Paul Dubois 00025812

Department 10241 - O&G Technical Permitting

Groundwater Advisory Unit

Manager II James Harcourt 00020767 Eng. Spec III Vacant 00020836

Injection-Storage Permits (UIC)

Manager III Sean Avitt 00020760

Permitting - Tech

Manager II Ricardo Rosso 00034510

Environmental Permits Manager III

Manager III Vacant 00020054

Engineering Unit

Manager II Tim Speer 00019987

Geoscientists

Geoscientist III Cristian Astorga 00023425

Geoscientist IV Norman Gearhart 00024058

Geoscientist IV Stephan Paetzold 00021797

Geoscientist III Karen Cassidy 00020267

Geoscientist II Toni Eilerts 00023567

Geoscientist IV Rick Behal 00023737

Geoscientist II Hank Zhao 00020165

GIS II Royce Massey 00034613

Geoscientist II Ben McIvor 00024162

Administrative Support

License & Permit Spec. III LaShonda Hicks 00021315

License & Permit Spec. II Steven Hardy (.6 FTE) 00019778

License & Permit Spec. II Heather Hesskew 00020186

License & Permit Spec. II Valerie Atkins 00024144

Permitting - Admin Team Lead

License & Permit Spec. IV Jason Lockie 00019740

License & Permit Spec. II Ashlee Kenney 00019560

License & Permit Spec. I James Solomons 00020446

License & Permit Spec. I Floyd Lewis Durham 00021005

Reporting and Monitoring Team Lead

Eng. Spec. IV Lauryn McFarland 00024508

> Eng. Spec. I Megan Askew 00023285

Eng. Spec. I Aaron Lejeune 00023143

Eng. Spec. I James Andres 00020565

Eng. Spec I Vacant 00023556

License & Permit Spec. V Margot Buyens 00022072

> Program Spec. V Tina Klein 00022345

Engineer II Scott Rosenquist 00023910

Geoscientist III Jim Moore 00022057

Eng. Spec. V Cheryl Burns 00024103

Eng. Spec. V Nagi Mabruk 00024343

Eng. Spec. II Rob Castillo 00034523

Eng. Spec. II Nicole Moore 00034511

Eng. Spec. II Will Labbé 00019767

Eng. Spec. II Rebecca Edwards 00045828 Data Analyst II Adam Bowerman

Engineering Specialists
Eng. Spec. II

00024234

Christopher Straub 00021011

Eng. Spec. III Vacant 00020955

Eng. Spec. II Abby Klein 00020908

Eng. Spec. II Christina Munoz 00021064

> Eng. Spec. II Heidi Pelkey 00025383

Eng. Spec. II Riley Monk 00020012

Eng. Spec. III Katherine Linford 00024230

Geoscientists

Geoscientist III Artemis "Arden" Harbert 00019930

Administrative Lead

Program Spec. III Irene Matos-Burns 00020728

Administrative Support

License & Permit Spec. III James Bolton 00023461

License & Permit Spec. I Jason Hollinger 00020939

License & Permit Spec. II Vacant 00019814

> Admin. Asst. II Amy Jackson 00020657

Engineering Unit

Eng. Spec. VI Atia Rahman 00047192

Eng. Spec. III Krystal Heibel 00022562

Eng. Spec II Connor Albrecht 00022368

Eng. Spec. II Kenneth "Weston" Cassady 00023968

> Eng. Spec. II Roseanna Edson 00024925

Eng. Spec. II Nathan Nattin 00019854

Eng. Spec. II Meketak Etienne 00020596

Eng. Spec. II Valentine Dongo 00035684

Administrative Support

Admin. Asst. IV Sandra Dunfield 00024018

Admin. Asst. II Lizana Villman 00035520

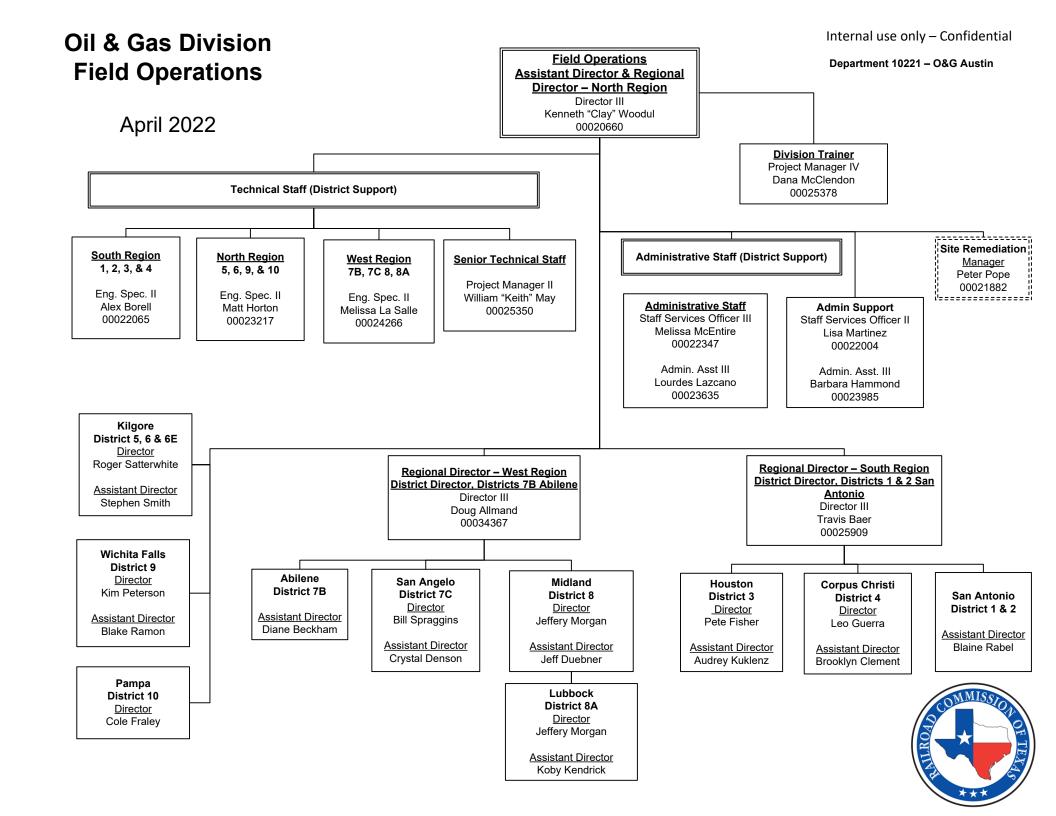
Admin. Asst. II Annette Coe-Brooks 00023661



Data Analyst I Tahereh Javaheripour 00045829

> Eng. Spec. IV Vacant 00060929

Eng. Spec. II Vacant 00060930



Department 10221 - O&G Austin

Oil & Gas Division Field Operations/Site Remediation

April 2022

Site Remediation Manager

Director III Peter Pope 00021882

Administrative Support

Program Spec. III Chrishun Brown 00021649

Program Spec. II Jennifer Delgado 00021479

Program Spec. II Vacant 00021774

SMCU - VCP - Grants

Team Lead
Project Manager IV
Art Correa
00019907

Eng. Spec. III Leslie Bruce 00020169

Engineering Specialists Eng. Spec. IV Chris Heiligenstein 00019865

> Eng. Spec. II Mark Stewart 00025384

Eng. Spec. II Casey Mibb 00022104

<u>OCP</u>

Team Lead Toxicologist II Amanda Kindt 00021344

Geoscientist III Sheila Williams 00020990

Geoscientist III Mary Helen Niemann 00022394

> Geoscientist II Jeff Beckage 00021373

Geoscientist II Kenneth "Kent" Stallings 00024505

