

Title: Returning to the Disclosure-Performance Link: Assessing Disclosure's Regional Impacts in Texas

Abstract: Extant research has assessed the role of information in achieving various policy outputs related to toxic chemicals discharges, energy efficiency goals, water consumption, and oil and gas regulatory encounters. Less attention, however, has been given to how disclosure impacts outputs and outcomes in spatial terms. In other words, are the impacts of information disclosure felt equally across substate jurisdictions or offices, especially in terms of enforcement. Our study addresses this unknown by leveraging a policy change in Texas that took place in 2019. The statewide change provided the public greater access to enforcement data/information including the results of inspections, violations, and administrative enforcement actions. Enforcement actions, however, are often routed through district offices, where technical staff engage in actions, e.g., review inspections, assist operations, and engage the public that impact performance. Results suggest...

Introduction

Energy and environmental policy engender a multitude of critical governance questions. Such questions often center on effective policy design, implementation and how best to achieve multiple goals, often without clear priorities. For oil and gas, the federal government operates at the periphery with regulators focused on managing production on federal lands, some tax incentives, distributing money and resources, and engaging in global dynamics, security, and shipping (Fisk 2017). By contrast, state governments and regulators form the core of oil and gas governance. Today, state policymakers enact and enforce the vast majority rules relative to oil and gas production with regulators promulgating rules and administrative processes tied to multiple goals such as ensuring efficient production, promoting economic development, and protecting public health and the environment (Amin et al. 2025; Fisk, Jordan, and Good 2022; Pautz and Rinfret 2013). In the pursuit of these goals, agencies utilize a variety of regulatory actions, generate copious data, and engage with a wide variety of stakeholders. These, in turn, produce a wide range of performance outputs. This latter output is key, as conflictual regulatory encounters can generate inefficiencies and poor outcomes whereas overly friendly encounters may precipitate calls of regulatory capture and a loss of trust (Fisk, Jordan, and Good 2022). Importantly, previous research has shown that disclosure policies can shape related outputs by making agency performance more transparent and available to the public.

Oil and gas data includes a wide variety of performance indicators: inspections and the related results, recording of violations (if any), and the use of administrative tools (if necessary) to address the violations, and follow-up inspections to ensure firm compliance. Importantly, however, these outputs are not ‘one-off’ events, i.e., the inspector finds a violation and issues a notice of violation. Rather, these outputs routed through district or regional offices where they

are reviewed. In Texas, for example, the Railroad commission notes that “staff in the district offices review completed inspections, assist operators and the public with questions or concerns, issue correspondence to operators, track compliance, and make referrals to Legal Enforcement as needed.” This administrative reality, we suggest, shines a bright light on potential interactions among disclosure, district-level offices, and performance outputs.

To address the potential links among disclosure, district/regional offices, and performance, we take advantage of a 2019 policy change that required the Railroad Commission of Texas to publicly disclose the results of inspections, violations, and administrative actions to bring the operator back into compliance. The dataset itself contains over _____ unique and place-specific actions associated with oil and gas enforcement recorded by the Railroad Commission of Texas (RRC) between August 2015 and December 2024.

Background

In January 2019, the Railroad Commission (RRC) changed its Online Inspection Lookup (OIL) tool to enable users to search its enforcement database for disaggregated and well-specific data. The policy change meant that site-level (or well-specific) inspections, violations, and administrative responses would now be disclosed. Moreover, users could search by a multitude of other criteria including operator name, lease, the API number, longitude/latitude, county, specific rule or operating standard, applicable RRC district, and periods of time. Commissioner Wayne Christian described the tool’s purpose as: “this tool will be helpful to our agency, the industry, and, most importantly, the public in ensuring individuals have easy, transparent access to data regarding the regulation of our natural resources. I applaud our hardworking staff and the commitment of funding from the Texas Legislature in making this long-desired tool a reality” (RRC 2019).

Disclosure Theory and Performance

Information disclosure serves as an alternative to traditional command and control regulation (Abel, Stephen, and Kraft 2007; Crow, Albright, and Koebele 2020; Fiorino 2006; Klyza and Sousa 2013; Li 2023; Young 2020;). Rather than creating adversarial relationships, disclosure works by targeting the information asymmetries between two parties by facilitating, disclosing, and/or permitting access to information that was previously unavailable. With their newly acquired information, researchers have identified several stakeholder strategies such as shaming the specific industry, attempting to sway public opinion or sentiment, and pushing administrative agencies in a desired direction (; Hamilton 2005; Niles & Lubell 2012). In other instances, the targeted industry may seek to blunt the impact of the information by voluntarily improving performance. Importantly, the disclosed information must possess strategic value (Cherone 2023; see also Moody 2023; Newsome 2021). In short, the core of disclosure is two-fold: information access is asymmetric and that it is valuable to stakeholders (Cherone 2023; Moody 2023; Newsome 2021).

Empirical research, however, has noted that the performance assumptions of information disclosure programs are not always met with many disclosure programs reporting mixed results vis-a-vie environmental policy outcomes (Mason 2020; Lim and Prakash 2014). Scholarship unpacking Environmental Protection Agency's (or EPA) Toxic Release Inventory (or TRI) (Tietenberg 1998; Abel, Stephan, and Kraft 2007) is emblematic of this dynamic. Here, the program has reported a reported a 21% decrease in TRI chemical discharges from 2013 to 2022 (Rodriguez 2024). However, critics have questioned the utility of TRI data and have noted challenges relative to firms' disclosure and levels of cooperation (Abel, Stephan, and Kraft 2007). Li (2023) found a positive relationship between firm disclosure and Clean Air Act

inspections. Yet, this dynamic was unrelated to levels of citizen activism, greater population density, and educational attainment. Other studies have observed similar results. Benneer and Olmstead (2008), for example, noted uneven results relative to the impact of disclosure on water-related outputs. Delmas et al. (2013, 2010) also found that information disclosure improved environmental performance for some firms but not others. Finally, Kraft, Stephen, and Abel (2011) concluded that community-level attributes, market reactions, federal and state environmental differences, and corporate commitments impacted TRI-related decision-making.

Disclosure and Agency Performance

A second vein of disclosure literature examines the role of information disclosure as a driver (or not) of agency performance. It shares a similar logic as the previous scholarship – disclosure is more likely to effectuate change when the information holds strategic value, if it conflicts with existing perceptions or beliefs, and when it is acted upon by actors (Anderson et al. 2022; Helland 1998; Tremblay-Boire and Prakash 2015; Marquis, Toffel, and Zhou 2016).

Of interest here is empirical scholarship that has also assessed the impact of information disclosure on administrative performance (Konisky and Reenock 2013; Grimmelikhuijsen et al. 2013; Grimmelikhuijsen and Welch 2012; Moynihan and Pandey 2010; Scholz and Wei 1986) with results decidedly mixed. Here, disclosure of performance-related information can shape behaviors by challenging perceived levels of performance and/or how agency elites and elected officials evaluate administrative performance. Extant research has found evidence of both mechanisms (Hansen and Nielsen 2022; (Lee 2022; Meier et al. 2022; Bustos 2021; Etienne 2015; Moynihan and Soss 2014). Representative of these findings is work by Carpenter and Krause (2012) and Moynihan and Hawes (2012) that found disclosed information which threatens agency reputation is the most likely to influence performance (Bustos 2021; Etienne

2015; Lee 2022). In short, as noted by Li (2023), “when their reputation is at risk, government agencies tend to heighten their scrutiny of entities with poor reputations to distance themselves from criticized actors and shield against external backlash” (Hiatt and Park 2013; Maor and Sulitzeanu-Kenan 2013).

Disclosure and State Oil and Gas Policies

Several scholars have utilized the disclosure literature to explore oil and gas management (Fisk 2013; Rabe and Borick 2013; Fisk and Good 2019; Weible, Heikkila, and Carter 2017). Heikkila et al. (2014), for example, found that industry learning as well as the support of a policy entrepreneur increased the likelihood that a state would adopt more stringent disclosure policies. Fisk (2013) observed that liberal states were more likely to promulgate disclosure policies. Six years later, Fisk and Good (2019) expanded the scope of oil and gas disclosure policies to pre-drilling disclosure notification, chemical disclosure, and the allowance of trade secrets. There again, they found mixed results, albeit, with linkages to state political characteristics: pre-drilling notification was linked to educational levels and state GDP and chemical disclosure policies tied to industry’s economic clout in the state. Surprisingly, they failed to find any significant associations with the presence of trade secrets. Considering these findings, we offer a third hypothesis:

Performance across Districts

The existing public administration literature indicates that context plays an important role in determining the performance of an organization. O’Toole and Meier argue that the “context to the management and performance relationship” is a key element in understanding how organizations behave (2015, 238). One such piece of context includes the “institutional structures and regimes” that characterize a particular organization (O’Toole and Meier 2015, 238). In

studies of regional governance within the European Union, researchers have noted that subdivisions of organizations that wield legitimate decision-making authority might perform very differently from other subdivisions within the same organization (Aivazidou et al. 2020; Mendez and Bachtler 2024). That said, the existing literature does not yet include robust discussion of the subdivisions that often exist within organizations' structural contexts (Mendez and Bachtler 2024).

O'Toole and Meier identify "the availability of needed resources" as a piece of context that can reveal relationships between management and performance (2015, 247). In particular, O'Toole and Meier argue the importance of an organization's "social capital" when implementing programs and policies (2015, 428; see also: Spillane and Thompson 1997). When organizations have stronger social connections with the communities in which they operate, they are likely to benefit from stronger feelings of efficacy, bolstered cooperation with citizens, and higher levels of public trust (O'Toole and Meier 2015, 248). For example, the rationale behind the subdivided structures in EU governance was that regional and local subdivisions could more readily access and accommodate the local communities (Mendez and Bachtler 2024, 694).

The degree by which an organization is hierarchical and/or centralized can also impact performance. Given that decentralized organizations tend to grant their employees higher levels of discretion (see: Lipsky 1980), understanding the hierarchical structure of an organization can provide insights into how responsive personnel might be to citizen and community concerns (O'Toole and Meier 2015, 250). For example, in the highly decentralized context of oil and gas well inspections in the State of Montana, legislative auditors found that individual inspectors had vastly different priorities in determining which cites needed to be inspected (State of Montana 2011).

Texas RRC Districts

The Texas Railroad Commission has structured its oil and gas field inspection apparatus into a relatively decentralized system. While the commission is ultimately run by three commissioners (RRC 2025), field inspections are conducted by approximately 185 field inspectors who report to ten different Oil and Gas district offices (RRC 2023, 7). The enforcement plan published for FY 2024 notes that those field inspectors “work in the communities where they live,” (RRC 2023, 7) suggesting that the commission recognizes the potential benefits of representative bureaucracy. The commission also recognizes that inspectors must be selective in which sites they inspect, given the vast number of oil and gas wells across the state (RRC 2023, 8). While the commission does provide a risk-based set of guidelines for how inspectors might set priorities, those guidelines include recognition of “area knowledge” and “unique District Office concerns” (RRC 2023, 22), thus formally acknowledging the discretion held by individual inspectors and district-level management.

Methodology

Citations

- Abel, Troy D., Mark Stephan, and Michael E. Kraft. 2007. "Environmental Information Disclosure and Risk Reduction among the States." *State and Local Government Review* 39 (3): 153–65. <https://doi.org/10.1177/0160323X0703900304>.
- Aivazidou, Eirini, Giovanni Cunico, and Edoardo Mollona. 2020. "Beyond the EU Structural Funds' Absorption Rate: How Do Regions Really Perform?" *Economies* 8 (3): 55. <https://doi.org/10.3390/economies8030055>.
- Amin, Alisha, David P. Adams, Jonathan M. Fisk, and Adam F. Mayer. 2025. "Plugged in? Assessing the Distribution of Orphaned Wells." *Journal of Environmental Policy & Planning*, March, 1–14. <https://doi.org/10.1080/1523908X.2025.2480289>.
- Anderson, Spencer B., Jessen L. Hobson, and Ryan D. Sommerfeldt. 2022. "Auditing Non-GAAP Measures: Signaling More Than Intended." *Contemporary Accounting Research* 39 (1): 577–606. <https://doi.org/10.1111/1911-3846.12724>.
- Arbia, Giuseppe, and Badi H. Baltagi, eds. 2009. *Spatial Econometrics*. Heidelberg: Physica-Verlag HD. <https://doi.org/10.1007/978-3-7908-2070-6>.
- Benear, Lori Snyder, and Sheila M. Olmstead. 2008. "The Impacts of the 'Right to Know': Information Disclosure and the Violation of Drinking Water Standards." *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.939590>.
- Bustos, Edgar O. 2021. "Organizational Reputation in the Public Administration: A Systematic Literature Review." *Public Administration Review* 81 (4): 731–51. <https://doi.org/10.1111/puar.13363>.
- Carpenter, Daniel P., and George A. Krause. 2012. "Reputation and Public Administration." *Public Administration Review* 72 (1): 26–32. <https://doi.org/10.1111/j.1540-6210.2011.02506.x>.
- Cherone, Heather. 2023. "Chicago Sues Monsanto for Polluting City's Air, Water, Soil with Toxic Chemicals." WTTW News. September 20, 2023. <https://news.wttw.com/2023/09/20/chicago-sues-monsanto-polluting-city-s-air-water-soil-toxic-chemicals>.
- Crow, Deserai A., Elizabeth A. Albright, and Elizabeth Koebele. 2020. "Evaluating Stakeholder Participation and Influence on State-Level Rulemaking." *Policy Studies Journal* 48 (4): 953–81. <https://doi.org/10.1111/psj.12314>.
- Delmas, Magali A., Dror Etzion, and Nicholas Nairn-Birch. 2013. "Triangulating Environmental Performance: What Do Corporate Social Responsibility Ratings Really Capture?" *Academy of Management Perspectives* 27 (3): 255–67. <https://doi.org/10.5465/amp.2012.0123>.
- Delmas, Magali, Maria J. Montes-Sancho, and Jay P. Shimshack. 2010. "INFORMATION DISCLOSURE POLICIES: EVIDENCE FROM THE ELECTRICITY INDUSTRY." *Economic Inquiry* 48 (2): 483–98. <https://doi.org/10.1111/j.1465-7295.2009.00227.x>.

- Edwards, Eric C., Trevor O'Grady, and David Jenkins. 2019. "Sooner or Safer?" Center for Environmental and Resource Economic Policy. JSTOR.
<http://www.jstor.org.spot.lib.auburn.edu/stable/resrep37144>.
- Etienne, J. 2015. "The Politics of Detection in Business Regulation." *Journal of Public Administration Research and Theory* 25 (1): 257–84.
<https://doi.org/10.1093/jopart/muu018>.
- Fiorino, Daniel J. 2006. *The New Environmental Regulation*. Cambridge, Mass: MIT Press.
- Fisk, Jonathan M. 2013. "The Right to Know? State Politics of Fracking Disclosure." *Review of Policy Research* 30 (4): 345–65. <https://doi.org/10.1111/ropr.12025>.
- Fisk, Jonathan M. 2017. *The Fracking Debate: Intergovernmental Politics of the Oil and Gas Renaissance*. 2nd ed. New York : Routledge, 2017.: Routledge.
<https://doi.org/10.4324/9781315212715>.
- Fisk, Jonathan M., and A.J. Good. 2019. "Information Booms and Busts: Examining Oil and Gas Disclosure Policies across the States." *Energy Policy* 127 (April):374–81.
<https://doi.org/10.1016/j.enpol.2018.12.032>.
- Fisk, Jonathan M., Soren Jordan, and A. J. Good. 2022. *The Shale Renaissance: How Fracking Has Changed Pennsylvania in the Twenty-First Century*. Pittsburgh, Pa: University of Pittsburgh Press.
- Grimmelikhuijsen, Stephan, and Eric W. Welch. 2012. "Developing and Testing a Theoretical Framework for Computer-Mediated Transparency of Local Governments." *Public Administration Review* 72 (4): 562–71. <https://doi.org/10.1111/j.1540-6210.2011.02532.x>.
- Grimmelikhuijsen, Stephan, Gregory Porumbescu, Boram Hong, and Tobin Im. 2013. "The Effect of Transparency on Trust in Government: A Cross-National Comparative Experiment." *Public Administration Review* 73 (4): 575–86.
<https://doi.org/10.1111/puar.12047>.
- Hamilton, JT. 2005. *Regulation through Revelation The Origin, Politics, and Impacts of the Toxics Release Inventory Program Introduction*. <https://doi.org/10.1596/978-0-8213-7891-5>.
- Hansen, Jesper Asring, and Poul Aaes Nielsen. 2022. "How Do Public Managers Learn from Performance Information? Experimental Evidence on Problem Focus, Innovative Search, and Change." *Public Administration Review* 82 (5): 946–57.
<https://doi.org/10.1111/puar.13533>.
- Heikkila, Tanya, Jonathan J. Pierce, Samuel Gallaher, Jennifer Kagan, Deserai A. Crow, and Christopher M. Weible. 2014. "Understanding a Period of Policy Change: The Case of Hydraulic Fracturing Disclosure Policy in Colorado." *Review of Policy Research* 31 (2): 65–87. <https://doi.org/10.1111/ropr.12058>.
- Helland, Eric. 1998. "The Enforcement of Pollution Control Laws: Inspections, Violations, and Self-Reporting." *Review of Economics and Statistics* 80 (1): 141–53.
<https://doi.org/10.1162/003465398557249>.

- Hiatt, Shon R., and Sangchan Park. 2013. "Lords of the Harvest: Third-Party Influence and Regulatory Approval of Genetically Modified Organisms." *Academy of Management Journal* 56 (4): 923–44. <https://doi.org/10.5465/amj.2011.0128>.
- King, Gary. 1989. *Unifying Political Methodology: The Likelihood Theory of Statistical Inference*. 2011 Reprint. Cambridge, New York: Cambridge University Press.
- Klyza, Christopher McGrory, and David J. Sousa. 2013. *American Environmental Policy: Beyond Gridlock*. Updated and Expanded edition. American and Comparative Environmental Policy. Cambridge, Mass. London: MIT Press.
- Konisky, David M., and Christopher Reenock. 2013. "Compliance Bias and Environmental (In)Justice." *The Journal of Politics* 75 (2): 506–19. <https://doi.org/10.1017/S0022381613000170>.
- Konisky, David M., and Christopher Reenock. 2018. "Regulatory Enforcement, Riskscape, and Environmental Justice." *Policy Studies Journal* 46 (1): 7–36. <https://doi.org/10.1111/psj.12203>.
- Kraft, Michael E., Mark Stephan, and Troy D. Abel. 2011. *Coming Clean: Information Disclosure and Environmental Performance*. Cambridge, Mass.: MIT Press.
- Lee, Danbee. 2022. "Managing Bureaucratic Reputation in the Face of Crises: An Experimental Examination of the Effect of Strategic Communication." *Public Administration Review* 82 (6): 1124–37. <https://doi.org/10.1111/puar.13520>.
- Li, Zhengyan. 2023. "Bureaucratic Response to Performance Information: How Mandatory Information Disclosure Affects Environmental Inspections." *Public Administration Review* 83 (4): 750–62. <https://doi.org/10.1111/puar.13636>.
- Lim, Sijeong, and Aseem Prakash. 2014. "Voluntary Regulations and Innovation: The Case of ISO 14001." *Public Administration Review* 74 (2): 233–44. <https://doi.org/10.1111/puar.12189>.
- Lipsky, Michael. 1980. *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*. 30th Anniversary Expanded Edition 2010. Russell Sage Foundation.
- Maor, Moshe, and Raanan Sulitzeanu-Kenan. 2013. "The Effect of Salient Reputational Threats on the Pace of FDA Enforcement." *Governance* 26 (1): 31–61. <https://doi.org/10.1111/j.1468-0491.2012.01601.x>.
- Marquis, Christopher, Michael W. Toffel, and Yanhua Zhou. 2016. "Scrutiny, Norms, and Selective Disclosure: A Global Study of Greenwashing." *Organization Science* 27 (2): 483–504. <https://doi.org/10.1287/orsc.2015.1039>.
- Mason, Michael. 2020. "Transparency, Accountability and Empowerment in Sustainability Governance: A Conceptual Review." *Journal of Environmental Policy & Planning* 22 (1): 98–111. <https://doi.org/10.1080/1523908X.2019.1661231>.
- Meier, Kenneth J., Miyeon Song, Jourdan A. Davis, and Anna A. Amirkhanyan. 2022. "Sector Bias and the Credibility of Performance Information: An Experimental Study of Elder Care Provision." *Public Administration Review* 82 (1): 69–82. <https://doi.org/10.1111/puar.13425>.

- Mendez, Carlos, and John Bachtler. 2024. "The Quality of Government and Administrative Performance: Explaining Cohesion Policy Compliance, Absorption and Achievements across EU Regions." *Regional Studies* 58 (4): 690–703. <https://doi.org/10.1080/00343404.2022.2083593>.
- Moody, Joe. 2023. "'Bad Chemistry,' An APR News Series-- 'Anniston and Monsanto: Twenty Years Later.'" Broadcast transcript. Alabama Public Radio. August 24, 2023. <https://www.apr.org/news/2023-08-24/anniston-and-monsanto-twenty-years-later>.
- Moynihan, D. P., and D. P. Hawes. 2012. "Responsiveness to Reform Values: The Influence of the Environment on Performance Information Use." *Public Administration Review* 72 (s1). <https://doi.org/10.1111/j.1540-6210.2012.02653.x>.
- Moynihan, D. P., and J. Soss. 2014. "Policy Feedback and the Politics of Administration." *Public Administration Review* 74 (3): 320–32. <https://doi.org/10.1111/puar.12200>.
- Moynihan, D. P., and S. K. Pandey. 2010. "The Big Question for Performance Management: Why Do Managers Use Performance Information?" *Journal of Public Administration Research and Theory* 20 (4): 849–66. <https://doi.org/10.1093/jopart/muq004>.
- Newsome, Melba. 2021. "Decades of Legal Battles over Pollution by Industrial Hog Farms Haven't Changed Much for Eastern NC Residents Burdened by Environmental Racism." North Carolina Health News. October 29, 2021. <http://www.northcarolinahealthnews.org/2021/10/29/legal-battles-over-pollution-from-hog-waste-environmental-racism-havent-changed-much/>.
- Niles, Meredith T., and Mark Lubell. 2012. "Integrative Frontiers in Environmental Policy Theory and Research." *Policy Studies Journal* 40 (s1): 41–64. <https://doi.org/10.1111/j.1541-0072.2012.00445.x>.
- Noonan, Douglas S. 2014. "Smoggy with a Chance of Altruism: The Effects of Ozone Alerts on Outdoor Recreation and Driving in Atlanta." *Policy Studies Journal* 42 (1): 122–45. <https://doi.org/10.1111/psj.12045>.
- O'Toole, L. J., and K. J. Meier. 2015. "Public Management, Context, and Performance: In Quest of a More General Theory." *Journal of Public Administration Research and Theory* 25 (1): 237–56. <https://doi.org/10.1093/jopart/muu011>.
- Pautz, Michelle C., and Sara R. Rinfret. 2013. *The Lilliputians of Environmental Regulation: The Perspective of State Regulators*. Routledge Research in Environmental Policy and Politics 2. New York, N.Y: Routledge. <https://doi.org/10.4324/9780203143933>.
- Prakash, A, and M Potoski. 2007. "Collective Action through Voluntary Environmental Programs: A Club Theory Perspective." *Policy Studies Journal* 35 (4): 773–92. <https://doi.org/10.1111/j.1541-0072.2007.00247.x>.
- Rabe, Barry G., and Christopher Borick. 2013. "Conventional Politics for Unconventional Drilling? Lessons from Pennsylvania's Early Move into Fracking Policy Development." *Review of Policy Research* 30 (3): 321–40. <https://doi.org/10.1111/ropr.12018>.
- Rodriguez, Elias. 2024. "New Toxics Release Inventory Data Reported." News Release. U.S. EPA. Northeast. March 21, 2024. <https://www.epa.gov/newsreleases/new-toxics-release-inventory-data-reported>.

- RRC. 2019. "Railroad Commission Launches Texas' First Online Searchable Database." Government Press Release. Railroad Commission of Texas. January 23, 2019. <https://www.rrc.texas.gov/news/012319a-railroad-commission-launches-texas-first-online-searchable-database/>.
- RRC. 2022. "Oil & Gas Monitoring & Enforcement Plan | Fiscal Year 2023." Railroad Commission of Texas.
- RRC. 2023. "Oil & Gas Monitoring & Enforcement Plan | Fiscal Year 2024." Railroad Commission of Texas, June 14. https://www.rrc.texas.gov/media/h3kff2xp/og-enforcement-plan-fy-2024_web.pdf.
- RRC. 2025. "Federally Funded Well Plugging." Government Press Release. Railroad Commission of Texas. 2025. <https://www.rrc.texas.gov/oil-and-gas/environmental-cleanup-programs/federally-funded-well-plugging/>.
- RRC. 2025. "Railroad Commissioners Past through Present." Railroad Commission of Texas. <https://www.rrc.texas.gov/about-us/commissioners/commissioner-list/>.
- Scholz, John T., and Feng Heng Wei. 1986. "Regulatory Enforcement in a Federalist System." *American Political Science Review* 80 (4): 1249–70. <https://doi.org/10.2307/1960866>.
- Spillane, James P., and Charles L. Thompson. 1997. "Reconstructing Conceptions of Local Capacity: The Local Education Agency's Capacity for Ambitious Instructional Reform." *Educational Evaluation and Policy Analysis* 19 (2): 185–203. <https://doi.org/10.3102/01623737019002185>.
- State of Montana. 2011. Performance Audit: Board of Oil and Gas Conservation Regulatory Program. Legislative Audit Nos. 11P-04. State of Montana, Legislative Audit Division. <https://archive.legmt.gov/content/Publications/Audit/Report/11P-04.pdf>.
- Tietenberg, Tom. 1998. "Disclosure Strategies for Pollution Control." *Environmental and Resource Economics* 11 (3/4): 587–602. <https://doi.org/10.1023/A:1008291411492>.
- Tremblay-Boire, Joannie, and Aseem Prakash. 2015. "Accountability.Org: Online Disclosures by U.S. Nonprofits." *VOLUNTAS: International Journal of Voluntary and Nonprofit Organizations* 26 (2): 693–719. <https://doi.org/10.1007/s11266-014-9452-3>.
- Ward, Michael Don, and Kristian Skrede Gleditsch. 2019. *Spatial Regression Models*. Second Edition. Quantitative Applications in the Social Sciences 155. Los Angeles: SAGE.
- Weible, Christopher M., Tanya Heikkila, and David P. Carter. 2017. "An Institutional and Opinion Analysis of Colorado's Hydraulic Fracturing Disclosure Policy." *Journal of Environmental Policy & Planning* 19 (2): 115–34. <https://doi.org/10.1080/1523908X.2016.1150776>.
- Woods, Neal D. 2006. "Interstate Competition and Environmental Regulation: A Test of the Race-to-the-Bottom Thesis." *Social Science Quarterly* 87 (1): 174–89. <https://doi.org/10.1111/j.0038-4941.2006.00375.x>.
- Young, Matthew M. 2020. "Implementation of Digital-Era Governance: The Case of Open Data in U.S. Cities." *Public Administration Review* 80 (2): 305–15. <https://doi.org/10.1111/puar.13156>.

