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 (CO_2) 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 CO_2 injection. The purpose for the Class VI rule is to ensure that geologic storage of CO_2 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 the1422 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 post-injection 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.

<u>Planning and Administration</u>

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.

<u>Permitting</u>

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, 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 modelers to evaluate area of review (AoR) delineation computational models during permitting and AoR reevaluations.	√	
Well construction and testing, e.g., well engineers, log 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 during permitting and annual evaluations of financial instruments.	√	
Risk analysts to evaluate emergency and remedial response scenario probabilities and remediation cost estimates.		√
Policy/regulatory experts on the UIC Program and the Class VI Rule to evaluate compliance with Class VI Rule requirements.	√	
Enforcement/compliance, e.g., staff who can initiate and pursue appropriate enforcement actions when permit or rule requirements are violated.	√	
Inspectors including well engineers or log analysts/experts to 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 issuance.	30%
Project oversight/review of operating data and testing and monitoring data and reports.	35%
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 non-compliant 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

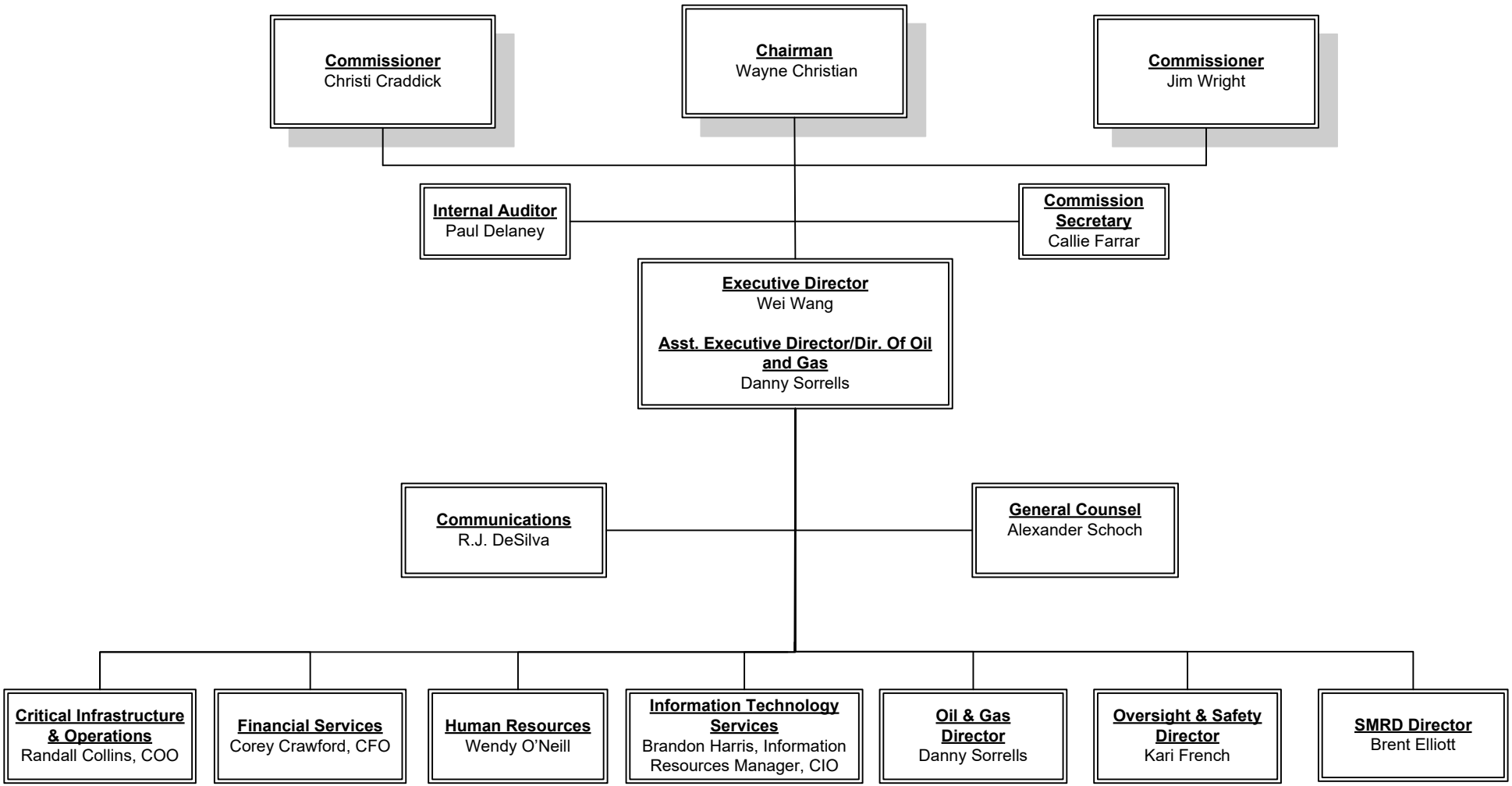
The Railroad Commission will use the EPA's GSDT portal for accepting Class VI applications.

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

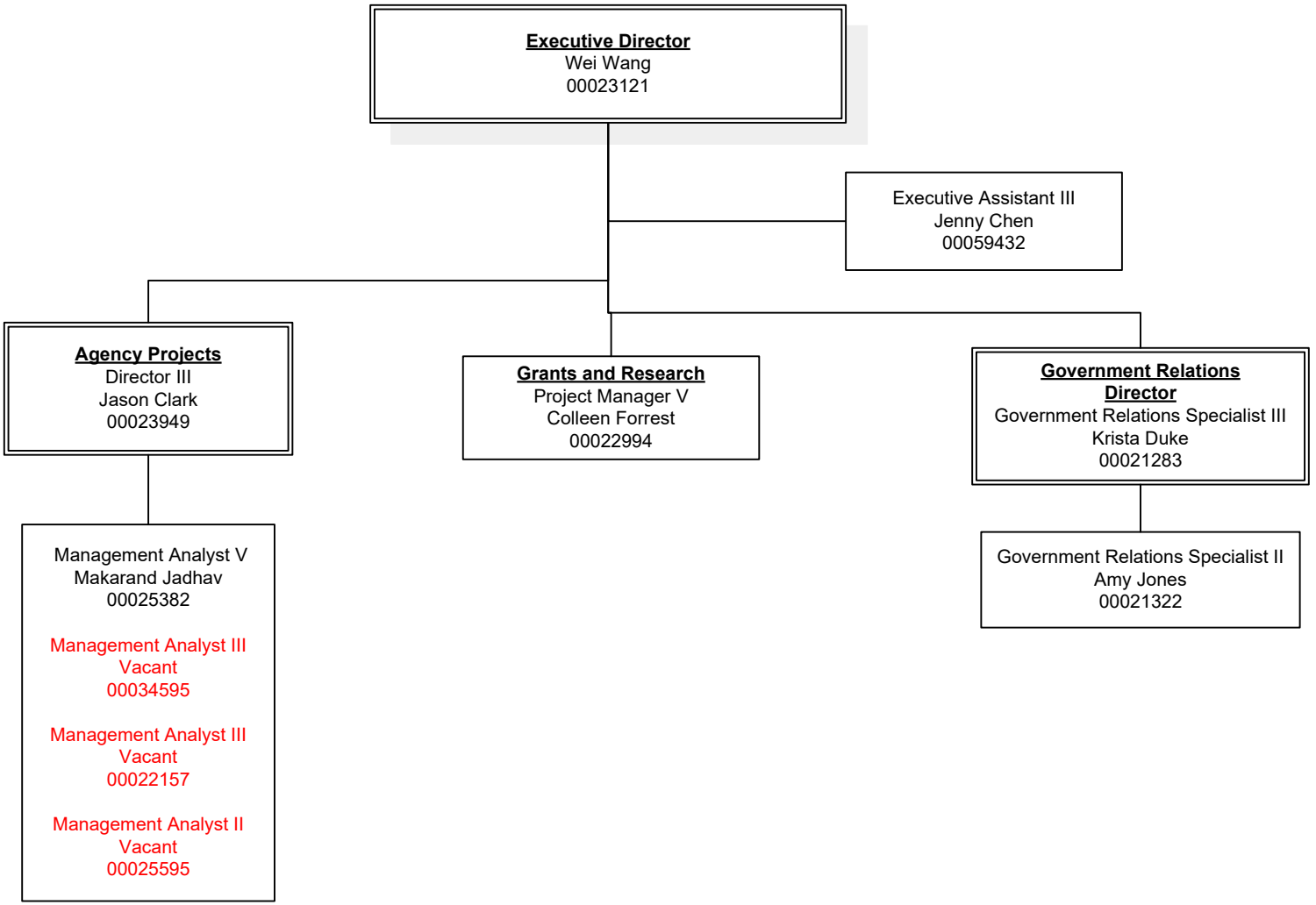
Commission Secretary
Executive Assistant III
Callie Farrar
00020283

Executive Director
Wei Wang
00023121

Executive Office

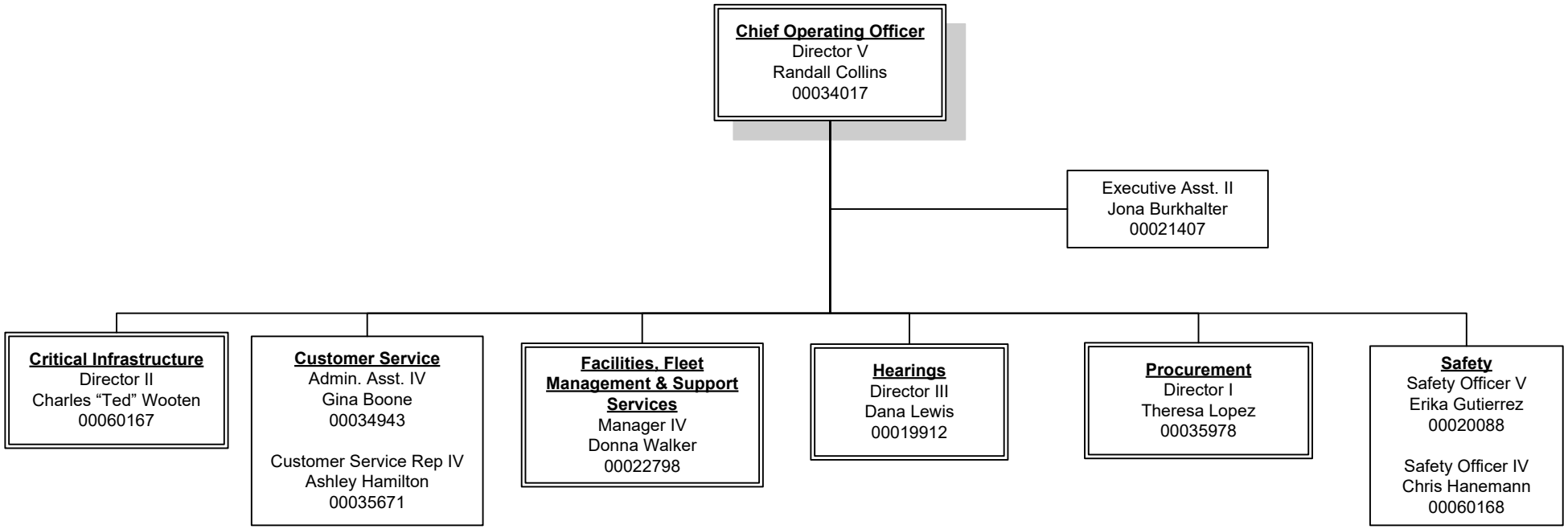
April 2022

Department 13010 – Executive Office



Operations Division
April 2022

Department 02122 - Operations
Department 02129 - Operations Customer Service



Critical Infrastructure

April 2022

Chief Operating Officer
Director V
Randall Collins
00034017

Program Manager
Project Manager IV
Christopher Cabrera
00025603

Division Director
Director II
Charles "Ted" Wooten
00060167

East Region (Houston)
Director I
Joseph "Todd" Gentles
00060098

West Region (Lubbock)
Director I
Jarrod Eberly
00060100

South Region (San Antonio)
Manager IV
Andrea Meyer
00060118

North Region (Ft. Worth)
Director I
Jim Collins
00060099

Administration & Records

Engineer III (TBD)
Vacant
00059148

Staff Services Officer III
Ann "Renee" Vick
00059758

Admin Asst. III
Regina Patterson
00059238

Systems Analyst I
Joseph Stasulli
00059997

Admin Asst. III
Vacant
00061012

Admin Asst. III
Vacant
00061013

Admin Asst. III
Vacant
00061014

Eng. Spec. VI
Ivan Salas
00059759

Eng. Spec. IV
Vacant
00060517

Eng. Spec. IV
Vacant
00060518

Eng. Spec. IV
Vacant
00060519

HQ Austin
Director I
Vacant
00061009

Data Analyst I
Vacant
00060890

Data Analyst I
Vacant
00060891

Data Analyst I
Vacant
00060892

Data Analyst I
Vacant
00060893

Data Analyst I
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Data Analyst I
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Data Analyst I
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Data Analyst I
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Data Analyst I
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Data Analyst I
Vacant
00060899

Eng. Spec. III
Vacant
00060902

Eng. Spec. III
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Eng. Spec. III
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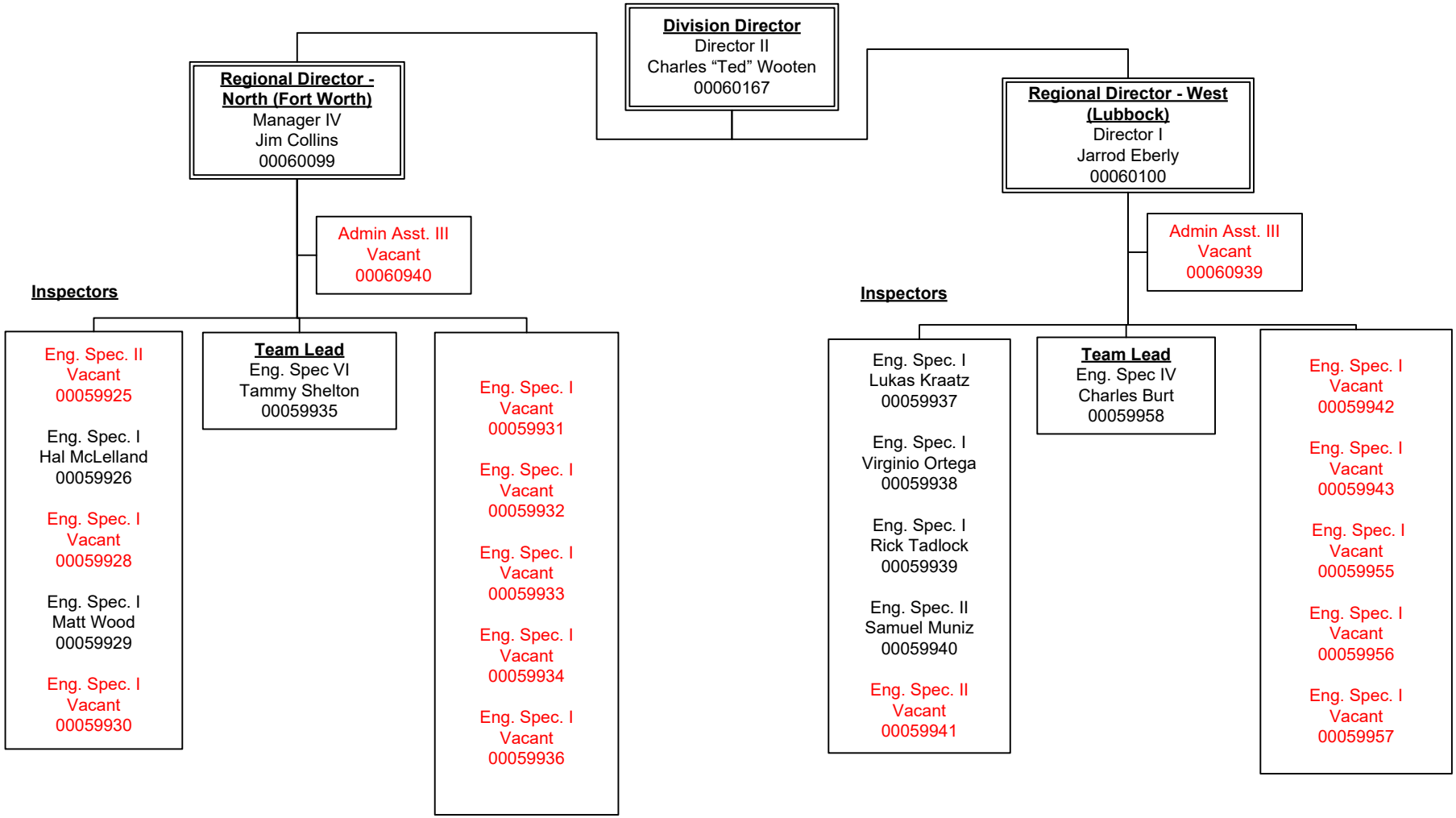
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Eng. Spec. III
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Eng. Spec. III
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Eng. Spec. III
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00060911

Critical Infrastructure
North and West Regions
April 2022



Critical Infrastructure
South and East Regions
April 2022

Internal use only – Confidential

15010 Critical Infrastructure

Division Director
Director II
Charles "Ted" Wooten
00060167

South Region (San Antonio)
Manager IV
Andrea Meyer
00060118

Admin Asst. III
Vacant
00060932

Inspectors

Eng. Spec. III
Vacant
00060913

Eng. Spec. III
Vacant
00060914

Eng. Spec. I
Adam Deluna
00059945

Eng. Spec. I
Cayson Martinez
00059946

Eng. Spec. II
Daniel Trevino
00059947

Eng. Spec. II
Max Bertetti
00059948

Team Lead
Eng. Spec IV
Ronnie Conyer
00059959

Eng. Spec. I
Vacant
00059949

Eng. Spec. I
Vacant
00059950

Eng. Spec. I
Vacant
00059951

Eng. Spec. I
Vacant
00059952

Eng. Spec. I
Vacant
00059953

Eng. Spec. I
Vacant
00059954

East Region (Houston)
Director I
Joseph "Todd" Gentles
00060098

Admin Asst. III
Katherine Bowman
00060931

Inspectors

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

Eng. Spec. I
Vacant
00060108

Eng. Spec. II
Yayma Martinez
00060109

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

Procurement Division

April 2022

Department 02130 – Procurement

Procurement Director
Director I
Theresa Lopez
00035978

Contract Management

Team Lead
Contract Admin Manager I
Jesse Herrera
00019879

Contract Spec. IV
Matt Bowman
00025219

Contract Spec. IV
Jeffrey "Reese" Miller
00025876

Contract Spec. IV
Sonya Patterson
00034514

Contract Spec. III
Valerie Wilcox
00021524

Contract Spec. III
Guadalupe "Michelle" Tafoya-Salazar
00033712

Contract Spec. II
Shemia Valentine
00033713

Compliance

Compliance Analyst IV
00034118
Sandra Maldonado

Purchasing

Team Lead
Purchaser VI
Donna Craine
00021720

Purchaser V
Michael Herman
00021673

Purchaser IV
Gilbert Gipson
00023106

Purchaser IV
Vacant
00022556

Purchaser VI
Johnny Galvan
00024293

Department 14010

Human Resources & Training Development

April 2022

Human Resources Director
Director II
Wendy O'Neill
00022550

Human Resources

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

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

Training

Professional Development Manager
Manager III
David Robinson
00034857

Training Specialist III
Christina Moyer
00059190

Facilities & Support Services

April 2022

Department 02128 – Ops Facilities & Support Services

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

Hearings Division

April 2022

Department 07701

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

Communications

April 2022

Department 03601- Communications

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

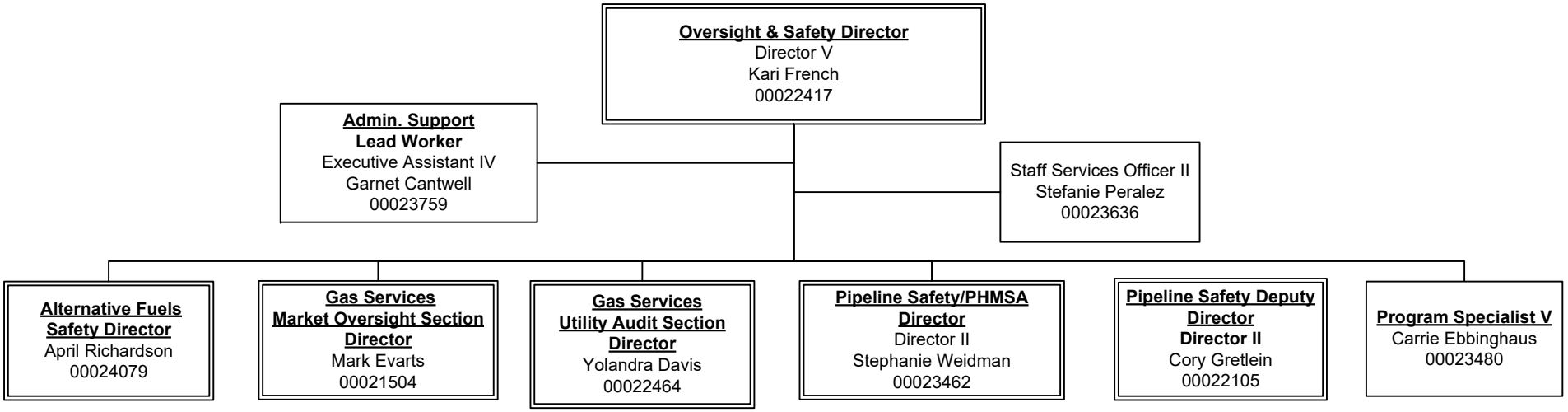
Web Administration
Web Administrator III
Phil Pettit
00023508

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

Department 09622 – AFS Training
Department 09633 – AFS Operations

Alternative Fuels Safety Director
Director II
April Richardson
00024079

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

Utility Audit Section Director
Director II
Yolandra Davis
00022464

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

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

Department 11430 – Pipeline Safety Support
Department 11440 – PS Damage Prevention

Pipeline Safety Deputy Director

Director II
Cory Gretlein
00022105

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

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

Pipeline Operations Compliance, Data Analysis and Grants

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
April 2022

Department 11420 – Pipeline Safety OGRC

Pipeline Safety Director
Director II
Stephanie Weidman
00023462

Special Projects

Project Manager V
Kendall Smith
00021844

Program Specialist II
Lori Reyes
00021288

Accident Coordinator
Program Spec. II
Michael Shields
00023699

PHMSA Operations & Analytics Manager
Manager V
Joey Bass
00024055

Project Manager III
Michael Parker
00021745

Project Manager II
Nicholas Owojori
00035581

Eng. Spec. VI
Mark Lay
00021065

Eng. Spec. VI
Godspower Oniovosa
00020314

Eng. Spec. III
Pedro “Pete” Longoria
00022619

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Oversight & Safety
Pipeline Safety Field Operations
April 2022

Department 11420 – Pipeline Safety OGRC

Pipeline Safety Director
Director II
Stephanie Weidman
00023462

Corpus Christi Region Manager
Manager V
Steven Rios
00023840

Austin
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"
00022024
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

Lubbock
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 V"
00025357
Juan "Michael" Valdez "I V"
00025719
Edward "Bill" Brown "I IV"
00019878
Jose "Joey" Cabezuela "I IV"
00021367

Houston Region Manager
Manager V
Samuel Copeland
00020062

Houston P/L
Team Lead
Program Spec VI
Keith Grimes "I"
00025721

Houston
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 IV"
00024361
Priscilla Alfred "I VI"
00022041
Charles Tetteh "I IV"
00025574
Aaron Terrones Quiroz "I V"
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"
Rayford Pemberton
00023416
Samuel Nkrumah-Agyeefi "I IV"
00025356

Admin. Support
Admin Asst. VI
LaDonna Leal
00021975

Kilgore Region Manager
Manager III
Daniel Francis
00024397

Kilgore
P/L Lead Inspector
Program Specialist VII
Vacant "I"
00025720

Kilgore P/L Inspectors
Justin Markham "I V"
00021674
Blaine Jacobs "I Eng. Spec. VI"
00022535
William Thomason "I Eng. Spec VI"
00019562
Eng. Spec. VI "I"
Carlos 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

Department 05013 – Legal Enforcement
Department 05009 – General Law

General Counsel
General Counsel IV
Alexander Schoch
00024012

Office Manager
Program Spec. VII
Diane Scandurra
00023327

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

General Law Section

Special Counsel
Attorney IV
David Cooney
00020348

Rules Coordinator
Program Spec. VI
Kellie Martinec
00020158

Attorneys
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

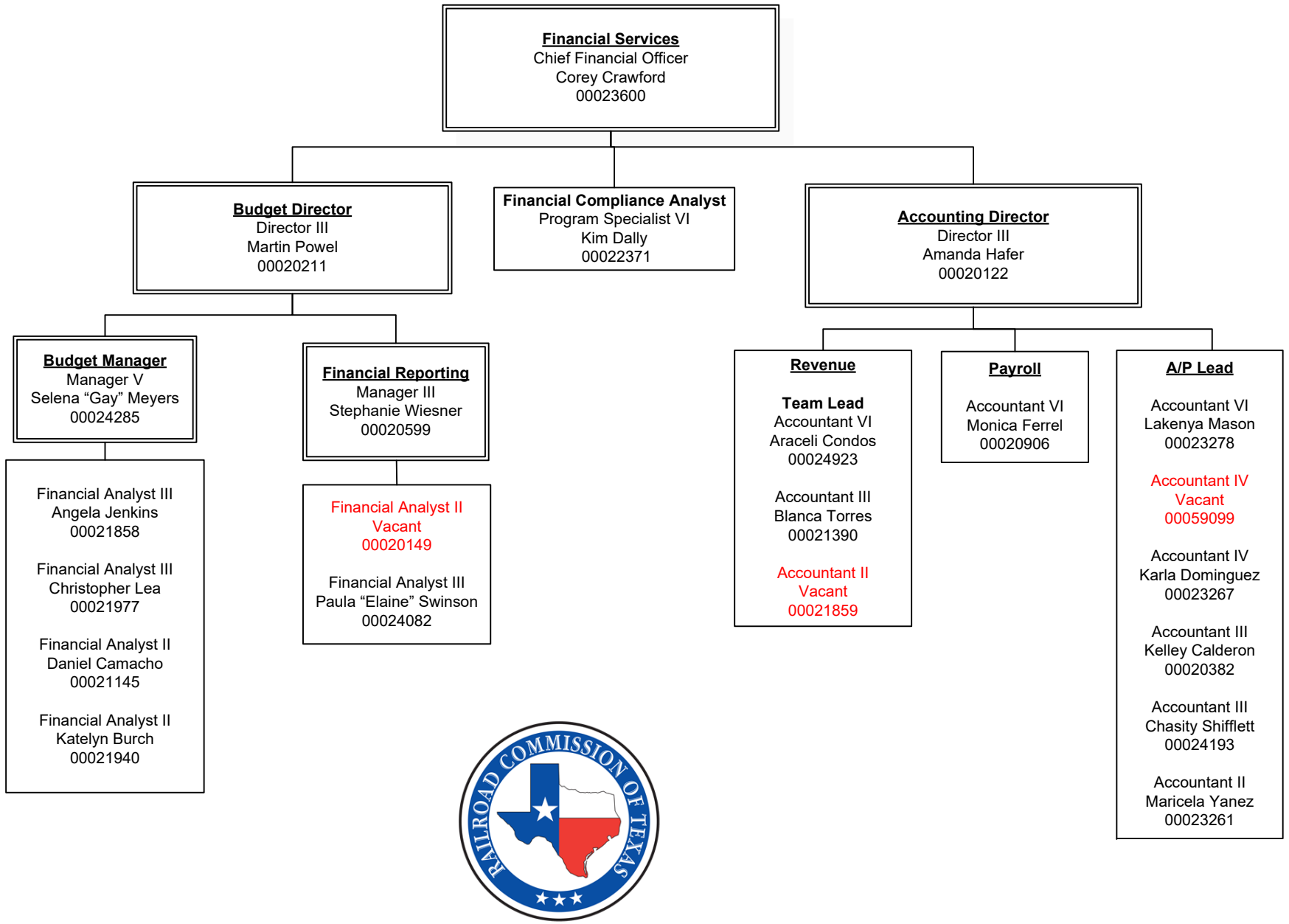
Admin Support
Legal Assistant IV
Karen Sanchez
00020279

Staff Services Officer II
Reshma Charles
00021560

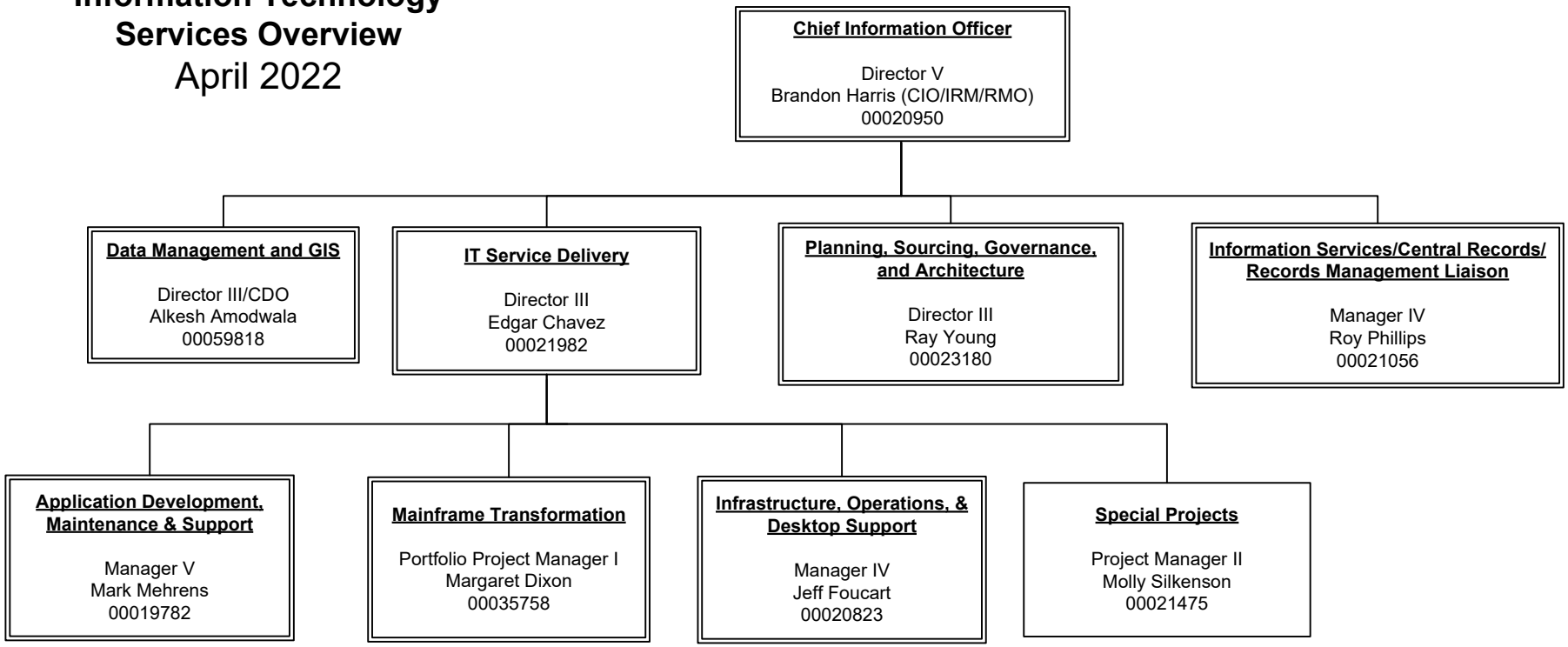
Financial Services

April 2022

Department 04010 – Financial Services



Information Technology Services Overview
April 2022



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

IT Service Delivery
Director III
Edgar Chavez
00021982

Mainframe Transformation
Portfolio Project Manager I
Margaret Dixon
00035758

Team Lead
Project Manager IV
Sapna Ahuja
00035760

Manager
Project Manager IV
Chris Miller
00035759

O&G Business Application/ LoneSTAR

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/Business Intelligence Tools and Integration

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

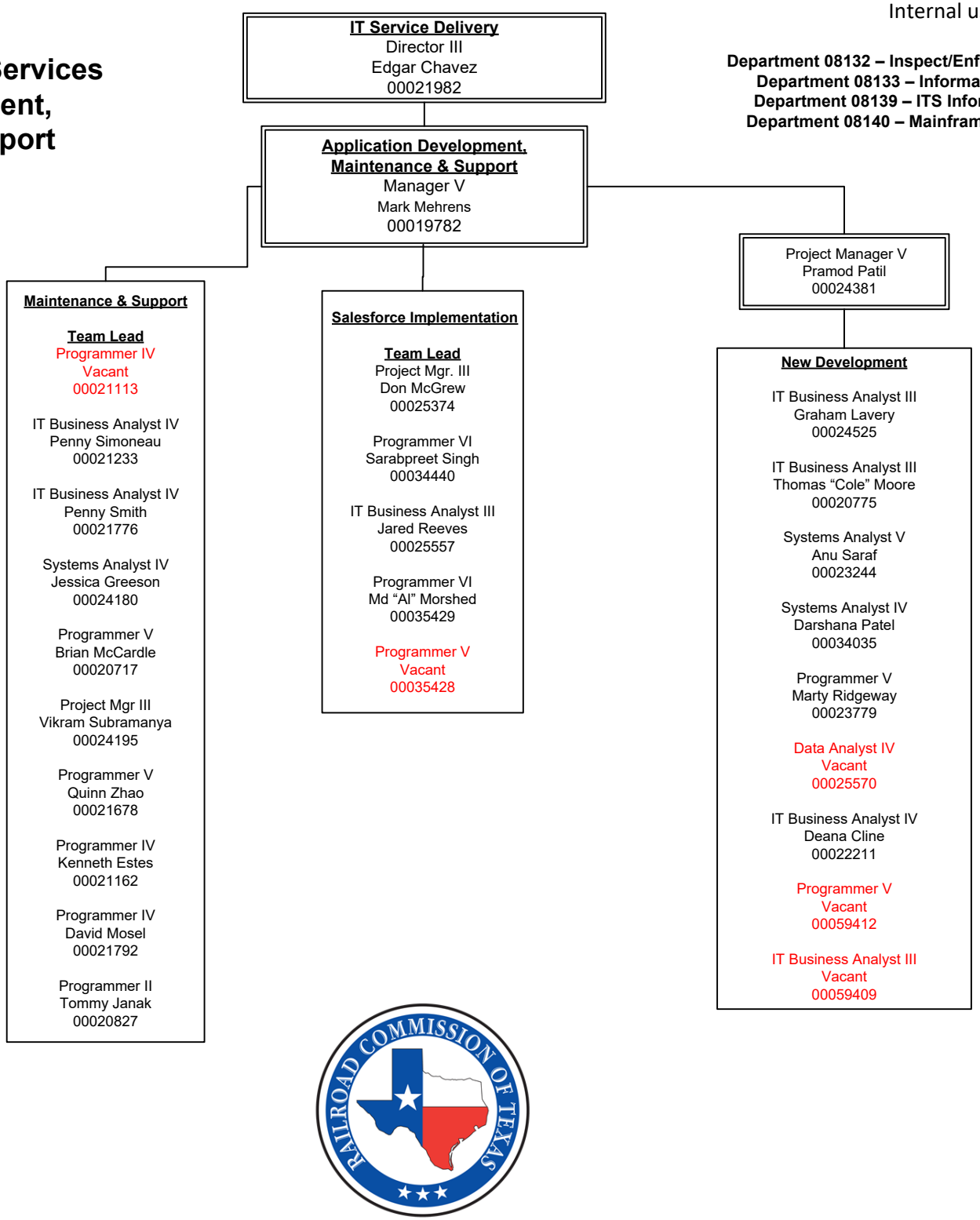
Database Admin. IV
Jayanthi Koindala
00021375

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

Information Technology Services
Application Development, Maintenance, and Support

April 2022

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



Information Technology Services
Planning, Sourcing, Governance, and Architecture

April 2022

Internal use only – Confidential

Chief Information Officer
Director V
Brandon Harris (CIO/IRM/RMO)
00020950

Chief Data Officer
Director III
Alkesh Amodwala
00059818

Planning, Sourcing, Governance, and Architecture
CTO/DMO
Director III
Ray Young
00023180

Enterprise Architecture & Planning

Systems Analyst VII
Michael Barber
00025370

Programmer VI
Yanhui Bian
00022494

Data Architect I
Vacant
00059278

Governance & Sourcing

IT Business Analyst IV
Mark Johannsen
00023594

IT Business Analyst IV
Kelli Casteel
00020110

Program Spec. VI
Eva Gowen
00022929

Budget Analyst IV
Morgan Frank
00023593

Information Security and Cyber Security

Cyber Security Officer (ISO)
Anil Koindala
00020252

Information Security Analyst II
Rohan Sterling
00021398

Information Security Analyst I
Joel Cortez
00025316

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

April 2022

Department 08133 – Information Technology

IT Service Delivery
Director III
Edgar Chavez
00021982

Infrastructure, Operations, & Desktop Support
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 III
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

Team Lead
Systems Admin VI
Bindu Kola
00047124

Infrastructure

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

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

Program Management Assistant
Program Spec. I
Mark Wright
00021557

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

Surface Mining & Reclamation

April 2022

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Division Director
Director III
Brent Elliott
00020835

Assistant Director
Director I
Joe Parks
00023358

Department 12901 – Inspection and Enforcement
Department 12911 – Administration
Department 12921 – Applications & Permits
Department 12931 – Abandoned Mine Land Constr.

Program Specialist VI
Sharon Walter
00024463

Administrative Support & Records

Team Lead
Executive Asst. III
Rachel Hampton
00021437

Admin Asst. III
Shyenne Hicks
00023130

Records Analyst I
Marina Reyes
00020874

Records Analyst I
Vacant
00023332

Customer Service Rep. III
Vacant
00023530

Inspection & Enforcement
Manager II
Jason Corley
00021921

Natural Resources Spec. III
Cade Harris
00021337 "I"

Natural Resources Spec. III
Scott Engelmann
00020887 "I"

Natural Resources Spec. II
Vacant "I"
00023673

Natural Resources Spec. III
Michael Gay "I"
00023335

Natural Resources Spec. III
Brad Martin "I"
00023939

Natural Resources Spec. III
Robert MacNabb
00022340 "I"

Natural Resources Spec. II
John Standridge
00019514 "I"

Abandoned Mine Land and Reclamation
Manager II
Katherine Upham
00023036

Natural Resources Spec. III
Alonzo Arredondo
00022403

Eng. Spec. III
Lee Hileman
00023387

Eng. Spec. IV
George Perez
00023741

Applications & Permits
Manager II
Adam Krabbenhoft
00023159

Eng. Spec. II
Jillian Simpson
00024038

Eng. Spec. III
Refugio Chapa
00019725

Eng. Spec. II
Vacant
00020504

Eng. Spec. V
Martin Alvarez
00022983

Eng. Spec. IV
Ismael Gonzalez
00021520

Engineer III
Dex Dean
00022006

Engineer III
Berney Williams
00023516

Engineer V
Vacant
00021948

Team Lead
Env. Protection Spec. V
Xiaoyan Dai
00022397

Geoscientist IV
David Koran
00020081

Geoscientist II
Robert Tilden
00023295

Env. Protection Spec. IV
Marian Farmmer-Kumassah
00021772

Natural Resources Spec. IV
Celeste Brancel
00019512

Natural Resources Spec. IV
Kimberly Jackson
00020773

Natural Resources Spec. II
Vacant
00020060

Natural Resources Spec. III
Vacant
00023694

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Oil & Gas Division

April 2022

Division Director
Danny Sorrells

Administrative Compliance
Assistant Director
Joe Stasulli

- **Deputy Assistant Director**
  Manager
  Lorenzo Garza
- **Well Compliance**
  Manager
  Sharon Frischen
- **Drilling Permits**
  Manager
  Vacant
- **Well Mapping**
  Manager
  Matt Brown
- **P-5 Financial Assurance**
  Manager
  Jennifer Gilmore
- **Production Audit**
  Manager
  Deborah Davis

Technical Permitting
Assistant Director
Paul Dubois

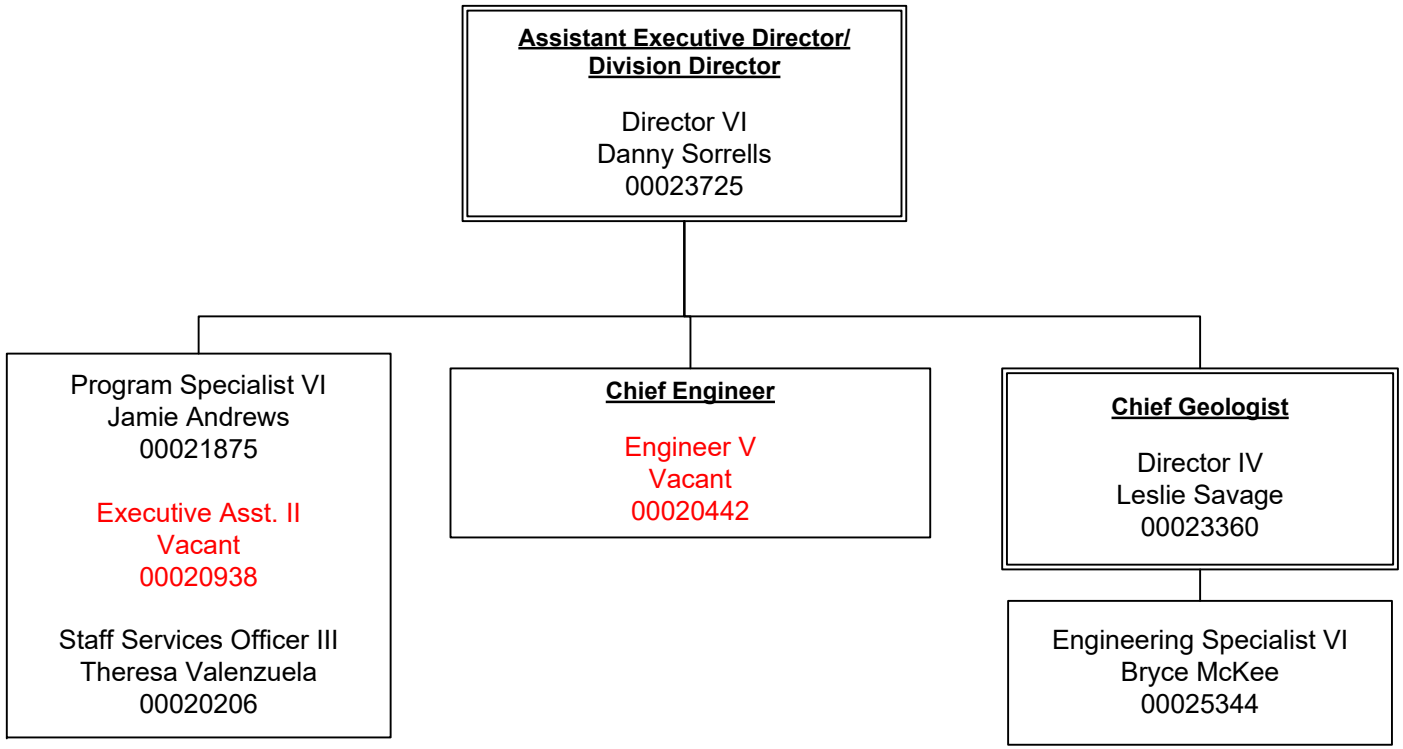
- **Engineering Unit**
  Manager
  Tim Speer
- **Environmental Permits**
  Manager
  Tiffany Humberson
- **Groundwater Advisory Unit**
  Manager
  James Harcourt
- **Injection-Storage Permits**
  Manager
  Sean Avitt

Field Operations
Assistant Director & Regional Director – North Region
Kenneth "Clay" Woodul

- **Regional Director – South Region**
  District Director, Districts 1 & 2
  San Antonio
  Travis Baer
  - **District 3**
    Houston
    District Director
    Pete Fisher
  - **District 4**
    Corpus Christi
    District Director
    Leo Guerra
- **Regional Director – West Region**
  District Director, District 7B
  Abilene
  Doug Allmand
  - **District 7C**
    San Angelo
    District Director
    Billy Spraggins
  - **Districts 8 & 8A**
    Midland
    District Director
    Jeffery Morgan
  - **District 8A**
    Lubbock
    Assistant Director
    Koby Kendrick
- **District Support & State Funded Plugging**
- **Site Remediation**
  Manager
  Peter Pope
- **Districts 5, 6 & 6E**
  Kilgore
  District Director
  Roger Satterwhite
- **District 9**
  Wichita Falls
  District Director
  Kim Peterson
- **District 10**
  Pampa
  District Director
  Cole Fraley

Oil & Gas Division
Planning / Administration
April 2022

Department 10220 – Oil & Gas Program Support



Oil & Gas Division
Administrative Compliance
April 2022

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Department 10261 – O&G Administrative Compliance

Assistant Director
Director II
Joe Stasulli
00021623

Deputy Assistant Director
Manager IV
Lorenzo Garza
00045280

P-5 Financial Assurance
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

Research Specialist III
Veronica "Lucia" Saldana
00022964

Research Specialist IV
Regina Campbell
00023029

Research Specialist IV
Marquita Horton
00024167

Research Specialist III
Elena Amezcua
00020354

Research Specialist III
Pamela Barnard
00019487

Research Specialist I
Alicia Strickland
00022362

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

Oil & Gas Division
Technical Permitting
April 2022

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Department 10241 – O&G Technical Permitting

Assistant Director
Director III
Paul Dubois
00025812

Groundwater Advisory Unit
Manager II
James Harcourt
00020767

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

Eng. Spec III
Vacant
00020836

Injection-Storage Permits (UIC)
Manager III
Sean Avitt
00020760

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

Permitting – Tech
Manager II
Ricardo Rosso
00034510

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 I
Tahereh Javaheripour
00045829

Eng. Spec. IV
Vacant
00060929

Eng. Spec. II
Vacant
00060930

Environmental Permits
Manager III
Vacant
00020054

Data Analyst II
Adam Bowerman
00024234

Engineering Specialists
Eng. Spec. II
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
Manager II
Tim Speer
00019987

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

Oil & Gas Division
Field Operations

April 2022

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Department 10221 – O&G Austin

Field Operations
Assistant Director & Regional Director – North Region
Director III
Kenneth "Clay" Woodul
00020660

Division Trainer
Project Manager IV
Dana McClendon
00025378

Technical Staff (District Support)

South Region
1, 2, 3, & 4
Eng. Spec. II
Alex Borell
00022065

North Region
5, 6, 9, & 10
Eng. Spec. II
Matt Horton
00023217

West Region
7B, 7C 8, 8A
Eng. Spec. II
Melissa La Salle
00024266

Senior Technical Staff
Project Manager II
William "Keith" May
00025350

Administrative Staff (District Support)

Site Remediation
Manager
Peter Pope
00021882

Administrative Staff
Staff Services Officer III
Melissa McEntire
00022347

Admin. Asst III
Lourdes Lazcano
00023635

Admin Support
Staff Services Officer II
Lisa Martinez
00022004

Admin. Asst. III
Barbara Hammond
00023985

Kilgore
District 5, 6 & 6E
Director
Roger Satterwhite

Assistant Director
Stephen Smith

Wichita Falls
District 9
Director
Kim Peterson

Assistant Director
Blake Ramon

Pampa
District 10
Director
Cole Fraley

Regional Director – West Region
District Director, Districts 7B Abilene
Director III
Doug Allmand
00034367

Abilene
District 7B
Assistant Director
Diane Beckham

San Angelo
District 7C
Director
Bill Spraggins

Assistant Director
Crystal Denson

Midland
District 8
Director
Jeffery Morgan

Assistant Director
Jeff Duebner

Lubbock
District 8A
Director
Jeffery Morgan

Assistant Director
Koby Kendrick

Regional Director – South Region
District Director, Districts 1 & 2 San Antonio
Director III
Travis Baer
00025909

Houston
District 3
Director
Pete Fisher

Assistant Director
Audrey Kuklenz

Corpus Christi
District 4
Director
Leo Guerra

Assistant Director
Brooklyn Clement

San Antonio
District 1 & 2

Assistant Director
Blaine Rabel

Oil & Gas Division
Field Operations/Site Remediation

April 2022

Department 10221 – O&G Austin

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

OCP

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