Railroad Commission of Texas
Oil and Gas Division
Technical Permitting
P.O. Box 12967
Austin, Texas 78711-2967
E-mail: SIP@rrc.texas.gov

January 15, 2026

Re: Comment on Project No. 57803 (ExxonMobil Low Carbon Solutions Onshore Storage, LLC, 22777 Springwoods Village Parkway, Spring, TX 77389)

Dear Members of the Railroad Commission of Texas:

Whenever permits involving the use of public land are requested, government institutions, such as the Railroad Commission of Texas, should base their decisions to approve or deny these permits on solid and concrete scientific evidence. Furthermore, government institutions have the responsibility of showing transparency when informing the public regarding the potential effects of approving or denying these permits.

Unfortunately, the proposed Permit No. 57803 for the Rose Carbon Capture and Sequestration Project in Jefferson County, TX, operated by ExxonMobil Low Carbon Solutions Onshore Storage, LLC, in Spring, TX, fails to meet these criteria (https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/injection-storage-permits/co2-storage/co2-notices/#Rose_CCS_Proj).

As a 501(c)(3) nonprofit scientific organization with the goal of determining and propagating the facts regarding carbon dioxide (CO_2) and the climate, the CO_2 Coalition (https://co2coalition.org/) would like to help the Railroad Commission of Texas in its decision-making process regarding the proposed Permit No. 57803 by providing the Railroad Commission of Texas with questions that both the Railroad Commission of Texas and the public should be asking, as well as the facts regarding CO_2 and its miniscule effects on the climate.

The gathering and injection of CO_2 for tertiary recovery of otherwise stranded oil is a common practice in Texas. However, CO_2 capture to transport and inject CO_2 for permanent sequestration cannot survive without subsidies and federal tax credits (https://esguniversity.substack.com/p/apis-new-rules-reveal-a-credibility), which means that taxpayers, rather than ExxonMobil shareholders, would bear the brunt of the Rose Carbon Capture and Sequestration Project.

Therefore, the Railroad Commission of Texas has the duty to provide the public with information regarding the monetary (USD) and energy (kWh) costs of capturing, compressing, transporting, and sequestering the CO_2 from each industrial source for the Rose Carbon Capture and Sequestration Project. Such important information should be readily available in the description of the project (https://www.rrc.texas.gov/oil-and-gas/applications-and-permits/injection-storage-permits/co2-storage/co2-notices/#Rose_CCS_Proj), without requiring a review of additional documents.

Before any taxpayers' money is spent on CO_2 capture, compression, transportation, and sequestration, we need to determine if such spending is needed. The answer is a resounding "no," as CO_2 is essential and beneficial for life on Earth and CO_2 sequestration is counterproductive for efficient photosynthesis.

For instance, the attached written comments (https://co2coalition.org/publications/co2-coalition-comment-2-on-epa-endangerment-finding/), prepared by Drs. Richard Lindzen and William Happer, in response to the U.S. EPA's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, discusses various aspects of CO_2, including its benefits and lack of effect on the temperature and climate.

For starters, plants need CO_2 for photosynthesis, which produces food and oxygen, both of which are essential for life on Earth. In fact, doubling the atmospheric CO_2 concentration from the current value of about 420 parts per million (ppm) to 840 ppm would increase food production by about 40%, while increasing the global mean surface temperature by only 0.75 °C (1.4 °F). In addition, exposing plants to increasing concentrations of CO_2 increases their water-use efficiency, which in turn increases their resistance to drought. The increasing concentration of CO_2 in the atmospheric also greens the Earth, as confirmed by NASA (https://www.nasa.gov/technology/carbon-dioxide-fertilization-greening-earth-study-finds/), where CO_2 has contributed 70% to the greening of Earth.

As for its greenhouse effect, CO_2 is only a minor greenhouse gas, as the combination of water vapor and clouds contribute more than 90% to the atmospheric greenhouse effect. Furthermore, due to a phenomenon known as "saturation," the warming effect of CO_2 has a logarithmic relation with the CO_2 concentration, thus causing the warming effect of each molecule of CO_2 added to the atmosphere to decrease as the CO_2 concentration increases. This phenomenon explains the reason temperatures were not dangerously high hundreds of millions of years ago even when the atmospheric CO_2 concentration exceeded 4,000 ppm, compared to the December 2025 atmospheric CO_2 concentration of about 427 ppm (https://gml.noaa.gov/ccgg/trends/). In fact, the Sun, rather than CO_2, plays a major role in altering Earth's temperature.

Finally, in looking at atmospheric CO_2 concentration data in the geological time scale that span hundreds of millions of years, today's atmospheric CO_2 concentration is actually low, and dangerously close to the minimum value of ~ 150 ppm that is required for plants to survive. This means that the recent increase in the atmospheric CO_2 concentration is a positive development that should be embraced, instead of feared and prevented.

In conclusion, given the overwhelming evidence that CO_2 is essential and beneficial for life on Earth, and that CO_2 does not cause dangerous warming, any effort to sequester CO_2 underground to reduce the emissions of CO_2 into the atmosphere is not recommended, especially with the probability that taxpayers would be paying for such an effort.

If you need additional details, the CO_2 Coalition will be happy to respond to any inquiries you may have, and the members of the CO_2 Coalition will be happy to meet with you for further discussions.

Thank you very much for your time and consideration.

Sincerely,

Gregory Wrightstone
Executive Director
The CO_2 Coalition
2677 Prosperity Avenue, Suite 300
Fairfax, VA 22031
Phone: 703-540-4700