Railroad Commission of Texas (RRC) Program Report to the Texas Radiation Advisory Board (TRAB)

June 24, 2022

The Railroad Commission of Texas (RRC) has jurisdiction over the disposal of oil and gas NORM waste, identification of NORM contaminated equipment, and abandonment of radioactive logging tools in oil and gas wells.

The RRC staff works with the Texas Department of State Health Services (DSHS) and the Texas Commission on Environmental Quality (TCEQ) with respect to jurisdiction, legislation, general licenses, permits and exemptions for the disposal and related handling of oil and gas NORM waste.

Permits:

The RRC has permitted eight (8) facilities with a total of 22 wells for the disposal of oil and gas NORM waste into Class II injection wells (Title 16, Chapter 4, Subchapter F, §4.617, Permit for Injection). The most recent well was permitted March 21, 2019, in Andrews County.

The following facilities are permitted to accept for disposal of Oil and Gas NORM waste:

| County | Field | Lease | Operator | # |
|-----------|------------------------------|--------------------------------|---|-------|
| | | | | wells |
| Andrews | Fuhrman-Mascho | Lotus | Lotus L.L.C. | 5 |
| Andrews | Shafter Lake (San Andres) | Permian Brine Grimmett Bros | Ecoserve Permian, LLC | 1 |
| Chambers | Moss Bluff | R.S. Sterling | Sabine Environmental SVCS, LLC | 2 |
| Duval | Palangana Dome | Schalert E&P | Huisache Enviro Services, L.L.C. | 4 |
| Howard | Sand Springs (Fusselman) | Big Spring Brine Station | Newpark Env. Services LLC Ecoserve Permian, LLC | 1 |
| Jefferson | Big Hill | Texas Exploration Co | Ecoserve Environmental SVCS, LLC | 7 |
| Liberty | Moss Bluff | Wm. McFaddin | Trinity Enviro Services I, L.L.C. | 1 |
| Liberty | Moss Bluff | Trinity Storage Services | Trinity Enviro Services I, L.L.C. | 1 |

RRC rules at 16 Texas Admin. Code §4.620 allow operators to apply for a permit for surface disposal; however, to date, no applications have been submitted and no permits have been issued for the surface disposal of NORM wastes under the jurisdiction of the RRC.

Inspections:

Inspections were performed at the following facilities during the report period:

Lotus LLC – Fuhrman-Mascho – Andrews County Sabine Env – Moss Bluff – Chambers County Huisache – Palangana Dome – Duval County Trinity Enviro Services I – Moss Bluff-McFaddin – Liberty County Trinity Enviro Services I – Moss Bluff-Trinity Storage – Liberty County

No violations were discovered during the inspections.

Incident Investigations:

There were no significant incidents reported during the past quarter.

Rulemaking:

The RRC currently has no ongoing rulemaking concerning oil and gas NORM waste.