

July 1, 2022

Rules Coordinator  
Office of General 22 Counsel  
Railroad Commission of Texas  
P.O. Box 12967, Austin, Texas, 78711-2967  
(512) 463-6981

**Subject: Proposed Rule: Title 16. Economic Regulation Part 1. Railroad Commission of Texas Chapter 5. Carbon Dioxide**

Dear Rules Coordinator,

This letter is to provide comment on proposed rules in the May 20, 2022 Texas Register related to the Railroad Commission of Texas' (RRC) application for primacy.

In the Port of Corpus Christi Authority's (PCCA) review of the proposed regulations, there is clear alignment with the process already established by EPA for the Class VI Underground Injection Control (UIC). PCCA applauds both agencies for their efforts related to permitting of CO<sub>2</sub> geologic sequestration. PCCA is supportive of the proposed amendments as they will provide a thorough process for permitting CO<sub>2</sub> geologic sequestration.

It is anticipated that the methodology of climate mitigation by way of Class VI UIC will be highly sought-after. When primacy is granted, PCCA recommends that RRC be allowed in the first five years to increase staff to review Class VI UIC applications or at least reduce the requirement to two years.

Thank you for your time and attention to this important matter. If you have any questions, please contact me at 361-885-6163 or sarah@pocca.com.

Sincerely,  
PORT OF CORPUS CHRISTI AUTHORITY



Sarah L. Garza  
Director of Environmental  
Planning and Compliance

Enclosure: YDG/hm/lc

cc: Sean Strawbridge, Chief Executive Officer, Port of Corpus Christi Authority  
Jeffrey Pollack, Chief Strategy and Sustainability Officer, Port of Corpus Christi Authority  
Omar Garcia, Chief External Affairs Officer, Port of Corpus Christi Authority  
Nelda Olivo, Director of Government Affairs, Port of Corpus Christi Authority  
Leslie Ruta, Director of Planning, Port of Corpus Christi Authority  
Harrison McNeil, Supervisor of Environmental Permitting, Port of Corpus Christi Authority  
Yvonne Dives-Gomez, Environmental Permitting Specialist, Port of Corpus Christi  
Authority